

Third Party Access to Information contained in Register of Members

Policy & Procedure (Group)

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About this document

Audience

This policy and procedures set out in this document apply to all executive and non-executive directors and staff members of Praemium Limited (ASX:PPS) ('PPS') and each of its incorporated subsidiaries including those incorporated in the United Kingdom ('Praemium' or the 'Company').

Objectives

The aim of this policy is to ensure PPS complies with the requirements set out in the Corporations Act 2001 (Cth) in relation to access by a third party to information contained in the PPS register of members and other Company registers.

Scope

This document outlines the policy that is approved by the PPS Board of Directors and the related procedures that set out the practical steps to manage the policy.

Related documentation

- Praemium Corporate Code of Conduct
- Shareholder Communication Policy
- Praemium Privacy Policy

Updates

If you have any questions about this document, or suggestions for improving its accuracy or usability, please send a message to the Legal & Compliance Department.

| Version no. | Status | Draft no. | Version date | Description of change | Created by |
|-------------|------------|-----------|---------------|-----------------------|------------|
| 1.0 | Definitive | 4 | 27 April 2011 | Approved | Board |

Next Review

- (a) Praemium will monitor and review this policy and procedure at least once every 5 years and assess its effectiveness and compliance with the law at the time.
- (b) This procedure is due to be reviewed by the Legal and Compliance Department December 2016.

1. Policy Statement

- 1.1. Praemium, its Board of Directors and Management are committed to ensuring that the Company will comply with the relevant provisions of the Corporations Act 2001 (Cth) (the 'Act') in relation to requests by third parties for access to information contained in a company register.

2. Applications Requesting Information contained in a Company Register

- 2.1. All applications requesting access to information contained in the Company security registers must be addressed to:
- (a) The Company Secretary
Praemium Limited
Level 1
406 Collins Street
Melbourne Vic 3000; or
 - (b) (for existing shareholders only)
Praemium Limited
C/- Link Market Services
Postal Address: Locked Bag A14
Sydney South NSW 1235
- Office: Level 1, 333 Collins Street
Melbourne VIC 3000
- Phone: 1300 554 474 or +61 2 8280 7111
Fax: +61 2 9287 0303
Email: registrars@linkmarketservices.com.au
- 2.2. All applications made directly to the Company Secretary must include the following information:
- (a) The applicants full name;
 - (b) The applicant's address;
 - (c) Bear the applicant's signature;
 - (d) The applicants contact details such as telephone number and email address (if applicable);
 - (e) Each purpose for which the applicant is seeking to access the information contained on the Company register;
 - (f) The number of member records requested (for example Top 20 / entire register etc);

(g) The following declaration:

I/We hereby declare that:

1. The purpose(s) set out in this application are the only intended purpose(s) for which I am/we are seeking to access information contained on the register of members/option holders/debenture holders;
2. I/We will not use the information obtained by way of this application for any purpose other than the purpose(s) disclosed in this application, or in any manner which is unlawful;
3. I/We will destroy the information obtained by way of this application as soon as the purpose(s) for which the information was requested has expired; and
4. I/We will not provide any information obtained by way of this application to any third party.

- 2.3. Shareholders may make an application to inspect the Share Registry by contacting the Link Market Services directly and providing the information that Link Market Services requests to verify their identity and rights to access and inspect the company's register.
- 2.4. All applicants must pay the applicable fee as set out in paragraph 3;
- 2.5. The Share Register is currently held by LINK MARKET SERVICES LIMITED, Level 1, 333 Collins Street Melbourne and may be inspected at that location during the hours of 9am to 5pm on business days. We recommend that you contact the registry by telephone to make an appointment.

3. Application Fees

- 3.1. Praemium shall seek reimbursement of any out of pocket expenses associated with the provision of requested information or may require that fees be paid directly to its Share Registry for that purpose. Fees shall not exceed the maximum amounts allowed by the Corporations Act and its regulations.

4. Proper Purpose

- 4.1. The Corporations Act regulations provide that information contained on the Company register must only be disclosed for a proper purpose.
- 4.2. Praemium acknowledges that the Corporations Act provides that a Company that does not provide access to books (including the register of members) commits a defence.
- 4.3. Praemium's Code of Conduct and its Privacy Policies require it to consider the privacy ramifications of providing sensitive and personal information to third parties, including information provided as a consequence of a request for access to its share register. Accordingly, even if the applicant is a shareholder, Praemium will give consideration to whether the application has been made for a proper purpose.

- 4.4. The provision of information by Praemium shall not imply that Praemium has determined that the purpose for which information is provided is a proper purpose.
- 4.5. The Company Secretary, in accordance the Corporations Regulations, will assess whether the purpose(s) set out in the Application are a “proper purpose”.
- 4.6. As a guide the Corporations Regulations state that the following purposes are **improper purposes**:
- (a) soliciting a donation from a member of a company;
 - (b) soliciting a member of a company by a person who is authorised to assume or use the word stockbroker or sharebroker in accordance with section 923B of the Corporations Act;
 - (c) gathering information about the personal wealth of a member of a company; and
 - (d) making an offer or invitation to purchase financial products off-market)

5. In what form will the Company Provide access to Information

- 5.1. Extracts will be provided in such form as Praemium considers appropriate in the circumstances.
- 5.2. Only the identity of the legal owners of shares will be disclosed.

6. Use of Information

- 6.1. Any applicant who gains access to information contained in the Company register through this policy and procedures document **is requested to**:
- (a) **not use** any information so obtained for the purpose(s) other than those disclosed in the application;
 - (b) **not use** any information so obtained in any manner which is unlawful;
 - (c) **not provide/disclose** any information so obtained to any other third party; and
 - (d) **destroy** all information so obtained as soon as the purpose(s) for which the information was requested has expired.

7. What if I don't follow the policy and procedures outlined in this document?

- 7.1. In the event this policy and procedures document is not followed by an applicant, the Company may, subject to the applicable law, refuse to provide the information requested.

8. Reporting to the Board of Directors

- 8.1. The Company Secretary, on a monthly basis, will report on each request for access to information contained on the Company's register(s) to the Company's Board of Directors.