



# Continuous Disclosure Policy

**Policy document**

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[Predictivediscovery.com](https://www.predictivediscovery.com)

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## Continuous Disclosure Policy

### 1. COMPANY'S DISCLOSURE OBLIGATIONS

The Company has adopted a Continuous Disclosure Policy to ensure that the Company complies with its disclosure obligations under the Corporations Act and the Listing Rules of the ASX Limited (ASX). The main ASX disclosure requirement is set out in Listing Rule 3.1, which essentially requires the Company to immediately notify ASX of information concerning the Company of which it is or becomes aware and which a reasonable person would expect to have a material effect on the price or value of securities of the Company.

Materially price sensitive information must be immediately notified to ASX unless it falls within the scope of the confidentiality exemption contained in Listing Rule 3.1.

### 2. COMPANY SECRETARY

The ASX Listing Rules require the Company to appoint a person to be responsible for communications with ASX in relation to listing rule matters, and the appointed person is the Company Secretary.

The Company Secretary plays an important role in the Company's Continuous Disclosure Policy. The Company Secretary will be the person principally responsible for operating, overseeing and maintaining this Policy. The Company Secretary is the liaison between the Company's employees and officers, its Board of Directors and the ASX. The Company Secretary is also responsible for co-ordinating education within the Company about its disclosure obligations.

The Company Secretary will work with the Chairman and/or Managing Director to determine whether any reported information needs to be disclosed in accordance with this Policy.

### 3. COMPLIANCE APPROACH

#### 3.1 The Board's commitment

The Company takes its continuous disclosure obligations seriously. The Company's Policy emphasises a pro-active approach to continuous disclosure. Employees and officers are encouraged to approach the Company Secretary if they have any queries about what information should be disclosed to ASX. The objective is to create a culture of openness which is conducive to the fulfilment of the Company's obligation of disclosure.

### 4. INFORMATION TO BE REPORTED AND REPORTING INFORMATION TO COMPANY SECRETARY

As soon as any employee or officer becomes aware of any sufficiently material information, they should promptly inform the Company Secretary.

### 5. MATERIALITY GUIDELINES

In determining whether information is material and, therefore, should be reported, the Board has adopted Materiality Guidelines. Whether a matter is material needs to be considered from both a quantitative viewpoint (eg a claim for more than a specified amount) and a qualitative viewpoint (eg if it could adversely affect the reputation of the

Company). Matters which may be material having regard to the Materiality Guidelines should be immediately reported to the Company Secretary.

If there is any doubt as to whether a matter is material then the matter should nevertheless immediately be notified to the Company Secretary for further consideration.

## **6. CONFIDENTIALITY GUIDELINES**

Under ASX Listing Rule 3.1, certain material information does not need to be disclosed if it falls within the scope of the confidentiality exemption in that Listing Rule. Therefore, once it has been determined that a matter is material, the Company Secretary will, possibly in conjunction with the Directors and/or external advisers, consider whether it could be considered confidential.

It is imperative that all material information be immediately disclosed to the Company Secretary, who will distribute this material to all relevant persons. To assist in making these decisions details as to why the information may be confidential should also be provided. If it is considered that information could be confidential, then all necessary steps should be taken to ensure that the information remains confidential. For instance, that information should not be disclosed to other parties except on the basis of a confidentiality undertaking.

## **7. CLOSED PERIODS**

In view of the nature of the Company's business, it does not adopt a closed period between the close of the relevant financial period and the date the results for that financial period are released.

## **8. DEALING WITH ANALYSTS**

The Company must ensure that it does not give analysts any material price sensitive non-public information at any time, for example, during analysts briefings, answering analysts questions or reviewing draft analyst research reports. It is permissible to clarify or correct any factual matters or errors of interpretation that analysts make concerning already publicly available information, but only to the extent that the clarification or correction does not itself amount to giving the material non publicly available information (such as correcting market expectations about profit forecasts).

In order to increase transparency and confidence in the Company's disclosure practices, all information given to analysts at a briefing, such as presentation slides is to be given to Company Secretary for immediate release to the ASX and posted on the Company's website. The information must always be released to ASX first. Slides from other public speeches, such as at an industry seminar should also be made available in this way.

Ideally, all dealings with analysts should be carefully monitored by the Company to ensure that material non-public information was not inadvertently disclosed, and if it was, to immediately disclose that information to ASX. Monitoring can occur by audio recording of the dealing, taking detailed notes of the conversations or having a person in the room where the sole role is to observe proceedings and look for any material non public disclosures.

## **9. AUTHORISED COMPANY SPOKESPERSON**

The only persons authorised to speak on behalf of the Company are the Chairman and Managing Director or persons authorised by them. All enquiries by the media, regulators or analysts should be passed on to either or both of them.

## **10. MARKET SPECULATION AND RUMOURS**

In general, the Company does not respond to market speculation and rumours except where:

- a) the speculation or rumours mean that the subject matter is no longer confidential and therefore the exception to disclosure set out in Listing Rule 3.1.2 no longer applies;
- b) ASX formally requests disclosure by the Company on the matter; or
- c) the Board considers that it is appropriate to make a disclosure in the circumstances.

Only authorised Company spokespersons may make any statement on behalf of the Company in relation to market rumours or speculation. If employees or officers become aware of any market speculation or rumours which the Company Secretary may not be aware of, these should be reported to the Company Secretary.

## **11. COMMUNICATION OF INFORMATION TO ASX**

The Company Secretary is responsible for all communications with the ASX, and will coordinate all price sensitive disclosures to the market. The Company must not release information publicly that is required to be disclosed to the ASX until it has received formal confirmation of its release to the market by the ASX.

## **12. TRADING HALTS**

In order to facilitate an orderly, fair and informed market it may be necessary to request a trading halt from the ASX. The Chairman and the Company Secretary (after consultation with the Board where practicable to do so) will make all decisions relating to a trading halt.

## **13. REVIEW OF POLICY**

This Policy will be reviewed regularly by the Board and the Board having regard to the changing circumstances of the Company and any changes to the programme will be notified to affected persons in writing. If any employee or officer has any comments or views concerning the operation or effectiveness of this Policy, they should also be communicated to the Company Secretary.

## **14. QUESTIONS**

If employees or officers have any questions about the operation of this Policy, please contact the Company Secretary.

## **15. POTENTIAL CONSEQUENCES OF BREACH**

There are a number of potential consequences of breaching this policy. If employees or officers have questions about the potential consequences of breaching this policy they should contact the Company Secretary.

## **16. ACCESS TO THE POLICY**

This Policy will be available for viewing upon request to the Company Secretary.

## **17. DISCLOSURE OF THE POLICY**

A summary of this Policy is disclosed in the Company's corporate governance policy summary.