

Securityholder communications policy

Acorn Capital Investment Fund Limited ACN 167 595 897
(Company)

Securityholder Communications Policy

1. Overview

1.1 Purpose

The purpose of this Securityholder Communications Policy (**Policy**) is to promote effective communication with securityholders and encourage effective participation at general meetings of Acorn Capital Investment Fund Limited (**Company**).

1.2 Maintaining Securityholder Communications

The Company will ensure that:

- (a) materials detailed in this Policy are maintained and updated on the Company's website within a reasonable timeframe;
- (b) securityholder communications are distributed to shareholders in accordance with the *Corporations Act 2001 (Cth)* (**Corporations Act**) and Listing Rules of the Australian Securities Exchange (**ASX**) (**Listing Rules**); and
- (c) this Policy is updated and maintained as required.

1.3 Methods of Communication

- (a) The following methods of communication are available to securityholders:
 - (i) telephone;
 - (ii) mail;
 - (iii) email; and
 - (iv) facsimile.
- (b) This Policy details the methods of communication available for various areas.

2. ASX Announcements

2.1 Outline

The Company makes announcements to the ASX in accordance with the ASX Listing Rules.

2.2 Availability

Announcements made by the Company to the ASX are available to securityholders:

- (a) via a link to the ASX website in the Investor Centre section of the Company's website;
- (b) under the Company Announcements section of the ASX website; and
- (c) by email notification (when securityholders provide the Company's Security Registry with their email address and elect to be notified of all Company ASX Announcements).

3. Company's Security Registry

3.1 General

Securityholders are able to access information relevant to their holding via the Company's Security Registry website, www.computershare.com.au. Securityholders who do not have access to the internet should contact the Company's Security Registry with any enquiries relating to their shareholdings.

3.2 Contact Details

The contact details of the Company's Security Registry are as follows:

Computershare Investor Services Pty Limited

Street Address:

Yarra Falls, 452 Johnston Street,
Abbotsford, Victoria 3067, Australia

Postal Address:

GPO Box 2975EE
Melbourne VIC 3000

Telephone:

1300 850 505 (investors within Australia)

+61 (0)3 9415 4000 (investors)

+61 (0)3 9415 5000 (main switchboard)

Facsimile: +61 (0)3 9473 2500 (all investor related faxes should be sent to this number)

3.3 ASX Code

The ASX Code for the Company is ACQ.

4. Company Security Registry Forms

4.1 Amendment of Securityholder Details

- (a) If securityholders wish to amend any of their details on the Company's Security Register, they must go to the Security Registry website, www.computershare.com.au, or complete the appropriate form and send it to the Company's Security Registry (see Company's Security Registry above for contact details). Forms available from the Security Registry include:
 - (i) Change of Address;
 - (ii) Direct Credit of Payments;
 - (iii) Communications; and
 - (iv) Tax File Number or Australian Business Number Notification.
- (b) These forms may be downloaded from the Security Registry website, www.computershare.com.au. Securityholders who do not have access to the internet should contact the Company's Security Registry (see the Company's Security Registry above for contact details).

5. Annual General Meetings

5.1 Date and location of Annual General Meeting (AGM)

- (a) The Company will usually hold its AGM in October/November each year.

- (b) The specific date, time and location of each AGM will be detailed:
 - (i) in the relevant Notice of Meeting; and
 - (ii) on the Company's website.
- (c) Alternatively, securityholders can contact the Company's Security Registry or Company Secretary directly to obtain this information.

5.2 Notice of Meeting

The Notice of Meeting will be distributed to all shareholders prior to the AGM within the timeframe set by the Corporations Act and the Company's Constitution. The full text of the Notice of Meeting will also be available via the 'Investor Centre' section of the Company's website, www.acif.com.au, under 'ASX Releases'.

5.3 Questions From Shareholders to the Chairman and External Auditor at the AGM

- (a) At the AGM, shareholders can ask questions about or comment on:
 - (i) the management of the Company;
 - (ii) the conduct of the audit, preparation and content of the auditor's report, accounting policies adopted by the Company in relation to the preparation of the financial statements, and the independence of the auditor in relation to the conduct of the audit;
 - (iii) the remuneration report; and
 - (iv) the other items of business at the AGM.
- (b) If shareholders are present at the AGM, the Chairman will provide reasonable time following the consideration of reports for questions and comments on these matters. If shareholders are not present at the AGM:
 - (i) a question form (and necessary instructions) will accompany the Notice of Meeting, giving shareholders the opportunity to forward their questions and comments to the Company prior to the AGM; and
 - (ii) as many as possible of the more frequently asked questions will be answered by the Chairman (or, where appropriate, the auditor) at the AGM.
- (c) Shareholders may attend the AGM in person or by proxy, representative or attorney. A proxy form will accompany the Notice of Meeting.

5.4 Chairman's Address

The Chairman's Address (and any Chief Executive Officer Address) will be released to the market just prior to the commencement of the AGM. It will be available to securityholders in the same manner as other ASX Announcements (see ASX Announcements above).

6. Annual Report

6.1 Timing and availability

The Annual Report contains key financial information about the Company, as well as important operating and corporate information. As permitted by the Corporations Act, the default method of receiving Company Annual Reports is electronically via the Investor Centre section of the Company's website (under 'Annual Reports'). A printed copy of the Annual Report is only sent to securityholders who elect to receive one. Securityholders who wish to receive a printed copy of the Annual Report should complete the Communications form available on the Company's Security Registry website (www.computershare.com.au) or contact the Company's Security

Registry (see the Company's Security Registry above for contact details). The Annual Report will be available to all securityholders prior to the AGM within the timeframe set by the Corporations Act.

7. Half-Year & Full-Year Results

7.1 Timing

The financial results for the half-year ended 31 December are reported in February each year. The financial results for the full-year ended 30 June are reported in August each year.

7.2 Availability

As the Half-Year and Full-Year Results are announced to the ASX pursuant to the Listing Rules, they will be available to securityholders in the same manner as other ASX Announcements (see ASX Announcements above). In addition, the results will be accessible via the 'Investor Centre' section of the Company's website (under 'ASX Releases').

7.3 Investor and analyst presentations

Presentations that are made to investors and analysts at a group briefing will be available to all securityholders via the 'Investor Centre' section of the Company's website (under 'Presentations') and will, where necessary, be released to the market prior to delivery.

8. Financial Calendar

8.1 Availability

The Company's financial calendar is available:

- (a) via the 'Investor Centre' section of the Company's website (under 'Key Dates'); and
- (b) by contacting the Company's Security Registry.

9. Corporate Governance

9.1 Corporate Governance website

In accordance with Recommendation 6.1 of the ASX Principles, the Company has a Corporate Governance section within the Company's website.

9.2 Corporate Governance statement

The Company's Annual Corporate Governance Statement is prepared in accordance with the ASX Listing Rules. It is contained in the Annual Report each year and is also available under the Corporate Governance section of the Company's website.

9.3 Board and Committee Charters

- (a) In accordance with Recommendation 1.1 of the ASX Principles, the Company has a formal Board Charter, containing details of the functions and responsibilities of the Company Board. To assist the Board in fulfilling its duties and responsibilities, it has established two Board Committees, which are the:
 - (i) Nomination and Remuneration Committee; and
 - (ii) Audit Committee.
- (b) Each of these Committees has a formal Charter. The Board and Committee Charters are available to Securityholders under the Corporate Governance section of the Company's website.

10. Media Releases

Access to Company media releases is available under the 'Investor Centre' section of the Company's website (under 'ASX Releases') and they are released to the market via the ASX.

11. Media and Investor and Analyst Briefings

11.1 General

Typically at the time of announcement to the ASX of the Company's Half-Year and Full-Year Results the Company conducts investor and analyst briefings (see Half-Year and Full-Year Results above). Investor and analyst briefings may occur at other times during the year as the Company thinks appropriate.

11.2 Presentations

If and when investor and analyst briefings occur at other times during the year, any presentation materials provided will be made available to all securityholders via the 'Investor Centre' section of the Company's website (under 'Company Presentations') and will be released to the market prior to delivery.

12. Dividends

12.1 Dividend Statements

Dividend Statements are lodged with Australia Post on the business day prior to the date the dividend is paid. These statements are mailed to securityholders at the addresses that appear on the Company's Security Register.

12.2 Dividend information

Securityholders can obtain historical dividend information via the 'Investor Centre' section of the Company's website (under 'Dividend History'). This information includes the amount of the dividend and the level of franking. If securityholders require specific dividend information they can obtain this via the 'Investor Centre' section of the Security Registry website (see the Company's Security Registry above). Securityholders who do not have access to the internet should contact the Company's Security Registry with any dividend-related enquiries (requests to the Security Registry may attract an administrative charge).

13. Information to Beneficial Owners

Beneficial owners of Company shares are encouraged to contact the Company's Security Registry to arrange the direct receipt of securityholder materials.

14. Publishing and updating the Policy

14.1 Publishing of the Policy

The Policy will be published on the Company's Intranet for the benefit of all Directors. In compliance with the ASX Corporate Governance Council Principles of Good Corporate Governance and Best Practice Recommendations, this Policy or a summary of its main provisions will also be published on the Company's website, www.acif.com.au for the benefit of securityholders, the investment community, the media and members of the public.

14.2 Updating the Policy

The Board may approve updates and amendments of this Policy from time to time. All updates and amendments, and a consolidation, of the Policy (or a summary of its main provisions) will

appear on the Intranet and the Company's website within a reasonable time after any such updates or amendments have been approved.

15. Questions about the Policy and its application

15.1 Questions from employees

Employees (if any) should direct their questions about the Policy and its application in the first instance to the Company Secretary. If a definitive interpretation of the Policy or its application is required, your question should be directed to the Company Secretary or his authorised delegate.

15.2 Questions from Securityholders, investors and public enquiries

Securityholders, investors and members of the public should direct their questions about this Policy and its application to the Company's Share Registrar, whose details are set out in section 3.

16. Responsibilities of the Manager

Subject to any applicable laws, the Company may, in its discretion, devolve any of its responsibilities under this Policy to the manager of the Company's investment portfolio, Acorn Capital Limited (**Manager**).

17. Approved and adopted

This policy was approved and adopted by the Board on 6 March 2014.

Date 6 March 2014

Signed _____
Chairperson of the board of directors
of Acorn Capital Investment Fund
Limited ACN 167 595 897