

InvestSMART Group Limited
ACN 111 772 359 (“Company”)
CONTINUOUS DISCLOSURE POLICY

INTRODUCTION

Detailed compliance procedures for ASX Listing Rule disclosure requirements have been adopted by the Company. When the Company becomes aware of any information concerning it, that a reasonable person would expect to have a material effect on the price or value of the Company’s securities, the Company must immediately disclose that information to the ASX.

POLICY

The Company will ensure that all employees are made aware of this policy and its obligations. This policy outlines procedures for:-

- The collection of all potential material information;
- The determination and assessment of whether the potential information is material; and
- The method of release of all material information to the ASX.

PROCEDURE

Procedures are in place for the approval and release of information and the nomination of an authorised Company spokesperson relating to:-

- Information or events of a material nature;
- Media releases;
- Shareholder correspondence/newsletters;
- Private briefings;
- Responding to market speculation, rumor and false markets; and
- ASX queries.

In summary, these procedures are as follows:-

- The Managing Director receives all information which may be of a material nature. The Managing Director determines whether the information received is material or not. The responsibility to progress to disclosure or not rests solely with the Managing Director.
- The Managing Director is primarily responsible for what information will be disclosed and the drafting of the announcement to the ASX. All draft announcements shall be approved by the Managing Director and Chairman on behalf of the Board, prior to being issued to the ASX.
- The Company Secretary shall be responsible for the release of the announcement to the ASX. When confirmation from the ASX has been received, the Company Secretary will forward a copy of the announcement to all Directors, arrange for the announcement to be posted to the Company’s website and retain a copy.
- Only after confirmation from the ASX has been received can the announcement be distributed to any third party; shareholders, analysts, journalists, etc.