



Communications Policy

Afterpay Limited

June 2020

1. Background

1.1 Overview

Afterpay Limited (**Company**) is committed to effective communication with its customers, shareholders, market participants, employees, suppliers, financiers, creditors, other stakeholders and the wider community. The Company will ensure that all stakeholders, market participants and the wider community are informed of its activities and performance.

The Company will endeavour to make publicly available all information to ensure that trading in its shares takes place in an efficient, competitive and informed market.

1.2 Purpose

This Communications Policy contains the Company's approach and commitment to communication. The Policy is designed to ensure that the Company:

- (a) provides timely and accurate information equally to all shareholders and market participants regarding the Company including its financial situation, performance, ownership, strategies, activities and governance; and
- (b) adopts channels for disseminating information that are fair, timely and cost efficient.

In addition to those policies and processes contained in the Continuous Disclosure Policy, the Company has implemented a number of processes to ensure achievement of these goals.

2. Confidentiality

Information that the Company considers private and that is not generally available outside the Company (**Confidential Information**) and information that the Company owns, develops, pays to have developed or to which it has an exclusive right (**Proprietary Information**) must be treated by the Company and all employees as follows:

- (a) the Company and all employees must ensure that they do not disclose any Confidential Information or Proprietary Information to any third party or other employee who does not have a valid business reason for receiving that information;
- (b) if Confidential Information or Proprietary Information is required to be provided to third parties or other employees for valid business purposes, the Company and its employees must:
 - (i) take adequate precautions to ensure that information is only used for those purposes for which it is provided and is not misused or disseminated to the Company's detriment; and
 - (ii) ensure that the information is returned or destroyed when the purpose is complete.

Such precautions include obtaining a confidentiality agreement or other undertaking. Advice about these measures can be obtained from the Company Secretary.

Any information concerning the Company which is not generally available and which may have a material effect on the price or value of the Company securities may need to be disclosed in order for the Company to comply with its continuous disclosure obligations referred to in its Continuous Disclosure Policy and in section 3 of this Communications Policy.

3. Communications with shareholders, employees and the market

3.1 Continuous and periodic disclosure

The Company is a public company listed on the ASX. It is subject to continuous disclosure requirements under the Corporations Act and the ASX Listing Rules, in addition to periodic and specific disclosure requirements.

A fundamental component of the Company's Communication Policy is its continuous disclosure program. To ensure the Company complies with its continuous disclosure obligations, the Board has adopted a Continuous Disclosure Policy.

In addition to its continuous disclosure obligations, the Company will make other periodic disclosures as required by law and as contemplated by the ASX Corporate Governance Council's Corporate Governance Principles and Recommendations.

3.2 Communications with the ASX

All communication with the ASX will be in accordance with the ASX Listing Rules. The Company Secretary is responsible for communications with ASX.

For further information refer to the Company's Continuous Disclosure Policy.

3.3 Company meetings

The meetings of shareholders of the Company represent an excellent opportunity for the Company to provide information to its shareholders. The Company encourages attendance at, and participation in, general meetings.

The Company typically holds its annual general meeting in October or November in Melbourne.

A notice of a meeting will be sent to shareholders prior to meetings, including details of the time and place of the meeting, the resolutions to be considered and proxy voting procedures.

The Company recognises that some shareholders will not be able to attend its meetings of shareholders. To allow for the participation of any such shareholders, the Company

encourages shareholders to forward their questions to the Company Secretary prior to the meeting. Where appropriate, these questions will be addressed at the meeting.

The Company will regularly review its policies and procedures that it has in place to facilitate and encourage participation in shareholder meetings including in relation to:

- (a) participation in meetings involving electronic communications, such as the linking of multiple venues by live telecommunications or through the live webcasting of meetings; and
- (b) providing direct voting facilities to allow shareholders to vote ahead of the meeting without having to attend or appoint a proxy.

3.4 **Website**

The Company's website is one of the cornerstones of the Company's Communication Policy with shareholders and the market. All information released to the ASX will be posted on the Company's website promptly after the ASX has confirmed that it has received the information. The Company's website also serves as an important communication tool for the Company's employees and external stakeholders, such as customers, suppliers and financiers.

The Company's website contains a range of information of relevance to stakeholders, including:

- (a) ASX announcements and media releases;
- (b) Annual Reports and other financial results;
- (c) Corporate Governance Statement;
- (d) Constitution, Board and Committee Charters and corporate governance policies and codes;
- (e) presentations to investors and analysts.
- (f) AGM information, including the Notice of Meeting; and
- (g) Investor contact information.

Stakeholders are encouraged to view the website on a regular basis so that they can keep up to date with information concerning the Company. The website has been designed to enable information to be accessed in a clear and readily accessible manner.

3.5 **Briefings**

The Company recognises the importance of the relationship between the Company and its institutional investors, brokers and analysts. The Company may from time to time conduct briefings to these groups. Protocols for these briefings are set out in the Company's Continuous Disclosure Policy.

3.6 **Communication with employees**

The Company recognises that its employees are central to the Company's success. In order to enable staff to fulfil their role to the high standards required and to promote employee satisfaction, the Company aims to ensure effective communication with employees. Effective communication with employees starts with their direct manager and with accessibility to senior management.

3.7 **Employee briefings**

The Company will from time to time conduct employee briefings so that all staff are aware of activities within the Company. These briefings may be conducted by the Chief Executive Officer (CEO) or an appropriate senior executive.

3.8 **Electronic communication**

The Company recognises that it is often efficient to communicate electronically and accordingly:

- (a) shareholders will be given the option to receive communications from, and send communications to, the Company and its share registry electronically; and
- (b) the Company's email system allows staff and stakeholders to communicate simply and easily with management and staff of the Company.

The Company will endeavour to format communications to shareholders from the Company and its share registry so as to be easily readable on a computer screen or other electronic devices which are commonly used for that purpose. The Company will also endeavour to include a printer-friendly option in these electronic communications to allow shareholders to retain a hard copy of the communication.

Employees and other stakeholders have access to the Company's email system and are encouraged to use it to improve the flow of information and communication generally.

The Company will use email to ensure a continued flow of information and to communicate effectively with staff. Staff should feel free to communicate with any member of management by email.

4. **Other communications**

4.1 **Communications with the media**

All communication with the media will be through the Chair of the Board, CEO, Chief Revenue Officer, Chief Financial Officer, Executive Vice President Public Policy and External Affairs, Executive Vice President Communications and Investor Relations or other persons authorised by the CEO from time to time.

4.2 **Communications with other stakeholders**

The Company is committed to ensuring that all stakeholders regularly receive information about the Company and its activities. While individual briefings may be held with key stakeholders, such as financiers, the principal means of ensuring that stakeholders have access to information will be through the Company's website.

5. Other matters

5.1 Questions

If you have any questions arising from the Company's Communications Policy, please contact the Company Secretary.

5.2 Review

This Policy will be reviewed periodically to ensure it is operating effectively and any material amendments must be approved by the Board. The Company Secretary will communicate any amendments to employees as appropriate.

5.3 Version Control

Version	June 2020
Owner	Company Secretary
Review Cycle	Annually