

SeaDragon Limited

Shareholders Communications Policy

Adopted on: 30 May 2018



Overview

The purpose of this Policy is to promote effective communication with shareholders and encourage effective participation at shareholder meetings of SeaDragon Limited (“**SeaDragon**”).

SeaDragon will endeavour to:

- maintain and update on SeaDragon’s website (www.seadragon.co.nz) within a reasonable timeframe, the materials detailed in this Policy;
- distribute shareholder communications to shareholders in accordance with the Companies Act 1993 (“**Companies Act**”) and listing rules of NZX Limited (“**NZX**”) (the “**Listing Rules**”); and
- use available channels and technologies to communicate widely and promptly to shareholders.

NZX announcements

SeaDragon makes announcements to NZX in accordance with the Listing Rules and the Companies Act.

Announcements made by SeaDragon to NZX are, subject to applicable securities laws, available to shareholders:

- on the ‘Investor Centre’ section of SeaDragon’s website, and
- under the ‘Market Announcements’ section at www.nzx.com.

Company’s share registry

Shareholders are able to access information relevant to their holding via SeaDragon share registry website at www.linkmarketservices.co.nz. Shareholders who do not have access to the internet should contact SeaDragon’s Company Secretary with any enquiries relating to their shareholdings or alternatively contact SeaDragon’s share registry (Link Market Services, 09 375 5998 or PO Box 91976, Auckland 1142).

The NZX code for SeaDragon is SEA.

Shareholders will be given the option through our share registry to receive communications from, and send communications to, SeaDragon and its share registry electronically.

Annual meetings

The specific date, time and location of each annual meeting of SeaDragon will be detailed:

- in the relevant notice of meeting; and
- on SeaDragon’s website.

Alternatively, shareholders can contact SeaDragon’s share registry or SeaDragon Secretary directly to obtain this information.

The notice of meeting will be distributed to all shareholders prior to the annual meeting within the timeframe set by the Companies Act and the constitution of SeaDragon, altered from time to time (“**Constitution**”). The full text of the notice of meeting will also be available via the ‘Investor Centre’ section of SeaDragon’s website and on www.nzx.com.

Shareholder meetings are an opportunity for shareholders and other stakeholders to hear from and put questions to the Board, Senior Management and the external auditor. Shareholders may attend the meeting in person (including by any relevant technological means made available by SeaDragon) or by proxy, representative or attorney.

The Chair will provide reasonable time following the consideration of reports for questions and comment on relevant matters (including questions or comments communicated to SeaDragon by absent shareholders). The Chair’s address (and any address by the Chief Executive Officer) will be released to the market immediately prior to the commencement of the annual meeting. It will also be available to shareholders via SeaDragon’s website in the same manner as other NZX announcements.

Annual report

The annual report contains key financial information about SeaDragon, as well as important operating and corporate information. As permitted by the Companies Act, the default method of receiving SeaDragon's annual reports is electronically via the 'Investor Centre' section of SeaDragon's website. A printed copy of the annual report is only sent to shareholders who elect to receive one. Shareholders who want to receive a printed copy of the annual report and half year report must elect their mailing options online on SeaDragon's share registry website (www.linkmarketservices.co.nz) or contact SeaDragon's share registry (Link Market Services, 09 375 5998 or PO Box 91976, Auckland 1142). The annual report will be available to all shareholders prior to the annual meeting within the timeframe set by the Companies Act and the Listing Rules.

Half-year and full-year results

As the half-year and full-year results are announced to NZX pursuant to the Listing Rules, they will be available to shareholders in the same manner as other NZX announcements. In addition, the results will be accessible via the 'Investor Centre' section of SeaDragon's website.

Corporate governance

SeaDragon has a board charter, containing details of the functions and responsibilities of the Board. To assist the Board in fulfilling its duties and responsibilities, it has established two Board committees:

- the Audit and Risk Committee; and
- the Remuneration and Nomination Committee.

The Board and committee charters, along with other corporate governance policies and documents, are available to shareholders from the 'Corporate Governance' section of SeaDragon's website.

Media releases

Access to SeaDragon's media releases is available from the 'Investor Centre' section of SeaDragon's website and they are released to the market via NZX.

Investor and analyst briefings

At the time of announcement to NZX of SeaDragon's half-year and full-year results, SeaDragon may conduct investor and analyst briefings. Investor and analyst briefings may occur at other times during the year as the Board deems appropriate.

If and when investor and analyst briefings occur at other times during the year, any presentation materials provided and webcasts or transcripts (if kept) will be made available to all shareholders via the 'Investor Centre' section of SeaDragon's website and will be released to the market prior to delivery.

Information for beneficial owners

Beneficial owners of Company securities are encouraged to contact SeaDragon's share registry to arrange the direct receipt of shareholder materials.

Other information

SeaDragon's website will also contain the information set out in the Schedule to this Policy.

Updating the Policy

The Board may approve updates and amendment of this Policy from time to time.

Questions about the Policy and its application

Employees should direct their questions about the Policy and its application in the first instance to SeaDragon Secretary.

Shareholders, investors and members of the public should direct their questions about this Policy and its application to SeaDragon's share registrar, Link Market Services (09 375 5998 or PO Box 91976, Auckland 1142).

Authorisation

This SeaDragon Shareholders Communications Policy has been approved by the Board on 30 May 2018.

SCHEDULE

SeaDragon's website will contain:

- the names, photographs and brief biographical information of each of the Directors and senior management;
- SeaDragon's Constitution, its Board Charter and the charters of each of its Board committees;
- SeaDragon's corporate governance policies and its other corporate governance materials;
- copies of SeaDragon's annual reports and financial statements;
- copies of SeaDragon's announcements to NZX;
- copies of notices of meetings of shareholders and any accompanying documents;
- an overview of SeaDragon's current business;
- a description of how SeaDragon is structured;
- a summary of SeaDragon's history;
- once they are known, the time, venue and other relevant details for results presentations and the annual meeting of SeaDragon;
- a description of SeaDragon's dividend or distribution policy (if any);
- copies of media releases that SeaDragon makes;
- contact details for enquiries from shareholders, analysts or the media; and
- contact details for SeaDragon's securities registry.