

Shareholder Communication Policy

21 October 2010

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**1 Our commitment**

Reverse Corp Limited's Code of Conduct requires Reverse Corp and its employees to act with high standards of honesty, integrity, fairness and equity in all aspects of their employment with Reverse Corp.

Reverse Corp commits to dealing fairly, transparently and openly with both current and prospective shareholders using available channels and technologies to reach widely and communicate promptly. Reverse Corp commits to facilitating participation in shareholder meetings and dealing promptly with shareholder enquiries.

Our shareholder communication policy is built around compliance with disclosure obligations. Our framework for communicating with shareholders is to concisely and accurately communicate:

- our strategy;
- how we implement that strategy; and
- the financial results consequent upon that strategy and its implementation.

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**2 Continuous disclosure**

The continuous disclosure regime is fundamental to the rights of shareholders to receive information concerning their securities. The most important aspect of Reverse Corp's shareholder communication policy is to comply with the continuous disclosure regime.

Market announcements made by Reverse Corp are posted to Reverse Corp's website immediately after release to the market.

Where Reverse Corp provides financial results briefings to analysts or media, these briefings are posted on Reverse Corp's website as soon as possible after the event. In any event no material information which has not been previously released to the market is covered in such briefings. The material upon which the briefing is based (such as slides or presentations) is released to the market prior to the briefing.

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**3 Insider trading**

The insider trading rules are an important adjunct to the continuous disclosure regime in ensuring that shareholders are given fair access to material information regarding securities. Reverse Corp seeks to limit the opportunity for insider trading in its own securities through its continuous disclosure policies and the trading policy applying to its team members and directors.

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## **4 Financial reporting**

Transparent and prompt financial reporting is a key element of listed company disclosure. Reverse Corp reports operating results and produces half yearly and yearly financial reports and an annual report in accordance with the Corporations Act and listing rules. Reverse Corp aims to report promptly, comply with all applicable laws, listing rules and accounting standards in its financial reporting and to report in a way which is easy to understand and conveys the materiality of the matters discussed.

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## **5 Other information about Reverse Corp**

Reverse Corp may make non-material announcements about itself from time to time via media releases. When this occurs, these announcements will be made available on Reverse Corp's website.

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## **6 Information for Shareholders on the Company Website**

Reverse Corp will maintain the following information on its website:

- Corporate Governance Practices and Company Policies
- ASX announcements of a financial and operational nature
- Half year and full year financial reports including Annual Reports
- Material used in post-result presentations and/or briefings with analysts or media.

All financial and corporate reporting will be reviewed by the Board prior to its release to the ASX and inclusion on the Company's website.

In order to manage the cost of maintaining and hosting the website all material, other than the Corporate Governance Policies and the Annual Report will be removed 6 months after they are posted. Each year's Annual Report will be removed and replaced with the current year's Annual Report.

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## **7 Shareholder meetings**

General meetings are used to communicate with shareholders and allow a reasonable opportunity for informed shareholder participation. Shareholder meetings are an opportunity for shareholders and other guests to hear from and question the board and management of Reverse Corp. The chair of the meeting, usually the Chairman, is responsible for the conduct of the meeting.

Reverse Corp's auditor attends its annual general meeting and is available to answer any questions regarding the conduct of and any issues arising from Reverse Corp's audit.

Reverse Corp will examine ways to ensure a broad range of participants may actively be involved in the conduct of its shareholder meetings without attending in person.

Reverse Corp accepts nominations for the board of Reverse Corp that are made to the Company Secretary in accordance with the listing rules and Reverse Corp's constitution. Reverse Corp conducts annual and extraordinary general meetings in accordance with the Corporations Act, the ASX Listing Rules, ASX Corporate Governance Council guidelines and Reverse Corp's constitution.

Reverse Corp drafts notices and proxy forms to maximise the ability of readers to understand and vote on the issues presented. Reverse Corp will also investigate ways of using technology to simplify voting and to electronically distribute material regarding meetings.

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## **8 Correspondence and reports to shareholders**

Reverse Corp corresponds periodically with all shareholders to update them on the company's activities and progress. This correspondence may at times accompany dividend payment advice or cheques.

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## **9 General interaction with shareholders**

Reverse Corp deals with shareholder enquiries promptly and courteously and takes measures to ensure that its registry, Link Market Services Ltd, also does so.

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## **10 Shareholder privacy**

Reverse Corp recognises that privacy is important and will not disclose registered shareholder details unless required by law. Shareholder details will only be used in accordance with applicable privacy laws.

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## **11 Conclusion**

Reverse Corp is committed to listening to its shareholders and welcomes shareholder participation at its annual general meeting.

Feedback from shareholders is also welcome throughout the year and may be made through the 'contact us' page of Reverse Corp's website, [www.reversecorp.com.au](http://www.reversecorp.com.au)