



Continuous Disclosure Policy

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1. Continuous Disclosure

1. Integrated Payment Technologies Limited (**Company**) is committed to:
 1. ensuring that shareholders and the market are provided with full and timely information about its activities;
 2. complying with the continuous disclosure obligations contained in the ASX Listing Rules and the applicable sections of the Corporations Act 2001 (Cth); and
 3. providing equal opportunity for all stakeholders to receive externally available information issued by the Company in a timely manner.
2. This Policy covers financial markets communication, media contact and continuous disclosure issues. It forms part of the Company's corporate policies and procedures and is available to all staff.
3. The Company Secretary manages this Policy. This Policy will develop over time as best practice and as regulations change and the Company Secretary will be responsible for communicating any amendments. This Policy will be reviewed by the Board annually.

2. Guiding Principle

1. The Company will immediately notify the market via an announcement to the ASX of any information concerning the Company that a reasonable person would expect to have a material effect on the price of the Company's shares or securities or influence an investment decision on those securities.
2. The Company will ensure that it does not communicate material price sensitive information to an external party except where that information has previously been disclosed to the ASX.
3. ASX Disclosure Carve-Outs
 1. Disclosure is not required, where all of the three following requirements are met in relation to the information:
 1. one or more of certain conditions contained in ASX Listing Rule 3.1A.1 are satisfied being:
 - it would be a breach of a law to disclose the information;
 - the information concerns an incomplete proposal or negotiation;
 - the information comprises matters of supposition or is insufficiently definite to warrant disclosure;

- the information is generated for the internal management purposes of the entity; or
 - the information is a trade secret; and
2. the information is confidential and ASX has not formed the view that the information has ceased to be confidential; and
 3. a reasonable person would not expect the information to be disclosed.
4. “Material” Information
1. Information is considered material if there is a substantial probability that the information would influence investors in deciding whether to invest in or divest the Company’s securities. In particular, results of earnings forecast guidance will not be provided to the market where this has not been released to the market in general.

3. Communication Protocols

1. Reporting of Material Information

1. The Company’s protocol in relation to the review and release of ASX announcements (and media releases) is as follows:

1. information is determined by the Board, Company Secretary or other employee of the Company as being of a type or nature that may warrant disclosure to the ASX;
2. if not known by the Chief Executive Officer, all information should be reported to the Chief Executive Officer;
3. the Chief Executive Officer will determine the nature and extent of the information and consult with the Board and Company Secretary to determine the form and content of any ASX Release;
4. the Chief Executive Officer will agree on the text of the proposed release and will be responsible for ensuring that the Company establishes a vetting procedure to ensure that the announcements are factual and do not omit any material information. The Chief Executive Officer will also be responsible for ensuring that Company announcements are expressed in a clear and objective manner that allows investors to assess the impact of the information when making investment decisions. The Company Secretary may also be required to assist in drafting releases for review and will liaise with the Chief Executive Officer in this regard;

5. depending on the nature of the release, the sensitivity of the information and the availability of the Board, the Chief Executive Officer will then determine whether the Board, as a whole, should be involved in the review of the ASX Release;
6. the Company Secretary will then release the ASX Release to the market, and ensure that the website is updated;
7. the Company will not release publicly any information required to be disclosed through the ASX until cleared by the ASX.

2. Authorised Spokespersons

1. Only authorised persons are allowed to make public statements to external parties, shareholders, investors, stockbrokers, analysts or the media in relation to any matters affecting the Company.
2. Currently, those persons authorised are:
 - the Chair;
 - the Chief Executive Officer; or
 - their delegates nominated for that purpose.
3. The authorised persons in (2) above may clarify information that the Company has publicly released but will not comment on material price sensitive issues that have not been disclosed to the market generally.
4. Any staff member who receives a request for comment from an external third party is to refer the enquiry to the Chair or Chief Executive Officer.

3. Distribution of Information

1. All information released to the ASX after clearance from the ASX will be promptly placed on the Company's website, the latest within 24 hours.

4. Management Responsibilities

1. The Company's officers, employees and contractors must be made aware of this Policy. Employees or contractors must disclose any information which comes to their attention and is believed to potentially be material to the Company Secretary or Chief Executive Officer.
2. Officers, employees and contractors must be made aware of the "no comment policy" to external parties on any matters which may be material to the Company.

5. Trading Halts

1. The Company may request a trading halt to maintain orderly trading in the Company's securities. The Company Secretary will manage the process in consultation with the Chair, Chief Executive Officer and Directors as required.

4. Contact with the Market

1. Key executives interact regularly with the market on the Company's activities in a number of ways, including briefings, market announcements, and regular updates on industry issues, one-on-one briefing, meetings and educational sessions.
2. In addition, the Company occasionally provides background and technical information to institutional investors and stockbroking analysts to support announcements made to the ASX about the Company's on-going business activities.
3. At all times when interacting with external individuals, investors, stockbroking analysts and market participants, the representatives of the Company should adhere to the guiding principle set out in this Policy.
4. Open Briefings to Institutional Investors and Stockbroking Analysts
 1. The Company may hold open briefings (ie. where all members of a relevant group are invited) with shareholders, investors and/or stockbroking analysts to discuss information that has been released to the market.
 2. Representatives of the Company are under the obligation of this Policy and should not disclose any material price or value sensitive information that has not been announced to the market generally.
 3. When the Company gives a new and substantive investor or analyst presentation it will release a copy of the presentation materials on the ASX Market Announcements Platform ahead of the presentation.
5. One-on-one Briefings with Stockbrokers, Analysts and Institutional Investors and Shareholders
 1. It is in the interests of the Company's shareholders that stockbroking analysts have a thorough understanding of the Company's business operations and activities. In addition, other professional investors may seek to better understand certain aspects of the Company's strategy.

2. From time to time, the Company participates in one-on-one briefings with various investment professionals. At these briefings the Company may provide background and technical information to assist these people in their understanding of the Company's business activities. The Company's policy is that no previously undisclosed material price or value sensitive information will be disclosed at these briefings.
3. For the purposes of this Policy a one-on-one briefing includes any communication between the Company and a stockbroking analyst including, for example, phone calls or e-mails made to the Company's Chief Executive Officer. Any written materials to be used at open or one-on-one briefings with institutional investors or stockbroking analysts will be reviewed by the Chief Executive Officer to ensure all information has previously been disclosed to the market. Where this is not the case, the information will be disclosed in the manner outlined above.

6. Review of Analyst Reports

1. The Company recognises the important role performed by analysts in assisting the establishment of an efficient market with respect to the Company's securities. However, the Company is not responsible for, and does not endorse, analyst reports that contain commentary on the Company.
2. The Company will not provide non-disclosed material price or value sensitive information in response to such reports. The information may be reviewed only to correct factual inaccuracies. Any correction of factual inaccuracies by the Company does not imply endorsement of the content of these reports.
3. The Company will only comment on financial outcomes and other forecasts that may be contained in this type of information in line with previously publicly released comment.

7. Managing Market Speculation and Rumours

1. Market speculation and rumours, whether substantiated or not, have a potential to impact the Company's share price. Speculation may also contain factual errors that could materially affect the Company.
2. The Company's general policy on responding to market speculation and rumours is that "the Company does not respond to market speculation or rumours". However, the Company may issue a statement in relation to market speculation or rumour where and when it considers it necessary.

3. Speculation may result in the ASX formally requesting disclosure by the Company on the matter, in which case the Company will respond to the request.

5. Verification of Periodic Corporate Reports

1. Increasingly, investors are relying on a broader range of periodic corporate reports than audited or reviewed financial statements to inform their investment decisions. This includes an entity's annual directors' reports, quarterly activity reports, quarterly cash flow reports and, in some cases, integrated reports (if prepared as a separate annual report), sustainability reports or similar periodic report prepared for the benefit of investors (**Periodic Corporate Reports**). Where a corporate report of this type is not subject to audit or review by an external auditor, it is important that investors understand the process by which the entity has satisfied itself that the report is materially accurate, balanced and provides investors with appropriate information to make informed investment decisions.
2. The Company's management has developed practices and guidance material that are intended to ensure that its Periodic Corporate Reports are accurate, balanced and provide investors with appropriate information to make informed investment decisions. The Company's processes are intended to ensure that all applicable laws, regulations and company policies have been complied with, and that appropriate approvals are obtained before a Periodic Corporate Report is released to the market.
3. The Company's process for verifying unaudited Periodic Corporate Reports is as follows:
 1. each report is prepared by, or under the supervision of, subject-matter experts;
 2. material statements in each report are reviewed by relevant senior management to ensure that they are accurate, not misleading, and meet the Company's corporate policy and regulatory requirements, and that the report contains no material omissions; and
 3. information in a report that relates to financial projections, statements as to future financial performance or changes to the policy or strategy of the Company (taken as a whole) must be approved by the Board.