



## DISCLOSURE POLICY

**CENTURY AUSTRALIA INVESTMENTS LIMITED**

Approved by the Board 18 May 2018

## **DISCLOSURE POLICY**

### **OBJECTIVE**

The objective of this policy is to ensure compliance with the ASX Listing Rules and the Corporations Act 2001 (Cth) and to ensure accountability at a Board level for that compliance.

### **INFORMATION TO BE DISCLOSED**

The ASX Listing Rule 3.1 requires the Company to inform the ASX immediately the Company becomes aware of any information that a reasonable person would expect to have a material effect on the Company's share price or value.

The Company will ensure compliance with this Charter and will disclose:

- price sensitive information to the ASX as soon as it becomes aware of that information;
- ensure that the information is not false, misleading or deceptive so as to avoid creating what would constitute a false market; and
- ensure that the information is disclosed clearly (expressed objectively), accurately and is complete.

In doing so the Company will ensure compliance with Listing Rule 15.7 that requires an entity not to release information to anyone until it has given the information to the ASX and has received an acknowledgement from the ASX that the information has been released to the market.

Chapter 4 of the ASX Listing Rules details the periodic reporting requirements, which include

- Half yearly reporting;
- Annual reporting; and
- Monthly net asset backing per share within 14 days of the end of the month.

All Australian Stock Exchange releases are available on the ASX website.

### **RESPONSIBILITY**

The Board assisted by the Company Secretary is responsible for ensuring that the Company complies with its continuous disclosure obligations.

All relevant staff of the Investment Manager, Wilson Asset Management Limited, its subsidiaries and Link Fund Solutions Limited, the Administration Manager, are made aware of these obligations and are required to report any price sensitive information to the Chair immediately after they become aware of it. The Chairman in consultation with the Company Secretary will decide whether the information should be disclosed to the ASX.

Where possible, all continuous disclosure releases to the ASX are approved by the Board. The monthly net asset backing per share is prepared and approved by Link Fund Solutions Limited. Where time does not permit approval by the Board, the Chairman must approve the release.

All significant lodgments with the ASX are available on the Company's website at [www.centuryaustralia.com.au](http://www.centuryaustralia.com.au) via a direct link to the ASX website <http://www.asx.com.au/asx/research/companyInfo.do?by=asxCode&asxCode=CYA>.

No Director or representative of Century is permitted to comment publicly on matters relating to the Company, unless they have approval from the Chairman. All information about the Company, its business and its prospects which is confidential information must be treated as such.

#### **NO COMMENTS POLICY**

The Company has adopted a “no comments” policy in relation to any market speculation or rumours and this policy must be observed by all Directors at all times. In light of this, the Company may issue an announcement in response to a market speculation or rumour where it is necessary to do so to eliminate the possibility of a false market or contravention of the ASX Listing Rules.

Where a Director is approached by the media or any analysts or other external parties with respect to providing any information about the Company the general policy to be observed is a “no comments” policy and will notify the Chair as soon as possible.

#### **RESPONDING TO ANALYST REPORTS AND FORECASTS**

If a draft report has been sent to the Company for comments the report should be forwarded directly to the Chair. The Company will not endorse any reports, and will restrict any comments to factual matters and matters which have been previously disclosed to the ASX.

#### **TRADING HALTS**

The Company in certain circumstances may need to request a trading halt from the ASX. The Chairman in consultation with the Board will make decisions in relation to trading halts and the only personnel authorised to request a trading halt on behalf of the Company will be the Chairman and the Company Secretary.

#### **ADVISORS**

To ensure compliance with its listing obligations, the Company may from time to time require advisors to advise on its adherence to this policy. The Company may ask such advisors to sign a confidentiality agreement before disclosing any information to them.

#### **CONTRAVENTION OF POLICY**

Non-compliance with the continuous disclosure obligations may constitute a breach of the Corporations Act 2001 (Cth) and the ASX Listing Rules. This may result in fines for the Company, personal liabilities for Directors and other officers and damage to the Company’s reputation. The Company takes continuous disclosure very seriously and will not tolerate any deviation from this policy by any Director or advisor and will take disciplinary action where a contravention arises. Disciplinary action may include dismissal.