



Shareholder Communication Policy

1. Purpose and Objectives

As a publicly listed company, Orion Minerals NL (**Orion** or the **Company**) has obligations under the Corporations Act 2001 and the Listing Rules of the Australian Securities Exchange (**ASX**) and the Johannesburg Stock Exchange (**JSE**) to keep the share market fully informed of all information which may have or could be expected to have a material effect on the price or value of its securities.

Orion's policy is designed for strict compliance with these requirements. In addition, Orion believes in maintaining full and open communications with its shareholders, observing the highest standards of corporate governance and shareholder communications. Subject to commercial and confidentiality constraints, Orion's policy provides for communications with shareholders over and above what is required by the legislation or regulations.

2. Regular Shareholder Communication

Orion is committed (subject to commercial and confidentiality constraints) to maintaining direct, open and timely communications with all shareholders. At a minimum, the Company will make available the following information on its website at www.orionminerals.com.au or by email to those on its email list:

- (a) announcements to the ASX and the JSE;
- (b) annual report;
- (c) notice of meeting for the annual general meeting (**AGM**) and all accompanying papers;
- (d) report of the Chairperson disclosed at the AGM (ordinarily on the day of the AGM);
- (e) interim/half yearly results;
- (f) interim/half yearly report; and
- (g) quarterly reports.

Orion's aim is to ensure that all shareholders, both individual and institutional, have simultaneous access to all publicly released information. Ordinarily market analysts, the ASX, the JSE and industry will also have access to this information at the same time as shareholders. All announcements made by Orion to the ASX and the JSE are also posted on the Company's website. In addition, some of the communications listed above are mailed to shareholders or emailed to shareholders if requested.

3. Continuous Disclosure

Orion also has a continuous disclosure policy to ensure it meets its continuous disclosure obligations. Continuous disclosure is a standing agenda item for all meetings of the Board and senior management to ensure that the Company keeps the market fully informed of all information which may have or could be expected to have a material effect on the price or value of its securities.

The Company Secretary is charged with on-going responsibility for Orion's continuous disclosure and as such will escalate matters to the Board or its representatives as required where he/she

considers it to be something requiring disclosure and it is outside the Board's and/or senior management's meeting schedules.

4. Special Shareholder Communications

From time to time Orion will communicate other information to shareholders. This will be on an as needs basis and may be direct written communication, emailed, broadcast or webcast to shareholders which would be announced to the ASX and the JSE and also published on the Company's website.

5. External Auditors and the AGM

The external auditor will attend the AGM and be available to answer shareholder questions about the conduct of the audit and the preparation and content of the auditor's report.

6. Summary

The aim of Orion's shareholder communication policy is to build the loyalty and confidence of its shareholders through frequent, full and forthright communication, both directly to shareholders and indirectly through analysts and the media. Orion will adopt best practice in its approach to shareholder communications and relations.

Orion seeks to ensure that each investor interaction with the Company meets the highest levels of professional standards and quality.

This policy is subject to regular review by the Board and will be amended as and when appropriate.

Updated by the Board as at 13 November 2017.



Denis Waddell
Chairman