



Continuous Disclosure Policy

Version: 2021.1

February 2021

Document Control

Purpose

This policy is designed to outline the Continuous Disclosure Policy of Wingara Ag Ltd (the Company).

Policy Information

Policy Contact:	Company Secretary	Policy Owner:	Company Secretary
Approver:	Board		
Approval date:	5 February 2021	Effective Date:	5 February 2021
Review period:	Annual	Next review date:	5 February 2022

Scope

All directors, employees, and contractors of Wingara AG Ltd, Elect Performance Group Pty Ltd and Austco Polar Cold Storage Pty Ltd.

Document History

Version	Date Approved	Author	Description
2016.1	15 February 2016	Company Secretary	Creation of policy
2021.1	5 February 2021	Company Secretary	Update of policy

Definitions

Term	Definition
Wingara	Wingara AG Limited and its related entities
Board	The Board of Directors of Wingara.
Company	Wingara AG Limited
Constitution	The constitution of Wingara AG Limited.
Executive Team	The Chief Executive Officer and all of their direct reports.
Material	Where omissions or misstatements could influence the economic decisions of users of the information, be it individually or collectively (i.e.: greater than 10%) both internally and externally.
Wingara employee	An employee, Director or contractor of Wingara or associated entities.
Wingara Executive	A member of Wingara's executive team.
Code of Conduct	Wingara's Code of Conduct approved by the Board.

Related documents

- Board Charter
- Conflicts of Interest Policy
- Code of Conduct

Policy

Company Disclosures

In accordance and in compliance with the *ASX Listing Rules*, the Company will immediately notify the ASX of information:

1. concerning the Company that a reasonable person would expect to have a material effect on the price or value of the Company's securities; and
2. that would, or would be likely to, influence persons who commonly invest in securities in deciding whether to acquire or dispose of the Company's securities.

The only exception to this is where the *ASX Listing Rules* do not require such information to be disclosed.

ASX has advised that it considers the word "immediately" to mean promptly and without delay.

Upon confirmation of receipt from the ASX, the Company will post all information disclosed in accordance with this policy on the Company's website in an area accessible to the public.

Internal notification and decision-making concerning the disclosure obligation

The Board has designated the Company Secretary as the person responsible for overseeing and coordinating disclosure of information to the ASX as well as communicating with the ASX. The Chief Executive Officer and Company Secretary (Disclosure Team) will be responsible for ensuring that Company announcements are made in a timely manner, and will establish a vetting procedure to ensure that the announcements are factual and do not omit any material information. The Disclosure Team will also ensure 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 Disclosure Team must provide Directors with the opportunity to review an announcement prior to lodgement with ASX. In rare circumstances, if this is not possible despite action taken, the Disclosure Team must ensure that:

- The Chair and the Chair of the Audit and Risk Committee have approved the announcement; and
- a copy of the announcement is sent to Directors at least as soon as it is lodged with ASX.

Measures for seeking to avoid the emergence of a false market in the Company's securities

The Company recognises that a false market in the Company's securities may result if the Company provides incomplete information to the ASX or if the Company fails to respond to market and media speculation that may, or may be likely to, have an impact on the price of the Company's securities.

While the Company does not, in general, respond to market speculation or rumours unless required to do so by law or the ASX, the Company is committed to disclosing as much information as possible, without harming the Company, to a wide audience of investors through media releases of important milestones, including information that may not strictly be required under continuous disclosure requirements. Information given to the ASX for market release will also be provided to investors through media releases. Such media releases will be posted on the Company's website.

Where appropriate, the Company will request a trading halt from the ASX to prevent trading in the Company's securities by an inefficient and uninformed market until the Company can make an announcement to the market.

Media contact and comment

The Board has designated the Chairman and/or the Chief Executive Officer to speak to the press on matters associated with the Company. In speaking to the press, the Chairman or the Chief Executive Officer will not comment on price sensitive information that has not already been disclosed to ASX, however, they may clarify previously released information.

There will be times when Directors and employees will be approached by the media for public comment.

On such occasions, the Director(s) or employee(s) should comply with the following:

1. refer the person to the Chairman or the Chief Executive Officer as appropriate for comment;
2. refrain from disclosing any information, documents or other forms of data to the person without the prior consent of the Chairman or the Chief Executive Officer;
3. report the person who contacted the Director/employee, the reason (explicit or inferred) for the contact and a summary of any other relevant information as soon as possible to the Chairman or the Chief Executive Officer.

External communications including analyst briefings and responses to shareholder questions

The Company discloses its financial and operational results to the market each half year/quarter as well as informing the market of other events throughout the year as they occur. Quarterly financial reports, media releases and AGM speeches are all lodged with the ASX and subsequently posted to the Company's website. As all financial information is disclosed through the ASX, the Company will only comment on factual errors in information and underlying assumptions when commenting on market analysts' financial projections, rather than commenting on the projections themselves.

In addition to the above disclosures, the Company does conduct briefings and discussions with the investing community. However, price sensitive information will not be discussed unless that particular information has been formally disclosed to the market via an ASX announcement.

Similarly, when answering shareholder questions, price sensitive information will not be discussed unless that particular information has been formally disclosed to the market via an ASX announcement.

Where a question can only be answered by disclosing price sensitive information, the Company will decline to answer it or take it on notice and announce the information to ASX prior to responding.

If any new price sensitive information is to be used in briefing media, institutional investors and analysts or in answering shareholder queries, written materials containing such information will be lodged with the ASX prior to the briefing commencing. These briefing materials may also include information that may not strictly be required under continuous disclosure requirements. The briefing material will be posted to the Company's website as soon as the ASX confirms that this information has been received.

END OF DOCUMENT