

## **CONTINUOUS DISCLOSURE POLICY**

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SenterpriSYS Limited (“the Company”) is committed to complying with the continuous disclosure obligations of the Corporations Act and the listing rules of the National Stock Exchange of Australia (NSX).

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

### **CONTINUOUS DISCLOSURE OBLIGATIONS**

In order to meet the requirements of the NSX (and in particular listing rule 3.1), the Company must ensure it notifies the NSX 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 Chairman of the Audit Committee and Company Secretary are responsible for the implementation, operation and monitoring of this Policy. This includes overseeing and coordinating disclosure of information to the NSX, educating employees on the Company's disclosure policies and procedures and communicating with the Managing Director 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 Chairman of the Audit Committee and Managing Director.

The Chairman of the Audit Committee and Managing Director are 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 NSX is required to be approved by the Chairman of the Audit Committee and approved by all Directors.

### **NSX ANNOUNCEMENTS**

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

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

### **AUTHORISED SPOKESPERSONS**

The only person authorised to speak on the Company's behalf is the 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 NSX and should avoid revealing or commenting on other price sensitive matters under all circumstances.

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

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

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.

## **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).

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 NSX.

## **MEDIA REPRESENTATIVES**

The 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 Chairman.

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

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 "SenterpriSYS Limited does not respond to market rumour or speculation".

Where rumours are present, the Chairman, in consultation with the 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 NSX in certain circumstances and consider applying to the NSX 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 NSX to ensure all investors are equally informed.