

## Continuous Disclosure

### **POLICY:**

Petsec Energy Ltd (**Petsec** or **Company**) aims to maintain open, timely and full communication with its shareholders, the investment community and its stakeholders in accordance with the Continuous Disclosure regime under ASX Listing Rule 3.1. The rule states that once an entity is or becomes aware of any information concerning the entity that a reasonable person would expect to have a material effect on the price or value of the entity's securities, the entity must immediately release that information to the ASX.

The Company is also required to disclose information if asked to do so by the ASX, to correct or prevent a false market.

All employees are responsible for alerting their manager, the Petsec Company Secretary ("CoSec"), Executive Chairman, Managing Director ("MD") or Head of Investor Relations to any potentially disclosable or disclosable matter or event as soon as they become aware of it.

### **AUTHORISED PERSONNEL:**

This Policy will be administered by Executive Chairman and CoSec. However employees at every level have a role to play to ensure that Petsec achieves the objectives of this Policy.

The responsibilities under this Policy are divided as follows:

- (a) Board of Directors – the Board will be responsible for signing off on any subsequent amendments to this Policy recommended by management. The Board will be involved in the review of significant ASX announcements;
- (b) Executive Chairman and CoSec – responsible for the overall administration of this Policy and all communications with ASX;
- (c) Other employees – report any materially price sensitive information to the Executive Chairman, MD, CoSec or Head of Investor Relations.

### **Managing Director and Company Secretary**

The Executive Chairman and CoSec are responsible for the overall administration of this Policy, and in particular, are responsible for:

- Ensuring that Petsec is in compliance with its continuous disclosure obligations;
- All communications with ASX;
- Reviewing proposed external announcements, and consulting with appropriate members of the Board, senior executives or external advisers as necessary;
- Implementing reporting processes and determining guidelines for materiality of information;
- Reporting to the Board on continuous disclosure issues;
- Keeping a record of all ASX and other announcements made by Petsec;

- Monitoring the effectiveness of this Policy, including the understanding by employees of the principles and spirit of continuous disclosure; and
- Regularly reviewing this Policy for legislative changes or development of best practice, and communicating any amendments to employees.

The Compliance Officer is the CoSec who should be kept informed of all material, potentially disclosable or disclosable matters, and is responsible for the release of such information to the market, following authorisation from the Executive Chairman &/or the Board.

In the absence of the CoSec, the Executive Chairman or MD or Head of Investor Relations or Group CFO should be advised of potentially disclosable or disclosable matters.

## **PROCEDURES:**

### **1. COMPANY ANNOUNCEMENTS**

The management of Petsec's external announcements depends largely on an effective system of internal reporting and preparation of announcements. In light of Petsec's obligation to disclose any price sensitive information "as soon as it becomes aware" of this information, the following procedures, should be followed:

- All public releases are to be made under the direction of the CoSec following sign-off by the Executive Chairman.
- All material releases are to be circulated by the CoSec prior to release to all members of the Board and Executive Management for comment to ensure announcements are factual, balanced and do not omit any material information, having regard to the time necessary for each to respond and the urgency of the release to ensure prompt disclosure.
- All releases or reports containing statements of reserves or resources are to be in accordance with ASX listing rules requiring sign-off for content and context by an appropriately qualified person and in accordance with Petsec's Reserves and Potential Resources Policy.
- The Board conducts a checking and verification process, based on information prepared by management, to ensure the integrity of all periodic reports released by the Company.
- The CoSec will electronically lodge all releases with the ASX.
- All releases will be promptly distributed to the Board and posted to the Company's website following acknowledgement from the ASX that the announcement has been released to the market
- All material releases are to be emailed to the Petsec contact list by the CoSec immediately upon receipt of confirmation from the ASX that the release is public. The contact list is to be maintained and kept up-to-date by the CoSec.
- All presentation material to be used externally must be reviewed by the CoSec prior to distribution to ensure the information is in the public domain or to allow time for disclosure to the ASX if required.

- All presentation material should be reviewed by the relevant members of the Executive Management team to verify its accuracy and conformity with other public information prior to external presentation.
- At the conclusion of each Board meeting, the Board and Executive Management will consider whether any additional disclosures are required to ensure the market remains fully informed.
- The Company endeavours to ensure that markets in the Company's securities are fully informed. Where necessary, the Company will request a trading halt from the ASX to prevent trading in the Company's securities by an inefficient and uninformed market until the Company can make an announcement to the market. The Chairman of the Audit Committee in conjunction with the Executive Chairman or MD will make all decisions in relation to trading halts. The Executive Chairman, MD or CoSec are the only personnel authorised to request a trading halt on behalf of Petsec.

### **Joint Announcements**

When a joint announcement with a joint venture partner is required, Petsec will seek to give the partner sufficient time to review the announcement prior to its release, provided it does not compromise Petsec's ability to comply with its disclosure obligations.

## **2. COMMUNICATING WITH ANALYSTS, INVESTORS AND SHAREHOLDERS**

All media enquiries are to be referred to the Executive Chairman or his nominated delegate.

Company personnel will have due regard for confidential and market sensitive information. Members of Executive Management (Executive Chairman, MD, CoSec, Chief Executive Officers of each of the geographic regions, and Head of Investor Relations, and other personnel as specifically authorised) charged with responsibility for communicating with shareholders, investors and analysts will not disclose or comment on price sensitive information that has not been previously disclosed to the ASX.

Stockbroking analysts frequently prepare reports on listed entities, including Petsec, which contain performance and financial forecasts. Petsec acknowledges the importance of analyst reports in facilitating the operation of an efficient and informed market.

However, Petsec is independent, and will do all things necessary to be seen as independent, from analysts. Petsec will not endorse any such reports, and will restrict its comments to matters of fact and information previously disclosed to the ASX.

## **3. PREVENTING INADVERTENT DISCLOSURE OF INFORMATION**

Disclosure of materially price sensitive information to an external party prior to disclosure to ASX constitutes a breach of Listing Rule 15.7. To prevent a breach of Listing Rule 15.7 and to minimise the consequences should such a breach occur, the following procedures apply.

A review should be carried out prior to communication with an external party. If a Petsec employee becomes aware that:

- (a) there may be inadvertent disclosure of materially price sensitive information (that has not been disclosed to the ASX) during any communication with external parties; or
- (b) confidential Petsec information may be leaked (whatever its source),

he or she should immediately notify the Executive Chairman, MD, CoSec or Head of Investor Relations. In such a situation the Executive Chairman, MD, CoSec and Head of Investor Relations will assess whether the information is price sensitive and if so will need to immediately release the information to the ASX or if it is not price sensitive they will ensure equal access to that information by posting it on the website. Similar procedures apply if materially price sensitive information has been inadvertently disclosed.

#### **4. MARKET SPECULATION AND RUMOURS**

The Company has a “no comment” policy on market speculation and rumours, which must be observed by all employees and consultants, however the Company must comply with any request by ASX to comment on a market report or rumour.

#### **5. BREACH OF POLICY**

Non-compliance with continuous disclosure obligations may constitute a breach of the Corporations Act or the Listing Rules. This may result in fines for Petsec, personal liabilities for Directors and other officers, and damage to the Company’s reputation.

Breaches of this Policy by an employee may result in disciplinary action against the employee including dismissal in serious cases.