

Introduction

The board of directors (the “Board”) and the senior executives of Civmec Limited (“Civmec” or the ‘Company’) together with its subsidiaries (the “Group”) are committed to ensuring compliance with the Australian Securities Exchange (“ASX”) and Singapore Exchange (“SGX”), and has processes in place to ensure compliance with ASX Listing Rules and SGX Listing Manual requirements, including:

- All investors have equal and timely access to material information concerning the Company, including its financial position, performance, ownership and governance; and
- The Company’s announcements are factual, complete, and clearly presented in an impartial way.

Purpose

This Policy applies to the Board, senior executives and employees of the Group (“Civmec People”) and all contractors engaged by the Group across its projects, forming a crucial part of the duties and responsibilities of each individual Board member, employee and contractor.

Roles and responsibilities

The Board is responsible for ensuring that all material matters concerning the Company are disclosed on a timely basis, in accordance with ASX and SGX disclosure requirements, by way of:

- Annual and half-yearly reports;
- Letters to shareholders;
- ASX and SGX announcements;
- Annual General Meetings;
- The Civmec website.

The Board has the ultimate responsibility for what information is to be disclosed, while the Chief Executive Officer and the Chief Financial Officer are responsible for informing the Board of matters requiring disclosure. The Chief Financial Officer is responsible for all communications with the ASX and SGX after the required approvals have been obtained from the Board. The Chief Executive Officer and Chief Financial officer are responsible for monitoring and reporting to the Board regarding compliance with Civmec’s disclosure policy. The continuous disclosure is to be included as an agenda item at all meetings of the Board.

Safeguarding

Prior to disclosing material information, the Board shall undertake a thorough review of the information to be disclosed to ensure it is accurate and clear, to safeguard confidentiality, and to avoid premature disclosure. Once satisfied, the Board will authorise the release of the information. Trading halts and false market The Company may request a trading halt from the ASX and SGX to prevent trading in the Company’s shares by an inefficient and uninformed market. The Chief Executive Officer and Chief Financial Officer are the only ones authorised to request this. Should there be a requirement to respond to a false market, the Chief Executive Officer and/or Chief Financial Officer will liaise with the Board to prepare the necessary communications and disclose to the market, as required.

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Releasing of information – analysts and media


The Company will only provide prior disclosed or publicly available information in meetings and discussions with investors, analysts and the media. The Company may invite the media to attend Company presentations directed to investors and analysts. Presentation materials not previously released will be disclosed to the market prior to briefing commencement.

Authorised Spokespersons

Employees must not speak with the media, analysts or investors about sensitive information until that information has been released publicly through SGX and ASX (including any subsidiary or joint venture). Unless otherwise authorised in writing by the Authorised Spokesperson, only those persons set out below are authorised to speak publicly about the affairs of the Group.

Authorised Spokesperson	Persons with whom the Authorised Spokesperson is authorised to communicate
Chairman and Chief Executive Officer	All persons (including investors, analysts, brokers and the media)
Chief Financial Officer	Investors, analysts and brokers
Executive Management	Investors, analysts and brokers, in certain pre-agreed situations
Senior Management	In accordance with the scope of their authority

In addition, all employees must observe and comply with the Social Media Policy available on the Company's website.



Patrick Tallon
Chief Executive Officer
Civmec Group
August 2022