

Shareholder Communication Policy

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1. Introduction to the Policy

Definitions

Unless the contrary intention is expressed in this Policy, the following words (when used in this Policy) have the meaning set out below:

Annual Report means the annual report (and any concise annual report) of the Company published annually for the benefit of shareholders, investors and other interested parties as prescribed by law.

Board means the Board of Directors of the Company from time to time.

Company means Biotron Limited ACN 086 399 144 having its registered office at Level 2, 66 Hunter Street, Sydney.

Portal means the Company's internal electronic portal where information is gathered for the exclusive use of employees, contractors, officers, directors and management of the Company.

Share Registry means Computershare Investor Services Pty Ltd or any other share registry services provider appointed by the Company from time to time.

General

This Policy sets out the standards and the requirements of the Company in relation to communicating with its shareholders.

The Company believes that an effective policy for communication with shareholders enhances its strong culture of disclosure to keep the shareholders and the relevant markets informed. This Policy reflects the Board's requirement that shareholders should be fully informed about the Company and that shareholders should have access to the latest information available utilising, where practicable, electronic communications to keep shareholders and the relevant markets informed of relevant information from the Company in a timely manner.

Board approval

The Board has approved this Policy. The Board may approve updates and amendments to this Policy from time to time.

Approval of communications with Shareholders

The Board will approve all shareholder communications. If in any circumstances that is not practical, shareholder communications will be approved by one of the Chairman or the Chief Executive Officer/Managing Director.

2. Company Meetings

2.1 Meetings

The annual general meeting and other general meetings of the Company are the primary forum for communication by the Company with its shareholders and for shareholder participation.

2.2 Notices of General Meetings

The Company will place all notices of general meetings and accompanying explanatory material on the Company's website.

The form and content of the notices of general meeting will comply with the Corporations Act 2001 and any applicable ASX listing rules and guidelines. Shareholders may fax proxy forms for annual general meetings and general meetings of the Company to the Share Registry.

3 Annual Report

The Company's Annual Report to shareholders is a central means of communicating to shareholders the Company's activities, operations and performance over the past financial year.

4 The Company's website

The Company's website (at www.biotron.com.au) contains information about the Company including shareholder communications.

The Company will place on its website all ASX announcements and relevant news releases and any other information that is an official release of material information to the market as soon as reasonably practicable after such information is released to the ASX. Relevant news releases, Company financial announcements, financial data and investment presentations for the preceding three years will be available on the Company's website.

5 Shareholder Newsletters

The Company may send a Shareholder Newsletter to all shareholders by the method of delivery selected by them. The Shareholder Newsletter will also be available for view on the Company's website.

6 Investment Market Brief

The Company may send an occasional Investment Market Brief to institutional shareholders by electronic means. The Investment Market Brief will also be available to be viewed on the Company's website.

7 Communication via e-mail

Shareholders may elect to receive shareholder communications from the Company via email. Shareholders may register for this service by visiting www-au.computershare.com/Investor/Default.asp and following the instructions. Registered shareholders will receive an e-mail advice with a link to the relevant part of the Company's website when annual reports are released, when notices of meeting and other shareholder communications are sent and each time a relevant announcement is made by the Company and posted on the Company's website.

Shareholders who elect to receive communications from the Company by email will not receive communications by post. A shareholder may change their election at any time by revisiting www-au.computershare.com/Investor/Default.asp and following the instructions.

It is the responsibility of the shareholder to keep a current e-mail account and e-mail address and to notify the Share Registry of any changes to these details. If the Company receives rejection advice for any shareholder e-mail, the relevant material will be sent to the shareholder by post.

8 Communication via post

The Company has in the past communicated with its shareholders via post and will continue to do so where a shareholder has not elected to use an electronic form of communication or otherwise as set out above.

9 Access to this Policy

This Policy will be available for viewing by any employee of the Company on the Portal and by any other person on the Company's website.

10 Review of this Policy

This Policy is subject to regular review by the Board and will be amended (as appropriate) to reflect current best practice in communications with shareholders.

11 Company Contacts

Employees should direct their questions about this Policy and its application in the first instance to their supervisor. If further assistance is required, questions may be directed to the Company Secretary. Shareholders, investors and members of the public should direct their questions about their shareholdings to the Share Registry.