



ABN 36 087 244 228

# Policy for Market Disclosure and Communications

Approved by the Board on 31 January 2008

## 1. Purpose

The Market Disclosure and Communications Policy is designed to meet the continuous disclosure obligations imposed by the ASX Listing Rules, as well as best practice for listed companies generally, to ensure that;

- All price sensitive information is disclosed in the proper timeframe,
- The Company prevents selective, inadvertent or inaccurate disclosure of material price sensitive information, and
- All interested parties have an equal opportunity to access that information, as is possible.

## 2. Responsibilities

The CEO is responsible for administering the policy, supported by the Company Secretary.

The Company Secretary is the designated officer responsible for communication with ASX.

## 3. Policy and procedures

To assist the whole organisation in understanding the Company's disclosure obligations, briefings are held with management and staff to ensure they are aware of the continuous disclosure regime and have an understanding of matters such as confidential information, insider trading, materiality, price sensitive information and the overarching requirement to keep the market fully informed.

Managers are required to bring to the immediate attention of the CEO and Company Secretary any matter which they believe may require consideration for disclosure. The CEO and Company Secretary will

then make an assessment of the matter and if disclosure is necessary will prepare a draft announcement to the market. Depending on the materiality and nature of the announcement, the CEO may then consult with all directors, or with as many as can be contacted immediately. Relatively simple or procedural announcements may be released to the market without the need for prior Board sign off. Announcements of a more material nature will be reviewed by at least one independent director prior to release.

All ASX announcements will be posted on the Company's website.

At each Board meeting the Board will review and ratify all ASX announcements released since the previous Board meeting.

Enquiries from shareholders, the media or general public in relation to ASX announcements are to be handled by the CEO, Company Secretary or the Company appointed Investor Relations consultant. Certain announcements may require the Chairman to be a point of contact and if this is the case the instruction will be specified on the announcement.

The Company will not disclose price sensitive information in any private meetings with investors or market analysts before formally disclosing it to the market.

#### **4. Investor relations communication including shareholder communications**

The following information is posted and kept up to date on the Company's website;

- ASX announcements
- Financial reports (annual and half yearly)
- Notices of shareholder meetings including explanatory materials
- Analyst research and any other relevant media
- Relevant company presentations

Notices of meetings and explanatory materials, and annual reports are mailed to all shareholders.

Periodic shareholder/investor updates are prepared and these are distributed either by mail or e-mail to those who have registered a desire to receive them.