



## CONTINUOUS DISCLOSURE POLICY

### CONTEXT

ITL Limited (ITL) is committed to complying with its continuous disclosure obligations in accordance with the Corporations Act and the Listing Rules of the Australian Stock Exchange (ASX). Listing Rule 3.1 provides that **“Once an entity is or 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 entity’s securities, the entity must immediately tell ASX that information”**.

Contravention of the continuous disclosure requirements could result in criminal sanctions being brought against ITL’s officers, ITL being liable to compensate any investor who suffers loss or damage as a result of that contravention, or ITL being delisted from the ASX.

In meeting its continuous disclosure obligations ITL is mindful that information regarding customer contracts may be required by the customer and or ITL’s suppliers to be kept confidential and the information released may have the potential to provide ITL’s competitors or ITL’s suppliers’ competitors with information that could be damaging to ITL’s business or its suppliers’ businesses.

The purpose of this policy is to ensure that all price sensitive information is released to the ASX prior to other audiences, and that all public communications (releases) including but not limited to analyst presentations and briefings, press releases, newsletters, web site contents or media interviews are checked for accuracy and possible breaches of ITL’s continuous disclosure obligations and properly approved prior to release.

### POLICY

Any staff member who becomes aware of information that has not been released by ITL and which may be price sensitive must immediately inform the Company Secretary or CEO/Managing Director, or in the event of their absence, the Chairman or other Director.

The Company Secretary or CEO/Managing Director are to review the information and if considered price sensitive, the Company Secretary is to prepare an ASX announcement in conjunction with the CEO/Managing Director, or in his absence, the Chairman, or in his absence, at least one other Director.

If the information is judged by the Company Secretary and CEO/Managing Director or other Directors not to be price sensitive, the information may be included in releases without first announcing to the ASX.

If price sensitive information that has not previously been announced to the ASX is inadvertently released, for example during a media interview or analyst presentation or briefing, the person who has released the information must immediately inform the Company Secretary or CEO/Managing Director so that an ASX announcement can be prepared and released in accordance with this policy.

Market rumours and speculation, which may contain factual errors, could impact on ITL’s share price and result in the ASX formally requesting disclosure by ITL.



The decision to comment will be made on a case by case basis and in most circumstances the comment will be of a general nature. ITL will issue a statement where it considers that it has an obligation to do so or if it is required to respond to a formal request from the ASX for information.

In the event of an ITL spokesperson inadvertently disclosing material information at a meeting or briefing, ITL will immediately disclose that information to the ASX and post it to the ITL website.

ITL may request a trading halt from the ASX in order to prevent trading in ITL's shares by an uninformed market. It is recognised that the trading halts should be only be used in exceptional circumstances and the decision to request a trading halt may be made after consultation between the Chairman, Managing Director, Company Secretary and available directors.

ASX announcements must be lodged electronically by the Company Secretary or delegated staff member who has been provided with his or her own ASX login ID and password.

Prior to release of any public communication ITL's Continuous Disclosure Checklist must be completed to ensure the release is checked and approved as follows:

1. Each release must be reviewed for accuracy and approved for release by the executive responsible for the area in which the release originated, or in their absence, by their delegated staff member,
2. The executive or delegated staff member must advise the Company Secretary and CEO/Managing Director of any contractual obligations, such as confidentiality, that must be adhered to,
3. If the release involves information about third parties those parties must be informed of the pending release and if required, their approval for the inclusion of their names in the release must be sought,
4. If a third party consents to the use of their name in a price sensitive release and wishes to see and approve the public communication prior to release they must be informed that they are possession of price sensitive information and that they must maintain confidentiality until release of the announcement to the ASX,
5. Prior to release, all public communications must be approved by both the CEO/Managing Director and the Chairman, or in their absence, at least two Directors.