

Continuous Disclosure Policy

1.1 Disclosures to the Investment Community

(a) Background

As part of our overall policy of open disclosure, the Company ensures all material communications regarding its operations are made available to all interested stakeholders in a timely fashion. To ensure information about or concerning the Company given to the news media is timely, accurate, consistent, appropriate and conforms with Company policy, no public statement may be made on any matter concerning the Company's work, employees or customers except in accordance with this policy.

The ASX Listing Rules and the Corporations Act require listed companies to immediately advise ASX of any material information which is price sensitive (unless one of the exceptions applies).

(b) Board policy on disclosure

The Board is aware of its continuous disclosure obligations in respect of material information, and embraces the principle of providing access to that information to the widest audience.

To ensure these principles are appropriately actioned, the Board has nominated the Company Secretary as having responsibility for:

- (i) ensuring the Company complies with continuous disclosure requirements;
- (ii) overseeing and co-ordinating disclosure of information to ASX, analysts, brokers, shareholders, the media and the public;
- (iii) educating directors and staff on the Company's disclosure policies and procedures and raising awareness of the principles underlying continuous disclosure.

To safeguard against inadvertent disclosure of price sensitive information, the Board has agreed to keep to a minimum the number of directors and staff authorised to speak on the Company's behalf. In order of precedence, the following combinations of officers have authority to speak on behalf of the Company without the prior approval of the Board:

- (i) the Chairperson or Managing Director, separately; then
- (ii) the Chairperson and a non-executive director, jointly; then

- (iii) any 2 non-executive directors and the Managing Director, jointly (by majority); and then
- (iv) in extreme circumstances, any 2 directors, jointly.

These officers are also authorised to clarify information the Company has released publicly through ASX, but must avoid commenting on other price sensitive matters.

The Company has determined the Company Secretary must be made aware of any information disclosures in advance, including information to be presented at private briefings. This will minimise the risk of breaching the continuous disclosure requirements.

The Company Secretary is responsible for:

- (i) ensuring the Chairperson and the Managing Director are aware of all sensitive information that may be required by the ASX Listing Rules and the law to be publicly released through ASX before disclosing it to any person, including analysts and others outside the Company;
- (ii) ensuring all information released through ASX is promptly made available to its bankers and other parties to whom it has a similar reporting responsibility;
- (iii) the further dissemination of information, after it has been released through ASX, to investors and other interested parties;
- (iv) posting such information on the Company's website immediately after ASX confirms it has received such announcements;
- (v) reviewing all briefings and discussions with media representatives, analysts and major shareholders, to check whether any price sensitive information has been inadvertently disclosed. If so, to immediately announce the information through ASX.

Responses to enquiries from market analysts are to be confined to errors in factual information and underlying assumptions. Earnings expectations are to be managed by using the continuous disclosure regime and any change to expectations is to be made by ASX announcement before commenting to anyone outside the Company.

The Company will include in the "Corporate Governance" section in the annual report/on its website an account of its policy for complying with its continuous disclosure obligations under the Listing Rules.

1.2 Shareholder communications strategy

The Board acknowledges the need for effective communications with shareholders. To encourage participation with shareholders at shareholder meetings, the Board has adopted the following strategy:

- (a) shareholder meetings are structured to provide effective communication to shareholders and allow reasonable opportunity for informed shareholder participation;

- (b) the external auditor attends the AGM and is available to respond to shareholder questions in relation to any audit related questions;
- (c) If a shareholder is unable to attend the AGM they may pose questions to the Company via email communication (please refer to the Company's website) or by written or telephone correspondence to the Company Secretary, and where appropriate these question may be answered at the AGM, either by being read out and then responded to at the AGM or by providing a transcript of the question and a written answer at the meeting;
- (d) the Company's annual report is available to be sent to each shareholder (at the shareholder's option);
- (e) in addition to the annual report, the Company issues a report with the release of the half-year and full-year financial results, which is sent to all shareholders;
- (f) the Company posts on its website all relevant announcements made to the market (including information used for analyst briefings and press releases) after they have been released to ASX;
- (g) the Company posts on its website all of its relevant corporate governance information, including weblinks to the following information:
 - (i) an overview of the Company's current business;
 - (ii) a description of how the Company is structured;
 - (iii) a summary of the Company's history;
 - (iv) a key events calendar showing the expected dates in the forthcoming year for:
 - (A) results presentations and other significant events for investors and analysts;
 - (B) the AGM;
 - (C) books closing dates for determining entitlements to dividends or distributions; and
 - (D) ex-dividend and payment dates for dividends or distributions;
 - (v) once they are known, the time, venue and other relevant details for results, presentations and the AGM;
 - (vi) historical information about the market prices of the Company's securities;
 - (vii) a description of the Company's dividend or distribution policy;
 - (viii) information about the Company's dividend or distribution history;
 - (ix) copies of media releases the Company makes;

- (x) contact details for enquiries from security holders, analysts or the media;
 - (xi) contact details for its share registry;
 - (xii) links to download key security holder forms, such as transfer and transmission forms, dividend or distribution reinvestment plan;
 - (xiii) the names, photographs and brief biographical information for each of its directors and senior executives;
 - (xiv) its constitution, its Board charter and the charters of each of its Board committees;
 - (xv) the corporate governance policies and any other relevant corporate governance materials;
 - (xvi) copies of its annual reports and financial statements;
 - (xvii) copies of its announcements to ASX;
 - (xviii) copies of notices of meetings of security holders and any accompanying documents;
 - (xix) if it keeps them, webcasts and/or transcripts of meetings of security holders and copies of any documents tabled or otherwise made available at those meetings;
 - (xx) if it keeps them, webcasts and/or transcripts of investor or analyst presentations and copies of any materials distributed at those presentations;
- (h) the Company will disclose on its website/ in the annual report whether it has any material exposure to economic, environmental and social sustainability risks, and if it does, how it manages or intends to manage those risks, especially where those risks could affect the Company's achievement of its financial performance or outcomes disclosed;
- (i) where possible, the Company will post advance notification of significant group briefings (eg results announcements) through the Company's website;
- (j) general shareholder questions may be posed to the Company via email communication (please refer to the Company's website) or by written or telephone correspondence to the Company Secretary; and
- (k) the Company will provide shareholders with the option to receive communications from it electronically.