

CONTINUOUS DISCLOSURE POLICY

Disclosure Obligations and the ASX Listing Rules

Listing Rule 3.1

Listing Rule 3.1 provides that once a company is or becomes aware of any information concerning it that a reasonable person would expect to have a material effect on the price or value or the company's securities, the company must immediately tell ASX that information.

Listing Rule 3.1A

Listing Rule 3.1A contains an exception to the general disclosure obligation under Listing Rule 3.1. Pursuant to Listing Rule 3.1A, the disclosure of particular information is not required whilst **all of the following** conditions are satisfied:

- a) A reasonable person would not expect the information to be disclosed;
- b) The information is confidential and ASX has not formed a view that the information has ceased to be confidential; and
- c) One or more of the following applies:
 - It would be a breach of a 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 the internal management purposes of the company; and/or
 - The information is a trade secret.

For the purposes of Listing Rule 3.1A, 'confidential' means confidential as a matter of fact. A company may give information to third parties in the ordinary course of its business and continue to satisfy the requirements for the exception under Listing Rule 3.1A, provided the company retains control over the use and disclosure of the information. Examples include information given to the following:

- The company's advisers for the purposes of obtaining advice;
- Other service providers such as share registries and printers;

- A party with whom the company is negotiating, for the purposes of the negotiation; or
- A regulatory authority or ASX in the course of an application or submission.

ASX would be likely to consider that information ceased to be confidential if the information, or part of it, becomes known either selectively or generally, whether inadvertently or deliberately.

If information becomes known by others in circumstances where the company does not retain control of its use and disclosure, the requirements of Listing Rule 3.1A would no longer be satisfied, regardless of whether the company or a third party disclosed the information.

For example, where there is a rumour circulating or media comment about the information and the rumour or comment is reasonably specific, this would generally indicate that confidentiality has been lost.

Listing Rule 3.1B

Listing Rule 3.1B imposes an additional disclosure obligation to prevent a false market for a company's securities. Listing Rule 3.1B provides that if ASX considers that there is likely to be a false market in a company's securities and asks the company to give it information to correct or prevent a false market, the company must give the information to the ASX.

The disclosure obligation under Listing Rule 3.1B applies even if the requirements for the exception under Listing Rule 3.1A would otherwise be satisfied.

Periodic Disclosure Obligations

In general terms, Chapter 4 of the Listing Rules set out the periodic disclosure requirements that a company will be required to satisfy in relation to each quarter, half-year and end of year.

Review of ASX Announcements

- All reasonable efforts must be made to provide a draft of the intended release to Directors for review in a reasonable time frame. Before releasing to the Market all ASX announcements must be reviewed and approved by at least two Directors unless exceptional circumstances exist.
- The Company Secretary is responsible for ensuring that any factual statements made in ASX announcements have appropriate supporting due diligence information and that the announcement complies with the ASX Listing Rules.
- The Managing Director, Legal Director or the Company Secretary only, are to sign Stock Exchange announcements.

- The Company Secretary is the nominated officer responsible for ensuring the Company complies with its continuous disclosure requirements and overseeing and coordinating disclosure of information to ASX.
- The Managing Director will respond, as appropriate, to any Company rumours or information leaks. The Company Secretary will ensure any inadvertent disclosure of price sensitive information will be immediately released to the ASX.
- As best practice, the Company will ensure:
 - Presentations, copies of presentation material given to brokers, when containing price sensitive new material or information, will be released to the market prior to the presentation being made.
 - Cash Converters International Limited's website is regularly updated – ASX announcements will be placed on the website as soon as possible following release to the ASX.
- All Directors and Senior Executives will safeguard the confidentiality of confidential information in order to avoid premature disclosure.

