

**Market Disclosure and Communications Policy** 

# **Policy Details**

Title of document	Market Disclosure and Communications Policy
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Category of document	Lead Policy
Short description	Describes MyState's approach to meeting its continuous disclosure obligations.
Applicable to	MyState Group
Approval Authority	Board Via ExCo and GNCGC
Responsible Executive	Company Secretary
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This Policy applies to MyState Limited (MYS) Group companies and subsidiaries.

## 1. Introduction

MYS (the Company) is committed to the promotion of investor confidence to enable trade in its securities to take place in an efficient, competitive and informed market.

The Company recognises the importance of forthright communication as a key plank in building shareholder value and that to prosper and achieve growth the Company must (among other things) earn the trust of employees, customers, suppliers, the community and security holders by being forthright in its communications and consistently delivering on its commitments.

## 2. Purpose

The purpose of this policy is to describe the Company's approach to communication with shareholders and the investment market in compliance with its continuous disclosure obligations.

# 3. Continuous Disclosure

The Company will immediately notify the market, by announcing to the securities exchange on which its securities are listed, of any information or any major development related to the business of the Company:

- which a reasonable person would expect to have a material effect on the price or value of the Company's securities; or
- which a reasonable investor is likely to use as part of the basis for making investment decisions (inside information).

In certain circumstances, the applicable listing rules permit the Company not to disclose, or to delay the disclosure of inside information. The Board is responsible for reviewing material information and determining what information must be disclosed and ensuring that the Company complies with all disclosure obligations, including responsibility for ensuring that adequate processes are in place for the identification of inside information and the maintenance of the Company's insider lists of people in possession of inside information.

## 4. Responsibility for Disclosure

The Board manages the Company's compliance with all continuous disclosure obligations and this Policy. The Board is responsible for implementing reporting processes and controls and determines guidelines for the release of information.

The Company Secretary is responsible for communications with the relevant securities exchange on which the Company's securities are listed.

#### 5. Responsibility For Identifying Information For Disclosure

- 5.1 The Board and Executives hold the primary duty to monitor all activities of the Company which may have a material impact on the price or value of the Company's shares;
- 5.2 Each of the Officers described in paragraph 5.1 has a duty to promptly notify the Managing Director and Chief Executive Officer (MD/CEO) and/or Company Secretary of any matter which may have a material impact on the price or value of the Company's shares;
- 5.3 In this policy "matter" includes circumstances involving market speculation and rumour concerning the Company or its shares which may lead to a false market in the Company's shares.
- 5.4 The MD/CEO and Company Secretary must assess the materiality of the matter reported to determine whether the Company has a duty to make disclosure;

- 5.5 If the MD/CEO determines that the matter under consideration may have a material impact on the price or value of the Company's shares, the matter must be reported to the Chairman and each Director together with the appropriate form of disclosure to be made; and
- 5.6 The Chairman must approve the form of the disclosure or otherwise deal with the reported matter. Subject to the direction of the Chairman, the Company Secretary must then disclose the matter immediately to the market and post the disclosure on the Company's website.
- 5.7 Where disclosure is required to be made the disclosure must be timely, factual, not omit material information and expressed in a clear and objective manner.

## 6. Market Communication Principles

The Company has adopted the following principles for market communication:

- timely and accurate information is provided equally to all shareholders and market participants;
- channels for disseminating information are adopted which are fair, timely and cost-efficient; and
- the Company does not communicate material price or value sensitive information to any external party prior to that information being disclosed to all shareholders and market participants in compliance with its continuous disclosure obligations.

# 7. Communication Of Disclosable Information On The Website

All information released to the securities exchange will be available through the Company's website (<u>www.mystatelimited.com.au</u>) on the same business day as the announcement to the relevant securities exchange.

## 8. Authorised Spokespersons

In general, only the Chairman and MD/CEO will make public statements on behalf of the company. Other employees authorised to make any public statement on behalf of, or attributable to the Company, are those who have the prior approval of the MD/CEO.

## 9. Rumours And Market Speculation

Subject to the Company's obligations under paragraph 4 above, the Company will not generally comment on rumours or market speculation.

## 10. Trading Halts

In order to facilitate an orderly, fair and informed market it may be necessary to request a trading halt from a securities exchange. The Board will make all decisions relating to a trading halt.

# 11. Corporate Calendar

The Company follows a calendar of regular disclosure to the market on the Company's financial and operational results. The calendar, which is posted on the website, includes target dates for the release of half year and full year results, other financial information, shareholder meetings and business briefings.

At these briefings and meetings:

- No materially sensitive information of the kind outlined in section 3 will be disclosed unless it has been previously released to the market; and
- If material information of the kind outlined in section 3 is inadvertently released it will immediately be released to the securities exchange and be available on the Company's website.

# 12. Analyst and Investor Briefings

The Company recognises the importance of the relationship between the Company, investors and analysts.

From time to time the Company conducts analyst and investor briefings. In these cases the following protocols will apply:

- No information of the kind outlined in section 3 will be disclosed at these briefings unless it has been previously or is simultaneously released to the market;
- If material information of the kind outlined in section 3 is inadvertently released it will immediately be released to the market via the securities exchange and be available on the Company's website;
- Questions at briefings that seek material information not previously disclosed will not be answered; and
- The Company will publish a copy of the presentation material on the Company's website.

# 13. Analysts' Reports & Estimates

Where requested to do so, the Company may review analysts' research reports but will confine comments to factual matters and material previously disclosed.

The Company may comment on analysts' earnings' estimate to the extent of:

- acknowledging the current range of estimates;
- questioning an analyst's assumptions or sensitivities if the analyst's estimate is significantly at variance from current market range estimates; and
- advising factual errors where data is already in the public domain.

Forecast information will not be provided by the Company unless it has already been disclosed to the market.

## 14. Consultants & Professional Advisers

The Company will require any consultant or professional adviser engaged to undertake work on behalf of the Company or any of its subsidiaries to abide by this Policy.

#### 15. Breaches

Failure to comply with this Policy may lead to a breach of applicable legislation or with securities exchange Listing Rules or other regulations particularly in relation to continuous disclosure which in turn may lead to personal penalties for directors and officers. Breaches of this Policy may lead to disciplinary action being taken, including dismissal in serious cases.

#### 16. Review

The Board will regularly evaluate this Policy to determine whether the Policy is effective in ensuring accurate and timely disclosure in accordance with the Company's disclosure obligations.

#### 17. Additional Information

If you have any questions arising from the Company's Market Disclosure and Communications Policy, you may contact one of the persons listed below.

Managing Director/Chief Executive Officer	Company Secretary
MyState Limited	MyState Limited
Level 2	Level 2
137 Harrington Street	137 Harrington Street
HOBART TAS 7000	HOBART TAS 7000
Tel: 61 3 6215 9601	Tel: 61 3 6215 9454
Email: <u>brett.morgan@mystate.com.au</u>	Email:
	scott.lukianenko@mystatelimited.com.au

# 18. Monitor and Review:

The Group Nominations and Corporate Governance Committee will review annually the Company's adherence to this policy.