



**ASPIRE**  
LIMITED

# Continuous Disclosure Policy

The Company must comply with continuous disclosure requirements arising from legislation and the ASX Listing Rules.

The general rule, in accordance with ASX Listing Rule 3.1, is that once the Company becomes aware of any information concerning it that a reasonable person would expect to have a material effect on the price or value of the Company's securities, the Company must immediately disclose that information to the ASX.

The Company has in place a written policy on information disclosure and relevant procedures.

The focus of these procedures is on continuous disclosure compliance and improving access to information for investors including:

- I. Complying with the general and continuous disclosure principles contained in the ASX Listing Rules and the Corporations Act 2001.
- II. Ensuring that shareholders and the market are provided with timely and accurate information about its activities; and
- III. Ensuring that all market participants have equal opportunities to receive externally available information issued by the Company.

The Company Secretary is responsible for:

- I. overseeing and co-ordinating disclosure of information to the relevant stock exchanges and shareholders; and
- II. providing guidance to Directors and employees on disclosure requirements and procedures.

## Material Information

Price sensitive information is publicly released through ASX before it is disclosed to shareholders and market participants. Price sensitive information is information or proposal that would likely influence investors in deciding whether to buy or sell securities in the Company. Distribution of other information to shareholders and market participants is also managed through disclosure to the ASX. If the information or proposal is material information, however satisfies the exceptions by the ASX as per Listing Rule 3.1A, then the Company is not required to release that information to the market.

All announcements (and media releases) must be:

- I. prepared in compliance with ASX Listing Rules continuous disclosure requirements;
- II. factual and not omit material information; and
- III. expressed in a clear and objective manner to allow investors to assess the impact of the information when making investment decisions.

The Company's protocol in relation to the review and release of ASX announcements (and media releases) is as follows:

- I. Any information or proposal that may potentially be considered material information must be communicated by all management and staff immediately to the Managing Director, or in his/her absence, the Company Secretary or another Director.
- II. All announcements are to be circulated to relevant verification and legal teams as required and reviewed by all members of the Board where the matter is the subject of an 'announcement protocol' as adopted by the Board from time to time.

- III. When Board approval is necessary, all members of the Board are required to seek to provide to the Managing Director (or in his/her absence, the Company Secretary) with verbal or written contribution of each key announcement, prior to its release.
- IV. Any relevant parties named in the announcement should also be given the opportunity to review the announcement prior to its release, to confirm all information is factually correct.
- V. The Managing Director (and in his/her absence, the Chairman) is to be given the final signoff before release to the ASX of the announcement.

The Company Secretary is to maintain a copy of all announcements released.

The Managing Director, Chairman, Company Secretary, or their delegates nominated for a special purpose are the authorised representatives of the Company for media and market communications.

The Company's general policy is not to respond to reports of rumours about the Company published by analysts, fund managers, or reporters. However it may be necessary to respond to the unauthorised, or selective disclosure of information or market rumours concerning the Company, where the information is having, or likely to have an impact on the price of the Company's securities. Should this matter arise the Managing Director or Company Secretary will discuss the significance of the matter and possible disclosure responses with the Chairman. The Company Secretary will co-ordinate the disclosure response to the ASX.

The Company procedures enable price sensitive information to be publically released through ASX before it is disclosed to shareholders and market participants. Distribution of other information to shareholders and market participants is also managed through disclosure to ASX.

Information is posted on the Company's website after the ASX confirms an announcement has been made, with the aim of making the information readily accessible to the widest audience.