

# Continuous Disclosure Policy

Issue Number 2

Release Date:

**15 September, 2022**

## 1. Background

Inventis Limited (the Company) is listed on the Australian Securities Exchange (ASX) and is required to comply with the continuous disclosure obligations contained in the Corporations Act and ASX Listing Rules. The Company is committed to its disclosure obligations by providing shareholders and investors timely, balanced and effective disclosures.

## 2. Purpose

The purpose of this policy is to assist the Company to comply with its Continuous Disclosure Obligations by establishing a framework to enable disclosure to investors and the market in a timely and transparent manner.

## 3. Roles and Responsibility

This policy applies to all Directors and employees (staff and contractors) of the Company and its subsidiaries.

### 3.1 Board of Directors

The Board is responsible for approving this policy and any amendments to it. The Board is also responsible for monitoring the effectiveness of the Company's continuous disclosure compliance. The Board may consider and determine any continuous disclosure matter. However, Board review and approval of ASX announcements will generally only be required for matters that are of fundamental significance to the Company.

Where an announcement that would ordinarily require Board approval must immediately be disclosed and such approval cannot be obtained in advance, the Managing Director and Company Secretary are responsible for ensuring compliance with the Company's Continuous Disclosure Obligations either by lodging an appropriate ASX Announcement or requesting a trading halt. At the earliest opportunity following that action, the Board will consider what, if any, further steps need to be taken.

### 3.2 Company Secretary

The Company Secretary (CS) is responsible for the overall administration of this policy and the review of information to determine whether it requires immediate release to the ASX. The CS is responsible for reporting to the ASX. The CS may appoint the Co-Company Secretary to perform one or more of their functions.

### 3.3 All Employees

All employees and directors of the Company are responsible for notifying either the MD and or CS if they become aware of any information that may be Market Sensitive Information that has not been previously disclosed.

#### 4. Disclosure Obligations on the Company.

The Corporations Act 2001 (Act) and the Australian Securities Exchange (ASX) Listing Rules require the Company, as a listed entity, to immediately disclose Market Sensitive Information to the ASX, unless it is exempted from doing so by the ASX Listing Rules (Continuous Disclosure Obligations).

**'Market Sensitive Information'** means information that a reasonable person would expect to have a material effect on the price or value of the Company's securities, being information that would, or would be likely to, influence persons who commonly invest in securities in deciding whether to acquire or dispose of IVT securities.

#### 5. False Market

If the ASX considers there is or is likely to be a false market in the Company's securities, the ASX may ask the Company to disclose information or make a statement to correct or prevent the false market. This may occur where there is market speculation or media reports arising from a leakage of confidential information concerning a proposal or negotiations that have not been disclosed by the Company because the exception to Listing Rule 3.1 applies.

#### 6. Communications

##### 6.1 Communications with Shareholders

The Company follows a calendar of regular disclosure to the market on its financial and operational results. The Company communicates with its Shareholders by way of:

- ASX Announcements
- Annual and half year results announcements, information packs and presentations
- Annual General Meeting
- Annual and mid-year reports
- Media releases.

It is the responsibility of the MD and CS to determine if information is Market Sensitive Information and therefore required to be disclosed to the ASX. Once the ASX release has been drafted, in order to safeguard confidentiality of corporate information and to avoid premature disclosures, the final form of the release is to be approved for release to the ASX by the Board.

Once approved for release, the CS is to arrange for its immediate release by online distribution to the ASX. Once lodgement is confirmed by the ASX, a copy of the release will be immediately available on the Company's website and promptly distributed to the Board, relevant company contacts, public relations consultants and other interested parties.

### 6.2 Avoiding selective disclosure

The Company must not disclose to, or discuss with, any third party any Market Sensitive Information that has not already been released to the ASX. After any external communication, the relevant officer must consider whether any Market Sensitive Information may have been inadvertently disclosed. If this is the case, the MD/and of CS must be advised immediately so that appropriate action can be taken to ensure that the Company continues to comply with its Continuous Disclosure Obligations.

### 6.3 Media Releases

If a media release is prepared by the Company or an external public relations consultant for release with an ASX release or as an ASX release it must be approved for release by the same person who would approve an ASX release as listed above. In some cases media releases do not necessarily require ASX disclosure. These media releases will also be posted to the Company's webpage investor information page.

### 6.4 Trading Halts

In some circumstances, it may be necessary to request a trading halt from the ASX in order to manage the Company's Continuous Disclosure Obligations. For example, a trading halt may be appropriate where the Company has established that Market Sensitive Information exists, and for reasons outside its control, it is not in a position to make an immediate announcement to the market.

If time permits, it is standard practice for the MD to seek legal advice and Board approval, whether a trading halt or voluntary suspension is required before lodging a request to the ASX. The MD is authorised to request a trading halt in exceptional circumstances where Market Sensitive Information comes to light shortly before or during trading of the Company's securities and it is not practical or possible to seek legal opinion and/or Board approval due to time constraints to do so.

## 7. Management of this Policy

The CS and Co Company Secretary is responsible for:

- i. Liaising with the ASX in relation to continuous disclosure matters.
- ii. Ensuring timely disclosure of material information to the ASX.
- iii. Liaising with the MD and others in relation to the form of disclosure by the Company.
- iv. Keeping records of releases to the ASX; and
- v. Reviewing this policy considering any changes to the rules governing continuous disclosure and recommending changes to the Board for its approval.

## 8. Breaches

Strict compliance with this policy is a condition of employment.

## 9. Review

This policy is to be reviewed annually.

## Approved by the Board

Date for next review of this policy: **September 2025**