

# **CO2 GROUP LIMITED**

## **Corporate Governance**

### **COMMUNICATIONS AND DISCLOSURE POLICY**

#### **Purpose**

The Company is required to comply with the Australian Stock Exchange (“ASX”) Listing Rules and also with the continuous disclosure requirements contained in the Corporations Act 2001.

The Company is committed to ensuring that shareholders are provided with relevant, timely and accurate information.

#### **Responsibilities**

The Executive Directors are responsible for communications with the media and major shareholders.

The Company Secretary is responsible for complying with the communication and disclosure requirements of the ASX, applicable legislation and regulations and for shareholder communications generally.

#### **Continuous Disclosure Regime**

The Listing Rules require immediate disclosure to ASX of any information concerning any company in the Group which a reasonable person would expect to have a material effect on the price of the Company’s shares or other securities. There are limited exceptions to this disclosure requirement.

The Group has a specific continuous disclosure policy which explains in more detail the requirements of Listing Rule 3.1, the type of information that has to be disclosed and Board and executive responsibilities at the holding company level and at subsidiary company level. The Board determines what is material information and, through the Company Secretary, is responsible for reporting to ASX.

All potentially material information is considered by the Board and if warranted, a formal board meeting may be convened to review and approve announcements relating to significant matters and to consider and approve a request for a trading halt.

Compliance with the Listing Rule is achieved by a written announcement sent to ASX. As soon as practicable after confirmation of receipt by ASX, the announcement is posted to the Company’s website at [www.co2australia.com.au](http://www.co2australia.com.au). Copies of all announcements are sent by email to the external auditors and other interested parties.

The Managing Director and Chief Financial Officer are responsible for monitoring and the immediate reporting of all continuous disclosure events occurring in their business. At least once each month a written report of information which could be price sensitive must form part of the monthly management reporting package to Corporate Office.

## **Shareholder Communications**

The Company is committed to ensuring that shareholders and potential shareholders have access to any relevant and timely information which is price sensitive.

All shareholders are sent by mail notices of general meetings and the annual report.

Apart from direct mail information, shareholders can access the Company's website for the following:

- Links to websites of entities with interests and reports in the Company's business arena;
- All recent announcements to the ASX including the Half Yearly report and the Chairperson's address;
- Annual reports; and
- Notice of annual general meeting and explanatory memoranda, if applicable.

## **Analysts and Institutional Investors**

In all dealings with analysts, brokers and investors, the Company adheres to the practice that there will be no disclosure of price sensitive information that has not been previously announced to the market. Any questions concerning forecasts will not be answered. If any potentially price sensitive information is inadvertently disclosed, it will be immediately referred to the continuous disclosure committee and if required, an announcement will be made to ASX and then posted to the website.

## **Market or Media Speculation**

All officers and employees of the Group are expected to reply to any market or media speculation with "it is Company policy not to comment on market or media speculation".

## **Authorised Spokespersons**

The officers and employees of the Group who are authorised spokespersons in relation to this policy are the Chairperson the two other Executive Directors and in limited circumstances the Managing Director of CO2 Australia Limited a wholly owned subsidiary.