

WHITEFIELD LIMITED

# Disclosure Policy

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This Policy was approved on 16<sup>th</sup> May 2019.

## Objectives of this Policy

The objectives of this policy are:

- to ensure compliance with the ASX Listing Rules and the Corporations Act 2001 by all personnel engaged by or acting for Whitefield;
- to encourage a fully informed market for the company's stakeholders
- to ensure accountability for compliance with this policy.

## Application

This policy applies to the Company's directors, officers and all persons acting in an executive capacity for the Company, whether directly or as an outsourced service provider.

## Requirements for the Company's Disclosure to ASX

Under ASX Listing Rule 3.1 Whitefield must inform the ASX immediately, should the Company become aware of any information that a reasonable person would expect to have a material effect on the Company's share price or value.

Under Chapter 4 of the ASX Listing Rules Whitefield must also comply with specified periodic reporting requirements being:

- (a) The submission of half year reports immediately they are ready to be given to ASX and no later than two months after period end;
- (b) The submission of full year reports immediately they are ready to be given to ASX and no later than two months after period end;
- (c) The submission of monthly net asset backing information within 14 days of the end of the month.

All Australian Stock Exchange releases are available on the ASX website or through the ASX Releases menu on the Company's website [www.whitefield.com.au](http://www.whitefield.com.au)

## Requirements for personnel to inform the Company

All persons to whom this policy applies shall be required to report any price sensitive information (as defined under ASX LR 3.1) to the Company Secretary and Managing Director immediately should they become aware of it, unless they have a high degree of certainty that both the Company Secretary and Managing Director are already in possession of this information.

## Assessment and reporting of price sensitive information

Once the Company Secretary and Managing Director receive, or otherwise become aware of, price sensitive information (as defined under ASX LR 3.1) they shall assess the information in accordance with the requirements of ASX LR 3.1 and agree upon the actions that are required by that Rule.

Where the information meets the materiality requirements of the listing rule, the information and recommended action shall be presented to the Board for review and ultimate approval.

## Review of Periodic Submissions & Other Reports

Half and full year reports shall be subject to review and approval by executive management, the Audit & Risk Committee, Board and external auditor.

Monthly Net Asset Backing releases shall be subject to review and approval by executive management in accordance with the company's internal control procedures.

The company subjects all reports to a series of checks based on their risk and materiality. The verification processes adopted are noted in the Report Verification Matrix below:

Report Verification Matrix	Internal Executive Cross Checking	Pre-Issuance Board or Committee Review	External Audit	Post-Issuance Scrutiny <sup>1</sup>
Financial Statements	✓	✓	✓	✓
Quarterly Reports	✓	✓	-	✓
Asset Backing Releases	✓	-	-	✓
Other Documents	✓	-	-	✓

[<sup>1</sup> Documents are available for scrutiny by all executives and Board].

## Post Issuance Scrutiny

The Board is provided with a copy of all material company announcements promptly after they are issued (if not otherwise provided prior to issuance).

## Presentations

Presentations or equivalent documents that outline information about the company, its outlook or performance shall be issued to market immediately prior to the presentation or meeting, where the information contained is both material and new.

## Monitoring of compliance with this policy

The Managing Director and Company Secretary are responsible for day to day monitoring and implementation of processes to satisfy the Company's continuous disclosure obligations.

The Board shall also monitor the Company's compliance with these obligations on a regular basis.