

Appendix 4G

Key to Disclosures

Corporate Governance Council Principles and Recommendations

Name of entity

SWIFT NETWORKS GROUP LIMITED

ABN/ARBN

54 006 222 395

Financial year ended:

30 JUNE 2024

Our corporate governance statement¹ for the period above can be found at:²
☐ These pages of our annual report:

☒ This URL on our website:

<https://www.swiftnetworks.com.au/corporate-governance/>

The Corporate Governance Statement is accurate and up to date as at 29 August 2024 and has been approved by the Board.

The annexure includes a key to where our corporate governance disclosures can be located.³

Date: 30 August 2024

Name of authorised officer: Suzie Foreman
authorising lodgement: Company Secretary

¹ "Corporate governance statement" is defined in Listing Rule 19.12 to mean the statement referred to in Listing Rule 4.10.3 which discloses the extent to which an entity has followed the recommendations set by the ASX Corporate Governance Council during a particular reporting period.

Listing Rule 4.10.3 requires an entity that is included in the official list as an ASX Listing to include in its annual report either a corporate governance statement that meets the requirements of that rule or the URL of the page on its website where such a statement is located. The corporate governance statement must disclose the extent to which the entity has followed the recommendations set by the ASX Corporate Governance Council during the reporting period. If the entity has not followed a recommendation for any part of the reporting period, its corporate governance statement must separately identify that recommendation and the period during which it was not followed and state its reasons for not following the recommendation and what (if any) alternative governance practices it adopted in lieu of the recommendation during that period.

Under Listing Rule 4.7.4, if an entity chooses to include its corporate governance statement on its website rather than in its annual report, it must lodge a copy of the corporate governance statement with ASX at the same time as it lodges its annual report with ASX. The corporate governance statement must be current as at the effective date specified in that statement for the purposes of Listing Rule 4.10.3.

Under Listing Rule 4.7.3, an entity must also lodge with ASX a completed Appendix 4G at the same time as it lodges its annual report with ASX. The Appendix 4G serves a dual purpose. It acts as a key designed to assist readers to locate the governance disclosures made by a listed entity under Listing Rule 4.10.3 and under the ASX Corporate Governance Council's recommendations. It also acts as a verification tool for listed entities to confirm that they have met the disclosure requirements of Listing Rule 4.10.3.

The Appendix 4G is not a substitute for, and is not to be confused with, the entity's corporate governance statement. They serve different purposes and an entity must produce each of them separately.

² Tick whichever option is correct and then complete the page number(s) of the annual report, or the URL of the web page, where your corporate governance statement can be found. You can, if you wish, delete the option which is not applicable.

³ Throughout this form, where you are given two or more options to select, you can, if you wish, delete any option which is not applicable and just retain the option that is applicable. If you select an option that includes "OR" at the end of the selection and you delete the other options, you can also, if you wish, delete the "OR" at the end of the selection.

See notes 4 and 5 below for further instructions on how to complete this form.

ANNEXURE – KEY TO CORPORATE GOVERNANCE DISCLOSURES

Corporate Governance Council recommendation		Where a box below is ticked, ⁴ we have followed the recommendation <u>in full</u> for the <u>whole</u> of the period above. We have disclosed this in our Corporate Governance Statement:	Where a box below is ticked, we have NOT followed the recommendation in full for the whole of the period above. Our reasons for not doing so are: ⁵
PRINCIPLE 1 – LAY SOLID FOUNDATIONS FOR MANAGEMENT AND OVERSIGHT			
1.1	A listed entity should have and disclose a board charter setting out: (a) the respective roles and responsibilities of its board and management; and (b) those matters expressly reserved to the board and those delegated to management.	<input checked="" type="checkbox"/> and we have disclosed a copy of our board charter at: https://www.swiftnetworks.com.au/corporate-governance/	<input type="checkbox"/> set out in our Corporate Governance Statement OR <input type="checkbox"/> we are an externally managed entity and this recommendation is therefore not applicable
1.2	A listed entity should: (a) undertake appropriate checks before appointing a director or senior executive or putting someone forward for election as a director; and (b) provide security holders with all material information in its possession relevant to a decision on whether or not to elect or re-elect a director.	<input checked="" type="checkbox"/>	<input type="checkbox"/> set out in our Corporate Governance Statement OR <input type="checkbox"/> we are an externally managed entity and this recommendation is therefore not applicable
1.3	A listed entity should have a written agreement with each director and senior executive setting out the terms of their appointment.	<input checked="" type="checkbox"/>	<input type="checkbox"/> set out in our Corporate Governance Statement OR <input type="checkbox"/> we are an externally managed entity and this recommendation is therefore not applicable
1.4	The company secretary of a listed entity should be accountable directly to the board, through the chair, on all matters to do with the proper functioning of the board.	<input checked="" type="checkbox"/>	<input type="checkbox"/> set out in our Corporate Governance Statement OR <input type="checkbox"/> we are an externally managed entity and this recommendation is therefore not applicable

⁴ Tick the box in this column only if you have followed the relevant recommendation in full for the whole of the period above. Where the recommendation has a disclosure obligation attached, you must insert the location where that disclosure has been made, where indicated by the line with “*insert location*” underneath. If the disclosure in question has been made in your corporate governance statement, you need only insert “our corporate governance statement”. If the disclosure has been made in your annual report, you should insert the page number(s) of your annual report (eg “pages 10-12 of our annual report”). If the disclosure has been made on your website, you should insert the URL of the web page where the disclosure has been made or can be accessed (eg “www.entityname.com.au/corporate governance/charters/”).

⁵ If you have followed all of the Council’s recommendations in full for the whole of the period above, you can, if you wish, delete this column from the form and re-format it.

Key to Disclosures Corporate Governance Council Principles and Recommendations

Corporate Governance Council recommendation	Where a box below is ticked, ⁴ we have followed the recommendation <u>in full</u> for the <u>whole</u> of the period above. We have disclosed this in our Corporate Governance Statement:	Where a box below is ticked, we have NOT followed the recommendation in full for the whole of the period above. Our reasons for not doing so are: ⁵
<p>1.5 A listed entity should:</p> <p>(a) have and disclose a diversity policy;</p> <p>(b) through its board or a committee of the board set measurable objectives for achieving gender diversity in the composition of its board, senior executives and workforce generally; and</p> <p>(c) disclose in relation to each reporting period:</p> <p>(1) the measurable objectives set for that period to achieve gender diversity;</p> <p>(2) the entity's progress towards achieving those objectives; and</p> <p>(3) either:</p> <p>(A) the respective proportions of men and women on the board, in senior executive positions and across the whole workforce (including how the entity has defined "senior executive" for these purposes); or</p> <p>(B) if the entity is a "relevant employer" under the Workplace Gender Equality Act, the entity's most recent "Gender Equality Indicators", as defined in and published under that Act.</p> <p>If the entity was in the S&P / ASX 300 Index at the commencement of the reporting period, the measurable objective for achieving gender diversity in the composition of its board should be to have not less than 30% of its directors of each gender within a specified period.</p>	<p><input type="checkbox"/></p>	<p><input checked="" type="checkbox"/> set out in our Corporate Governance Statement OR</p> <p><input type="checkbox"/> we are an externally managed entity and this recommendation is therefore not applicable</p> <p>We have disclosed a copy of our diversity policy at: https://www.swiftnetworks.com.au/corporate-governance/</p> <p>and we have disclosed the information referred to in paragraph (c) at: The Corporate Governance Statement (2024) at https://www.swiftnetworks.com.au/corporate-governance/</p> <p>The Company does not currently have defined measurable objectives in respect of Gender Diversity.</p> <p>The Company was not included in the S&P / ASX 300 Index at the commencement of the reporting period.</p>
<p>1.6 A listed entity should:</p> <p>(a) have and disclose a process for periodically evaluating the performance of the board, its committees and individual directors; and</p> <p>(b) disclose for each reporting period whether a performance evaluation has been undertaken in accordance with that process during or in respect of that period.</p>	<p><input checked="" type="checkbox"/></p> <p>The Board Performance Evaluation Policy is available at https://www.swiftnetworks.com.au/corporate-governance/</p> <p>and we have disclosed the evaluation process referred to in paragraph (a) at: The Corporate Governance Statement (2024) at https://www.swiftnetworks.com.au/corporate-governance/</p>	<p><input type="checkbox"/> set out in our Corporate Governance Statement OR</p> <p><input type="checkbox"/> we are an externally managed entity and this recommendation is therefore not applicable</p>

Key to Disclosures Corporate Governance Council Principles and Recommendations

Corporate Governance Council recommendation		Where a box below is ticked, ⁴ we have followed the recommendation <u>in full</u> for the <u>whole</u> of the period above. We have disclosed this in our Corporate Governance Statement:	Where a box below is ticked, we have NOT followed the recommendation in full for the whole of the period above. Our reasons for not doing so are: ⁵
1.7	<p>A listed entity should:</p> <p>(a) have and disclose a process for evaluating the performance of its senior executives at least once every reporting period; and</p> <p>(b) disclose for each reporting period whether a performance evaluation has been undertaken in accordance with that process during or in respect of that period.</p>	<p><input checked="" type="checkbox"/> The Board Performance Evaluation Policy is available at https://www.swiftnetworks.com.au/corporate-governance/ and we have disclosed the senior executive performance evaluation process results at The Remuneration Report – Annual Financial Report (2024).</p>	<p><input type="checkbox"/> set out in our Corporate Governance Statement OR</p> <p><input type="checkbox"/> we are an externally managed entity and this recommendation is therefore not applicable</p>

Key to Disclosures Corporate Governance Council Principles and Recommendations

Corporate Governance Council recommendation		Where a box below is ticked, ⁴ we have followed the recommendation in full for the whole of the period above. We have disclosed this in our Corporate Governance Statement:	Where a box below is ticked, we have NOT followed the recommendation in full for the whole of the period above. Our reasons for not doing so are: ⁵
PRINCIPLE 2 - STRUCTURE THE BOARD TO BE EFFECTIVE AND ADD VALUE			
2.1	<p>The board of a listed entity should:</p> <p>(a) have a nomination committee which:</p> <p>(1) has at least three members, a majority of whom are independent directors; and</p> <p>(2) is chaired by an independent director, and disclose:</p> <p>(3) the charter of the committee;</p> <p>(4) the members of the committee; and</p> <p>(5) as at the end of each reporting period, the number of times the committee met throughout the period and the individual attendances of the members at those meetings; or</p> <p>(b) if it does not have a nomination committee, disclose that fact and the processes it employs to address board succession issues and to ensure that the board has the appropriate balance of skills, knowledge, experience, independence and diversity to enable it to discharge its duties and responsibilities effectively.</p>	<input type="checkbox"/>	<p><input checked="" type="checkbox"/> set out in our Corporate Governance Statement OR</p> <p><input type="checkbox"/> we are an externally managed entity and this recommendation is therefore not applicable</p> <p>The Company has disclosed the fact that we do not have a nomination committee and the processes we employ to address board succession issues and to ensure that the board has the appropriate balance of skills, knowledge, experience, independence and diversity to enable it to discharge its duties and responsibilities effectively in the Corporate Governance Statement (2024), at: https://www.swiftnetworks.com.au/corporate-governance/</p>
2.2	A listed entity should have and disclose a board skills matrix setting out the mix of skills that the board currently has or is looking to achieve in its membership.	<p><input checked="" type="checkbox"/></p> <p>and we have disclosed our board skills matrix in the Corporate Governance Statement (2024), which is available on our website at: https://www.swiftnetworks.com.au/corporate-governance/</p>	<p><input type="checkbox"/> set out in our Corporate Governance Statement OR</p> <p><input type="checkbox"/> we are an externally managed entity and this recommendation is therefore not applicable</p>

Key to Disclosures Corporate Governance Council Principles and Recommendations

Corporate Governance Council recommendation		Where a box below is ticked, ⁴ we have followed the recommendation in full for the whole of the period above. We have disclosed this in our Corporate Governance Statement:	Where a box below is ticked, we have NOT followed the recommendation in full for the whole of the period above. Our reasons for not doing so are: ⁵
2.3	A listed entity should disclose: (a) the names of the directors considered by the board to be independent directors; (b) if a director has an interest, position, affiliation or relationship of the type described in Box 2.3 but the board is of the opinion that it does not compromise the independence of the director, the nature of the interest, position or relationship in question and an explanation of why the board is of that opinion; and (c) the length of service of each director.	<input checked="" type="checkbox"/> and we have disclosed the names of the directors considered by the board to be independent directors and, where applicable, the information referred to in paragraph (b), and the length of service of each director in the Corporate Governance Statement (2024) . https://www.swiftnetworks.com.au/corporate-governance/	<input type="checkbox"/> set out in our Corporate Governance Statement
2.4	A majority of the board of a listed entity should be independent directors.	<input checked="" type="checkbox"/>	<input type="checkbox"/> set out in our Corporate Governance Statement OR <input type="checkbox"/> we are an externally managed entity and this recommendation is therefore not applicable
2.5	The chair of the board of a listed entity should be an independent director and, in particular, should not be the same person as the CEO of the entity.	<input checked="" type="checkbox"/>	<input type="checkbox"/> set out in our Corporate Governance Statement OR <input type="checkbox"/> we are an externally managed entity and this recommendation is therefore not applicable
2.6	A listed entity should have a program for inducting new directors and for periodically reviewing whether there is a need for existing directors to undertake professional development to maintain the skills and knowledge needed to perform their role as directors effectively.	<input type="checkbox"/>	<input checked="" type="checkbox"/> set out in our Corporate Governance Statement OR <input type="checkbox"/> we are an externally managed entity and this recommendation is therefore not applicable
PRINCIPLE 3 – INSTIL A CULTURE OF ACTING LAWFULLY, ETHICALLY AND RESPONSIBLY			
3.1	A listed entity should articulate and disclose its values.	<input checked="" type="checkbox"/> and we have disclosed our values at: https://www.swiftnetworks.com.au/corporate-governance/	<input type="checkbox"/> set out in our Corporate Governance Statement
3.2	A listed entity should: (a) have and disclose a code of conduct for its directors, senior executives and employees; and (b) ensure that the board or a committee of the board is informed of any material breaches of that code.	<input checked="" type="checkbox"/> and we have disclosed our code of conduct at: https://www.swiftnetworks.com.au/corporate-governance/	<input type="checkbox"/> set out in our Corporate Governance Statement

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Corporate Governance Council recommendation		Where a box below is ticked, ⁴ we have followed the recommendation in full for the whole of the period above. We have disclosed this in our Corporate Governance Statement:	Where a box below is ticked, we have NOT followed the recommendation in full for the whole of the period above. Our reasons for not doing so are: ⁵
3.3	A listed entity should: (a) have and disclose a whistleblower policy; and (b) ensure that the board or a committee of the board is informed of any material incidents reported under that policy.	<input checked="" type="checkbox"/> and we have disclosed our whistleblower policy at: https://www.swiftnetworks.com.au/corporate-governance/	<input type="checkbox"/> set out in our Corporate Governance Statement
3.4	A listed entity should: (a) have and disclose an anti-bribery and corruption policy; and (b) ensure that the board or committee of the board is informed of any material breaches of that policy.	<input checked="" type="checkbox"/> and we have disclosed our anti-bribery and corruption policy at: https://www.swiftnetworks.com.au/corporate-governance/	<input type="checkbox"/> set out in our Corporate Governance Statement

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PRINCIPLE 4 – SAFEGUARD THE INTEGRITY OF CORPORATE REPORTS			
4.1	<p>The board of a listed entity should:</p> <p>(a) have an audit committee which:</p> <p>(1) has at least three members, all of whom are non-executive directors and a majority of whom are independent directors; and</p> <p>(2) is chaired by an independent director, who is not the chair of the board,</p> <p>and disclose:</p> <p>(3) the charter of the committee;</p> <p>(4) the relevant qualifications and experience of the members of the committee; and</p> <p>(5) in relation to each reporting period, the number of times the committee met throughout the period and the individual attendances of the members at those meetings; or</p> <p>(b) if it does not have an audit committee, disclose that fact and the processes it employs that independently verify and safeguard the integrity of its corporate reporting, including the processes for the appointment and removal of the external auditor and the rotation of the audit engagement partner.</p>	<input type="checkbox"/>	<p><input checked="" type="checkbox"/> set out in our Corporate Governance Statement</p> <p>We have disclosed the fact that we do not have an audit committee and the processes we employ that independently verify and safeguard the integrity of our corporate reporting, including the processes for the appointment and removal of the external auditor and the rotation of the audit engagement partner in the Corporate Governance Statement (2024). https://www.swiftnetworks.com.au/corporate-governance/</p>
4.2	The board of a listed entity should, before it approves the entity's financial statements for a financial period, receive from its CEO and CFO a declaration that, in their opinion, the financial records of the entity have been properly maintained and that the financial statements comply with the appropriate accounting standards and give a true and fair view of the financial position and performance of the entity and that the opinion has been formed on the basis of a sound system of risk management and internal control which is operating effectively.	<input checked="" type="checkbox"/>	<input type="checkbox"/> set out in our Corporate Governance Statement
4.3	A listed entity should disclose its process to verify the integrity of any periodic corporate report it releases to the market that is not audited or reviewed by an external auditor.	<input checked="" type="checkbox"/>	<input type="checkbox"/> set out in our Corporate Governance Statement

Key to Disclosures Corporate Governance Council Principles and Recommendations

Corporate Governance Council recommendation		Where a box below is ticked, ⁴ we have followed the recommendation in full for the whole of the period above. We have disclosed this in our Corporate Governance Statement:	Where a box below is ticked, we have NOT followed the recommendation in full for the whole of the period above. Our reasons for not doing so are: ⁵
PRINCIPLE 5 – MAKE TIMELY AND BALANCED DISCLOSURE			
5.1	A listed entity should have and disclose a written policy for complying with its continuous disclosure obligations under listing rule 3.1.	<input checked="" type="checkbox"/> and we have disclosed our continuous disclosure compliance policy at: https://www.swiftnetworks.com.au/corporate-governance/	<input type="checkbox"/> set out in our Corporate Governance Statement
5.2	A listed entity should ensure that its board receives copies of all material market announcements promptly after they have been made.	<input checked="" type="checkbox"/>	<input type="checkbox"/> set out in our Corporate Governance Statement
5.3	A listed entity that gives a new and substantive investor or analyst presentation should release a copy of the presentation materials on the ASX Market Announcements Platform ahead of the presentation.	<input checked="" type="checkbox"/>	<input type="checkbox"/> set out in our Corporate Governance Statement
PRINCIPLE 6 – RESPECT THE RIGHTS OF SECURITY HOLDERS			
6.1	A listed entity should provide information about itself and its governance to investors via its website.	<input checked="" type="checkbox"/> and we have disclosed information about us and our governance on our website at: https://www.swiftnetworks.com.au/corporate-governance/	<input type="checkbox"/> set out in our Corporate Governance Statement
6.2	A listed entity should have an investor relations program that facilitates effective two-way communication with investors.	<input checked="" type="checkbox"/> and we have disclosed our Shareholder Communications Policy and our governance on our website at: https://www.swiftnetworks.com.au/corporate-governance/	<input type="checkbox"/> set out in our Corporate Governance Statement
6.3	A listed entity should disclose how it facilitates and encourages participation at meetings of security holders.	<input checked="" type="checkbox"/> and we have disclosed how we facilitate and encourage participation at meetings of security holders in the Corporate Governance Statement (2024) . https://www.swiftnetworks.com.au/corporate-governance/	<input type="checkbox"/> set out in our Corporate Governance Statement

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6.4	A listed entity should ensure that all substantive resolutions at a meeting of security holders are decided by a poll rather than by a show of hands.	<input checked="" type="checkbox"/>	<input type="checkbox"/> set out in our Corporate Governance Statement
6.5	A listed entity should give security holders the option to receive communications from, and send communications to, the entity and its security registry electronically.	<input checked="" type="checkbox"/>	<input type="checkbox"/> set out in our Corporate Governance Statement
PRINCIPLE 7 – RECOGNISE AND MANAGE RISK			
7.1	<p>The board of a listed entity should:</p> <p>(a) have a committee or committees to oversee risk, each of which:</p> <p>(1) has at least three members, a majority of whom are independent directors; and</p> <p>(2) is chaired by an independent director, and disclose:</p> <p>(3) the charter of the committee;</p> <p>(4) the members of the committee; and</p> <p>(5) as at the end of each reporting period, the number of times the committee met throughout the period and the individual attendances of the members at those meetings; or</p> <p>(b) if it does not have a risk committee or committees that satisfy (a) above, disclose that fact and the processes it employs for overseeing the entity's risk management framework.</p>	<p><input checked="" type="checkbox"/></p> <p>and we have disclosed the fact that we do not have a risk committee or committees that satisfy (a) and the processes we employ for overseeing our risk management framework in the Corporate Governance Statement (2024).</p> <p>https://www.swiftnetworks.com.au/corporate-governance/</p>	<input type="checkbox"/> set out in our Corporate Governance Statement
7.2	<p>The board or a committee of the board should:</p> <p>(a) review the entity's risk management framework at least annually to satisfy itself that it continues to be sound and that the entity is operating with due regard to the risk appetite set by the board; and</p> <p>(b) disclose, in relation to each reporting period, whether such a review has taken place.</p>	<p><input checked="" type="checkbox"/></p> <p>and we have disclosed whether a review of the entity's risk management framework was undertaken during the reporting period in the Corporate Governance Statement (2024).</p> <p>https://www.swiftnetworks.com.au/corporate-governance/</p>	<input type="checkbox"/> set out in our Corporate Governance Statement

Key to Disclosures Corporate Governance Council Principles and Recommendations

Corporate Governance Council recommendation		Where a box below is ticked, ⁴ we have followed the recommendation in full for the whole of the period above. We have disclosed this in our Corporate Governance Statement:	Where a box below is ticked, we have NOT followed the recommendation in full for the whole of the period above. Our reasons for not doing so are: ⁵
7.3	A listed entity should disclose: (a) if it has an internal audit function, how the function is structured and what role it performs; or (b) if it does not have an internal audit function, that fact and the processes it employs for evaluating and continually improving the effectiveness of its governance, risk management and internal control processes.	<input checked="" type="checkbox"/> and we have disclosed the fact that we do not have an internal audit function and the processes we employ for evaluating and continually improving the effectiveness of our risk management and internal control processes in the Corporate Governance Statement (2024) . https://www.swiftnetworks.com.au/corporate-governance/	<input type="checkbox"/> set out in our Corporate Governance Statement
7.4	A listed entity should disclose whether it has any material exposure to environmental or social risks and, if it does, how it manages or intends to manage those risks.	<input checked="" type="checkbox"/> and we have disclosed whether we have any material exposure to environmental and social risks and how we manage or intend to manage those risks in the Corporate Governance Statement (2024) . https://www.swiftnetworks.com.au/corporate-governance/	<input type="checkbox"/> set out in our Corporate Governance Statement

Key to Disclosures Corporate Governance Council Principles and Recommendations

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PRINCIPLE 8 – REMUNERATE FAIRLY AND RESPONSIBLY			
8.1	<p>The board of a listed entity should:</p> <p>(a) have a remuneration committee which:</p> <p>(1) has at least three members, a majority of whom are independent directors; and</p> <p>(2) is chaired by an independent director, and disclose:</p> <p>(3) the charter of the committee;</p> <p>(4) the members of the committee; and</p> <p>(5) as at the end of each reporting period, the number of times the committee met throughout the period and the individual attendances of the members at those meetings; or</p> <p>(b) if it does not have a remuneration committee, disclose that fact and the processes it employs for setting the level and composition of remuneration for directors and senior executives and ensuring that such remuneration is appropriate and not excessive.</p>	<input type="checkbox"/>	<p><input checked="" type="checkbox"/> set out in our Corporate Governance Statement OR</p> <p><input type="checkbox"/> we are an externally managed entity and this recommendation is therefore not applicable</p> <p>We have disclosed the fact that we do not have a remuneration committee and the processes we employ for setting the level and composition of remuneration for directors and senior executives and ensuring that such remuneration is appropriate and not excessive in the Corporate Governance Statement (2024). https://www.swiftnetworks.com.au/corporate-governance/</p>
8.2	A listed entity should separately disclose its policies and practices regarding the remuneration of non-executive directors and the remuneration of executive directors and other senior executives.	<p><input checked="" type="checkbox"/> and we have disclosed separately our remuneration policies and practices regarding the remuneration of non-executive directors and the remuneration of executive directors and other senior executives in the Remuneration report of the Company's 2024 Annual Report.</p>	<p><input type="checkbox"/> set out in our Corporate Governance Statement OR</p> <p><input type="checkbox"/> we are an externally managed entity and this recommendation is therefore not applicable</p>
8.3	<p>A listed entity which has an equity-based remuneration scheme should:</p> <p>(a) have a policy on whether participants are permitted to enter into transactions (whether through the use of derivatives or otherwise) which limit the economic risk of participating in the scheme; and</p> <p>(b) disclose that policy or a summary of it.</p>	<p><input checked="" type="checkbox"/> and we have disclosed our policy on this issue or a summary of it in the Share Trading Policy. https://www.swiftnetworks.com.au/corporate-governance/</p>	<p><input type="checkbox"/> set out in our Corporate Governance Statement OR</p> <p><input type="checkbox"/> we do not have an equity-based remuneration scheme and this recommendation is therefore not applicable OR</p> <p><input type="checkbox"/> we are an externally managed entity and this recommendation is therefore not applicable</p>

Key to Disclosures Corporate Governance Council Principles and Recommendations

Corporate Governance Council recommendation		Where a box below is ticked, ⁴ we have followed the recommendation <u>in full</u> for the <u>whole</u> of the period above. We have disclosed this in our Corporate Governance Statement:	Where a box below is ticked, we have NOT followed the recommendation in full for the whole of the period above. Our reasons for not doing so are: ⁵
ADDITIONAL RECOMMENDATIONS THAT APPLY ONLY IN CERTAIN CASES			
9.1	A listed entity with a director who does not speak the language in which board or security holder meetings are held or key corporate documents are written should disclose the processes it has in place to ensure the director understands and can contribute to the discussions at those meetings and understands and can discharge their obligations in relation to those documents.	<input type="checkbox"/>	<input type="checkbox"/> <input checked="" type="checkbox"/> we do not have a director in this position and this recommendation is therefore not applicable <input type="checkbox"/>
9.2	A listed entity established outside Australia should ensure that meetings of security holders are held at a reasonable place and time.	<input type="checkbox"/>	<input type="checkbox"/> <input checked="" type="checkbox"/> we are established in Australia and this recommendation is therefore not applicable <input type="checkbox"/>
9.3	A listed entity established outside Australia, and an externally managed listed entity that has an AGM, should ensure that its external auditor attends its AGM and is available to answer questions from security holders relevant to the audit.	<input type="checkbox"/>	<input type="checkbox"/> <input checked="" type="checkbox"/> we are established in Australia and not an externally managed listed entity and this recommendation is therefore not applicable
ADDITIONAL DISCLOSURES APPLICABLE TO EXTERNALLY MANAGED LISTED ENTITIES			
-	<i>Alternative to Recommendation 1.1 for externally managed listed entities:</i> The responsible entity of an externally managed listed entity should disclose: (a) the arrangements between the responsible entity and the listed entity for managing the affairs of the listed entity; and (b) the role and responsibility of the board of the responsible entity for overseeing those arrangements.	N/A	<input type="checkbox"/> set out in our Corporate Governance Statement
-	<i>Alternative to Recommendations 8.1, 8.2 and 8.3 for externally managed listed entities:</i> An externally managed listed entity should clearly disclose the terms governing the remuneration of the manager.	N/A	<input type="checkbox"/> set out in our Corporate Governance Statement

The Board is committed to achieving and maintaining high standards of corporate governance. This Corporate Governance Statement discloses the extent to which the Company has, during the financial year ending 30 June 2024, followed the recommendations set by the ASX Corporate Governance Council in its publication Corporate Governance Principles and Recommendations – 4th Edition (Recommendations). In accordance with ASX Listing Rule 4.10.3, the corporate governance statement discloses the extent to which the Company follows the recommendations.

The Recommendations are not mandatory, however the Recommendations that have not been followed for any part of the reporting period have been identified and reasons provided for not following them along with what (if any) alternative governance practices were adopted in lieu of the recommendation during that period.

The Company has adopted a Corporate Governance Plan which provides the written terms of reference for the Company's corporate governance duties. This statement addresses:

- the Company's corporate governance framework; and
- key risks and the Company's response to mitigating these risks.

This Corporate Governance Statement is current at **27 August 2024** and has been approved by the Board on that date. The Company's Corporate Governance Plan has been posted on the Company's website along with the Company's governance related documents, at <https://www.swiftnetworks.com.au/corporate-governance/>

ASX Principle and Recommendation	Compliance	Reference	Commentary
Principle 1: Lay solid foundations for management and oversight			
Recommendation 1.1 A listed entity should have and disclose a charter which sets out: <ul style="list-style-type: none"> (a) the respective roles and responsibilities of the Board, the Chair and management; and (b) includes a description of those matters expressly reserved to the Board and those delegated to management. 	YES	Board Charter Available on Website.	The Company has established the respective roles and responsibilities of its Board and management, and those matters expressly reserved to the Board and those delegated to management and has documented this in its Board Charter. The responsibilities of the Board include but are not limited to: <ul style="list-style-type: none"> (a) setting and reviewing the strategic direction of the Company; (b) overseeing implementation of the Company's strategic objectives; (c) approving operating budgets; (d) reviewing financial and operational performance of the Company; (e) reviewing the principal business risks and reviewing risk management strategies; (f) considering and reviewing significant capital investments by the Company and material transactions; (g) monitoring the management processes that support the integrity of financial and other reporting by the Company;

ASX Principle and Recommendation	Compliance	Reference	Commentary
			(h) selecting and appointing suitable Executive Directors and determining their remuneration; and (i) developing and reviewing corporate governance policies. The Board has delegated responsibility for the business operations of the Company to the Managing Director and the management team. The management team, led by the Managing Director, is accountable to the Board. Further details of the matters reserved for the Board and those delegated to management are detailed in the Board Charter available on the Company's website.
Recommendation 1.2 A listed entity should: (a) undertake appropriate checks before appointing a director or senior executive or putting someone forward for election as a Director; and (b) provide security holders with all material information in its possession relevant to a decision on whether or not to elect or re-elect a Director.	YES	Board Charter - available on website	The Company's Remuneration and Nomination Committee Charter requires the Nomination Committee (or, in its absence, the Board) to ensure it conducts background checks of candidates for new Director positions prior to their appointment or nomination for election by Shareholders, including checks as to good character, experience, education, qualifications, criminal history and bankruptcy. Any changes to that assessment are required to be notified by all Directors to the Board. All material information relevant to a decision on whether or not to elect or re-elect a Director will be provided to security holders in a Notice of Meeting pursuant to which the resolution to elect or re-elect a Director will be voted on.
Recommendation 1.3 A listed entity should have a written agreement with each Director and senior executive setting out the terms of their appointment.	YES	Kept at registered office	The Company's Nomination Committee Charter requires the Nomination Committee (or, in its absence, the Board) to ensure that each Director and senior executive is personally a party to a written agreement with the Company which sets out the terms of that Director's or senior executive's appointment. The material terms of any employment, service or consultancy agreement the Company, or any of its child entities, has entered into with its Managing Director, any of its directors, and any other person or entity who is a related party of the Managing Director or any of its directors will be disclosed in accordance with ASX Listing Rule 3.16.4 (taking into consideration the exclusions from disclosure outlined in that rule).

ASX Principle and Recommendation	Compliance	Reference	Commentary
Recommendation 1.4 The Company Secretary of a listed entity should be accountable directly to the Board, through the Chair, on all matters to do with the proper functioning of the Board.	YES	Board Charter – available on website	The Board Charter outlines the roles, responsibility and accountability of the Company Secretary. The Company Secretary reports directly, and is accountable, to the Board through the Chairperson in relation to all governance matters. The Company Secretary advises and supports the Board members on general governance matters, ensuring a good flow of information between the Board, its committees, and Directors; monitoring policies and procedures of the Board, advising the Board through the Chairman of corporate governance policies; and conducting and reporting matters of the Board, including the despatch of Board agendas, briefing papers and minutes.

ASX Principle and Recommendation	Compliance	Reference	Commentary
<p>Recommendation 1.5</p> <p>A listed entity should:</p> <ul style="list-style-type: none"> (a) have and disclose a diversity policy; (b) through its board or a committee of the board set measurable objectives for achieving gender diversity in the composition of its board, senior executives and workforce generally; and (c) disclose that policy or a summary of it; and (d) disclose as at the end of each reporting period the measurable objectives for achieving gender diversity set by the Board or a relevant committee of the Board in accordance with the entity's diversity policy and its progress towards achieving them, and either: <ul style="list-style-type: none"> (i) the respective proportions of men and women on the Board, in senior executive positions and across the whole organisation (including how the entity has defined "senior executive" for these purposes); or (ii) if the entity is a "relevant employer" under the <i>Workplace Gender Equality Act</i>, the entity's most recent "Gender Equality Indicators", as defined in and published under that Act. 	NO	N/A	<p>The Company has a Diversity Policy, the purpose of which is:</p> <ul style="list-style-type: none"> (a) to outline the Company's commitment to creating a corporate culture that embraces diversity and, in particular, focuses on the composition of its Board and senior management; and (a) to provide a process for the Board to determine measurable objectives and procedures which the Company will implement and report against to achieve its diversity goals. <p>As at 30 June 2024 there are two women in senior executive positions in the Company (22%), and 14 women employees across the Company, representing 27% of the whole organisation. There is one woman on the Board (25%) of the total Board members, currently.</p> <p>The Board maintains full transparency of board processes, reviews and appointments and encourages gender diversity.</p> <p>Given the Company's size the Board does not consider it appropriate to set quantitative objectives regarding gender diversity at this time. As the operations grow, the Board will give consideration to the setting of such objectives and their achievement through the appointment of appropriate candidates to the Board and senior executive positions as they become available.</p>

ASX Principle and Recommendation	Compliance	Reference	Commentary
Recommendation 1.6 A listed entity should: <ul style="list-style-type: none"> (a) have and disclose a process for periodically evaluating the performance of the Board, its committees and individual Directors; and (b) disclose, in relation to each reporting period, whether a performance evaluation was undertaken in the reporting period in accordance with that process. 	YES	Board Performance Evaluation Policy – available on website	<p>Swift has adopted a Board Performance Evaluation Policy which outlines a process for evaluation of the Board and its committees.</p> <p>The Chair of the Board is responsible for ensuring that a formal review of the performance of the Board, committees and individual Directors occurs regularly. The Chair is responsible for determining the process under which this evaluation takes place occurs in accordance with the Company's Policy.</p> <p>This Policy is to ensure:</p> <ul style="list-style-type: none"> (b) individual Directors and the Board as a whole work efficiently and effectively in achieving their functions; (c) the executive Directors and key executives execute the Company's strategy through the efficient and effective implementation of the business objectives; and (d) committees to which the Board has delegated responsibilities are performing efficiently and effectively in accordance with the duties and responsibilities set out in the board charter. <p>The Board conducts the performance evaluation of the Chair. This policy will be reviewed annually. During the current reporting period, the Company has not conducted an evaluation of the Board, individual non-executives or committees. An evaluation will be conducted during the current financial year.</p>
Recommendation 1.7 A listed entity should: <ul style="list-style-type: none"> (a) have and disclose a process for periodically evaluating the performance of its senior executives; and <p>disclose in relation to each reporting period, whether a performance evaluation was undertaken in the reporting period in accordance with that process.</p>	YES	Board Performance Evaluation Policy – available on website FY24 - Annual Financial Report	<p>The Managing Director is responsible for evaluating the performance of the Company's senior executives in accordance with the process disclosed in the Company's Process for Performance Evaluations.</p> <p>The Chair is responsible for evaluating the performance of the Company's Chief Executive Officer / MD in accordance with the process disclosed in the Company's Process for Performance Evaluations.</p> <p>During the current reporting period the Company conducted a formal evaluation of its Managing Director based upon organizational performance objectives (qualitative and quantitative measures) and individual objectives. Performance against these objectives is reflected in the Chief Executive Officer remuneration review and vested awards, and is disclosed within the Remuneration Report to the FY24 Annual Financial Report.</p>

ASX Principle and Recommendation	Compliance	Reference	Commentary
Principal 2: Structure the Board to add value			
<p>Recommendation 2.1</p> <p>The Board of a listed entity should:</p> <p>(a) have a nomination committee which:</p> <ul style="list-style-type: none"> (i) has at least three members, a majority of whom are independent Directors; and (ii) is chaired by an independent Director, <p>and disclose:</p> <ul style="list-style-type: none"> (iii) the charter of the committee; (iv) the members of the committee; and (v) as at the end of each reporting period, the number of times the committee met throughout the period and the individual attendances of the members at those meetings; or <p>(b) if it does not have a nomination committee, disclose that fact and the processes it employs to address Board succession issues and to ensure that the Board has the appropriate balance of skills, knowledge, experience, independence and diversity to enable it to discharge its duties and responsibilities effectively.</p>	NO	<p>Nomination Policy – available on website</p>	<p>The Company's Remuneration and Nomination Committee Charter provides that the Nomination Committee will have at least three members, a majority of whom are independent Directors, and which must be chaired by an independent Director.</p> <p>During the period, the Board carried out the duties of the Nomination Committee in accordance with the Nomination Committee Charter. These included following processes to address succession issues and ensuring the Board has the appropriate balance of skills, experience, independence and knowledge of the entity to enable it to discharge its duties and responsibilities effectively, namely:</p> <ul style="list-style-type: none"> (i) devoting time at least annually to discuss Board succession issues and updating the Company's Board skills matrix; and (ii) all Board members being involved in the Company's nomination process, to the maximum extent permitted under the Corporations Act and ASX Listing Rules.

ASX Principle and Recommendation	Compliance	Reference	Commentary
Recommendation 2.2 A listed entity should have and disclose a Board skills matrix setting out the mix of skills and diversity that the Board currently has or is looking to achieve in its membership.	YES	In Commentary	<p>Under the Nomination Committee Charter, the Nomination Committee (or, in its absence, the Board) is required to prepare a Board skills matrix setting out the mix of skills that the Board currently has (or is looking to achieve). The Committee will review this at least annually against the Company's Board skills matrix to ensure it has the appropriate mix of skills to discharge its obligations effectively and to add value and to ensure the Board has the ability to deal with new and emerging business and governance issues.</p> <p>The mix of skills and diversity which the Board is looking to achieve in its composition is:</p> <ul style="list-style-type: none"> (a) a broad range of business experience; and (b) technical expertise and skills required to discharge duties. <p>The mix of skills and experience in the current Board, and that the Board would look to maintain, and build on, includes:</p> <ol style="list-style-type: none"> 1. Management and Leadership: <ul style="list-style-type: none"> - Directorships of listed companies other than the Company 2. Strategy and Strategic Planning <ul style="list-style-type: none"> - Capital markets/funding - Investor relations 3. Governance <ul style="list-style-type: none"> - Legal and risk - Compliance 4. Finance <ul style="list-style-type: none"> - Financial Acumen <p>Full details as to each Director's relevant skills and experience are available in the Director's Report section of the Company's financial report.</p>

ASX Principle and Recommendation	Compliance	Reference	Commentary
Recommendation 2.3 A listed entity should disclose: (a) the names of the Directors considered by the Board to be independent Directors; (b) if a Director has an interest, position, association or relationship of the type described in the Corporate Governance Principles and Recommendations (4th Edition), but the Board is of the opinion that it does not compromise the independence of the Director, the nature of the interest, position, association or relationship in question and an explanation of why the Board is of that opinion; and (c) the length of service of each Director.	YES	Annual Report - 2024	<p>The Board reviewed the independence of each of the Directors in office during the reporting period having regard to the relationships guidance listed in Box 2.3 of the Principles and Recommendations.</p> <p>Currently the Board is structured as follows:</p> <ul style="list-style-type: none"> (a) Charles Fear (Independent Non-Executive-Director, appointed 19 November 2021), appointed Chair 21 March 2022; (b) Brian Mangano (Managing Director, appointed 27 April 2021) (c) Brad Denison (Independent Non-Executive Director, appointed 19 November 2021); (d) Pippa Leary (Non-Executive Director, appointed 7 April 2021); <p>Details of the Directors' interests, positions, associations and relationships are provided in the Remuneration Report section of the Annual Report.</p> <p>The length of service of each Director is also disclosed within the Remuneration Report.</p>

ASX Principle and Recommendation	Compliance	Reference	Commentary
Recommendation 2.4 A majority of the Board of a listed entity should be independent Directors.	NO	Board Charter – available on website	The Board was not comprised of a majority of independent Directors during the year. There are currently two Directors who satisfy the criteria for independence for the purposes of ASX Recommendation 2.4, being Mr Fear and Mr Dennison. Ms Leary was not considered as independent director for part of the year, given she was employed in an executive capacity with Swift in the prior three years. This ceased on 7 April 2024, and Pippa is now considered as an independent non-executive Director. The independent Directors now comprise a majority of the Board.
Recommendation 2.5 The Chair of the Board of a listed entity should be an independent Director and, in particular, should not be the same person as the CEO of the entity.	YES	Board Charter – available on website	The Board considers that the Chairman of Swift, Mr Fear, is independent with the criteria for independence outlined in ASX Recommendation 2.3. The Managing Director, Mr Mangano, is the Chief Executive Officer and is not the Chairperson, which is in compliance with Recommendation 2.5.
Recommendation 2.6 A listed entity should have a program for inducting new Directors and for periodically reviewing whether there is a need for existing directors to undertake professional development to maintain the skills and knowledge needed to perform their role as Directors effectively.	NO	N/A	Swift does not currently have a formal induction program for new Directors, nor does it have a formal professional development program for existing Directors. The Board does not consider that a formal induction program is necessary given the current size and scope of Swift's operations. New Directors are given a full briefing on the Company. The Directors have been selected on the basis that collectively they have experience with a range of skills to discharge the Company's obligations effectively and to add value, and to ensure the Board has the ability to deal with new and emerging business and governance issues. The Company encourages and supports, Directors to attend on behalf of Swift and otherwise, professional education, technical and commercial seminars and industry conferences which enable them to maintain their understanding of Directors' duties, risk and corporate governance, industry matters and technical advances. All directors undertook training on Responsibilities and Obligations of the Competition and Consumer Act 2010, which prohibits anti-competitive practices.

ASX Principle and Recommendation	Compliance	Reference	Commentary
Principal 3: Act ethically and responsibly			
Recommendation 3.1 A listed entity should articulate and disclose its values.	YES	Statement of Values	The Company has adopted a Statement of Values which sets out the following core values and fundamental principles of the Company: <ul style="list-style-type: none"> (a) Integrity – to act fairly and ethically, to comply with the law at a times and act accordingly, to be honest and transparent in our dealings. (b) One Team – to respect others, both inside and outside of our workplace, to promote diversity. Work together proactively and collaboratively across boundaries. (c) Customer First – to listen and deliver exceptional experiences with empathy, always. (d) Be the Change – to drive innovation and move fast for commercial success, be adaptable and curious. (e) Own it – to be empowered, accountable and never give up.
Recommendation 3.2 A listed entity should: <ul style="list-style-type: none"> (a) have a code of conduct for its Directors, senior executives and employees; and (b) ensure that the Board or a committee of the Board is informed of any material breaches of that code. 	YES	Code of Conduct - website	The Company is committed to promoting good corporate conduct grounded by strong ethics and responsibility. The Company has established a Code of Conduct (Code), which addresses matters relevant to the Company's legal and ethical obligations to its stakeholders. The Code is disclosed on the Company's website. The Code applies to all Directors, employees, contractors and officers of the Company. The Code will be formally reviewed by the Board each year.
Recommendation 3.3 A listed entity should: <ul style="list-style-type: none"> (a) have and disclose a whistleblower policy; and (b) ensure that the Board or a committee of the Board is informed of any material incidents reported under that policy. 	YES	Whistleblower Policy - Website	The Company adopted a Whistleblower Policy which sets out: <ul style="list-style-type: none"> (a) who is entitled to protection as a Whistleblower; (b) the protections available to Whistleblowers; and (c) how the Group will handle disclosures made by Whistleblowers. Any material breaches of the Whistleblower Protection Policy are to be reported to the Board or a committee of the Board.

ASX Principle and Recommendation	Compliance	Reference	Commentary
Recommendation 3.4 A listed entity should: (a) have and disclose an anti-bribery and corruption policy; and (b) ensure that the Board or committee of the Board is informed of any material breaches of that policy.	YES	Anti-Bribery and Anti-Corruption Policy - Website	The Company adopted an Anti-Bribery & Corruption Policy which sets out the that the Company will: (a) not engage in corrupt business practices; (b) implement measures to prevent bribery and corruption by all personnel; (c) at a minimum, endeavour to comply with all applicable laws, regulations and standards, including Anti-Bribery and Corruption Laws; and (d) when dealing with third parties, undertake reasonable due diligence to ensure that such parties are suitable for the Company to associate with and will not make bribes or perform corrupt acts on the Company's behalf or for which the Company may be or become responsible or liable. Any material breaches of the Anti-Bribery and Anti-Corruption Policy are to be reported to the Board or a committee of the Board.

ASX Principle and Recommendation	Compliance	Reference	Commentary
Principal 4: Safeguard integrity in corporate reporting			
Recommendation 4.1 The Board of a listed entity should: (a) have an audit committee which: <ul style="list-style-type: none"> (i) has at least three members, all of whom are non-executive Directors and a majority of whom are independent Directors; and (ii) is Chaired by an independent Director, who is not the Chair of the Board, and disclose: (iii) the charter of the committee; (iv) the relevant qualifications and experience of the members of the committee; and (v) in relation to each reporting period, the number of times the committee met throughout the period and the individual attendances of the members at those meetings; or (b) if it does not have an audit committee, disclose that fact and the processes it employs that independently verify and safeguard the integrity of its corporate reporting, including the processes for the appointment and removal of the external auditor and the rotation of the audit engagement partner.	NO	Audit Committee Charter – available on website	<p>Due to the size of the Board, the Company does not have a separate Audit Committee. The roles and responsibilities of an audit committee are undertaken by the Board.</p> <p>The full Board in its capacity as the audit committee is responsible for reviewing the integrity of the Company's financial reporting and overseeing the independence of the external auditors. The duties of the full Board in its capacity as the audit committee are set out in the Company's Audit Committee Charter which is available on the Company's website.</p> <p>When the Board meets as an audit committee it carries out those functions which are delegated to it in the Company's Audit Committee Charter. Brad Denison, an independent director and experienced CFO, takes the lead with respect to Audit and Risk matters and meets the auditors bi-annually, prior to their formal presentations to the Board. Items that are usually required to be discussed by an Audit Committee are marked as separate agenda items at Board meetings when required.</p> <p>The Board is responsible for the initial appointment of the external auditor and the appointment of a new external auditor when any vacancy arises. Candidates for the position of external auditor must demonstrate complete independence from the Company through the engagement period. The Board may otherwise select an external auditor based on criteria relevant to the Company's business and circumstances. The performance of the external auditor is reviewed on an annual basis by the Board.</p> <p>The Board has adopted an Audit Committee Charter which describes the role, composition, functions and responsibilities of the Audit Committee and is disclosed on the Company's website.</p>

ASX Principle and Recommendation	Compliance	Reference	Commentary
Recommendation 4.2 The Board of a listed entity should, before it approves the entity's financial statements for a financial period, receive from its CEO and CFO a declaration that, in their opinion, the financial records of the entity have been properly maintained and that the financial statements comply with the appropriate accounting standards and give a true and fair view of the financial position and performance of the entity and that the opinion has been formed on the basis of a sound system of risk management and internal control which is operating effectively.	Yes	Kept at registered office	<p>Before the Board approves the Company financial statements for each financial period it will receive from the Chief Executive Officer and the Chief Financial Officer or equivalents a declaration that, in their opinion, the financial records of the Company for the relevant financial period have been properly maintained and that the financial statements for the relevant financial period comply with the appropriate accounting standards and give a true and fair view of the financial position and performance of the Company and the consolidated entity and that the opinion has been formed on the basis of a sound system of risk management and internal control which is operating effectively.</p> <p>The Company has obtained a sign off on these terms for each of its financial statements in the past financial year.</p>
Recommendation 4.3 A listed entity should disclose its process to verify the integrity of any periodic corporate report it releases to the market that is not audited or reviewed by an external auditor.	YES	Continuous Disclosure Policy	<p>Under the Company's Continuous Disclosure, the Board has appointed the Managing Director to ensure that Company announcements (including the annual directors' report) are accurate, balanced and understandable and provide investors with appropriate information to make informed investment decisions.</p> <p>The Managing Director together with the CFO (or equivalent) coordinates the form of disclosure and verifies the accuracy of the information contained in announcements. Where necessary and possible, the Managing Director consults on announcements with the Chairman of the Board and Directors available at that time. All material announcements are approved by the Board prior to release.</p> <p>The Board obtains declarations from the CEO and CFO (or their equivalents) that the financial information contained in the quarterly cashflow reports has been prepared in accordance with Australian Accounting Standards, gives a true and fair view of the financial information reported, and that the financial records have been properly maintained, risk management and internal compliance control systems are operating efficiently and effectively in all material respects in relation to financial reporting risks.</p>

ASX Principle and Recommendation	Compliance	Reference	Commentary
Principal 5: Make timely and balanced disclosure			
Recommendation 5.1 A listed entity should: (a) have a written policy for complying with its continuous disclosure obligations under Listing Rule 3.1; and disclose that policy or a summary of it.	YES	Continuous Disclosure Policy - available on website	The Company has adopted a Continuous Disclosure Policy. (a) The Company's Corporate Governance Plan details the Company's Continuous Disclosure policy. (b) The Continuous Disclosure and Policy is available on the Company's website. The Chair and the MD manage the policy. The policy will develop over time as best practice and regulations change and the Company Secretary will be responsible for communicating any amendments. This policy will be reviewed by the Board annually.
Recommendation 5.2 A listed entity should ensure that its board receives copies of all material market announcements promptly after they have been made.	YES	The Continuous Disclosure Policy - available on website	Under the Company's Continuous Disclosure Policy, all members of the Board receive material market announcements promptly after they have been made.
Recommendation 5.3 A listed entity that gives a new and substantive investor or analyst presentation should release a copy of the presentation materials on the ASX Market Announcements Platform ahead of the presentation.	YES	The Continuous Disclosure Policy - available on website	All new and substantive investor or analyst presentations are released on the ASX Markets Announcement Platform ahead of such presentations.

ASX Principle and Recommendation	Compliance	Reference	Commentary
Principal 6: Respect the rights of security holders			
Recommendation 6.1 A listed entity should provide information about itself and its governance to investors via its website.	YES	Website	Information about the Company and its governance is available in the Corporate Governance Plan, Statement and policies, financial results, media releases, ASX Announcements, contacts and an overview of the Company can all be found on the Company's website, https://www.swiftnetworks.com.au/
Recommendation 6.2 A listed entity should design and implement an investor relations program to facilitate effective two-way communication with investors.	YES	Shareholder Communication Policy - website	Swift has adopted a Shareholder Communications Policy, the purpose of which is to facilitate the effective exercise of Shareholders' rights by communicating effectively with Shareholders, giving Shareholders ready access to balanced and understandable information about Swift and its corporate strategies and making it easy for Shareholders to participate in general meetings. The Company has implemented the use of Investor Hub in FY24 to facilitate this process in real time. The Company has made available a telephone number and relevant contact details (via the website) for Shareholders to make their enquiries.
Recommendation 6.3 A listed entity should disclose the policies and processes it has in place to facilitate and encourage participation at meetings of security holders.	YES	Shareholder Communication Policy - website	The Board supports full Shareholder participation in general meetings and seeks to provide appropriate mechanisms for such participation, including by ensuring that meetings are held at convenient times and places to encourage Shareholder participation. Mechanisms for encouraging and facilitating Shareholder participation such as live webcasting / meetings online, allowing voting in person, by proxy or online, will be reviewed regularly to encourage the highest level of Shareholder participation to meet the current circumstances. However, due to the size and nature of the Company, the Board does not consider a formal policy outlining the policies and processes that it has in place to facilitate and encourage participating at meetings of shareholders to be appropriate at this stage.

ASX Principle and Recommendation	Compliance	Reference	Commentary
Recommendation 6.4 A listed entity should ensure that all substantive resolutions at a meeting of security holders are decided by a poll rather than by a show of hands.	YES		All substantive resolutions at general meetings will be decided by poll.
Recommendation 6.5 A listed entity should give security holders the option to receive communications from, and send communications to, the entity and its security registry electronically.	YES	Shareholder Communication Policy - website	<p>Swift considers that communicating with Shareholders by electronic means is an efficient way to distribute information in a timely and convenient manner.</p> <p>Swift provides new Shareholders with the option to receive communications from the Company electronically and Swift encourages them to do so. Existing Shareholders are also encouraged to request communications electronically.</p> <p>Shareholders are given the option to receive communications from, and send communication to, the Company and its share registry electronically. To ensure that shareholders can obtain all relevant information to assist them in exercising their rights as shareholders, the Company has made available a telephone number and relevant contact details (via the website) for shareholders to make their enquiries. The Company has implemented the use of Investor Hub in FY24 to facilitate this process in real time.</p>

ASX Principle and Recommendation	Compliance	Reference	Commentary
Principal 7: Recognise and manage risk			
<p>Recommendation 7.1</p> <p>The Board of a listed entity should:</p> <p>(a) have a committee or committees to oversee risk each of which:</p> <p>(i) has at least three members, a majority of whom are independent Directors; and</p> <p>(ii) is Chaired by an independent Director, and disclose</p> <p>(iii) the charter of the committee;</p> <p>(iv) the members of the committee; and</p> <p>(v) as at the end of each reporting period, the number of times the committee met throughout the period and the individual attendances of the members at those meetings; or</p> <p>(b) if it does not have a risk committee or committees that satisfy (a) above, disclose that fact and the processes it employs for overseeing the entity's risk management framework.</p>	YES	Risk Management Policy - website	<p>Due to the size of the Board, the Company does not have a separate Risk Committee. The Board is responsible for the oversight of the Company's risk management and control framework.</p> <p>When the Board meets as a risk committee, it carries out those functions which are delegated to it in the Company's Audit Committee Charter. Items that are usually required to be discussed by a Risk Committee are marked as separate agenda items at Board meetings when required.</p> <p>The Board has adopted an Audit Committee Charter which describes the role, composition, functions and responsibilities in relation to the risk management system of the Audit Committee and is disclosed on the Company's website.</p> <p>The Board has adopted a Risk Management Policy, which is disclosed on the Company's website. Under the policy, responsibility and control of risk management is delegated to the appropriate level of management within the Company with the Chief Executive Officer (MD) having ultimate responsibility to the Board for the risk management and control framework.</p> <p>The risk management system covers:</p> <ul style="list-style-type: none"> (a) operational risk; (b) financial reporting; (c) compliance / regulations; and (d) system / IT process risk. <p>A risk management model has been developed to provide a framework for systematically understanding and identifying the types of business risks threatening the Company as a whole, or specific business activities within the Company.</p>

ASX Principle and Recommendation	Compliance	Reference	Commentary
Recommendation 7.2 The Board or a committee of the Board should: <ul style="list-style-type: none"> (a) review the entity's risk management framework at least annually to satisfy itself that it continues to be sound and that the entity is operating with due regard to the risk appetite set by the Board; and (b) disclose, in relation to each reporting period, whether such a review has taken place. 	YES	Risk Management Policy - website	<p>The Board review's the Company's risk management framework annually to satisfy itself that it continues to be sound, to determine whether there have been any changes in the material business risks the Company faces and to ensure that the Company is operating within the risk appetite set by the Board.</p> <p>Arrangements put in place by the Board to monitor risk management include, but are not limited to:</p> <ul style="list-style-type: none"> (a) monthly reporting to the Board in respect of key risks, operations and the financial position of the Company; and (b) quarterly rolling forecasts prepared; (c) high level risks identified in each monthly Board report and progress towards managing risks and (d) a report to the Board by each committee (if relevant) to be provided on an annual basis. <p>Key risks are also disclosed in the directors' report of the Annual Financial Report for the year.</p> <p>A review of the Company's risk management framework was undertaken by the Board during the financial year.</p>
Recommendation 7.3 A listed entity should disclose: <ul style="list-style-type: none"> (a) if it has an internal audit function, how the function is structured and what role it performs; or (b) if it does not have an internal audit function, that fact and the processes it employs for evaluating and continually improving the effectiveness of its governance, risk management and internal control processes. 	YES	Risk Management Policy - website	<p>The Company does not currently have, nor does it intend to establish, an internal audit function. The Board considers that an internal audit function is not currently necessary given the current size and scope of Swift's operations.</p> <p>To evaluate and continually improve the effectiveness of the Company's risk management and internal control processes, the Board relies on ongoing reporting and discussion of the management of material business risks as outlined in the Company's Risk Management Policy.</p> <p>The Board and senior management are charged with evaluating and considering improvements to a range of internal audit functions and procedures on an ongoing basis.</p>

ASX Principle and Recommendation	Compliance	Reference	Commentary
Recommendation 7.4 A listed entity should disclose whether it has any material exposure to environmental or social risks and, if it does, how it manages or intends to manage those risks.	YES	N/A	Swift's primary activity is the provision of content, communications and advertising on television screens for out of home environments. These activities do not expose it to any particular economic, environmental or social sustainability risks not faced by all other participants in an open economy. The Board will consider on an on-going basis whether Swift has any particular exposure to material economic, environmental and social sustainability risks and, if identified, Swift will include details in its annual report.
Principal 8: Remunerate fairly and responsibly			
Recommendation 8.1 The Board of a listed entity should: (a) have a remuneration committee which: (i) has at least three members, a majority of whom are independent Directors; and (ii) is chaired by an independent Director, and disclose: (iii) the charter of the committee; (iv) the members of the committee; and (v) as at the end of each reporting period, the number of times the committee met throughout the period and the individual attendances of the members at those meetings; or if it does not have a remuneration committee, disclose that fact and the processes it employs for	NO	Remuneration Committee Charter - website	The full Board carried out the duties of the Remuneration Committee during the year, including following the process as set out in the Remuneration Committee Charter for establishing and approving all compensation arrangements for Directors and the senior executives (KMP). Mr Denison chairs any discussions regarding executive remuneration. The Board Performance evaluation policy establishes the procedure for ensuring the Chief Executive Officer and key executives execute the Company's strategy through the efficient and effective implementation of the business objectives. Within this policy is alignment of KMP remuneration with the Company's strategic objectives. The Board is also responsible for the setting performance criteria, performance indicators, approving any equity incentive performance schemes, superannuation entitlements, retirement and termination entitlements for the Managing Director. The Board approves any equity compensation schemes for employees.

setting the level and composition of remuneration for Directors and senior executives and ensuring that such remuneration is appropriate and not excessive.			
ASX Principle and Recommendation	Compliance	Reference	Commentary
Recommendation 8.2 A listed entity should separately disclose its policies and practices regarding the remuneration of non-executive Directors and the remuneration of executive Directors and other senior executives.	YES	Remuneration Committee Charter - website	The Company's policies and practices regarding the remuneration of the Managing Director, senior executives, and Non-Executive Directors, are set out in the Remuneration Report contained in the Company's Annual Report for FY24.
Recommendation 8.3 A listed entity which has an equity-based remuneration scheme should: <ul style="list-style-type: none"> (a) have a policy on whether participants are permitted to enter into transactions (whether through the use of derivatives or otherwise) which limit the economic risk of participating in the scheme; and disclose that policy or a summary of it.	YES	Share Trading Policy - website	The Company's Share Trading Policy includes a statement on the Company's policy on prohibiting participants in the Company's Employee Incentive Plan entering into transactions (whether through the use of derivatives or otherwise) which limit the economic risk of participating in the Employee Incentive Plan. Share Trading Policy In accordance with ASX Listing Rule 12.9, the Company has adopted a trading policy which sets out the following information: <ul style="list-style-type: none"> (a) closed periods in which directors, employees and contractors of the Company must not deal in the Company's securities; (b) trading in the Company's securities which is not subject to the Company's trading policy; and (c) the procedures for obtaining written clearance for trading in exceptional circumstances. The Company's Share Trading Policy is available on the Company's website.