

# China Magnesium Corporation Limited ACN 125 236 731 (Company)

## Continuous Disclosure and Shareholder Communication Policy

---

### 1 Policy objectives

- 1.1 The objective of this Policy is to ensure that the market is fully informed about the Company's strategy, financial performance and outlook and business operations.
- 1.2 The Company will seek to achieve this objective by seeking to provide equal access to information for all investors and avoiding the disclosure of price sensitive information (refer to paragraph 2.3) to any person on a selective basis.

### 2 Policy

#### Equal access to information

- 2.1 Price sensitive information that is required to be disclosed by the ASX listing rules must be disclosed to ASX prior to disclosure to institutional investors, analysts, the media or others outside the Company.
- 2.2 Following receipt of confirmation that ASX has released information, lodged by the Company, to the market, that information will be available on or through the Company's website.

#### Continuous disclosure

- 2.3 Except for certain confidential information that no reasonable person would expect to be disclosed, once the Company becomes aware of any information concerning it that a reasonable person would expect to have a material effect on the price or value of the Company's securities it will immediately tell ASX that information (**price sensitive information**).
- 2.4 Continuous disclosure obligations are reviewed as a standing item on the agenda for each regular meeting of the Board and all Directors are required to confirm details of any matter within their knowledge that might require disclosure to the market.

### 3 Reporting and disclosure

#### Periodic reporting

- 3.1 The Company will communicate regularly with shareholders through its:
  - 3.1.1 full annual report, which the Company will send to shareholders in hard copy unless they elect to receive it by electronic copy;
  - 3.1.2 annual general meeting, at which shareholders will be updated as to the Company's strategy, financial performance and outlook and business

operations. Shareholders will be given the opportunity to ask questions of the Board and the auditor will be invited to the meeting to answer questions about the audit;

3.1.3 release of the annual results in August each year and the interim results in February; and

3.1.4 where appropriate and practicable, release of certain announcements and notices through the Company website or other electronic means.

### **Public announcements - authorised spokespersons and releases**

3.2 Only the Chairman or a person authorised by the Chairman is authorised to make any public statement on behalf of the Company.

3.3 All ASX and media releases are to be approved by the Board except for:

3.3.1 urgent releases which must be approved by the Chairman and advised to all Directors prior to release; and

3.3.2 administrative releases such as disclosure of Directors' interests and substantial holder notices.

3.4 Subject to its continuous disclosure obligations, the Company will not comment on rumours or market speculation.

### **General briefings**

3.5 The Company will brief the market as required:

3.5.1 if unexpected material events occur; and

3.5.2 to ensure that the market is informed about the Company's strategy, financial performance and outlook and business operations.

### **Briefings to institutional investors and analysts**

3.6 The Company will not communicate any price sensitive information to institutional investors, analysts or any other third party unless that information has first been disclosed to ASX.

3.7 The Company may hold general or one-on-one briefings with institutional investors or analysts. At such briefings, the Company will not disclose price sensitive information but may give background and other information to assist institutional investors and analysts to understand its strategy, financial performance and outlook and business operations.

3.8 All written information and presentations to be used at general or one-on-one briefings will be reviewed by the Company secretary (refer paragraph 3.13) to determine whether information in the proposed briefing has previously been disclosed to ASX. If the proposed briefing contains information that has not previously been disclosed to ASX, that information must be:

3.8.1 deleted from the briefing; or

3.8.2 disclosed to ASX and not disclosed in any briefing until receipt of confirmation that ASX has released that information to the market.

### **Answering questions**

3.9 No price sensitive information that has not been disclosed to ASX will be provided at general, institutional investor or analyst briefings. Questions at briefings that deal with such price sensitive information will either:

3.9.1 not be answered; or

3.9.2 taken on notice and not answered until the information is released to ASX and receipt of confirmation that ASX has released that information to the market.

### **Written record**

3.10 More than one Company representative must be present at all institutional investor or analyst briefings and file notes of all such briefings must be made and kept for a reasonable period having regard to the nature of information discussed at the briefing.

### **Disclosure to ASX**

3.11 Slides and presentation materials used in general, institutional investor or analyst briefings will be released to ASX before the briefing.

3.12 If there is any inadvertent disclosure of price sensitive information during any briefing, it will be released to ASX as soon as practicable.

### **Role of Company secretary**

3.13 All proposed media releases and external presentations must be reviewed by the Company secretary in advance in order to minimise the risk of breaching the continuous disclosure requirements.

3.14 The Company secretary is responsible for all communications with the ASX. The Company secretary should be involved in all discussions and meetings with institutional investors and analysts, if possible or be fully briefed about those meetings.

## **4 Other matters**

### **Trading halts**

4.1 If a trading halt is necessary to ensure an orderly, fair and informed market, it must be approved by the Board unless it is urgent in which case it must be approved by the

Chairman (or a person authorised by the Chairman) and advised to all directors prior to release.

**Analyst reports**

- 4.2 The Company may review analysts' research reports but will limit its comments to factual matters and information previously disclosed.