

Policy

Communications Policy

Governance Schedule

Document Owner:	HO Public Relations
Accountable Person:	Chief Marketing Officer
Approval Authority:	Chief Executive Officer
Effective Date:	11 March 2025
Next Review Date:	29 August 2025
Version:	2.1

Bendigo and Adelaide Bank acknowledges Aboriginal and Torres Strait Islander peoples as the First Peoples of this nation and the Traditional Custodians of the land where we live, learn and work.

We pay our respects to Elders past and present as it is their knowledge and experience that holds the key to the success of future generations.

Table of Contents

Overview	3
Purpose and Application	3
Roles and Responsibilities	3
Supporting Documents	3
Policy	4
1 Shareholder Communications	4
1.1 Methods	4
1.2 Website	4
1.3 Annual General Meetings	4
2 ASX Announcements	5
2.1 What is the policy?	5
3 Analyst, Stockbroker, and institutional investor briefings	5
3.1 What is the policy?	5
4 General media releases and public comment	5
4.1 Approval for media releases and comments	5
4.2 Responsibilities for media releases	5
4.3 Public speeches and addresses	6
5 Comment solicited by media	6
5.1 Group	6
6 Authorised persons	6
6.1.1 Who is authorised to speak on behalf of BEN?	6
6.1.2 Authorisation categories and responsibilities	7
7 Policy Breaches	8
8 Policy Exemptions	8
Appendices	9
Appendix A - Glossary	9
Appendix B - Tables of Authorisations	10
Management	10
Directors	11
Document Control Table	12

Overview

Purpose and Application

This document sets out the communications policy of Bendigo and Adelaide Bank and its subsidiaries (BEN). The focus of this policy is to manage and regulate communications externally.

This policy also applies to employees within BEN employed to work for Community Banks as communications apply to BEN, or the Bank. It also applies to Community Bank directors and company secretaries as communications apply to the Bank.

Roles and Responsibilities

Role	Responsibility
Brand Marketing and Communications	To review and maintain the policy and communicate the authority levels
Investor Relations	To be the primary contact for all communications with Institutional investors, and the secondary contact for communications with Retail investors.
Corporate Secretariat	To be the primary contact for all communications with Retail investors.

Supporting Documents

This Policy must be read in conjunction with:

- Continuous Disclosure Policy
- Business Continuity Policy
- Social Media Policy

The above Policies can be found on Policy Hub.

Website: www.bendigobank.com.au and Media Centre www.bendigobank.com.au/media/

Policy

1 Shareholder Communications

1.1 Methods

BEN communicates with external stakeholders through.

- ASX announcements
- Emails and letters
- Investor and Trading Updates
- Investor Days
- Annual reporting (half-year and full-year)
- Annual general meetings
- Information on the Website (see section 1.2)
- Media releases
- Speeches and presentations at a range of conferences and events
- Submissions and/or attendances at relevant hearings
- Social media posts including Twitter, Facebook, Instagram and LinkedIn
- Podcasts
- Share Registry portal managed by the external share registry provider

1.2 Website

The following material is made available on the Website.

- Investor and Trading Updates
- The Annual financial reporting suite including the Annual Financial Report, Sustainability Report, the Climate Report, the Corporate Governance Statement, and the Appendix 4G
- ASX announcements (including result announcements, regulatory disclosures, Investor Calendar, dividend payments and general investor updates that comply with the Continuous Disclosure Policy [Continuous Disclosure Policy \(bendigoadelaide.com.au\)](https://www.bendigoadelaide.com.au/continuous-disclosure-policy))
- Media releases
- Notices of AGM including AGM User Guide
- Webcasts and transcript of results presentations
- Webcast and transcript of annual general meetings

1.3 Annual General Meetings

Notices: The Annual General Meeting notice provides for the appointment of proxies and a shareholder's question form is included with the notice of meeting for shareholders to ask questions of the auditor and of the Board.

Chair and CEO & MD's addresses: The Chair's address and CEO & MD's address is released to the ASX before the Annual General Meeting starts.

Auditors: The auditor attends the Annual General Meeting to answer questions.

Webcast: The annual general meeting is webcast on the Website.

Direct Voting: Bendigo and Adelaide Bank shareholders may 'direct vote'.

2 ASX Announcements

2.1 What is the policy?

See Bendigo and Adelaide Bank [Continuous Disclosure Policy](#)

3 Analyst, Stockbroker, and institutional investor briefings

3.1 What is the policy?

See Bendigo and Adelaide Bank Continuous Disclosure Policy. [Continuous Disclosure Policy \(bendigoadelaide.com.au\)](#)

In relation to persons who are authorised to speak with analysts, stockbrokers, and institutional shareholders on behalf of Bendigo and Adelaide Bank, see section 6.

4 General media releases and public comment

4.1 Approval for media releases and comments

All information prepared for written or oral use with media must be developed in consultation with the Head of Public Relations and approved in writing by **one of** the following.

- CEO & MD
- Chair, (or a delegate), if the communication is on behalf of the Board of Directors;
- Head of Public Relations (or a delegate). However, if in the case of a document prepared by the Head of Public Relations (or a delegate), the approval must be by one of the above persons.
- A person who is authorised in writing by the CEO & MD to speak with the media as an authorised spokesperson (see section 6).

If an announcement is required to be given to the ASX, it must not be given to the media before confirmation of its release by the ASX – see Continuous Disclosure Policy. This includes giving information to the media on an embargoed basis.

In key disclosure periods, including half-year results, full-year results, and the Bank's AGM, the CEO & MD, in consultation with the Head of Public Relations, will approve who is to speak with media as an authorised spokesperson, to ensure streamlined and consistent message delivery.

4.2 Responsibilities for media releases

The Head of Public Relations (or a delegate) is responsible for:

- Preparing media releases relating to BEN.
- Making sure the information in media releases is accurate.
- Maintaining a register of all media releases and arranging for relevant releases to be made available on the Website.

4.3 Public speeches and addresses

The text of all external speeches and addresses relating to strategy and operations must be approved by the CEO & MD, the relevant Executive (or a delegate) or the Head of Public Relations before being made.

The Head of Public Relations must assess and/or approve invitations to appear on panel discussions and other public appearances including presentations at conferences.

5 Comment solicited by media

5.1 Group

All media enquiries, including requests for interviews, must be referred to the Head of Public Relations (or a delegate), or in their absence, the CEO & MD, before responding (and before agreeing to an interview).

The Head of Public Relations or the CEO & MD may elect to deal with the enquiry personally or with the assistance of a subject matter expert, in the event the enquiry relates to an issue where the Bank's position is already public and/or is not considered to be material.

In the event where the Bank's position is not public or there is risk of reputational impact, the Head of Public Relations will engage the CEO & MD, and/or the relevant Executive, where appropriate, before proceeding.

6 Authorised persons

6.1.1 Who is authorised to speak on behalf of BEN?

BEN limits the number of persons authorised to speak on behalf of BEN.

This limitation is to maintain control over the information that is provided and, in the case of information that is required to be disclosed to the ASX, to prevent inadvertent disclosure to third parties before the information is given to, and released by, the ASX.

The limitations include disclosures to the following parties:

Financial community

- Institutional Investors
- Retail investors
- Analysts and stockbrokers

Media

- Newspapers
- Magazines
- Television news outlets
- Radio stations
- Online publications

Regulators and rating agencies

- Australian Securities and Investments Commission (ASIC)
- Australian Prudential Regulation Authority (APRA)
- Australian Securities Exchange (the ASX)
- Australian Competition and Consumer Commission (ACCC)
- Reserve Bank of Australia (RBA)
- Australian Transaction Reports and Analysis Centre (AUSTRAC)
- Rating agencies
- Office of the Australian Information Commissioner (OAIC)

Industry

- Australian Banking Association (ABA)
- Australian Financial Complaints Authority (AFCA)

6.1.2 Authorisation categories and responsibilities

For each category the Tables of Authorisations in Appendix B sets out

- a Primary Contact,
- an Other Authorised Spokesperson, and
- an Authorised Spokesperson in their Area of Responsibility.

If an authorised spokesperson who is not the primary contact for a particular category speaks on behalf of BEN to third parties, **that person is responsible for consulting with the relevant Primary Contact about the intended communication.**

An authorised spokesperson who is not the primary contact for a particular category, may speak on a regular basis on behalf of BEN to agreed third parties, where the relevant Primary Contact has approved a protocol in advance that outlines the intended frequency and nature of those discussions.

All authorised spokespersons must be familiar with the Continuous Disclosure Policy and, in particular, make sure that no market sensitive information is disclosed before it is given to the ASX and confirmation of release is received from the ASX (unless otherwise required by law).

Notwithstanding this policy, no prospective, current or former officer, employee or contractor (including professional service provider) is to be constrained or impeded from cooperating with, meeting with and disclosing information to all regulators including APRA. Regulators are to be provided with unfettered access to staff, where requested. Such persons are not to be constrained or impeded from providing information to auditors, and others, who have statutory responsibilities in relation to BEN.

7 Policy Breaches

A breach is defined as non-compliance with a policy or standard that does not have an approved (and active) exemption or exception¹.

- 7.1.1.1 Policy breaches must be managed in line with the Enterprise Consequence Management Policy and recorded per the Event Management Policy.
- 7.1.1.2 Breaches must be formally recorded in BEN's Policy Breach Register.

8 Policy Exemptions

Exemptions are temporary assistance for a division/business unit from complying with all or parts of a policy (and/or standard).

- 8.1.1.1 If compliance with all of parts of this Policy cannot be achieved, you must seek approval for an exemption from the Policy Owner.
- 8.1.1.2 Approved exemptions must be formally recorded in BEN's Policy Exemption Register and reported to the relevant Divisional Risk Committee.

¹ Only for credit lending policies.

Appendices

Appendix A - Glossary

Refer to the [Enterprise Business Glossary](#) for BEN's standard definitions.

Appendix B – Tables of Authorisations

✓ Primary Contact	✓ Other Authorised Spokesperson (only after consultation with Primary Contact)	✓ Can authorise others	✓ Authorised Spokesperson in area of responsibility (only after consultation with Primary Contact)	✓ Can authorise others in area of responsibility	✗ No Authority
-------------------	---	------------------------	---	--	----------------

Management

	Institutional Investors	Retail Investors	Analysts	Media	ASIC	APRA	ASX	ATO	ACCC	RBA	Austrac	Rating Agencies	ABA	AFCA	OAIC
Managing Director	✓ ✓	✓ ✓	✓ ✓	✓ ✓	✓ ✓	✓ ✓	✓ ✓	✓ ✓	✓ ✓	✓ ✓	✓ ✓	✓ ✓	✓ ✓	✓ ✓	✓ ✓
General Manager, Corporate and Public Affairs	✗	✗	✗	✗	✗	✗	✗	✗	✗	✗	✗	✗	✓ ✓	✗	✗
Chief Financial Officer	✓ ✓	✓ ✓	✓ ✓	✓ ✓	✓ ✓	✓ ✓	✓	✓	✓ ✓	✓ ✓	✓	✓ ✓	✓ ✓	✓ ✓	✓
Chief Risk Officer	✓	✓	✓	✓ ✓	✓ ✓	✓ ✓	✗	✓	✓ ✓	✓	✓ ✓	✓	✓ ✓	✓ ✓	✓
Other Executives	✓	✓	✓	✓ ✓	✓ ✓	✓ ✓	✗	✓	✓	✗	✗	✓	✓ ✓	✓ ✓	✓
Head of Public Relations	✗	✗	✗	✓ ✓	✗	✗	✗	✗	✗	✗	✗	✗	✓	✗	✗
Group Treasurer	✓ for debt investors	✗	✗	✓	✗	✓	✗	✗	✗	✓	✗	✓	✓	✗	✗

Communications Policy
Version 2.1

11

	Institutional Investors	Retail Investors	Analysts	Media	ASIC	APRA	ASX	ATO	ACCC	RBA	Austrac	Rating Agencies	ABA	AFCA	OAIC
	✓														
Head of Investor Relations	✓ for equity investors ✓	✓	✓	✓	✗	✓	✗	✗	✗	✗	✗	✓	✓	✗	✗
Company Secretary	✓	✓ ✓	✗	✗	✓ ✓	✓ ✓	✓ ✓	✗	✗	✓ ✓	✗	✗	✗	✗	✓
Customer Advocate	✗	✗	✗	✗	✗	✗	✗	✗	✗	✗	✗	✗	✗	✓ ✓	✗
Chief of Staff & General Counsel	✗	✓	✗	✗	✓	✓	✓	✗	✓	✓	✓	✗	✓ ✓	✓	✓
Chief Economist	✗	✗	✗	✓	✗	✗	✗	✗	✗	✗	✗	✗	✗	✗	✗
Head of Group Tax	✗	✗	✗	✗	✗	✗	✗	✓	✗	✗	✗	✗	✗	✗	✗

Directors

	Investors (Institutional and other)	Analysts Stock-brokers	Media	ASIC	APRA	ASX	ACC C	AT O	RB A	Austrac	Rating Agencies	Industry - ABA	AFCA	OAIC
--	--	---------------------------	-------	------	------	-----	----------	---------	---------	---------	--------------------	-------------------	------	------

Chair



In consultation with CEO & MD and can authorise other non-executive directors (for all categories) in relation to specific matters, in particular in relation to where the director acts as Chair of a specific Board Committee

Document Control Table

Version No:	Document owner	Date Approved	Approved By	Next Review	Purpose or Change
1.0	Corporate Secretariat	30/04/19	BEN Board	04/05/20	New Policy
2.0	Corporate & Public Affairs	30/01/24	BEN Board	29/08/25	
2.1	HO Public Relations	11/03/25	Chief Marketing Officer	29/08/25	Non-material: Minor wording updates Updated template