



## **Centrepont Alliance Limited**

**ABN: 72 052 507 507**

### **INFORMATION DISCLOSURE POLICY**

#### **Objective**

The Centrepont Alliance Limited (CAF) Information Disclosure Policy ('Disclosure Policy') aims to ensure that:

- there is full and timely disclosure of CAF's activities to shareholders, investors and other interested parties ('stakeholders') in accordance with all statutory obligations;
- all parties have equal access to externally available information about the Company.

The Policy reflects CAF's responsibility to comply with the disclosure requirements of the Australian Stock Exchange (ASX) and is reviewed regularly to reflect any changes in legislative or regulatory requirements and best practice.

This Policy will be published on the CAF website.

#### **Disclosure Principle**

CAF will immediately notify the market of any "price-sensitive" information concerning CAF in accordance with legislative and regulatory disclosure requirements.

Information will be "price-sensitive" if a reasonable person would expect that information to have a material effect on the price of CAF's shares, by influencing investors in deciding whether to buy, hold or sell those shares.

Price sensitive information will be disclosed in the first instance to the ASX and copies of these disclosures will then be posted on CAF's website.

#### **Exceptions to the Disclosure Principle**

In accordance with ASX listing Rule 3.1, CAF is not required to disclose price-sensitive information concerning CAF if:

- a reasonable person would not expect the information to be disclosed; or
- the information is confidential; or
- the information is of a kind exempted by Listing Rule 3.1 (e.g. where the information is insufficiently definitive; concerns an incomplete negotiation or proposal; is generated for internal management purposes; or its disclosure would be illegal).

### **Disclosure responsibilities and procedures**

The Chairman, the Managing Director and the Company Secretary are designated by CAF as the 'Disclosure Officers' of the Company.

Disclosure Officers are the only persons authorised to make disclosures of price sensitive information regarding CAF. They also have responsibility for reviewing proposed disclosures and making decisions in relation to what information can or should be disclosed to the market.

All CAF employees and contractors are required to inform a Disclosure Officer of any information they consider could potentially be price-sensitive as soon as they become aware of it.

### **External Communications**

Disclosure Officers are the only persons authorised by the Company to;

- Disclose information regarding CAF to the ASX;
- Speak on behalf of CAF to media, analysts and investors.
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CAF will not respond to market speculation or rumours unless required to do so by the ASX or for legal reasons.

CAF explicitly does not endorse or approve any externally prepared information (including profit forecasts) pertaining to CAF which has been compiled and published by any analyst or investor and will request the publishers of such information to include a disclaimer to this effect.

Requests for information from individual analysts or investors will be responded to by reference to this Policy and the associated announcement timetable and rules regarding expectations of profitability.

Profit forecasts and budgets are generated for internal management purposes and will not be disclosed externally except:

- where there is a legal or regulatory requirement to do so; or
- where the Directors consider it to be in the best interests of the Company to do so.

### **Trading Halts**

CAF may request a trading halt from the ASX in order to prevent trading in CAF securities by an inefficient and uninformed market.

The Board of Directors or a minimum of two Disclosure Officers must approve any request for a trading halt if one is considered necessary.

*Prepared: 16 June 2004  
Revised: 20 April 2005  
Revised: 26 September 2009*