



Continuous Disclosure and External Communications

Adopted by resolution of the Board on 26 October 2015
Best Practice Corporate Governance Principles:
Recommendation 5.1

MILLENNIUM SERVICES GROUP LTD
ACN 607 926 787
(MIL)

1. Policy objectives

- 1.1 The objective of this Policy is to ensure the market is fully informed of its strategy and financial performance.
- 1.2 The Company will endeavor to achieve this by seeking to provide equal access to information for all investors and avoiding the disclosure of material information to any person on a selective basis. The Board will be responsible for managing the Company's compliance with its continuous disclosure obligations.

2. Policy

Equal access to information

- 2.1 Disclosable price sensitive information must be disclosed to ASX prior to disclosure to analysts, the media or others outside the Company.
- 2.2 Following confirmation of receipt of lodgement, all information released to ASX will be available on or through the Company's website.

Continuous disclosure

- 2.3 Except for certain confidential information that no reasonable person would expect to be disclosed, once the Company becomes aware of any information concerning it that a reasonable person would expect to have a material effect on the price or value of the Company's securities, it will immediately tell ASX that information.
- 2.4 The ASX have indicated in ASX Listing Rules Guidance Note 8 that the term 'immediately' is to be interpreted as acting 'promptly and without delay', permitting officers to adequately conduct assessments of potentially 'market sensitive' information, in order to consider, and if required, draft an announcement to the market. The Company will ensure it implements appropriate compliance systems to enable such information that may be market sensitive to be assessed, and if required, disclosed 'promptly and without delay'.
- 2.5 The ASX has also indicated in that Guidance Note that in determining the materiality of information, the officers of an entity should consider two subjective questions:
 - 2.5.1 Would this information influence my decision to buy or sell securities in the entity at their current market price?
 - 2.5.2 Would I feel exposed to an action for insider trading if I were to buy or sell securities in the entity at their current market price, knowing this information had not been disclosed to the market?
- 2.6 The Company notes the general ASX position that, if the answer to either question is 'yes', the information will most likely be market sensitive, and should be disclosed (subject to the confidentiality exceptions at Listing Rule 3.1A).
- 2.7 Continuous disclosure obligations are reviewed as a standing item on the agenda for each regular meeting of the Board and all Directors are required to confirm details of any matter within their knowledge that might require disclosure to the market.

Periodic reporting

- 2.8 The Company will communicate regularly with shareholders through the following means:
 - 2.8.1 Its full annual report, which the Company will send to shareholders in hard copy unless they elect to receive it by electronic copy;
 - 2.8.2 Its annual general meeting, where shareholders will be updated as to the Company's performance and outlook. Shareholders will be given the opportunity to ask questions of the Board and of the auditor about the audit who will be invited to the meeting;
 - 2.8.3 Release of annual results in August each year and interim results in February.

Market briefings

- 2.9 The Company will brief the market as required:
 - 2.9.1 If unexpected material events occur during the year; and
 - 2.9.2 To ensure that market is clear about the Company's strategy, business and outlook.
- 2.10 No new materially price sensitive information will be provided at these briefings. Questions at briefings that deal with material information not previously disclosed will not be answered. All inadvertent disclosure of material information during market briefings should be immediately released to ASX.
- 2.11 Slides and presentations used in briefings are to be released to ASX.
- 2.12 The Company may review analysts' research reports but will limit its comments to factual matters and material previously disclosed.

Public Announcements – authorised spokespersons and releases

- 2.13 Only the Chairman or a person authorised by the Chairman is authorised to make any public statement on behalf of the Company.
- 2.14 All ASX and media releases are to be provided by the Board except for:
 - 2.14.1 Urgent releases which must be approved by the Chairman and advised to all directors prior to release; and
 - 2.14.2 Administrative releases such as disclosure of directors interests and substantial holder notices.
- 2.15 Subject to the continuous disclosure obligations, the Company will not comment on rumours or market speculation.

Role of Company Secretary and CFO

- 2.16 All proposed media releases and external presentations must be reviewed by the Company Secretary in advance in order to minimise the risk of breaching the continuous disclosure requirements, with the Company Secretary performing a vetting and authorization role designed to ensure that company announcements are made in a timely manner, are factual, do not omit material information and are expressed in a clear and objective manner that allows investors to assess the impact of the information when making investment decisions.
- 2.17 The Company Secretary is responsible for all communications with ASX.
- 2.18 The Chief Financial Officer should be involved in all discussions and meetings with analysts and investors, if possible or be fully briefed about those meetings. A record should be kept of all meetings and briefings with investors/analysts.

Trading halts

- 2.19 If a trading halt is necessary to ensure an orderly, fair and informed market, it must be approved by the Board unless it is urgent, in which case it must be approved by the Chairman (or a person authorised by the Chairman) and advised to all directors prior to release.