Shareholder Communications Policy

Lark Distilling Co. Ltd

ACN 104 600 544

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<th>Reviewed/Approved by the Board</th>
<th>Date</th>
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<td>Adopted</td>
<td>25 November 2019</td>
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<td>Reviewed &amp; Approved</td>
<td>26 November 2020</td>
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<td>Reviewed &amp; Approved</td>
<td>19 April 2023</td>
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1. **Purpose**

1.1 Lark Distilling Co. Ltd (ACN 104 600 544) (Company) has adopted this Shareholder Communications Policy (Policy) to ensure that shareholders are informed in a timely and readily accessible manner of all major developments concerning the Company.

1.2 The purpose of this policy is to promote effective 'two-way' communication with shareholders and to encourage and facilitate participation at the Company’s general meetings and deal promptly with the enquiries of shareholders.

2. **Methods of Communication**

2.1 Information is provided to shareholders through, but is not limited to:

(a) the Company’s annual and half-yearly reports;

(b) market releases to the Australian Securities Exchange (ASX) in accordance with continuous disclosure obligations;

(c) social media;

(d) newsletters;

(e) webinars and presentations;

(f) the Company’s website; and

(g) the annual general meeting (AGM).

2.2 The Company encourages shareholders to receive company information electronically by registering their email address online with the Company’s share registry.

2.3 Shareholders may communicate with the Company by:

(a) contacting the Company by telephone, mail or facsimile (contact details are available from the Company’s website);

(b) the contact page on the Company’s website;

(c) participation at the AGM (see section 5 below); or

(d) participation at analyst and investor briefings which may be conducted from time to time (see section 6 below).

2.4 Where appropriate, a summary of the views and matters of concern or interest to shareholders be communicated to the Board.

3. **Market Releases**

3.1 The Company will make announcements to the market in accordance with the applicable listing rules (see also the Company’s Continuous Disclosure Policy).

3.2 All announcements released to the market are available to shareholders:

(a) under the 'Investors’ section of the Company’s website;

(b) under the ‘Company Announcements’ section of the ASX website;
by email notification (when shareholders provide the Company with their email address and elect to be notified of all the Company’s ASX announcements); and

under the Company’s social media accounts.

4. **Website**

4.1 The Company’s website is the primary medium of providing information to all shareholders.

4.2 The Company’s website will contain information relevant to shareholders and stakeholders, including announcements made to the market by the Company (including all financial results, annual reports and press releases), board and board committee charters, corporate governance policies and other material relevant to shareholders.

4.3 Shareholders are encouraged to view the website on a regular basis so that they can keep up to date with information concerning the Company.

4.4 The Company will also utilise social media and newsletters as key communication channels to distribute Company news that is not required to be issued through the ASX platform including but not limited to notification of webinars, speaking events, sector education and other non-price sensitive information.

5. **Company’s Share Registry**

5.1 Shareholders are able to access information relevant to their holding via the Company share registry website, Boardroom Limited. Shareholders who do not have access to the internet should contact the Company's share registry with any enquiries relating to their shareholdings or alternatively contact the Company Secretary via email at melanie.leydin@vistra.com.

5.2 Shareholders will be given the option to receive communications from, and send communications to, the Company and its share registry electronically.

6. **Annual General Meeting**

6.1 The AGM provides an important opportunity for the Company to provide information to its shareholders and a reasonable opportunity for informed shareholder participation. At the AGM, shareholders can express their views to the Board and vote on the Board’s proposals. All shareholders are encouraged to attend the AGM.

6.2 The notice convening the AGM may state that shareholders unable to attend the AGM are invited to submit questions in writing up to 5 business days prior to the AGM. Any questions and responses will be included in the record of the AGM.

6.3 The date, time and location of the AGM will be provided in the notice of meeting.

6.4 The notice of meeting and proxy form will be distributed to all shareholders prior to the AGM in the timeframe set by the Corporations Act and will be available on the Company’s website.

6.5 The Company’s auditor will attend its AGM and will be 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. **Media Releases**

7.1 Access to the Company’s media releases is available from the 'Press Releases' section of the Company's website (under ‘Investors’) and are released to the market via the ASX.

8. **Analyst and Investor Briefings**

The Company may conduct briefings for analysts and investors from time to time to discuss matters concerning the Company. In these cases, the protocols set out in the Company’s Continuous Disclosure Policy will apply.

9. **External Communications and further assistance**

9.1 Any external enquiry about the Company’s performance or announcements should be directed to the Managing Director/CEO.

9.2 The persons authorised to respond on behalf of the Company, or give any official, or non-speculative information are the Managing Director/CEO and the Company Secretary. The Chairperson may respond on behalf of the Company in the absence of the Managing Director/CEO and Company Secretary.

9.3 All other persons are prohibited from speaking or responding on behalf of the Company in relation to its performance or announcements.

9.4 Any employees that are approached by any shareholders, investors, members of the public or the media should direct any questions about the Company to the Company Secretary who will either respond or redirect internally.

9.5 The Company reserves the right at its absolute discretion not to respond to investor enquiries which are purely speculative in nature, statements of personal opinion or defamatory / offensive in nature or sent via social media only.

9.6 Social media posts will be released or authorised by the Managing Director/CEO and Head of Content and Community only.

10. **General**

10.1 **Annual report:** Unless shareholders have elected to have a hardcopy of the annual report mailed to them, the annual report (or a link where it can be downloaded) will be emailed to shareholders (to the email address recorded on the Company’s share register) prior to the AGM within the timeframe set by the Corporations Act.

10.2 **Half-year and full year results:** The half-year and full-year results are announced to the ASX pursuant to the ASX Listing Rules and are available to shareholders in the same manner as other ASX announcements.

10.3 **Share registry:** Shareholders with any questions related to their shareholding should contact the Company’s share registry:

Boardroom Limited
GPO Box 3993
Sydney, NSW, 2001
Telephone: 1300 737 760
Email: enquiries@boardroomlimited.com.au
7.4 **Shareholder privacy:** The Company recognises that privacy is important and will not disclose registered shareholder details unless required by law. However, shareholders should be aware that certain details of holdings in a public company are publicly available by law. Shareholder details will only be used by the Company in accordance with applicable privacy laws.

11. **Review of this Policy**

11.1 The Company Secretary may review this policy from time to time and report to the Board any changes they consider should be made.

11.2 This policy may be amended from time to time by resolution of the Board.

12. **Further Assistance**

12.1 Any questions about this policy should be referred to the Company Secretary.

13. **Approved and Adopted**

13.1 This Policy was approved and adopted by the Board on 25 November 2019.