

UNITHOLDER COMMUNICATION POLICY

The Trust Company (RE Services) Limited (ACN 003 278 831) as responsible entity for the Ophir High Conviction Fund (ARSN 620 920 201)

Adopted on 19 December 2018

1 Background and purpose

- (a) Units in the Ophir High Conviction Fund (**Trust**) are listed on the Australian Securities Exchange (**ASX**). The Trust Company (RE Services) Limited as responsible entity for the Trust (**Responsible Entity**) has entered into an Investment Management Agreement with Ophir Asset Management Pty Ltd (**Manager**) pursuant to which the Manager will provide certain management and administrative services to the Trust.
- (b) The Responsible Entity recognises that unitholders and other stakeholders are entitled to be informed in a timely and readily accessible manner of all major developments affecting the Trust.
- (c) The purpose of this Unitholder Communications Policy is to promote effective communication with unitholders and other stakeholders, and to encourage and facilitate participation at the Trust's general meetings and dealing promptly with the enquiries of unitholders and other stakeholders.

2 Methods of communication

Information is provided to unitholders and other stakeholders through, but is not limited to:

- (a) releases to ASX in accordance with continuous disclosure obligations;
- (b) the Ophir High Conviction Fund section of the Trust's website (https://http://www.ophiram.com.au/ophir-high-conviction-fund)
- (c) the Trust's annual and half-yearly reports:
- (d) annual series of investor presentations.

The Responsible Entity encourages unitholders to receive Trust information electronically by registering their email address online with the Trust's registry provider, whose details are provided below.

For any queries about the Trust, Unitholders may contact the Trust's registry provider, whose details are provided below.

3 ASX releases

- (a) The Responsible Entity will make announcements to ASX in a timely manner and in accordance with ASX Listing Rules.
- (b) All announcements made to ASX are available to unitholders:
 - (i) under the Ophir High Conviction Fund section of the Trust's website;or
 - (ii) under the announcements section of ASX website.

4 Trust website

- (a) The Ophir High Conviction section of the Trust's website is the primary medium for providing information to all unitholders and stakeholders. It has been designed to enable information to be accessed in a clear and readily accessible manner.
- (b) The Ophir High Conviction Fund section of the Trust's website will contain information relevant to unitholders and stakeholders including statements lodged with ASX (including all financial results and annual reports), board committee charters and corporate governance policies, press releases and other material relevant to unitholders and other stakeholders.

5 Investor Presentations

- (a) The Manager expects to conduct an annual series of investor presentations in the second half of each calendar year that Unitholders will be welcome to attend.
- (b) Notification of which locations the roadshow will visit, along with copies of any presentations to be given, will be available to Unitholders through ASX.

6 Annual general meeting

- (a) If called, the AGM provides an opportunity for the Responsible Entity to provide information to unitholders and a reasonable opportunity for informed unitholder participation. At the AGM, unitholders can express their views to the Responsible Entity and the Manager, and can vote on proposals. All unitholders are encouraged to attend the AGM if called. The AGM may or may not be called at the full discretion of the Responsible Entity.
- (b) The date, time and location of the AGM will be provided in the notice of meeting and on the Trust's website.
- (c) The notice of meeting and proxy form will be distributed to all unitholders prior to the AGM in the timeframe set by the Corporations Act, and will be available on the Trust's website.
- (d) The Trust's external auditor attends its AGM and is available to answer any questions regarding the conduct of and any issues arising from the audit or the preparation and content of the auditor's report.

7 General

- (a) Annual report: Unless the Trust's registry provider has been notified otherwise, the annual report will be emailed to all unitholders (to the email address recorded on security register) within the timeframe set by the Corporations Act.
- (b) Half-year and full-year results: The half-year and full-year results will be announced to ASX pursuant to ASX Listing Rules and are available to unitholders in the same manner as other ASX announcements. Following the release of the Trust's half-year and full-year results, the Responsible

Entity or the Manager may conduct investor and analyst briefings at which the media, institutional investors, and stockbroking analysts will be briefed and given an opportunity to ask questions.

- (c) **Dividends**: Australian resident unitholders are encouraged to provide the Trust's registry provider with bank account details to enable the Trust to pay dividends by electronic Trusts transfer, rather than by cheque.
- (d) **Security registry**: Unitholders with any questions related to their holding should contact the Trust's registry provider at:

Email: enquiries@boardroomlimited.com.au

Telephone number Within Australia: 1300 737 760

Outside Australia: + 61 2 9290 9600

- (e) Unitholder enquiries: The Responsible Entity is committed to dealing with unitholder enquiries promptly and courteously and takes measures to ensure that its registry provider also does so.
- (f) Unitholder complaints: Unitholders with any complaint should contact the Responsible Entity. If the Manager becomes aware of a complaint relating to the units in the Trust or the Responsible Entity, the Manager must promptly notify the Responsible Entity and the Responsible Entity will handle such complaint in accordance with the Responsible Entity's complaint handling procedures.
- (g) **Unitholder privacy:** The Responsible Entity recognises that privacy is important and will not disclose registered unitholder details unless required by law. Unitholder details will only be used in accordance with applicable privacy laws.

The privacy policy of the Responsible Entity is publicly available at its website at www.perpetual.com.au or you can obtain a copy free of charge by contacting the Responsible Entity.