

COMMUNICATIONS POLICY

Version: 24 June 2022

Policy Owner: CEO | Managing Director

Policy Approver: Board

Last Approval: 6 December 2019

Background

Overview

Tyro is committed to effective communication with its merchants, shareholders, employees, suppliers, creditors, other stakeholders and the wider community.

We will endeavour to make publicly available all appropriate information to ensure that trading in our shares takes place in an efficient, competitive and informed market.

Purpose

This Communications Policy sets out our approach and commitment to communication. This Policy is designed to ensure that we:

- provide timely and accurate information equally to all our shareholders and market participants regarding and in relation to our financial situation, performance, ownership, strategies, activities and governance; and
- adopt channels for disseminating information that are fair, timely and cost efficient.

In addition to the policies and processes contained in our Continuous Disclosure Policy, we intend to implement a number of processes to best achieve these goals.

Investor relations program

We will have an investor relations program that facilitates effective two-way communication with investors. Our investor relations program will focus both on:

- professional investors (and financial market participants who service them); and
- engaging with retail investors (and the organisations that represent them),

to understand the matters of concern or interest to those investors. Significant comments or concerns raised by investors or their representatives will be conveyed to the Board or senior management as appropriate.

Confidentiality

Background

Information that we consider private and that is not generally available outside of Tyro (Confidential Information) and information that we own, develop, pay to have developed or to which we have an exclusive right (Proprietary Information) must be treated by as follows:

- we must ensure that Confidential Information or Proprietary Information is not disclosed to any third party or team member who does not have a valid business reason for receiving that information; and
- if Confidential Information or Proprietary Information is required to be provided to a third party or team member for a valid business purpose, we must:
 - take adequate precautions to ensure that information is only used for the purpose for which it is provided and is not detrimentally misused or disseminated; and
 - ensure that the information is returned or destroyed when the purpose is complete.

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

However, any information concerning Tyro which is not generally available and which may have a material effect on the price or value of our shares may need to be disclosed in order for Tyro to comply with its continuous disclosure obligations referred to in the Continuous Disclosure Policy and in the following section of this Communications Policy.

Communications with shareholders, employees and the market

Continuous and periodic disclosure

We are a public company listed on the ASX. We are subject to continuous disclosure requirements under the Corporations Act 2001 (Cth) and the ASX Listing Rules, in addition to periodic and specific disclosure requirements.

A fundamental component of our Communication Policy is our continuous disclosure program. To ensure we comply with our continuous disclosure obligations, our Board has adopted a Continuous Disclosure Policy.

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

Communications with the ASX

All communication with the ASX will be in accordance with the ASX Listing Rules. The Head Of Investor Relations (or in his or her absence any one or more of the Company Secretary, General Counsel, CEO, CFO, or a member of the Board, or any delegate of the Head of Investor Relations, General Counsel, Company Secretary, CEO, CFO or of the Board,) is responsible for communications with the ASX.

For further information refer to our Continuous Disclosure Policy.

Company meetings

The meetings of our shareholders represent an excellent opportunity to provide information to our shareholders. We encourage attendance at, and participation in, our general meetings.

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

We recognise that some shareholders will not be able to attend our meetings of shareholders. To allow for the participation of any such shareholders, we encourage shareholders to forward their questions and comments to the Head of Investor Relations prior to our meetings.

We regularly review our policies and procedures to facilitate and encourage participation in shareholder meetings where practicable, including in relation to providing shareholders with dial-in details, providing a link to a live audiocast, and by making available on our website a recording or transcript of the meeting as soon as we reasonably can. We intend providing direct voting facilities to allow shareholders to vote ahead of the meeting without having to attend or appoint a proxy.

In the case of private meetings between us and analysts or investors, we do not expect to provide security holders with the opportunity to participate. We will not in these meetings disclose any information that a reasonable person would expect to have a material effect on the price or value of our securities that has not already been disclosed to the market.

Access to public presentations

We will provide copies of any presentations that contain material price sensitive information or new and substantive information to ASX prior to delivering that presentation publicly (as discussed in our Continuous Disclosure Policy).

Briefings

We recognise the importance of our relationship with our institutional investors, brokers and analysts. We may from time to time conduct briefings to these groups. In these cases, the following protocols will apply:

- material information which is required to be disclosed under our Continuous Disclosure Policy will not be disclosed at these briefings unless it has been previously, or is simultaneously, released to the market;
- if material information which has not been disclosed is inadvertently released, we will immediately release it to the market via the ASX and place it on our website;

- questions at briefings that deal with material information that has not previously been disclosed will not be answered; and
- we will place a copy of new and substantive investor or analyst presentation materials on our website ahead of the relevant presentation.

Communication with employees

We recognise that our team is central to our success. In order to enable our team members to fulfil their role to the high standards required and to promote employee satisfaction, we aim to ensure effective communication with our team members. Effective communication with employees starts with their direct manager and with accessibility to senior management.

Electronic communication

We recognise that it is often efficient to communicate electronically and accordingly:

- shareholders will be given the option to receive communications from, and send communications to, us and our share registry electronically; and
- our email system allows team members and stakeholders to communicate simply and easily with management and our wider team.

We use email, other electronic communication as well as the Tyro Intranet and meetings to ensure a continued flow of information and to communicate effectively with our team. Team members should feel free to communicate with any member of management by email and are encouraged to use email generally to improve the flow of information and communication generally.

Website

Our website is an important communication tool for our team, investors and other external stakeholders, such as our merchants. It is our primary means to provide all information to all stakeholders. It has been designed to enable information to be accessed in a clear and readily accessible manner.

Our website contains a range of information of relevance to stakeholders including: relevant corporate governance policies and codes; our statement of values; media and market announcements; and presentations to shareholders and institutional investors. Stakeholders are encouraged to view the website on a regular basis so that they can keep up to date with Tyro information.

Our website is also one of the cornerstones of our Communication Policy with shareholders and the market. All information released to the ASX will be posted on our website as soon as practicable after the ASX has confirmed that it has received the information.

Other communications

Communications with the media

All communication with the media will be from the Chair or the CEO/Managing Director, their delegates or other persons authorised by the Board.

Communications with other stakeholders

We are committed to enabling all our stakeholders to regularly receive information about us and the principal means of achieving this is providing stakeholders access to information through our website.

Other matters

Questions

If you have any questions arising from our Communications Policy, please contact the Head of Investor Relations.

Amendment of policy

This Policy can only be amended with the approval of the Board.

Adoption of Policy and Board review

This Policy was adopted by the Board on the date on the front cover of this Policy and takes effect from that date and replaces any previous policy in this regard.

The Board will review this Policy periodically. The Head of Investor Relations will communicate any amendments to team members as appropriate.

