

NOVOGEN SHAREHOLDER COMMUNICATION POLICY

1. Introduction

At Novogen, we are proud of the work we do, and we look forward to sharing our progress with scientists, clinicians, regulators, investors, and other interested parties. Moreover, as a company listed on both the Australian Securities Exchange (ASX) and NASDAQ, we take very seriously our obligation to ensure that material information about our business is continuously disclosed to the market. This document describes how we manage these important commitments.

2. Our Priorities

No matter what information we are communicating, there are some important principles that we will always endeavor to observe.

First, we aim to ensure that all current and potential shareholders receive the same information at the same time. This is particularly important with information that is considered material, and we will release this kind of information via announcements to the stock exchanges so that all investors are kept continuously informed. ‘Material’ information is generally defined as information that would enable a reasonable investor to decide whether to acquire, retain or dispose of securities in the Company. The term ‘price sensitive’ is applied by the ASX at its discretion to announcements which it considers to be of particularly significant or immediate impact.

Second, we will present information about our activities as objectively and factually as possible. Interpretation of scientific data can be complex, and we believe it is important for scientists and investors to formulate their own judgments and analyses about the impact of our findings. We will try to explain what our research might mean for the respective projects and how they move forward, but we will always be transparent about the different outcomes that may eventuate.

Third, we recognize that we have a range of different channels available through which we can communicate with our investors and other parties. Our aim is to select the right channel for the right information. For example, only information that is considered material will generally be disclosed through an announcement to the ASX and NASDAQ. Financial information about the company will generally be published in the annual report and the half-yearly report. Preclinical scientific data, which generally has limited immediate impact on the Company’s value, will be shared primarily through conference presentations and peer-reviewed journals. Sometimes, information may be appropriate in more than one forum, and we will release data concurrently in these situations. For example, if we publish important data from a clinical trial, we will announce this to the ASX and to NASDAQ at the same time.

3. How We Communicate

3.1 Announcements to ASX & NASDAQ

Novogen ensures that it is at all times fully compliant with the respective Listing Rules of the ASX and NASDAQ, and we also observe the ASX / AusBiotech ‘Code of Best Practice for Reporting by Life Science Companies’ and the Governance Institute’s ‘Good Governance Guide’ on disclosure and communication policy.

We respect the time of our investors, and we understand that many of them hold Novogen Stock in the context of a broad portfolio of positions. We therefore use releases to the stock exchanges only for announcements that are required by regulation or to communicate information that is material, i.e. information that would help a reasonable person to decide whether to acquire, retain or dispose of the Company’s securities. Information that is not material will generally not be announced to the markets unless it is considered helpful to clarify specific or general points in regard to the Company’s activities.

3.2 Our Website

Our corporate website is the heart of our interactions with our investors and potential partners. We will endeavor to keep it continuously updated with general information about the company, copies of all announcements to the stock exchanges, and either copies of relevant scientific publications or links to online journals and conference proceedings. It should always be the first port of call for anyone looking to learn more about what we do.

3.3 Social Media

Novogen aims to use channels such as Twitter, LinkedIn, YouTube, and other sites to informally engage with people, and provide a more general sense of the nature and impact of our work. We won’t use these sites to disclose material information about the business, but rather as a way of providing supplementary information that may be of interest to our shareholders and partners.

3.4 General Meetings

Our Annual General Meeting (AGM) will usually be held in Sydney in November, and we may occasionally need to call shareholder meetings at other times in order to seek approval for specific initiatives.

We encourage shareholders to attend the AGM because it provides a valuable opportunity for us to interact in person. We will usually provide a presentation of our activities over the past year, summarizing our progress across all our projects, and we welcome the opportunity to answer questions from shareholders and provide clarification. The notice of meeting and other relevant documents will also be made available via the company website.

3.5 Half-Year and Full-Year Reports

Our Half-Year Report and our Annual Report are important documents that provide detailed financial information about the company. We also use these documents to provide a broader

overview of the Company's activities and progress. As well as being sent to shareholders directly, these reports will also be made available via the company website.

3.6 Analyst and Media Briefings

We recognize that investment analysts and journalists often take an interest in our business and provide a valuable service by analyzing and interpreting our activities for the benefit of current and potential shareholders. We will always try to provide them with as much detail as we can. These briefings frequently help set the context for the disease and the patient in which our products will be used. However, we believe it is important that no new material information be disclosed during such interactions.

3.7 Scientific Conferences & Journals

We prefer to share our scientific data primarily through scientific meetings and peer-reviewed journals, since these channels provide the best opportunity for fellow scientists and clinicians to understand our work and to provide input, advice, and feedback.

Often, meetings or journals require us to 'embargo' the data before it is published or presented, which means that we are prohibited from sharing it beforehand. In common with all life sciences companies, we will do our best to respect these requirements. If the data that is being presented or published is considered to be material, we will announce the disclosure to the stock exchange concurrently with the publication or presentation. For most data, we will make abstracts, publications, and web links available via our website as soon as the embargo is lifted, as far as we are permitted by copyright and other considerations.

3.8 Newsletter

Our company newsletter contains regular updates about our programs, a digest of recent news, and other information of interest such as significant changes in the management team. It is distributed regularly via email, and anyone may subscribe via the company website.

4.0 What We Communicate

Drug development is a complex process, and much of what we do is highly technical in nature, so we try to focus our communications on information that we believe will be most useful to scientists, clinicians, regulators, investors, and other interested parties. Moreover, we recognize that we work in a highly-competitive environment, and some of our scientific data must be treated as commercially confidential to avoid the risk of providing opportunities for our competitors.

4.1 Preclinical Data

Preclinical data is usually exploratory in nature, and helps us to understand how best to move our molecules forward towards clinical trials. Generally, no single experiment will determine the fate of the molecule. Rather, the optimum approach will be based on an analysis of all the available data, often in consultation with external experts and collaborators.

As such, we believe that the best way to share such data is usually through presentations at conferences and publications in peer-reviewed journals. We will aim to list any posters,

presentations, abstracts, and publications on the website, concurrent with their presentation or publication, so that investors can review this data at their convenience.

In rare cases, we may form the view that preclinical data represents a material disclosure, either because the data itself is particularly impactful from a scientific point of view, or because the data or the forum in which it is shared may attract a high degree of attention and thereby influence the near-term value of the company. In these situations, we will release information to the stock exchanges in compliance with continuous disclosure rules, concurrent with the lifting of any applicable embargos.

4.2 Clinical Trial Conduct and Results

The key operational events in a clinical trial are the initiation and completion of patient recruitment, which are often referred to by the abbreviations FPI (First Patient In) and LPLV (Last Patient, Last Visit). For studies which are on the critical path to registration, such as first-in-human (FIH) studies and proof-of-concept studies, we will announce these events to the stock exchanges.

Studies which are not on the critical path (e.g. drug-drug interaction studies or food effect studies) will usually be discussed as appropriate in the company newsletter and through other forums. Progress updates for ongoing studies will also be provided via the company newsletter.

Novogen is committed to the principle of clinical trial registration, as required by FDAAA 801, the ICMJE statement on clinical trial registration, and other applicable regulations and guidelines. We will register our clinical studies primarily on clinicaltrials.gov, which is run by the National Institutes of Health, but we may additionally engage other registries if required to do so by local regulations or ethics committees. We will register our studies at or shortly prior to FPI, or in accordance with local requirements, and will aim to keep our registrations continually updated.

Our preference is to share clinical trial data primarily through conference presentations and peer-reviewed journals, since these mechanisms provide the best opportunity for scientists, clinicians, and potential partners to understand our work. In cases where the study is on the critical path to registration (e.g. first-in-human and proof-of-concept studies), we will simultaneously announce results to the stock exchanges.

On very rare occasions we may need to suspend or terminate a clinical study early for safety reasons. Events such as this are generally material and will require immediate disclosure.

4.3 Regulatory Activities

Novogen engages with global regulatory agencies at an early stage in the development of our molecules, so that our development programs can be most precisely tailored to the needs of our regulators. Many of these discussions are routine and exploratory in nature, and often they are commercially confidential. We will not generally make these interactions public, unless the outcome is material to the future development of the respective molecule.

Certain regulatory events are generally recognized as representing key milestones and / or value drivers for the development of a new therapeutic, and we will announce these events to the stock exchanges. In particular, such events will generally include opening of an Investigational New Drug (IND) application with the US FDA, granting of important designations such as Orphan Drug Designation or Fast Track Designation by major agencies, and submission of a New Drug Application (NDA) where applicable.

4.4 Licensing Transactions

Negotiations around potential licensing transactions are almost always extremely confidential, and we will generally not make these discussions public until a transaction is executed, unless we are obliged to do so by a regulator (e.g. in response to an ASX price query).

4.5 Research Partnerships

Novogen aspires to work in partnership with some of the best scientists and researchers around the world, and we recognize that the challenging work of drug development can only be accomplished by working with a broad range of experts. We are proud of the relationships that we build, and we will generally share them via the company website, and via investor newsletters and other updates. We will generally not announce all such partnerships to the stock exchanges unless the financial terms are particularly significant, or unless the content of the work is such that it represents a critical value driver for the molecule in question.

4.6 Intellectual Property

Patents are an essential way in which we capture the value of our scientific discovery efforts, and they provide a degree of validation for the scientific innovation inherent in our work. We will announce the granting of a first patent for each of our key technology platforms, and we will disclose subsequent follow-on and national patent grants via newsletters and via the corporate website.

4.7 Manufacturing, Toxicology & Technical Development

Preparation for clinical development requires a wide range of operational tasks to be completed, which typically include tasks such as manufacturing scale-up, formulation optimization, stability testing, GLP toxicology, ADMET studies, evaluation of interactions with storage, closure and administration devices, etc. This work is essential, but does not of itself generally drive value in the development of a new molecule, unless an unexpected critical issue is identified. As such, we will generally share information about this kind of work only on an exceptional basis if it reveals considerations which significantly alter the future trajectory of the molecule in question.