

GI DYNAMICS, INC.

SHAREHOLDER COMMUNICATIONS POLICY

GI Dynamics, Inc. (**Company**) is committed to regularly communicating with its shareholders in a timely, accessible and clear manner with respect to both procedural matters and major issues affecting the Company. To achieve this, the Company communicates with shareholders through a range of forums and publications.

Electronic and written communications

The Company aims to ensure that its Annual Report provides shareholders with a good understanding of the Company's activities, performance and position for the previous financial year. Shareholders can elect to receive an electronic copy or a hard copy of the Annual Report.

As set out in the Company's continuous disclosure policy, the Company is committed to complying with, and taking a proactive approach in relation to, its continuous disclosure obligations, which extends to promptly providing all applicable securities regulators and securities exchanges, including but not limited to the Australian Securities Exchange (**ASX**), with all necessary information and communications for publication on the ASX website.

The Company aims to provide shareholders with comprehensive and timely access to Company documents and releases through its website. The Company's website will include the following:

- (a) details of the Company's certificate of incorporation and bylaws, Board and committee charters and key corporate governance policies;
- (b) copies of all material information lodged with ASX and any other applicable securities regulators and securities exchanges;
- (c) copies of material announcements, briefings and speeches made to the market or media;
- (d) a means for the shareholders to submit enquiries directly to the Company;
- (e) the full text of notices of shareholder meetings and explanatory material; and
- (f) advance notice of all open briefings to institutional investors and analysts, including presentation materials.

Other information may be provided to shareholders via periodic mail-outs. In addition, the Company allows shareholders to elect to receive email communications where appropriate.

Shareholder participation

The Company encourages shareholders to submit questions or requests for information directly to the Company Secretary or Chief Executive Officer.

The Company's board of directors encourages all shareholders to attend and participate in the Company's annual meeting of shareholders. The Company intends to webcast its annual meeting for the benefit of shareholders who cannot attend the meeting in person. The Company's external

auditor will attend the Company's annual meeting and will be available to answer questions from shareholders about the conduct of the audit and preparation of the auditor's report.