



## Policy on Continuous Disclosure

**ZipTel Ltd** ACN 108 042 593 (Company)

### Summary of Policy on Continuous Disclosure

The Board has adopted a Policy on Continuous Disclosure. The policy raises awareness of the Company's obligations under the continuous disclosure regime; establishes a process to ensure that information about the Company which may be market sensitive and which may require disclosure is brought to the attention of the person primarily responsible for ensuring that the Company complies with its continuous disclosure obligations in a timely manner and is kept confidential; and sets out the obligations of directors, officers, employees and contractors of the Company to ensure that the Company complies with its continuous disclosure obligations.

The policy also outlines who is authorised to speak to the media, analysts, brokers, shareholders and other external parties; a person's confidentiality obligations and the consequences of breaching the policy. The policy is subject to annual review by the Board.

### Summary of Compliance Procedures

The Board has adopted Compliance Procedures to assist it to comply with its disclosure obligations. Under the Compliance Procedures, a Responsible Officer is appointed who is primarily responsible for ensuring the Company complies with its disclosure obligations. The duties of the Responsible Officer, together with the responsibilities of the Board and the Company Secretary, are set out in the Compliance Procedures.

The Compliance Procedures are designed to ensure that information about the Company which may be market sensitive and which may require disclosure under Listing Rule 3.1 is promptly assessed to determine whether it requires disclosure and if it does, is given to ASX promptly and without delay.

The Compliance Procedures also set out procedures to correct or prevent a false market in the Company's securities; set out measures for safeguarding confidentiality of corporate information to avoid premature disclosure; and establish procedures for media contact and comment and external communications such as analyst briefings and responses to shareholder questions.

The Compliance Procedures also provide guidance on drafting announcements to ensure that the Company's announcements are accurate, complete and not misleading and presented in a clear and balanced way.