



## **CONTINUOUS DISCLOSURE POLICY**

### **CONTEXT**

ITL Health Group Limited (ITL) is committed to complying with its continuous disclosure obligations in accordance with the Corporations Act and in particular s675 which requires a disclosing entity to lodge documents with ASIC as soon as it becomes aware of knowledge which is not generally available and which a reasonable person would expect to have a material effect on the price of the security.

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

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, 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 ASIC release 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.

If price sensitive information that has not previously been announced to ASIC 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 ASIC advice can be prepared and released in accordance with this policy.

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 ASIC 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 ASIC and post it to the shareholder portal on the ITL website.

Announcements to ASIC will be lodged to the shareholder Portal on the ITL website.

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 in possession of price sensitive information and that they must maintain confidentiality until release of the announcement,
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.