



# **Continuous Disclosure Policy**

# CONTINUOUS DISCLOSURE POLICY

---

## 1. INTRODUCTION

This policy outlines the procedures to be adopted to ensure compliance with continuous disclosure obligations under the Corporations Act 2001 and ASX Listing Rules by the GEO Property Group (GEOPG).

This Policy sets out the procedures for:

- identifying material price sensitive information;
- reporting such information to the Company Secretary for review; and
- achieving best practice in complying with its continuous disclosure obligations under the Corporation Act (Act) and ASX Listing Rules.

This policy applies to every director, officer and employee of GEOPG.

Any contraventions of this policy will be noted by the Company Secretary and reported to the Managing Director and Chief Executive Officer. A contravention will also result in notice on the employee's personnel file and be dealt with in a manner deemed appropriate by the Managing Director or Chief Executive Officer which may involve disciplinary action and could result in dismissal. The Managing Director and Chief Executive Officer will advise the GEOPG Boards of any contraventions of this policy.

Nothing in this policy shall authorise any person to act in contravention of the continuous disclosure provisions of the Act.

## 2. CONTINUOUS DISCLOSURE POLICY

GEOPG has obligations under the Corporations Act and ASX Listing Rules to keep the securityholders and the market fully informed of information which may have a material effect on the price of the securities of GEOPG. GEOPG discharges these obligations by complying with the continuous disclosure obligations as outlined in the Act and in relation to listed schemes releasing information to the ASX in the form of an ASX release or disclosure in other relevant documents (for example Annual Report).

The continuous disclosure obligations outlined in the Corporations Act and ASX Listing Rules must be complied with at all times.

The Managing Director and Chief Executive Officer, are the 'senior officers' nominated by the Board to have responsibility for

- ensuring GEOPG complies with continuous disclosure requirements; and
- disclosure of information to the ASX, analysts, brokers, securityholders, the media and the public.

The following procedures apply to ensure breaches of GEOPG's continuous disclosure obligations do not occur:

- directors and employees must immediately notify the Managing Director or Chief Executive Officer as soon as they become aware of information that may potentially require disclosure to the securityholders / market;
- the Managing Director or Chief Executive Officer will:
  - review the information provided;
  - consult with the Company Secretary, other members of senior management and if appropriate the Chair, to determine action, if any, required regarding disclosure;
  - co-ordinate disclosure to the ASX and securityholders / co-ordinate lodgement of relevant information with ASIC (where applicable) with the General Manager Property Investments and Company Secretary;
- the Managing Director, General Manager Property Investments and Company Secretary are required to approve all market releases;
- the Managing Director, General Manager Property Investments and Company Secretary are required to approve all communication to securityholders;
- the Managing Director and the General Manager Property Investments are to provide a monthly certification to the Company Secretary confirming compliance with GEOPG's continuous disclosure obligations on the basis of information the Managing Director and General Manager Property Investments are aware and after having made appropriate enquiries of employees within their communication reporting lines;
- All lodgements with the ASX and ASIC are to be filed with the regulator by the Company Secretary.

Employees must also be aware that rumours and market speculation will exist in the marketplace. Should employees become aware of rumours or market speculation involving scheme securities, this must be communicated to the Managing Director.

All disclosures are to be made within the timeframes stipulated in the Corporations Act and ASX Listing Rules.

## **2.1 Company Secretary**

The Company Secretary is the senior officer nominated for dissemination of information to the market and liaison with the ASX and ASIC. The Company Secretary is responsible for:

- (a) liaising with the ASX / ASIC in relation to continuous disclosure issues;
- (b) monitoring the system for the disclosure of all material information to the ASX / ASIC / securityholders;
- (c) reviewing proposed announcements to the ASX and liaising with the Managing Director in relation to the form of any ASX releases;
- (d) keeping a record of all ASX releases that have been made;
- (e) periodically reviewing disclosure procedures in light of changes to the ASX Listing Rules or Corporations Act 2001 and recommending any necessary changes to the procedures; and
- (f) preparing regular reports to the Boards of GEOPG which advise of:
  - (i) market disclosures; and
  - (ii) any material changes to the GEOPG continuous disclosure processes or policy.

## 2.2 Briefing Analysts

Information provided to, and discussions with, analysts are also subject to the Continuous Disclosure Policy. Material information must not be selectively disclosed (ie: to an analyst, the media or securityholders) prior to being announced to the ASX.

All enquiries from analysts must be referred to the Managing Director or Chief Executive Officer. All material to be presented at an analyst briefing must be approved by the Managing Director or Chief Executive Officer prior to briefing.

All media releases must be approved by the Managing Director or Chief Executive Officer prior to release to journalists.

All material to be presented at a seminar that may have a material effect on the price of the securities must be approved by the Managing Director or Chief Executive Officer prior to release.

Should price sensitive information inadvertently be disclosed, then the Managing Director or Chief Executive Officer will give securityholders immediate access to that information by releasing it as soon as possible.

At briefings, employees must also be careful when dealing with analysts' questions that raise issues outside the intended scope of discussion. For this reason, GEOPG's policy is to:

- only discuss information that is publicly available; and
- if a question can only be answered by disclosing price sensitive information, then employees must decline to answer or take it on notice, then provide the information to the Managing Director or Chief Executive Officer to announce the information through the ASX to securityholders before responding.

## 2.3 Website

Release of information to the ASX is only the first step in the process of disclosing information to the market. Both the ASX and ASIC recommend that information also be posted on a company's website to assist with the distribution of the information. Accordingly, all major announcements released to the ASX will be posted on the GEO Property Group website.

Release date:	28 March 2008	To be reviewed by:	28 March 2009
Owner:	Group General Manager Corporate Services	Approved by:	Board
Version Number:	Last updated:	Modified by:	Comments: