

## 1. Objective

SeaLink Travel Group ('SeaLink' or the 'Company') is committed to complying with its continuous disclosure obligations and to ensuring that trading in its securities takes place in a market which is orderly and informed and is not, or is not likely to be, false.

The purpose of this Policy is to assist employees, particularly Directors, executives, officers and managers, to understand SeaLink's continuous disclosure obligations and to set out the procedures that must be followed for the release of information to the Australian Securities Exchange ('ASX'), the investment community, the media and the public.

***It is important that all employees with access to information which may have a material effect on the price or value of our shares read, understand and abide by this policy.***

## 2. Commitment to disclosure

The Company is committed to:

- complying with its periodic and continuous disclosure obligations under the ASX Listing Rules ("Listing Rules") and the Corporations Act 2001, Australia;
- ensuring that the Company's stakeholders are able to access externally available information issued by the Company.

This policy has been approved by the Board of the Company and is managed by the Group Company Secretary.

The Group Company Secretary is primarily responsible for co-ordinating the disclosure of information to regulators and shareholders on behalf of the Company, in consultation with the Board and other executives as required.

This Policy will be reviewed regularly to ensure that it reflects any legislative or regulatory requirements.

This policy should be reviewed in conjunction with SeaLink's Share Trading Policy and Shareholder Communications Policy.

## 3. Policy

The ASX Listing Rules require the Company to immediately disclose to the ASX any information concerning SeaLink that is "price sensitive", in the sense that a reasonable person would expect the information to have a material effect on the price or value of the Company's securities.

However, the Company is not required to disclose that information while each of the following applies:

- a reasonable person would not expect the information to be disclosed;
- the information is confidential and the ASX has not formed the view that the information has ceased to be confidential; and

- the information is of a kind exempted under Listing Rule 3.1A. (For example: disclosure of the information would breach the law, the information concerns an incomplete proposal or negotiation, is insufficiently definite, is generated for internal management purposes or is a trade secret).

**All three of these requirements must be met for the information to be exempt from disclosure.**

There may however, be circumstances where even though all of the requirements in the Listing Rule discussed above exempt the information from disclosure, the ASX considers that there is or is likely to be a false market in the Company's securities (for example, because of press speculation or market rumour). In these circumstances, the ASX may direct the Company to make a clarifying statement to prevent or correct the false market.

The Company may request a trading halt from the ASX to prevent trading in the Company's securities by an inefficient and uninformed market. The Group Company Secretary in conjunction with the Group Chief Executive Officer ('Group CEO') will manage the process of seeking a trading halt in consultation with the Board. Any price sensitive information must be released to the market through the ASX. Following confirmation of receipt from the ASX, the Company will place all information disclosed on its website.

Information must not be selectively disclosed to others such as prospective shareholders, the media, and analysts, before it is disclosed to the ASX.

#### **4. Communications with the ASX**

All communications regarding disclosures between SeaLink and the ASX, and the actual making of disclosures by SeaLink to the ASX, are to be conducted by the Chair, Group CEO, Group Company Secretary or Group Chief Financial Officer ("Group CFO"), or an authorised representative of the authorised spokespersons.

No other employee of SeaLink is authorised to deal or otherwise communicate with the ASX on disclosure matters. **If contacted for comment you must always refer the inquiry to an authorised person.**

#### **5. Employee Becoming Aware of Information**

Where an employee becomes aware of information which is not generally available and which may have a material effect on the price or value of SeaLink's shares, the employee must immediately inform the Group CEO, Group Company Secretary, or Group CFO of this information.

The Group Company Secretary will:

- (a) Review the material information reported by senior management;
- (b) Determine, in consultation with the Group CEO and Group CFO, the Chair and other members of the Board and executive as appropriate, whether any of the material information is required to be disclosed to the ASX; and
- (c) Coordinate the actual form of disclosure with relevant members of management.

## 6. Rumours and market speculation

Subject to its obligations under the ASX Listing Rules, SeaLink will not normally comment on rumours or market speculation.

When media comment or speculation becomes reasonably specific or there is evidence that (or the ASX forms the view) the rumour or comment is likely to have an impact on the price of Sealink shares, then SeaLink has a positive obligation to make disclosure to prevent a false market from being formed.

## 7. Trading halts

In order to facilitate an orderly market, it may be necessary, in exceptional circumstances, for SeaLink to request a trading halt or suspension from the ASX.

The Group CEO, Group Company Secretary, and Group CFO in consultation with the Board will make all decisions relating to any need for a trading halt or suspension and any requests to the ASX for any such trading halt or suspension.

## 8. Briefings and Presentations

Information provided at briefings and presentations is subject to the continuous disclosure obligations. The following procedures are to be followed in relation to briefings and presentations given:

- material to be presented at an external briefing/presentation is to be provided in advance to the Group Company Secretary to enable consideration to be given to whether any disclosure to the ASX is required;
- where practicable, a briefing/presentation should be attended by at least two Company representatives. Where this is not possible, the person making the briefing/presentation is required to keep an appropriate file note or other record of proceedings;
- care must be taken in answering questions at the briefing/presentation to ensure that there is no disclosure of price sensitive information which has not been previously disclosed to the ASX. A question raised at the briefing should not be answered if it would result in the disclosure of price sensitive information that has not been previously disclosed to the ASX.

## 9. Breaches

If SeaLink contravenes its continuous disclosure obligations, **offences attracting criminal and/or civil penalties under the Corporations Act 2001 may be committed by the Company and persons involved in the contravention.** Breaches of this Policy will be regarded with very seriously will be subject to disciplinary action, and may include dismissal from employment, where appropriate.