

# Continuous Disclosure Policy

The Company must comply with continuous disclosure requirements arising from legislation and the Listing Rules of the Australian Stock Exchange (ASX).

The general rule, in accordance with ASX Listing Rule 3.1, is that once the Company becomes aware of any information concerning it that a reasonable person would expect to have a material effect on the price of value of the Company's securities, the Company must immediately disclose that information to the ASX.

The focus of these procedures is on:

- a. complying with the general and continuous disclosure principles contained in the ASX Listing Rules and the Corporations Act 2001;
- b. ensuring that shareholders and the market are provided with timely and accurate information about its activities; and
- c. ensuring that all market participants have equal opportunities to receive externally available information issued by the Company.

## Material Information

- a. all management and staff must inform the Managing Director and/or Chief Executive Officer, or in their absence, the Company Secretary or another Director of any potentially material information or proposal as soon as practicable after the person becomes aware of that information.
- b. information is material if it is likely that the information would influence investors in deciding whether to buy or sell Decmil Group Limited securities.
- c. material information need not be disclosed if the following are satisfied:
  - I. a reasonable person would not expect the information to be disclosed;
  - II. the information is confidential and the ASX has not formed the view that the information has ceased to be confidential;
  - III. one of the following:
    - it would breach the law to disclose the information;
    - the information concerns an incomplete proposal or negotiation;
    - the information comprises matters of supposition or is insufficiently definite to warrant disclosure;
    - the information is generated for internal management purposes; or
    - the information is a trade secret.
- d. subject to and in accordance with the provisions of ASX Listing Rule 3.1, the Chairperson and Managing Director and/or Chief Executive Officer must immediately notify the market, via an announcement to the ASX, of any information concerning the Company that the Managing Director and/or Chief Executive Officer or Chairperson believes a reasonable person would expect to have a material effect on the price or value of the Company. The Company Secretary is the Authorised Officer for Listing Rule purposes.

## Financial Information - Communication Blackout Periods

To protect against inadvertent disclosure of price sensitive information, the Company imposes communication blackout periods for financial information between the end of financial reporting periods; at the end of June (full year) and December (half year), and the announcement of results to the market. During these periods, the Company does not hold meetings or briefings to discuss financial information with individual investors, institutional investors, analysts or media representatives unless such meetings or briefings are the subject of a specific announcement to the market via ASX.

## Company Secretary Responsibilities

The Company Secretary is responsible for:

- e. overseeing and co-ordinating disclosure of information to the relevant stock exchanges and shareholders; and
- f. providing guidance to Directors and employees on disclosure requirements and procedures.

The Company's general policy is not to respond to reports or rumours about the Company published by analysts, fund managers or reporters. However, it may be necessary to respond to the unauthorised, or selective disclosure of information or market rumours concerning the Company, where the information is having, or likely to have an impact on the price of the Company's securities.

Should this matter arise, the Managing Director and/or Chief Executive Officer or Company Secretary will discuss the significance of the matter and possible disclosure responses with the Chairperson. The Company Secretary will co-ordinate the disclosure response to the ASX.

The Company procedures enable price sensitive information to be publicly released through the ASX before it is disclosed to shareholders and market participants. Distribution of other information to shareholders and market participants is also managed through disclosure to the ASX.

Information is posted on the Company's website after the ASX confirms an announcement has been made, with the aim of making the information readily accessible to the widest audience.

**This Policy was approved by the Decmil Group Limited Board on 29 June 2021.**



**Andrew Barclay**  
Chair of the Board