



## Ridley Corporation Limited

### DISCLOSURE POLICY

#### INTRODUCTION

Ridley is committed to the promotion of investor confidence by ensuring that trading in its securities takes place in an informed market. Ridley recognises the importance of equal, timely, accurate, balanced and meaningful disclosure of its activities and state of affairs, that allows investors to assess the impact of the information when making investment decisions.

#### WHO THIS POLICY APPLIES TO

This Disclosure Policy (**Policy**) applies to all directors, officers, employees and contractors of the Ridley Corporation Limited consolidated group (**Ridley**). Ridley also has a Disclosure Procedure which contains detailed information about the roles and responsibilities of Ridley's directors, officers and employees in complying with Ridley's continuous disclosure obligations.

#### PURPOSE

- (i) The objective of this Policy is to ensure that Ridley complies with its continuous disclosure obligations under the Corporations Act and the ASX Listing Rules and that the information contained in all Ridley communications with the public is consistent, accurate, fair and timely. To meet these objectives: Ridley will at all times comply with all laws and regulations regarding public disclosure of information including facts and changes, financial results and operations, including immediately notifying the ASX of any information concerning Ridley that a reasonable person would expect to have a material effect on the price or value of Ridley's securities as soon as Ridley becomes aware of any such information (the continuous disclosure rule).

The Disclosure Procedure contains information about matters including:

- what is meant by 'immediate' disclosure;
  - what is meant by a 'material effect' on the price or value of the securities;
  - the exceptions that apply to ASX Listing Rule 3.1; and
  - the consequences for the Company and individuals involved in any contravention of Listing Rule 3.1.
- (ii) Ridley is committed to the fair disclosure of information about Ridley and to the avoidance of selective disclosure that would advantage or disadvantage any participant in the financial market place;
- (iii) When Ridley is relying on an exception to the continuous disclosure rule in Listing Rule 3.1, or is involved in a development that may eventually require reliance on an exception, appropriate confidentiality protocols must be adhered to. A leak of confidential information will immediately deny Ridley the ability to withhold the information from the ASX and force the Company to make a 'premature' announcement;
- (iv) Ridley will give the ASX the information needed to correct or prevent a false market where the ASX considers that there is or is likely to be a false market in Ridley's securities and asks Ridley to give it information to correct or prevent a false market;
- (v) all disclosure to the media and to the financial community, including investment analysts, brokers and current or potential investors, will be communicated only following the approval by, or with the attendance of, two Ridley designated spokespersons. Ridley's Disclosure

Procedure contains further details in relation to potential disclosure issues associated with analyst briefings and responses to security holder questions. The Disclosure Procedure also sets out Ridley's policy on media contact and comment; and

- (vi) all Ridley media releases, information prepared for the financial community, and all other Ridley related information for public disclosure, must follow the procedures for review and approval outlined in the Ridley Disclosure Procedure.

The Company Secretary is responsible for maintaining this Policy, ensuring that this Policy is reviewed and updated periodically as necessary, and ensuring that this Policy and the Ridley Disclosure Procedure are communicated throughout Ridley and followed consistently in their operations.

Questions of interpretation should be directed to the Chief Executive Officer (**CEO**), Chief Financial Officer (**CFO**) or the Company Secretary.

#### **VERSION CONTROL**

Last approved by the Board: 29 June 2021

Last reviewed by Management: 16 June 2022