

## **CONTINUOUS DISCLOSURE POLICY**

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Antaria Limited (Antaria or the Company) is committed to complying with the continuous disclosure obligations of the Corporations Act and the listing rules of the Australian Securities Exchange (ASX).

In order to ensure compliance with the requirements of the Corporations Act and the ASX rules relating to continuous disclosure of material information, Antaria has established internal procedures for the dissemination and monitoring of that information.

### **CONTINUOUS DISCLOSURE OBLIGATIONS**

In order to meet the requirements of the ASX (and in particular listing rule 3.1), the Company must ensure it notifies the ASX of information concerning the Company that a reasonable person would expect to have a material effect on the price or value of the Company's securities, except where such information is not required to be disclosed in accordance with the exception provisions of the listing rules.

### **RESPONSIBILITY**

The Chief Financial Officer is responsible for the implementation, operation and monitoring of this Policy. This includes overseeing and coordinating disclosure of information to the ASX, educating employees on the Company's disclosure policies and procedures and communicating with the Executive Chairman and Directors on continuous disclosure matters.

### **DISCLOSURE PROCEDURE**

All Directors and senior managers are required to forward details of any potentially price sensitive information to the Chief Financial Officer.

The Chief Financial Officer is also to be made aware, in advance, of proposed information disclosures (including information to be presented at private meetings, and information to be released by external parties) to enable consideration of the continuous disclosure requirements.

Any proposed announcement of price sensitive information for release to the ASX is required to be approved by the Executive Chairman and at least one Non-Executive Director.

### **ASX ANNOUNCEMENTS**

The announcement is released electronically to the ASX first (or via fax if the email system is not operating).

Following confirmation of the announcement to the ASX, the announcement is immediately placed on the Company's website and sent to various media outlets and contacts.

Only after public release of the information through the ASX can the information be disclosed to analysts or others outside the Company

### **AUTHORISED SPOKESPERSONS**

The only person authorised to speak on Company's behalf is the Executive Chairman.

Authorisation for other management or employees to speak on behalf of the Company may be given in specific circumstances only and on a case by case basis.

In all cases, authorised spokespersons are only permitted to clarify information that the Company has publicly released through the ASX and should avoid revealing or commenting on other price sensitive matters under all circumstances.

## **FINANCIAL MARKETS / BROKERS / ANALYSTS**

Antaria provides half-yearly disclosures to the market on its financial and operational results. This is complemented by disclosures during the year as events occur.

The only Company officers authorised to speak on behalf of the Company to institutional investors, stockbrokers and analysts is the Executive Chairman. Approaches by brokers/analysts or shareholders to non-authorised spokespersons should be referred to the Executive Chairman.

When an authorised spokesperson is responding to a financial projection and/ or report of a broker/ analyst, that spokesperson must confine their comments to errors in factual information and underlying assumptions.

Comments on expected earnings are confined to the Company's financial reports, but any material change in a disclosed expectation is disclosed immediately via the ASX.

## **FINANCIAL INFORMATION – COMMUNICATION BLACKOUT PERIODS**

To protect against inadvertent disclosure of price sensitive information, the Company imposes communication blackout periods for financial information between the end of financial reporting periods (31 December and 30 June) and the announcement of quarterly cash reports and/or results to the market (31 March, 30 June, 30 September, and 31 December).

During these periods the Company does not hold meetings or briefings to discuss financial information with individual investors, institutional investors, stockbrokers, analysts or media representatives unless such meetings or briefings are the subject of a specific announcement to the market via the ASX.

## **MEDIA REPRESENTATIVES**

The Executive Chairman is the only person authorised to discuss any business of the Company with any media representative. An employee contacted by a media representative must immediately refer that representative to the Executive Chairman.

## **INADVERTENT DISCLOSURE, LEAKS & RUMOURS**

Market speculation and rumours have the potential to impact the Company whether they are unsubstantiated or not, The Company's general policy is to respond by advising that "Antaria Limited does not respond to market rumour or speculation".

Where rumours are present, the Chief Financial Officer, in consultation with the Executive Chairman and Directors, will determine an appropriate course of action having regard to the specific facts of the situation and the Company's continuous disclosure obligations.

Depending on the specific circumstances, it may be necessary to make an announcement to the ASX in certain circumstances and consider applying to the ASX for a trading halt until an announcement is made.

In the event of an inadvertent disclosure of price sensitive information, a public announcement is to be lodged as soon as practicable with the ASX to ensure all investors are equally informed.

In the event of an inadvertent disclosure of confidential non-price sensitive information, that information should be posted on the Company's website as soon as practicable.

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