

Inventis Share Allocation Policy

Issue Number 1

Release Date:

1 June, 2021

Inventis Ltd (ACN 084 068 673).

This Policy supersedes all previous Company policies relating to share allocation.

Purpose

This Policy is to outline the procedures and guidelines that the Company's Directors will use to determine the allocation of shares including those the subject of a rights issue (including any shortfall) or a share placement.

Scope and Applicability

This policy applies to all Shareholders of the Company.

Policy

The Company will take all reasonable steps to act fairly and without discrimination and considering all ASX Listing Rules and the Corporation Act, 2001, whilst guided by legal advice to determine the optimum best position for the Company as a whole to determine the allocation of shares.

The Directors will at all times consider the various implications known to them in determining the most suitable allocation method.

1. Rights Issue

In respect to a rights issue, the Directors shall ensure all eligible shareholders are given the right to participate in the offer and to ensure that each eligible shareholder is offered to acquire those number of shares reflecting that shareholder's shareholding.

An eligible shareholder is who registered as a shareholder on the "Record Date" with a registered address in Australia or New Zealand.

All eligible shareholders shall be invited to participate in any shortfall based on their respective shareholdings. These shareholders shall be entitled to subscribe for more shares where other eligible shareholders do not take up their rights.

The Board will take all reasonable steps to ensure the spread of the shortfall shares is fair and reasonable.

Shareholder approval will be required in the event that any shortfall shares are to be issued to directors.

In making the determination in how to allocate the shortfall the Company will consider:

- ASX Listing including LR 7.1 and 7.2;
- Corporations Law pertaining to take-over provisions;

- Tax Law regarding change in ownership; and
- The effects this may have on the future cash position of the Company.

This does not prohibit the Company from making any decision if it is determined that it is in the best interest of the Company and its Shareholders as a whole. In particular, in relation to the liquidity and ability of the Company to pay its obligations in a timely fashion.

When making an allocation under this Policy, Directors will take note of the Company's Share Trading Policy found on the Company webpage link below:

<https://www.inventis.com.au/wp-content/uploads/2019/10/20160829-ShareTradingPolicy.pdf>

2. Placement

In the case of a placement of shares under ASX Listing Rule 7.1 the Company can issue up to 15% of the issued securities in any 12-month period based on the formula in that Listing Rule.

Where the Company intends to exercise its rights under LR 7.1, it will do so where it believes it is in the best interests of the Company and its shareholders. For example, conversion of debt to equity or issuing shares as part of an acquisition.

In doing this the Company is aware of the dilutionary impact upon shareholders when issuing shares under this Rule. As a result, the Company will always consider what is best for the Company and its shareholders.

The Directors will require Shareholder approval to exceed this limit.

The above limit can also be increased by a further 10% under Listing Rule 7.1A which requires shareholder approval as a special resolution by the Company's Annual General Meeting ("AGM").

Rights to lodge complaints

The Board will consider any Shareholder complaints regarding allocations, fairly and will aim to reply with solutions in a reasonable time frame.

Variations

The Company reserves the right to vary, replace or terminate this policy from time to time.

Approved by the Board

Date for next review of this policy: **September 2025**