

PIONEER NICKEL LIMITED

ABN 44 103 423 981

SHAREHOLDER COMMUNICATIONS STRATEGY

The Company respects the rights of its shareholders and to facilitate the effective exercise of those rights the Company is committed to:

- communicating effectively with shareholders;
- giving shareholders ready access to balanced and understandable information about the Company and corporate proposals; and
- making it easy for shareholders to participate in general meetings of the Company.

Provision of Information

The Company will communicate with shareholders in four main ways:

1. through releases to the market via the ASX;
2. through the Company's website;
3. through information provided directly to shareholders; and
4. at general meetings of the Company.

Market Releases

It is the Company's policy to comply with its continuous and periodic disclosure obligations. In accordance with the Company's continuous disclosure policy (refer Pioneer Nickel Limited's Continuous Disclosure Policy), unless exempted by the *ASX Listing Rules*, the Company will immediately notify the ASX of information:

1. concerning the Company that a reasonable person would expect to have a material effect on the price or value of the Company's securities; and
2. that would, or would be likely to, influence persons who commonly invest in securities in deciding whether to acquire or dispose of the Company's securities.

Company Website

The Company is committed to maintaining a Company website with general information about the Company and its operations, details of the Company's corporate governance policies and procedures and information specifically targeted at keeping the Company's shareholders informed about the Company.

In particular, where appropriate, after confirmation of receipt by the ASX, the following will be posted to the Company website:

- relevant announcements made to the market via the ASX;
- media releases;
- information provided to analysts or the media during briefings;
- the full text of notices of meeting and explanatory material;
- information related to general meetings, including the Chairman's address and voting results; and
- copies of annual, half-yearly and quarterly reports including financial statements.

Direct Communications with Shareholders

Throughout the year it may be appropriate for the Company to directly communicate with shareholders by mail. For example, to give shareholders notice of general meetings or to update shareholders by way of a Chairman's letter.

In addition, the website provides shareholders and others interested in the Company the opportunity to receive additional information by registering to receive by email press releases and other materials posted to the website.

Meetings of the Company

In preparing for general meetings of the Company, the Company will draft the notice of meeting and related explanatory information so that they provide all of the information that is relevant to shareholders in making decisions on matters to be voted on by them at the meeting. This information will be presented clearly and concisely so that it is easy to understand and not ambiguous.

The Company will use general meetings as a tool to effectively communicate with shareholders and allow shareholders a reasonable opportunity to ask questions of the Board of Directors and to otherwise participate in the meeting.

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

Other Information

While the Company aims to provide sufficient information to shareholders about the Company and its activities, it understands that shareholders may have specific questions and require additional information. To ensure that shareholders can obtain all relevant information to assist them in exercising their rights as shareholders, the Company will make available a telephone number and email address for shareholders to make their enquiries.

This Strategy was adopted by the Pioneer Nickel Limited Board on 27 August 2004.