



Continuous Disclosure Policy

Myer Holdings Limited
(ACN 119 085 602)

Company

Approved on 19 June 2024

1. Introduction

The Company has obligations under the *Corporations Act 2001* (Cth) (**Corporations Act**) and the Listing Rules of ASX Limited (**ASX**) to keep the market fully informed of information which may have a material effect on the price or value of the Company's securities, as described in clause 2.1 below. The Company's policy is to strictly comply with these requirements, and the Company discharges these obligations by releasing information to the ASX in the form of an ASX release or by disclosure of other relevant documents (eg. the annual report, results announcements etc.).

2. Continuous disclosure obligations, contraventions and penalties

2.1 ASX Listing Rule 3.1

This listing rule requires that the Company must immediately notify the ASX of any information the Company becomes aware of concerning itself that a reasonable person would expect to have a material effect on the price or value of the Company's securities. This is known as the continuous disclosure obligation.

2.2 ASX Listing Rule 15.7

This listing rule requires that the Company **must not release information that is for release to the market to any person until it has given the information to ASX** and has received an acknowledgement that ASX has released the information to the market.

2.3 Material effect on the price of securities

A reasonable person is taken to expect information to have a **material effect** on the price or value of securities if it would, or would be likely to, influence persons who commonly invest in securities in deciding whether or not to subscribe for, buy or sell the securities.

2.4 Immediately

The requirement to disclose price sensitive information immediately means that the Company must disclose information "promptly and without delay". Once it becomes aware of material price sensitive information, the Company will not be permitted to defer, postpone or put off disclosure to a later time and must release an announcement as quickly as it can in the circumstances.

2.5 Information that is generally available

The continuous disclosure obligation does not apply where the information is generally available. Information is generally available if it:

- (a) consists of readily observable matter;
- (b) has been made known in a manner that would, or would be likely to, bring it to the attention of persons who commonly invest in any of the classes of securities issued by the Company and since it was made known, a reasonable period for it to be disseminated among those persons has elapsed. That is, information will be "generally available" if it has been released to the ASX or published in an annual report, prospectus or similar document and a reasonable time has elapsed after the information has been disseminated in one of these ways; or
- (c) consists of deductions, conclusions or inferences made or drawn from information referred to in clause 2.5(a) above or information made known as mentioned in clause 2.5(b) above, or both.

2.6 Exceptions to continuous disclosure obligation

Disclosure is not required to the market where **each** of the following conditions is and remains satisfied:

- (a) **one or more** of the following apply:
- the information concerns an incomplete proposal or negotiation;
 - the information comprises matters of supposition or is insufficiently definite to warrant disclosure;
 - the information is generated for the internal management purposes of the Company;
 - the information is a trade secret; or
 - it would be a breach of a law to disclose the information; **and**
- (b) the information is confidential; **and**
- (c) a reasonable person would not expect the information to be disclosed.

As soon as any one of these 3 conditions is no longer satisfied (eg. the information is reported in the media and is therefore no longer confidential), the Company must immediately comply with its continuous disclosure obligation.

In this respect, it should also be noted that if the ASX forms the view that the information has ceased to be confidential, then such information will no longer be regarded as confidential and must be released to the market. The ASX will generally hold this view where there is a rumour circulating or there is media comment about the information and the rumour or comment is reasonably specific and reasonably accurate or where there is a sudden and significant movement in the market price or traded volumes of the Company's securities that is not otherwise explicable. This highlights the importance of maintaining confidentiality of sensitive information.

2.7 False market

If the ASX considers that there is or is likely to be a false market in the Company's securities and asks the Company to give it information to correct or prevent a false market, the Company must immediately give the ASX that information.

The obligation to give this information arises even if an exception described in clause 2.6 applies.

The ASX may consider that there is or is likely to be a false market in the Company's securities in the following circumstances:

- (a) where the Company has made a false or misleading announcement;
- (b) where there is other false or misleading information, including a false rumour, circulating in the market; or
- (c) where a segment of the market is trading on the basis of market sensitive information that is not available to the market as a whole.

2.8 Contraventions

The Company contravenes its continuous disclosure obligations if it fails to notify the ASX of information required by ASX Listing Rule 3.1.

Either the ASX or ASIC, as co-regulators, may take action upon a suspected contravention.

Contravention of its continuous disclosure obligations may also lead to unwanted publicity for the Company and may cause damage to its reputation in the marketplace which may adversely impact the market value of its securities.

2.9 Liability and enforcement

- (a) **ASX Listing Rules.** If the Company contravenes its continuous disclosure obligations under the Listing Rules, the ASX may suspend trading in the Company's shares or may de-list the Company from the ASX.

- (b) **Corporations Act.** If the Company contravenes its continuous disclosure obligations, it may also be liable under the Corporations Act and may face:
- criminal liability which attracts substantial monetary fines; and
 - civil liability for any loss or damage suffered by any person as a result of the failure to disclose relevant information to the ASX.

There is no fault element required to establish civil liability. However, a court has power to relieve a person from civil liability if the person acted honestly and in the circumstances the person ought fairly to be excused for the contravention.

ASIC has the power to issue infringement notices to the Company (see clause 2.11 below), and may also institute proceedings.

2.10 Persons involved in contravention and “due diligence” defence

The Company’s officers (including its Directors), employees or advisers who are involved in any contravention of the Company’s continuous disclosure obligations may face criminal penalties and civil liability. Substantial penalties or imprisonment, or both, may apply.

A person will not be considered to be involved in the contravention if the person proves that they:

- (a) took all steps (if any) that were reasonable in the circumstances to ensure that the Company complied with its continuous disclosure obligations; and
- (b) after doing so, believed on reasonable grounds that the Company was complying with those obligations.

2.11 Infringement notices and statement of reasons

If ASIC has reasonable grounds to believe that the Company has contravened its continuous disclosure obligations, ASIC may issue an infringement notice to the Company, providing (among other things) details of the alleged contravention and specifying the penalty.

Before issuing the infringement notice, ASIC must:

- (a) give the Company a written statement of reasons; and
- (b) give a representative of the Company an opportunity to appear at a private hearing before ASIC, give evidence and make submissions to ASIC in relation to the alleged contravention.

3. Reporting disclosable events, and response to infringement notices and written statement of reasons

- (a) **Committee** – the Company has established a Continuous Disclosure Committee (Committee). The Committee is a management committee constituted by:
 - (i) the Executive Chair or the Chief Executive Officer (**CEO**), in each case, where so appointed by the Board and holding office as such;
 - (ii) the Chief Financial Officer (**CFO**); and
 - (iii) the General Counsel and Company Secretary.
- (b) **Standing agenda item** – It is a standing agenda item at all the Company Board meetings to consider whether any matters reported to or discussed at a Board meeting should be disclosed to the market pursuant to the Company’s continuous disclosure obligation.

Continuous disclosure is also a standing agenda item at senior management meetings for the purpose of monitoring compliance with the Company’s obligations.

- (c) **Management's obligations** – If management becomes aware of any information at any time that should be considered for release to the market, it must be reported immediately to the CFO or the General Counsel and Company Secretary.
- All Executive Managers, General Managers and divisional heads of Myer must ensure they have appropriate procedures in place within their areas of responsibility to ensure that all relevant information (ie. any information that could be materially price sensitive) is reported to them immediately for on-forwarding in accordance with this Policy.
- (d) **Directors' obligations** – If the Executive Chair or Chair, in each case, where so appointed by the Board and holding office as such, or a Non-executive Director becomes aware of information that should be considered for release to the market, it must be reported immediately to the Committee.
- (e) **Receipt of infringement notice** – The receipt by the Company of any infringement notice, or written statement of reasons, issued to it by ASIC must be reported immediately to the Committee, who will determine the appropriate response.
- (f) **Role of Committee** – Where any information, infringement notice or written statement is reported (as referred to in clauses 3(c) or 3(d)), the CFO or the General Counsel and Company Secretary will inform the Committee and the Committee will (as appropriate):
- (i) review the information in question;
 - (ii) determine whether any of the information is required to be disclosed to the ASX;
 - (iii) coordinate the actual form of disclosure with the relevant members of management; and
 - (iv) review and respond to any infringement notice, or written statement of reasons, issued to the Company by ASIC. Any response to ASIC must be in a form approved by the Committee. The final form of any response to ASIC must be approved by:
 - A. the Executive Chair and Deputy Chair and Lead independent Director; or
 - B. the Chair and the CEO;in each case, where so appointed by the Board and holding office as such.
- (g) **Chair to be notified** – All deliberations of the Committee will be shared without delay with the Deputy Chair and Lead Independent Director (where so appointed by the Board and holding office as such) or, in their absence, the Chair of the Audit, Finance and Risk Committee.
- (h) **Announcements** – All announcements to the ASX will be made through Company Secretariat under the authority of the General Counsel and Company Secretary in **accordance** with the procedure outlined in Attachment 1 to this Policy (**ASX Lodgement Procedures**).
- (i) **Briefings and public speeches** – Where open briefings or public speeches are to be made and, in accordance with this Policy, relevant presentation materials and speeches are to be **lodged** with the ASX, prior approval will be obtained from the Executive Chair or the CEO, in each case where so appointed by the Board and holding office as such.

4. Trading Halts

The Company may request a trading halt from the ASX in order to prevent trading in the Company's securities by an uninformed market.

All trading halt requests will be made through the Company Secretariat under the authority of the General Counsel and Company Secretary, in accordance with the Company's procedures, as approved by the Board from time to time.

5. Public comment / statements

In order to ensure the Company meets its continuous disclosure obligations, it is important to exercise strict controls on what is said publicly, and by whom. It is therefore necessary to limit who is authorised to issue statements or make verbal comment to the media and in this regard, the Company has established a Media Relations Policy which must be read in conjunction with this Policy. A copy is attached as Attachment 2 to this Policy.

The Company Secretariat will ensure all announcements to the ASX made under this Policy are placed promptly on the Company's website following receipt of acknowledgement from the ASX that it has released the information to the market.

6. Financial markets communications

6.1 The Company's contact with the market

Throughout the year the Company has scheduled times for disclosing information to the financial market on its performance. The Company provides technical back-up information at these times that supports such announcements. The financial results announcements, and the supporting information, must be lodged with the ASX.

In addition, the Company interacts with the market in a number of ways outside these sessions which can include one-on-one briefings, speeches etc. At all times when interacting with the financial community including institutional investors and analysts, the Company must adhere to its continuous disclosure obligation and must not selectively disclose material price sensitive information to an external party unless that information has first been released to the ASX.

6.2 Authorised spokespersons

- (a) The only Company representatives authorised to speak on behalf of the Company to the financial community including institutional investors and analysts are:
- the Executive Chair or CEO, in each case, where so appointed by the Board and holding office as such;
 - the Chair (where an Executive Chair has not been appointed);
 - the Deputy Chair and Lead Independent Director, where so appointed by the Board and holding office as such;
 - the CFO; and
 - the General Counsel and Company Secretary,
- or their delegates nominated for a specific purpose.
- (b) Authorised spokespersons must not provide any material price sensitive information that has not already been announced to the market through the ASX nor make comment on anything that may have a material effect on the price or value of the Company's securities.
- (c) No guidance on actual or forecast financial performance will be provided to any external party that has not already been provided to the market generally.
- (d) Any questions or enquiries from the financial community (whether received in writing, verbally or electronically including via the website) should be referred in the first instance to the Investor Relations Manager or the General Counsel and Company Secretary.

6.3 Communication blackout periods

- (a) Between the end of a reporting period and the announcement of the financial results, the Company imposes a blackout period in order to avoid the risk of inadvertent disclosure of price sensitive information. The Company's policy is that during this time it will not hold one-on-one briefings with institutional investors, individual investors or

stockbroking analysts to discuss financial information concerning the Company and will not hold any open briefings to discuss anything other than information which has been announced to the ASX.

- (b) Any proposal to deviate from this Policy must be subject to approval in advance from the Executive Chair or CEO, in each case, where so appointed by the Board and holding office as such and, if any briefings or meetings are held during a blackout period, there must be no discussion or provision of financial or other information in breach of the Company's continuous disclosure obligation.

6.4 Open briefings to institutional investors and stockbroking analysts

- (a) The Company holds open briefing sessions, often at times when the Company has posted results or made other significant announcements. The Company will not disclose any information in these sessions which may have a material effect on the price or value of the Company securities unless such information has already been announced to the ASX.
- (b) The Company will advise the market in advance of open briefings via the ASX and the Company's website, lodge all presentation materials with the ASX prior to the presentation commencing and place such information on the Company's website promptly following completion of the briefing. The Company may web cast its open briefings at the time they occur and if so, will keep a clearly dated historical archive record of the web cast for at least a 6 month period. This information will be retained by the General Counsel and Company Secretary.
- (c) Public speeches will often be categorised as open briefings and these will be lodged first with the ASX if they contain material price sensitive information and will also be posted on the Company's website.
- (d) The Investor Relations Manager and the General Counsel and Company Secretary are responsible for ensuring the Policy requirements in relation to open briefings are met.

6.5 One-on-one briefings with the financial community / institutional investors / analysts

From time to time the Company may conduct one-on-one briefings with the financial community, including institutional investors and analysts. Where such briefings occur, no information will be provided which may have a material effect on the price or value of the Company's securities unless it has been announced previously to the ASX.

A record or note of all one-on-one briefings must be kept for compliance purposes.

6.6 Site Visits

The Company may conduct visits to its sites from time to time which involve the presence of members of the financial community including institutional investors and analysts.

Nothing will be disclosed during these site visits which may have a material effect on the price or value of the Company's securities unless it has already been announced to the ASX.

6.7 Broker sponsored investor and general conferences

Where the Company's executives give speeches or presentations to, or participate in, conferences or forums, it is important that the same protocols are maintained as for presentations to the financial community including institutional investors and analysts. In addition, where appropriate having regard to the principles underlying this Policy, the General Counsel and Company Secretary will liaise to ensure such presentations are posted promptly on the Company's website.

6.8 Review of briefings, meetings, visits and presentations

Immediately following any briefings, meetings, visits or presentations referred to in this clause 6 (Financial markets communications), management involved will review the matters discussed and presented (including any questions and answers provided).

Where he/she believe any information has been disclosed inadvertently which may have a material effect on the price or value of the Company's securities, he/she must immediately report the matter to the General Counsel and Company Secretary, the Executive Chair or CEO, in each case, where so appointed by the Board and holding office as such, or the CFO for review by the Committee for immediate disclosure to the ASX.

6.9 Review of analyst reports and forecasts

The Company recognises the importance placed on reports by stockbroking analysts.

- (a) Any comment by the Company to an analyst in relation to an analyst's report or financial projections should be confined to errors in factual information and underlying assumptions provided such comment of itself does not involve a breach of the Company's continuous disclosure obligation.
- (b) The Investor Relations Manager will maintain a record of analysts' earnings forecasts and provide a summary report of these forecasts to the CFO on a regular basis.
- (c) The CFO will monitor the analysts' forecast earnings relative to the Company's own internal forecasts and any financial forecasts previously published by the Company. In determining analysts' consensus, the Company may use a number of methods, including plotting analysts' forecasts and determining a range, calculating an average, mean or median figure (including by excluding outliers) or by obtaining a figure from a third party information provider. If the CFO becomes aware of a divergence between analysts' consensus and the Company's internal forecasts which may have a material effect on the price or value of the Company securities, the CFO will refer the matter immediately to the Committee for consideration as to whether an announcement should be made to the ASX.
- (d) As with any other deliberations of the Committee, it is important that any consideration given by the Committee to any matter referred by the CFO must be shared without delay with the Executive Chair or Chair (where so appointed by the Board and holding office as such), in his/her absence, the Chair of the Audit, Finance and Risk Committee. Where a decision is made to make an announcement about the Company's profit outlook, it is of critical importance that the Company provides clear guidance to the market regarding the Company's view of profit outlook.
- (e) During an analyst briefing, if the Company is concerned that the analyst's "forecast" diverges from the Company's internal expectations, then there is a risk that even a carefully scripted communication limited to previously disclosed information may be interpreted by the analyst as a "down grade" or "upgrade" and thus amounts to "selective disclosure".
- (f) Accordingly, analyst briefings should not be used to manage analyst's expectations. If necessary (eg. consensus analyst forecasts diverge from the Company's expectations) a public ASX release must be made.

6.10 Monitor share price movements

The Investor Relations Manager and the General Counsel and Company Secretary will monitor the Company's share price movements. If the Investor Relations Manager or the General Counsel and Company Secretary identifies circumstances where a false market may have emerged in the Company's securities, they will report the matter to the General Counsel and Company Secretary, the Executive Chair or CEO, in each case, when so appointed by the Board and holding office as such, or the CFO to determine whether the circumstances should be reviewed by the Committee.

6.11 Clear communication

It is recognised that the investor relations function requires interaction with different external stakeholders. Whilst this function must ensure the Company complies at all times with its continuous disclosure obligation, it is important for this function to liaise closely in relation to all information provided to stakeholders so as to ensure consistent and accurate communication across all areas and in order to avoid inconsistencies or ambiguities which can lead to confusion or misinformation in the marketplace.

7. Electronic communication with shareholders

- (a) In addition to its continuous disclosure obligations, the Company has a policy of seeking to keep shareholders informed through electronic communication. Under this Policy, the Company seeks to:
 - (i) provide a comprehensive and up to date website which includes copies of all material information lodged with the ASX (including announcements and financial information) as well as other Company information. The website also provides a facility for shareholders to direct enquiries to the Company;
 - (ii) place all relevant announcements, briefings and speeches made to the market or media on the website; and
 - (iii) advise the market in advance of open briefings to financial community including institutional investors and analysts via the ASX and the website, and lodge all presentation materials with the ASX prior to the presentation commencing.
- (b) The Policy also requires the Company to place such information on the website promptly following completion of the briefing;
 - (i) place full text of notices of meeting, and accompanying explanatory notes on the website; and
 - (ii) encourage shareholders to provide e-mail addresses so that the Company can notify them when announcements have been lodged with the ASX.
- (c) Providing as much information as possible to shareholders through electronic means reinforces the importance of ensuring that executives clearly understand the Company's continuous disclosure obligation and that the procedures set out in this Disclosure Policy are adhered to. This in turn assists in ensuring that all appropriate material information is identified and released to the market and the Company's shareholders in accordance with the Company's continuous disclosure obligation.

8. Role of the General Counsel and Company Secretary

The Company has nominated the General Counsel and Company Secretary as the person with the primary responsibility for all communication with the ASX in relation to Listing Rule matters. In particular, the Company Secretary is responsible for:

- (a) liaising with the ASX in relation to continuous disclosure issues;
- (b) the lodging of announcements with the ASX in relation to continuous disclosure matters;
- (c) ensuring senior management are aware of this Policy and related procedures, and of the principles underlying continuous disclosure;
- (d) ensuring this Policy is reviewed and updated periodically as necessary; and
- (e) maintaining an accurate record of all announcements sent to the ASX and all correspondence with ASIC in relation to the Company's continuous disclosure obligations.

9. Policy breaches

The Company regards its continuous disclosure obligation very seriously. Breach of this Policy may lead to disciplinary action being taken against the employee, including dismissal in serious cases.

10. Policy review

The Board of Directors will review this Policy periodically. The General Counsel and Company Secretary will communicate any amendments to employees as appropriate.

Attachment 1 – ASX Lodgement procedures

Purpose

To outline the procedures to be followed by the Company in relation to the release of announcements to ASX Limited (ASX) in relation to the Company's continuous disclosure obligations.

Background

ASX Listing Rules require a listed entity to immediately notify the ASX of any information concerning it that a reasonable person would expect to have a material effect on the price or value of the entity's securities. The entity does this by way of an online lodgement to the ASX Company Announcements Office (**CAP**). The online lodgement will be carried out on a secure online service.

There are 2 main types of announcements made to the ASX:

- (a) Price sensitive information, including annual and half-yearly results announcements, which are usually in the form of media materials; and
- (b) General notifications required by the ASX (eg. change of Director, change in Directors shareholdings, issue of new securities) which are usually drafted by Company Secretariat.

All price sensitive announcements are to remain confidential until release with CAP.

Any information provided to CAP will be immediately released by CAP to the market. As such, it is extremely important that appropriate controls are placed over the ASX lodgement process to ensure:

- (a) Only authorised personnel are able to lodge announcements with CAP; and
 - (b) All documents lodged with CAP are the final versions approved by the relevant person within the Company.
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Person authorising the announcement to ASX

ASX Listing Rules require that any announcement must identify the title of the body, or the name and title of the officer of the Company that authorised the document to be given to the ASX.

ASX lodgement procedure

The procedure to be followed in relation to the lodgement of announcements with the ASX is as follows:

1. Company Secretariat will draft the ASX release.
2. The Executive Chair or CEO, in each case, where so appointed by the Board and holding office) as such, must approve **all** price sensitive releases. Where the Executive Chair or CEO (as applicable) is not available, the Chief Financial Officer will approve price sensitive releases.
3. Any ASX releases drafted by the Company Secretariat (other than the Company Secretary) will be sent by email to the General Counsel and Company Secretary.
4. The General Counsel and Company Secretary will review all announcements before confirming their release to the ASX. Where the General Counsel and Company Secretary is not available, the CFO will approve announcements before confirming their release to the ASX.
5. Where the General Counsel and Company Secretary or Continuous Disclosure Committee considers the information disclosed in the announcement to be sufficiently material, the Board

will review the announcement before confirming its release to the ASX. In these circumstances, the Board meeting would need to be convened promptly and without delay.

6. Once the ASX release has been approved and the timing for release has been confirmed, the General Counsel and Company Secretary will release the announcement online to the ASX
7. Confirmation of the ASX release is received via e-mail by the Company Secretariat.
8. The Company Secretariat will advise the appropriate Company management of the release via e-mail and a copy of the release will also be provided to all Non-executive Directors.
9. The email confirmation should be filed with the hard copy of the announcement in the ASX release file and the announcement placed on the Investor and Media Centre section of the Company website.

Attachment 2 – Media Relations Policy

1. Statements and comments to the media

This document has been prepared to assist the Company's managers in dealings with the news media.

The Company maintains regular contact with the news media but, as a public company, must exercise strict controls on what is said, and by whom. It is therefore necessary to limit who is authorised to issue statements or make verbal comment to the media.

ASX Limited (**ASX**) has stringent requirements under Listing Rule 3.1 in relation to the continuous disclosure of price-sensitive information. This has resulted in the Company determining that, as a matter of policy, all media releases made anywhere in the world, must first be provided to the Company Secretariat for clearance and possible lodgement at the ASX prior to that information being made publicly available in any other way.

2. Issuing a media release or other written statement

Media releases on Company policy, acquisitions, matters which could affect the Company's share price, or which relate to other sensitive matters (such as the Company's performance, Government policy, economic or political issues) may only be made by the Company Secretariat on the authority of the Executive Chair or CEO, in each case, where so appointed by the Board and holding office as such.

Executive Managers, General Managers and divisional heads of Myer, with the guidance of the General Counsel and Company Secretary, may issue statements on matters pertaining solely to their area of business responsibility that relate to industry matters, new services and product releases, but not on strategic direction.

Copies of all proposed media statements must be passed to the Company Secretariat prior to release for clearance and possible lodgement at the ASX.

Media releases or other written statements (such as letters to the press) must not be issued in any circumstances other than as set out above, except with the approval of the Executive Chair or CEO, in each case, where so appointed by the Board and holding office as such.

Questions from the Company's website and any media requests received via the website should be forwarded to General Manager Corporate Affairs for a response.

3. Verbal comment

The requirements of ASX Listing Rule 3.1 on continuous disclosure should be kept in mind at all times when making public comment. This means that, as a general rule, no information should be released which is not already in the public domain.

Verbal comment to the media, such as a telephone interview or a face-to-face interview, generally can only be made by the Executive Chair or CEO, in each case, where so appointed by the Board and holding office as such, or the Chair (where an Executive Chair has not been appointed), or his/her specifically nominated delegates.

Verbal comment on Company policy, acquisitions, matters which could affect the Company's share price or which relate to other sensitive matters (such as the Company's performance, Government policy, economic or political issues) may only be made by the Executive Chair or CEO, in each case, where so appointed by the Board and holding office as such, or the Chair (where an Executive Chair has not been appointed), or his/her specifically nominated deputy.

4. Responding to media inquiries

Enquiries from journalists, or requests for information, must be treated as detailed in clause 3 (Verbal comment).

If any employee or executive is approached for information by a representative of the media, the employee should obtain the person's name, the organisation they represent, their location and phone number, as well as an outline of the information required, without responding to the questions/issues raised. The enquirer should be advised that arrangements will be made for someone to make contact with them. The matter should then be passed on to General Manager Corporate Affairs immediately.

The Executive Chair or CEO, in each case, where so appointed by the Board and holding office as such, is available to handle enquiries at the request of any business unit head.

On no account should an unauthorised person make a comment or respond to any media enquiries.

5. Emergency contacts

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In emergency situations, where the media are seeking immediate comment, the procedures detailed in clause 3 (Verbal comment) apply.

Managers should not make comment and instead, contact the General Counsel and Company Secretary.

6. Summary

The reputation of the Company is at risk on every occasion that a public statement is made. When making public statements, the Company must be consistent and accurate. It is better to err on the side of caution and say nothing rather than risk embarrassment or legal action.

In all cases where approval is granted to talk to the media particular attention must be paid to relevant laws, including trade practices, consumer protection, environment and health and safety legislation, and the requirements of ASX Limited Listing Rules.