

Schedule 6 – Continuous Disclosure and Market Communications Policy

1. GENERAL PRINCIPLES

The Company must comply with continuous disclosure requirements arising from legislation and the ASX Listing Rules.

This policy also outlines the requirements of the Corporations Act 2001 (Cth) (**Corporations Act**) and the ASX Listing Rules (**Listing Rules**) with respect to the release of information to the market.

2. OBJECTIVES

The objectives of this policy are to:

- (a) ensure that the Company complies with its continuous disclosure obligations under the Corporations Act and Listing Rules;
- (b) provide shareholders and the market with timely, direct and equal access to information issued by the Company; and
- (c) promote investor confidence in the integrity of the Company and its securities.

3. SCOPE AND APPLICATION

This policy applies to the Company and:

- (a) all directors and officers of the Company;
- (b) all employees of the Company, whether full time, part time or casual;
- (c) all persons engaged by the Company to perform services for the Company and its subsidiaries or related companies under a contract for services or consultancy agreements; and
- (d) all advisors to the Company,

(Relevant Persons or you).

Relevant Persons must comply with this policy.

In addition, the Company Secretary is responsible for:

- overseeing and co-ordinating disclosure of information to the relevant stock exchanges and shareholders; and
- providing guidance to Relevant Persons on disclosure requirements and procedures.

4. COMMUNICATION OF INFORMATION

4.1 Overview

Price sensitive information is publicly released through ASX before it is disclosed to shareholders and market participants. Distribution of other information to shareholders and market participants is also managed through disclosure to the ASX. The importance of safeguarding the confidentiality of corporate information to avoid premature disclosure is paramount.

Information is posted on the Company's website after the ASX confirms an announcement has been made, with the aim of making the information readily accessible to the widest audience.

4.2 **Listing Rule 3.1**

The primary continuous disclosure obligation is contained in Listing Rule 3.1, which states that:

"Once an entity is or becomes aware of any information concerning it that a reasonable person would expect to have a material effect on the price or value of the entity's securities, the entity must immediately tell ASX that information."

This is generally referred to as "*market sensitive information*".

4.3 **Exceptions – Listing Rule 3.1A**

The only exceptions to this disclosure principle are those permitted under Listing Rule 3.1A where an entity may withhold disclosure if all three of the following criteria are satisfied:

- (a) a reasonable person would not expect the information to be disclosed;
- (b) the information is confidential and the ASX has not formed the view that the information has ceased to be confidential; and
- (c) one or more of the following applies:
 - it would be a breach of law to disclose the information;
 - the information concerns an incomplete proposal or negotiation;
 - the information comprises matters of supposition or is insufficiently definite to warrant disclosure;
 - the information is generated for the internal management purposes of the Company; and
 - the information is a trade secret.

Where the Company is relying on an exception to Listing Rule 3.1, or is involved in a development that may eventually require reliance on an exception, appropriate confidentiality protocols must be adhered to.

However, if the ASX considers that there is, or is likely to be, a false market in the Company's securities and asks the Company to give the ASX information to correct or prevent a false market, the Company must immediately give that information to the ASX. This obligation arises even if the Company considers that an exception to continuous disclosure obligation applies. All announcements (and media releases) must be:

- prepared in accordance with ASX Listing Rules and continuous disclosure requirements;
- factual and not omit material information; and
- expressed in a clear and objective manner to allow investors to assess the impact of the information.

4.4 **Examples of Price Sensitive Information or Market Sensitive Information**

Information is "market sensitive" or "price sensitive" if a reasonable person would be taken to expect information to have a "material effect on the price or value" of the Company's securities if the information "would, or would likely to, influence persons who commonly invest in securities in deciding whether to acquire or dispose of" those securities.

It is not possible to exhaustively list the information which must be disclosed. Market sensitive information or price sensitive information extends beyond pure matters of fact and includes matters of opinion and intention and may include:

- (a) the Company considering a major acquisition or disposal;
- (b) the threat of major litigation against the Company;
- (c) the Company's revenue and profit or loss results materially exceeding (or falling short of) the market's expectations;
- (d) a material change in debt, liquidity or cash flow;
- (e) a significant new development proposal (e.g. new product or technology);
- (f) the grant or loss or renewal of a major contract;
- (g) a management or business restructuring proposal;
- (h) a share issue proposal; or
- (i) giving or receiving a notice of intention to make a takeover.

5. ROLES AND RESPONSIBILITIES

This policy will be administered by several key personnel within the Company. However, employees at every level have a role to play to ensure that the Company achieves the objectives of this policy.

The responsibilities under this policy are divided as follows:

- **Board of Directors:** the Board has adopted this policy and will be responsible for reviewing and approving all draft Company announcements that contain market sensitive information, including periodic financial reports of the Company (such as quarterly, half-yearly and annual reports) before these announcements or reports are released to the market;
- **Company Secretary or Responsible Officer:** responsible for the overall administration of this policy and the filing of all communications with ASX;
- **authorised spokespersons:** the only employees authorised to speak on behalf of the Company to external parties (see paragraph 6); and
- **all employees:** report any market sensitive information to the management or the Board and observe the Company's "no comments" policy.

6. AUTHORISED SPOKESPERSONS

The authorised spokespersons for the Company are:

- (a) the Chairperson of the Board;
- (b) the Chief Executive Officer (or Managing Director);
- (c) the Company Secretary; and
- (d) other persons authorised by the Board from time to time.

The authorised spokespersons are the only directors, officers or employees who may speak to the media or other external parties in relation to matters subject to this policy.

7. ASX ANNOUNCEMENTS

The Company's protocol in relation to the review and release of ASX announcements (and media releases) is as follows:

- (a) All key announcements at the discretion of the Chief Executive Officer/ Managing Director are to be circulated to and reviewed by all members of the Board.
- (b) All members of the Board are required to seek to provide their Chief Executive Officer/ Managing Director (or in his/ her absence, the Company Secretary) with

verbal or written contribution of each key announcement, prior to its release. Where the urgency of the subject matter precludes reference to the full Board, an announcement within this category may be approved by Directors who are available. It is specifically acknowledged that where a continuous disclosure obligation arises, disclosure cannot be delayed to accommodate the availability of Board members.

- (c) Any relevant parties named in the announcement should also be given the opportunity to review the announcement prior to its release, to confirm all information is factually correct.
- (d) All members of the Board will receive copies of all material market announcements (or media releases) promptly after they have been made.

The Company Secretary shall lodge the announcements (or media releases) and maintain a copy of all announcements made.

In situations where the Company needs to issue a joint announcement with a joint venturer or collaboration partner, the Company will seek to give that other party the opportunity to review the announcement prior to its release, provided that it does not compromise the Company's ability to comply with its disclosure obligation.

8. TRADING HALTS

The Company may, in exceptional circumstances, request a trading halt to prevent the emergence of a false or uninformed market for the Company's securities and to manage disclosure issues. Any decision to request a trading halt will be made by the Chief Executive Officer/ Managing Director and/ or Chairperson of the Board.

9. BRIEFINGS

The Company holds briefing sessions with analysts, investors and media groups. Only authorised Company spokespersons may conduct such sessions and all sessions will be conducted in accordance with the Company's continuous disclosure obligations.

Any new and substantive investor or analyst presentation will be released on the ASX Market Announcements Platform ahead of the presentation. Where practicable, the Company will consider providing shareholders the opportunity to participate in such presentations.

10. INADVERTENT DISCLOSURE OF INFORMATION

Disclosure of market sensitive information to an external party prior to disclosure to ASX constitutes a breach of Listing Rule 15.7. To prevent a breach of Listing Rule 15.7, and to minimise the consequences of such a breach occurring, the following procedures apply.

A review should be done following any communications with an external party. If any personnel becomes aware that:

- there may have been inadvertent disclosure of market sensitive information (which has not been disclosed to ASX) during any communication with external parties; or
- confidential Company information may have been leaked (whatever its source),

he or she should immediately notify the Chief Executive Officer/ Managing Director and/ or Company Secretary. In such a situation, there may be a requirement for the Company to immediately issue a formal ASX announcement.

Where the confidential information disclosed during external communications is not market sensitive, the Company will still ensure equal access to that information by posting it on its website.

11. RUMOURS AND MARKET SPECULATION

The Company's general practice, which must be observed by all Relevant Persons and employees, is not to comment on market speculation and rumours. The Chief Executive Officer/ Managing Director and/ or Chairperson of the Board will decide if a comment is to be made.

12. ADVISORS AND CONSULTANTS

The Company will require consultants and professional advisers engaged by the Company or any of its subsidiaries to adhere to this policy. The Company may ask such consultants and professional advisers to sign a confidentiality agreement

13. MEDIA CONTACT AND PUBLIC COMMENT

All authorised spokespersons must ensure that they comply with the Company's Code of Conduct and any other policies in respect of media contact and public comment.

14. REVIEW OF POLICY

The Board will monitor the content, effectiveness and implementation of this Policy on a periodic basis. Any updates or improvements identified will be addressed as soon as possible.

Any questions about this policy should be directed to the Company Secretary or the Chief Executive Officer/ Managing Director.

15. VERSION CONTROL

Version	Date	Changes
1	12 October 2021	Review and update consistent with 4 th Edition compliant Corporate Governance Plan