

Shareholder Communications Policy

Adopted by the Board on 12 November 2009

Contents

1	Introduction and Purpose	1
2	Who does this policy apply to?	1
3	Application of Continuous Disclosure Policy	1
4	Reports to shareholders	1
5	Dyno Nobel's website	1
6	Use of electronic communication and other technology	2
7	General meetings	2
8	Notice of meetings	2
9	Auditor attendance at AGM	2
10	Shareholder privacy	2
11	Contact details for shareholder services	3
12	Review and publication of this policy	3

Doc Number: 6005 Owner: Company Secretary

Status: Approved Version: 1 Reformatted (12 November 2009)

1 Introduction and Purpose

Dyno Nobel Limited (the "Company" or "Dyno Nobel") is committed to the objective of promoting investor confidence and the rights of shareholders by:

- complying with the continuous disclosure obligations imposed by law;
- ensuring that Company announcements are presented in a factual, clear and balanced way;
- ensuring that all shareholders have equal and timely access to material information concerning Dyno Nobel; and
- communicating effectively with shareholders and making it easy for them to participate in general meetings.

The purpose of this policy is to promote effective communication between Dyno Nobel and its shareholders, and to encourage shareholder participation in general meetings, including through the use of electronic communication. This policy seeks to incorporate Principle 6 (Respect the rights of shareholders) of the ASX Corporate Governance Council's Corporate Governance Principles and Recommendations (2nd edition, 2007) ("ASX Recommendations").

2 Who does this policy apply to?

This Policy applies to all directors, officers and employees of Dyno Nobel.

Application of 3 **Continuous Disclosure Policy**

This policy should be read in conjunction with Dyno Nobel's Continuous Disclosure Policy, which is designed to ensure compliance with continuous disclosure rules. A copy of the Continuous Disclosure Policy is available on the Company's website.

4 Reports to shareholders

Dyno Nobel produces half yearly and yearly financial reports and an annual report in accordance with the Corporations Act 2001 (Cwlth) ("Corporations Act"), the ASX Listing Rules ("ASX Listing Rules") and applicable accounting standards ("Reports"). The Reports seek to give balanced and understandable information about Dyno Nobel in a timely and transparent manner.

5 Dyno Nobel's website

Dyno Nobel's website contains information about Dyno Nobel including shareholder communications, press releases, the Reports, ASX announcements, dividends and related information, as well as Dyno Nobel's charters and policies. The Company will make available electronic copies of Annual Reports and relevant ASX announcements, together with summaries or copies of its charters and policies on its website. This information will be posted in an investor relations section on the Company's website which is separate from other material about Dyno Nobel.

Dyno Nobel will ensure the investor information provided on the Company's website is made available within a reasonable timeframe after release on the ASX and to the market. The Company's obligations and responsibilities in relation to continuous disclosure are described further in Dyno Nobel's Continuous Disclosure Policy, which is available on the Company's website.

Dyno Nobel's website also provides information for shareholders to direct inquiries to Dyno Nobel through the Company's Share Registry.

Doc Number: 6005

Status: Final Draft Version: 1 Reformatted (12 November 2009) Owner: Company Secretary

6 Use of electronic communication and other technology

Shareholders may elect to receive information by email. Dyno Nobel will communicate by post with shareholders who have not elected to receive information electronically.

The Company's website provides information about how shareholders can make an election to receive information electronically via a link to the Share Registry's secure shareholder services area. It is the responsibility of each shareholder who elects to receive information by e-mail to keep a current e-mail account and e-mail address and to notify the Company's Share Registry of any changes to these details. If the Company receives rejection advice for any shareholder e-mail, the relevant material may be sent to the shareholder by post.

The annual general meeting of the Company is webcast to shareholders via Dyno Nobel's website.

Dyno Nobel may consider the use of other reliable technologies as they become widely available.

7 General meetings

General meetings are used to communicate with shareholders and allow an opportunity for informed shareholder participation. Shareholders are encouraged to attend or, if unable to attend, to vote on the motions proposed by appointing a proxy or using any other means included in the notice of meeting. Dyno Nobel conducts its general meetings in accordance with its constitution, the Corporations Act and ASX Listing Rules.

8 Notice of meetings

Dyno Nobel seeks to ensure that the form, content and delivery of notices of general meetings of the Company comply with its constitution, the Corporations Act and ASX Listing Rules. Notices of meeting and accompanying explanatory notes aim to clearly, concisely and accurately set out the nature of the business to be considered at the meeting. Dyno Nobel will place notices of general meetings and accompanying explanatory material on Dyno Nobel's website.

9 Auditor attendance at AGM

The external auditor will attend each annual general meeting of the Company and will be available to answer questions about the conduct of the audit and the preparation and content of the auditor's report.

10 Shareholder privacy

Dyno Nobel recognises that privacy is important. The Company will ensure that shareholder details and information are only used for corporate purposes and in accordance with applicable privacy laws.

Doc Number: 6005 Status: Final Draft

Owner: Company Secretary **Version:** 1 Reformatted (12 November 2009)

11 Contact details for shareholder services

All shareholder queries should be directed to Dyno Nobel's Share Registry, MUFG Corporate Markets (AU) Limited:

Australia

Toll Free Phone: 1300 303 780

Phone: (02) 8280 7765 Fax: (02) 9287 0303

International

Toll Free Phone: +61 1300 303 780

Phone: +61 2 8280 7765 Fax: +61 2 9287 0303

Mailing Address

MUFG Corporate Markets (AU) Limited Locked Bag A14 Sydney South NSW 1235

Street Address

MUFG Corporate Markets (AU) Limited Tower 4 727 Collins Street Docklands Vic 3008

Email: support@cm.mpms.mufg.com

Website: au.investorcentre.mpms.mufg.com

12 Review and publication of this policy

The Board will review this policy from time to time to ensure consistency with the ASX Recommendations.

This policy may be amended by resolution of the Board. This policy (and any amendment of it) will be made available on Dyno Nobel's website.

Owner: Company Secretary **Version:** 1 Reformatted (12 November 2009)