

# Corporate Governance Policy No 1 - Continuous Disclosure

In accordance with the *ASX Listing Rules* CPT Global Limited will immediately notify the ASX of information:

1. Concerning the Company that a reasonable person would expect to have a material effect on the price or value of the Company's securities.
2. That would, or would be likely to, influence persons who commonly invest in securities in deciding whether to acquire or dispose of the Company's securities.

The only exception to this is where the *ASX Listing Rules* do not require such information to be disclosed.

Upon confirmation of receipt from the ASX the Company will post all information disclosed in accordance with this policy on the Company's Web site in an area accessible by the public.

## **Internal Notification and Decision Making Concerning the Disclosure Obligation**

The Board has designated the Company Secretary as the person responsible for overseeing and coordinating disclosure of information to the ASX as well as communicating with the ASX. The Company Secretary will be responsible for ensuring that Company announcements are made in a timely manner and will establish a vetting procedure to ensure that the announcements are factual and do not omit any material information. The Company Secretary will also ensure that Company announcements are expressed in a clear and objective manner that allows investors to assess the impact of the information when making investment decisions.

To assist the Company Secretary fulfil the Company's disclosure requirements, the CEO is responsible for immediately communicating to the Company Secretary any possible continuous disclosure matter concerning CPT Global Limited. The CEO is responsible for ensuring that the information is provided to the Company Secretary as soon as they become aware of it and that it is factual and does not omit any material information. The CEO will promptly respond to requests from the Company Secretary for further information concerning the possible continuous disclosure matter concerning the company.

The Company Secretary after consultation with the Chairman and/or CEO determines whether information should be disclosed to the ASX.

## **Promoting and Monitoring Compliance**

The Company has a Continuous Disclosure Committee comprising the following:

- Company Secretary.
- Chairman.
- CEO.

The purpose of the Continuous Disclosure Committee is to promote and monitor compliance with the Company's continuous disclosure obligations and to ensure that all employees and Consultants are aware of this policy. In addition the Continuous Disclosure Committee is responsible for ensuring that the Regional Managers are aware of the type of information that needs to be communicated and their obligation to communicate to the CEO and Company Secretary any possible continuous disclosure matter concerning their region.

A meeting of the Committee may be convened from time to time to consider particular continuous disclosure issues.

On a daily basis the Company Secretary is charged with monitoring compliance with this policy. As part of that monitoring all major announcements to the ASX will be reviewed for compliance with this policy. These compliance reviews will be reported to the Continuous Disclosure Committee as part of their regular review of compliance. Any possible non-compliance will be reported to the Board at its next meeting. The Company Secretary must notify both the Chairman and the CEO at the earliest opportunity if they believe that a false market in the Company's securities either exists or has the possibility to exist.

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## Measures for Seeking to Avoid the Emergence of a False Market in the Company's Securities

The Company recognises that a false market in the Company's securities may result if the Company provides incomplete information to the ASX or if the Company fails to respond to market and media speculation that may, or may be likely to, have an impact on the price of the Company's securities.

While the Company does not, in general, respond to market speculation or rumours unless required to do so by law or the ASX, the Company is committed to disclosing as much information as possible, without harming the Company, to a wide audience of investors through media releases of important milestones including information that may not strictly be required under continuous disclosure requirements. Information given to the ASX for market release will also be provided to investors through media releases. Such media releases will be posted on the Company's Web site.

Where appropriate the Company will request a trading halt from the ASX to prevent trading in the Company's securities by an inefficient and uninformed market until the Company can make an announcement to the market.

## Safeguarding Confidentiality of Corporate Information to Avoid Premature Disclosure

All employees and Consultants are advised of the confidentiality of Company information. In addition the Company imposes communication blackout periods for financial information between the end of financial reporting periods and the announcement of results to the market via the ASX. To protect against inadvertent disclosure of price sensitive information the Company does not hold meetings or briefings to discuss financial information with individual investors, institutional investors, Analysts or media representatives during the communication blackout periods unless such meetings or briefings are the subject of a specific announcement to the market via the ASX.

## Media Contact and Comment

The Board has designated the CEO and the Chairman to speak to the press on matters associated with the Company. In speaking to the press the CEO or the Chairman will not comment on price sensitive information that has not already been disclosed to the ASX, however they may clarify previously released information. To assist in safeguarding against the inadvertent disclosure of price sensitive information the CEO and the Chairman will be informed of what the Company has previously disclosed to the market on any issue prior to briefing anyone outside the Company.

The Chairman is authorised to comment on:

- Annual and half yearly results at the time of the release of the annual or half yearly report.
- Resolutions to be put to General Meetings of the Company.
- Changes in Directors and any matter related to the composition of the Board or Board processes.
- Any speculation concerning Board meetings or the outcomes of Board meetings.
- Other matters specifically related to shareholders.

The CEO is authorised to comment on:

- The Company's future outlook.
- Any operational matter and other media queries concerning operational issues which reflect either positively or negatively on the Company.
- Proposed or actual legal actions.
- Queries and general discussion concerning the Company's industry.

There will be times when Directors, employees and Consultants will be approached by the media for public comment. On such occasions the Director, employee or Consultant should comply with the following:

1. Refer the person to the CEO or Chairman of the Board as appropriate for comment.
2. Refrain from disclosing any information, documents or other forms of data to the person without the prior consent of the CEO or the Chairman of the Board.
3. Report the person who contacted the Director/employee/Consultant, the reason (explicit or inferred) for the contact and a summary of any other relevant information as soon as possible to the CEO or the Chairman.

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## **External Communications Including Analyst Briefings and Responses to Shareholder Questions**

The Company discloses its financial and operational results to the market each half year as well as informing the market of other events throughout the year as they occur. Financial reports, media releases and AGM speeches are all lodged with the ASX and subsequently posted to the Company's Web site. As all financial information is disclosed through the ASX the Company will only comment on factual errors in information and underlying assumptions when commenting on market Analysts' financial projections, rather than commenting on the projections themselves.

In addition to the above disclosures the Company does conduct briefings and discussions with Analysts and institutional investors. However price sensitive information will not be discussed unless that particular information has been formally disclosed to the market via an ASX announcement. Slides and presentations used in briefings will also be released immediately prior to the briefing to the market via the ASX and posted on the Company's Web site.

After the conclusion of each briefing or discussion it will be reviewed to determine whether any price sensitive information has been inadvertently disclosed. If any price sensitive information was disclosed it will be announced immediately to the ASX and then posted on the Company's Web site.

Similarly when answering shareholder questions price sensitive information will not be discussed unless that particular information has been formally disclosed to the market via an ASX announcement.

Where a question can only be answered by disclosing price sensitive information the Company will decline to answer it or take it on notice and announce the information to the ASX prior to responding.

If any new price sensitive information is to be used in briefing media, institutional investors and Analysts or in answering shareholder queries, written materials containing such information will be lodged with the ASX prior to the briefing commencing. These briefing materials may also include information that may not strictly be required under continuous disclosure requirements. The briefing material will be posted to the Company's Web site as soon as the ASX confirms that this information has been received.

This policy will form a component of the induction process for all new Managers.