

## CONTINUOUS DISCLOSURE POLICY

### 1 CONTINUOUS DISCLOSURE

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#### 1.1 DEFINITION

ASX defines continuous disclosure in its Listing Rules as "the timely advising of information to keep the market informed of events and developments as they occur". The Listing Rules and the Corporations Act require that a listed company disclose to the market matters which a reasonable person would expect to have a material effect on the price or value of Pluton's securities. A reasonable person is 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.

Pluton's Continuous Disclosure Policy is designed to meet market best practice, promote transparency and investor confidence and ensure that all interested parties have an equal opportunity to obtain information which is issued by Pluton. Pluton is committed to complying with the continuous disclosure obligations contained in the listing rules of the Australian Securities Exchange Limited (ASX) and under the Corporations Act, and ensuring that all shareholders and the market have an equal opportunity to obtain and review full and timely information about Pluton's securities.

#### 1.2 PROCESS FOR DISCLOSURE

It is Pluton's policy for the immediate reporting of any matter which could potentially have a material effect on its share price, via established reporting lines to Pluton Secretary. Pluton Secretary is responsible for monitoring information which could be price sensitive, liaising with the Managing Director and/or the Chairman to make an initial assessment, and escalating to the Board for disclosure of such information where practicable. The Managing Director monitors daily activity to ascertain what matters should be considered for disclosure and as soon as a matter is appropriate for disclosure the Managing Director must immediately notify Pluton Secretary. Pluton must not delay in giving this information to ASX.

The Managing Director controls all Pluton's communications with the ASX. The Managing Director or Chairman are the only two officers allowed to authorise the release of material information to the market. Pluton Secretary is responsible for administering this policy and is responsible for dealing with the ASX in relation to all listing rule issues.

It is also Pluton's policy that price-sensitive information will be disclosed, in the first instance, to ASX and disclosures to the market will then be placed on Pluton's website. Material information will not be selectively disclosed (i.e. to analysts, the media or shareholders) prior to being announced to the ASX, and all media releases must be referred to the Managing Director for approval prior to any release.

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## 2 PROTECTING VALUABLE COMPANY INFORMATION

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Employees must ensure that company information is disclosed to outsiders only for legitimate company purposes and that due care is taken to protect the value of that information. In most cases this will involve obtaining an undertaking by the outsider to keep the information confidential.

## 3 MEDIA

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The requirements of ASX Listing Rule 3.1 on continuous disclosure should be kept in mind at all times when making public comment. This means that, as a general rule, no information should be released which is not already in the public domain.

Media releases on policy, acquisitions and matters which could affect Pluton's share price or which relate to other sensitive matters (such as Pluton's performance, Government policy, economic or political issues) may only be made by the Managing Director on the authority of the Board.

Copies of all proposed statements must be passed to the office of the Managing Director and Chairman prior to release for clearance and possible lodgement at the ASX.

Media releases or other written statements (such as letters to the press) must not be issued in any circumstances other than as set out above, except with the approval of the Managing Director.

Questions from Pluton's website and any media requests received via the website should be forwarded to the office of the Managing Director for a response.

The reputation of Pluton is at risk on every occasion that a public statement is made. When making public statements, Pluton must be consistent and accurate. It is better to err on the side of caution and say nothing rather than risk embarrassment or legal action.

In all cases where approval is granted to talk to the media particular attention must be paid to relevant laws, including Trade Practices, Consumer Protection, Environment and Health and Safety Legislation, Indigenous matters and the requirements of the Australian Stock Exchange Listing Rules.