



Shareholder Communication Policy for Vulcan Steel Limited

Reviewed and adopted by the Board on 25 November 2024

1. Purpose

- 1.1. Vulcan recognises that shareholders and other stakeholders are entitled to be informed in a timely and readily accessible manner of all major developments affecting Vulcan.
- 1.2. The purpose of this Policy is to encourage and facilitate shareholders' participation at Vulcan's Annual Meetings and any special meetings of shareholders, to promote effective communication with Vulcan's shareholders and other stakeholders, and to ensure that enquiries from shareholders and other stakeholders are dealt with promptly by Vulcan.

2. Methods of communication

- 2.1. Information is provided to Vulcan's shareholders and other stakeholders through, but is not limited to:
 - (a) releases to ASX and NZX in accordance with continuous disclosure rules and other obligations as provided in the ASX Listing Rules and the NZX Listing Rules;
 - (b) Vulcan's Investor Website;
 - (c) Vulcan's annual reports and half-year reports; and
 - (d) Vulcan's Annual Meetings.
- 2.2. Vulcan encourages shareholders to receive communications from Vulcan electronically by registering their email address with Vulcan's Share Registry.

3. ASX and NZX releases

- 3.1. Vulcan will make announcements to ASX and NZX in a timely manner in accordance with the ASX Listing Rules and the NZX Listing Rules, and Vulcan's Disclosure Policy.
- 3.2. All announcements made to ASX and/or NZX are available to shareholders:
 - (a) on Vulcan's investor website; and
 - (b) under the company announcements section on each of ASX's and NZX's websites (see <https://www2.asx.com.au/markets/company/vsl> and <https://www.nzx.com/companies/VSL/announcements>).

4. Vulcan's investor website

- 4.1. Vulcan's Investor Website is the primary medium of providing information to all shareholders and other stakeholders. It has been designed to enable information to be accessed in a clear and readily accessible manner.
- 4.2. The Investor Website provides governance-related information, including:
 - (a) details of the Board and members of Vulcan's leadership team;
 - (b) copies of Vulcan's corporate governance documents (including the Board Charter, Audit and Risk Management Committee Charter, People and Remuneration Committee Charter, Disclosure Policy and this Policy);
 - (c) copies of documents lodged with ASX and/or NZX by Vulcan (including all financial results, annual reports and half-year reports);
 - (d) any media releases made by Vulcan; and
 - (e) other material relevant to Vulcan shareholders.

5. Shareholder meetings

- 5.1. Annual Meetings and any special meetings of shareholders provide an important opportunity for Vulcan to provide information to its shareholders and a reasonable opportunity for informed shareholder participation. At shareholder meetings (including the Annual Meeting), shareholders will have the opportunity to:
- (f) express their views to the Board and management;
 - (g) ask the Board and management questions; and
 - (h) vote on any director appointments, grants of share performance rights (or other equity) to executive directors and any other proposed shareholder resolutions.

All shareholders are encouraged to attend and participate at shareholder meetings (including the Annual Meeting).

- 5.2. The date, time and location of Annual Meetings will be provided in each notice of Annual Meeting and on the Investor Website.
- 5.3. Where practicable, Vulcan will consider the use of technological solutions for encouraging shareholder participation at shareholder meetings (which may include, for example, live webcasting of meetings, holding meetings across multiple venues linked by live telecommunications and hybrid meetings).
- 5.4. A notice of Annual Meeting and proxy form will be distributed to all shareholders prior to each Annual Meeting no later than the timeframe set by the Companies Act. Copies will also be available on Vulcan's Investor Website.
- 5.5. Vulcan will ensure that all substantive resolutions at a meeting of shareholders are decided by a poll rather than by a show of hands.
- 5.6. Vulcan's auditor will attend its Annual Meetings, and will be available to answer any questions regarding the conduct of, and any issues arising from, the audit and the preparation and content of the auditor's report.

6. General

- 6.1. Vulcan's annual report (or a notice as to how a shareholder may obtain a copy of the annual report by electronic means) will be provided to all shareholders prior to each Annual Meeting within the applicable statutory timeframes.
- 6.2. The half-year and annual results will be announced to ASX and NZX pursuant to the ASX Listing Rules and will be available to shareholders in the same manner as other ASX and NZX announcements. Following the release of Vulcan's half-year and annual results, Vulcan 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 of Vulcan's Chief Executive Officer and/or other members of Vulcan's leadership team.
- 6.3. Australian and New Zealand resident shareholders are encouraged to provide Vulcan's Share Registry with Australian or New Zealand bank account details respectively, to enable Vulcan to pay dividends by electronic funds transfer. Registered shareholders who do not provide a bank account will have their dividend held, pending receipt of bank account details being provided to the Share Registry.

- 6.4. Shareholders with any questions related to their shareholding should contact Vulcan's Share Registry at:

Australian Share Registry contact:

Address: Link Market Services Limited
Locked Bag A14
Sydney South
NSW 1235
Australia

Telephone number: +61 1300 554 474

Email: registrars@linkmarketservices.com.au

New Zealand Share Registry contact:

Address: Link Market Services Limited
PO Box 91976
Victoria Street West
Auckland 1142
New Zealand

Telephone number: +64 9 375 5998

Email: enquiries@linkmarketservices.com

- 6.5. Vulcan is committed to dealing with shareholder enquiries promptly and courteously, and takes measures to ensure that its Share Registry also does so.

- 6.6. Shareholders can get in touch with Vulcan by contacting Vulcan's Investor Relations team as follows:

Address: 29 Neales Road
East Tamaki
Auckland, 2013
New Zealand

Telephone number: +64 9 273 7214

Email: investor@vulcan.co

- 6.7. Vulcan recognises that privacy is important. Shareholder details will only be used in accordance with applicable privacy laws and will not be disclosed, unless required by law.

- 6.8. A copy of this Policy is available on Vulcan's Investor Website.

7. Reviews and changes to this Policy

- 7.1. The Board will review this Policy every two years or as often as it considers necessary.
- 7.2. The Board may change this Policy from time to time, by resolution of the Board.

8. Definitions

In this Policy, the following terms will have the following meanings:

- (a) **Annual Meeting** means the annual meeting of shareholders to be held by Vulcan in accordance with the Companies Act.
- (b) **ASX** means the Australian Securities Exchange.
- (c) **Board** means the board of directors of Vulcan.
- (d) **Companies Act** means the New Zealand Companies Act 1993.
- (e) **Investor Website** means Vulcan's investor website at www.investor.vulcan.co.
- (f) **NZX** means the New Zealand Stock Exchange.
- (g) **Share Registry** means Link Market Services Limited.
- (h) **Vulcan** means Vulcan Steel Limited (NZBN 9429038466052 and ARBN 652 996 015).
- (i) **Vulcan Group** means Vulcan and each of its subsidiaries, which at the date of adoption of this Policy were Vulcan Steel (Australia) Pty Limited (ACN 100 061 283), Ullrich Aluminium Co Limited (NZ company number 47279) and Ullrich Aluminium Pty Limited (ACN 001 697 445).