

# iiNet Market Disclosure Policy

## 1. INTRODUCTION

The company is required to comply with the continuous disclosure requirements of the Corporations Act, the Australian Stock Exchange (ASX) and other relevant exchanges on which the company's securities are listed. The company is committed to ensuring full and timely disclosure of price sensitive information to accommodate an efficient and informed securities market.

## 2. Continuous Disclosure Practices

ASX listing rule 3.1 requires that a company notify immediately the ASX and other relevant exchanges, of any information, which a reasonable person would expect to have a material effect on the price or value of the company's securities.

In order for iiNet to meet its continuous disclosure obligations of such information, the following practices are adhered to:

- Information that is potentially market sensitive is discussed and considered by the Executive Management team with the Managing Director in the first instance;
- Information considered to be market sensitive (ie: having a material effect on the price or value of the company's securities as prescribed under ASX listing rule 3.1, except where such information is not required to be disclosed under ASX listing rule 3.1A) is communicated immediately to the Managing Director and/or in his absence, the Company Secretary. Upon approval of the Managing Director, continuous disclosure is immediately made to the relevant exchanges;
- In the event that circumstances occur that severely impact the business activities and the outcome is not immediately identifiable or quantifiable, the Managing Director together with the board of directors and the Company Secretary has the discretion to request a trading halt from the relevant exchanges;
- Periodic Disclosures require the approval of the Board of Directors prior to release;
- Following appropriate approval, all continuous and periodic disclosure announcements are released on a timely basis to the relevant exchanges by the Company Secretary;
- Upon acknowledgement of receipt from the relevant exchanges the information, where appropriate, is released to the company website, staff and media contacts;

It may also be necessary to make an announcement in certain circumstances or where the ASX or other relevant exchange considers there is, or is likely to be, a false market in the company's securities.

Prior to contact with any external parties, including media, results briefings and presentations to investors and analysts, any information which is price sensitive in nature will not be discussed, unless that particular information has been formally disclosed to the market. In this regard, any written materials used are lodged with the ASX and other relevant exchanges prior to commencement of the briefing.

## 3. Continuous Disclosure

iiNet has adopted a disclosure policy that is designed to ensure timely and full disclosure of price sensitive information to shareholders and the market.

The Company Secretary has responsibility for overseeing and coordinating disclosure of information to the exchanges on which iiNet securities are listed. The Company Secretary liaises with the Managing Director and where necessary the General Manager, Marketing in relation to continuous disclosure matters.

The Chief Financial Officer is responsible for overseeing and co-ordinating disclosure of information to analysts, brokers and shareholders.

All such releases, including relevant external briefing and presentation materials, will be made available on iiNet's website. It is iiNet policy that, in general, iiNet will not respond to market speculation or rumours unless required to do so by law or the Australian Stock Exchange.

The Company has a formal continuous disclosure policy which is available under the "Corporate Governance" section on the Company's website.

## 4. Media Communications Policy

The General Manager, Marketing is responsible for overseeing and co-ordinating disclosure of information to the media. Generally, media interviews are conducted by the Managing Director.

When contacted, the Chair is authorised to exercise discretion to discuss any relevant matter, but should inform the Managing Director of any approaches.

Specific authority has been delegated to the Chief Financial Officer to discuss matters of a financial nature. Specific authority has also been delegated to:

- General Manager – Chime; to discuss business/industry regulatory matters with the media.
- General Manager – New Zealand; to discuss non-financial related issues with the New Zealand media; and
- Any other General Manager; in relation to their areas of expertise where requested to do so by the Managing Director.

In the absence of the Managing Director, the Chief Financial Officer is authorised to exercise his discretion to discuss any relevant matter. In the event that this occurs, the Managing Director and/ or where appropriate the Chair should be notified of the contents of the discussion.

Under no circumstances, other than those stated above, may an iiNet staff member make contact with the media, or when approached, discuss iiNet related matters. If an iiNet staff member is approached by the media, they are required to refer the matter in the first instance to the Managing Director.

## 5. Review

On an annual basis, the Company Secretary reviews the company continuous disclosure policy and media policy to ensure continued compliance with the Corporations Act, the ASX and other relevant exchange listing rules, and best practice recommendations.