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## **CONTINUOUS DISCLOSURE POLICY**

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The Board has a continuous disclosure policy that allows the Company to meet its obligations under the Corporations Act and Australian Securities Exchange (ASX) Listing Rules in order to keep the market fully informed of information which may have a material effect on the price or value of the Company's securities, may influence an investment decision on the Company's securities or correct any material misinformation in the market.

### **Purpose**

The purpose of the Continuous Disclosure Policy is to ensure that Company announcements are timely, factual, do not omit material information and are expressed in a clear and objective manner to allow investors to assess the impact of announcements when making investment decision.

### **ASX Listing Rule 3.1**

ASX Listing Rule 3.1 requires that the Company immediately notifies the ASX of any information on which the Company becomes aware, that a reasonable person would expect to have a material effect on the price or value of the Company's securities.

A reasonable person would be taken to expect information to have a material effect on the price or value of securities if it would, or would be likely to, influence persons who commonly invest in securities in deciding whether or not to subscribe for, buy or sell the securities. Hence, information is considered to be material if there is a substantial likelihood that it would influence an investor in deciding whether to trade in or hold the Company's shares/securities.

Information arises when any of Bulletin's directors or executive officers has or ought reasonably to have, come into possession of the information in the course of the performance of his or her duties as a director or executive officer of Bulletin. The disclosure obligation does not generally apply where the information is considered generally available.

### **Policy**

When directors and senior executives become aware of information that could be considered material information the following procedures apply:

- The Chairman and/or the Company Secretary should be notified immediately;
- The Chairman and/or the Company Secretary will review the material information reported, determine whether or not there is a requirement to disclose the information to the ASX, consulting with any necessary parties, and then coordinate the form of the disclosure to the ASX;
- If a decision is made that the information does not warrant an ASX release the Chairman and/or the Company Secretary should advise all directors the rationale for the decision.

This policy applies to all directors, senior executives and employees. Where any person who reports to you becomes aware of, or is in possession of, information that is not generally available and/or which may be price sensitive, you should implement procedures to ensure that person will promptly notify you of such information.

### **Release of Information to Others**

Bulletin should not release material price sensitive information to any person if that information is required to be disclosed to the ASX, until cleared by the ASX. The Chairman and/or the Company Secretary will advise all relevant parties when the ASX release has been announced by the ASX. All the

information disclosed through ASX is to be promptly placed on the Company's investor website after clearance by ASX.

This also applies to presentations and briefings which are to be provided to third parties. The Chairman and/or the Company Secretary should approve the material prior to external presentation.

Any enquires from the media should be referred to the Chairman and/or the Company Secretary. No employee may give an interview or make a presentation unless express authority or specific permission is received from the Chairman.

### **Management of the Policy**

The Chairman and/or the Company Secretary are responsible for:

- Liaising with the ASX in respect of continuous disclosure issues;
- Ensuring that the system for disclosure of all material information is made in a timely manner to the ASX;
- Reviewing any proposed ASX announcements and liaising with the Board in relation to the disclosure of information;
- From time to time reviewing the Company's disclosure procedures due to changes in the ASX Listing Rules or Corporations Act and recommending any necessary changes if required.