

# Market Disclosure & Communications Policy

## 1. Introduction

Tasmanian Perpetual Trustees Limited (the Company) is committed to the promotion of investor confidence by ensuring that trade in its securities takes place in an efficient, competitive and informed market.

The Company recognises the importance of forthright communication as a key plank in building shareholder value and that to prosper and achieve growth the Company must (among other things) earn the trust of employees, customers, suppliers, the community and security holders by being forthright in its communications and consistently delivering on its commitments.

## 2. Purpose

The purpose of this policy is to:

- reinforce the Company's commitment to the continuous disclosure obligations imposed by law and to describe the processes implemented by the Company to ensure compliance; and
- outline the Company's corporate governance standards and related processes aimed at ensuring timely and accurate information is provided equally to all shareholders.

## 3. Commitment to continuous disclosure

The Company will immediately notify the market, by announcing to the securities exchange on which its securities are listed, of any information or any major development related to the business of the Company:

- which a reasonable person would expect to have a material effect on the price or value of the Company's securities; or
- which a reasonable investor is likely to use as part of the basis for making investment decisions (inside information).

In certain circumstances, the applicable listing rules permit the Company not to disclose, or to delay the disclosure of inside information.

The Board is responsible for reviewing material information and determining what information must be disclosed and ensuring that the Company complies with all disclosure obligations, including responsibility for ensuring that adequate processes are in place for the identification of inside information and the maintenance of the Company's insider lists of people in possession of inside information.

## 4. Responsibility for disclosure

The Board manages the Company's compliance with all continuous disclosure obligations and this Policy. The Board is responsible for implementing reporting processes and controls and determines guidelines for the release of information.

## 5. Responsibility for identifying information for disclosure

- 5.1 The Managing Director, the Company Secretary, each General Manager, each Director and each Committee of the Company has a duty to monitor all activities of the Company which may have a material impact on the price or value of the Company's shares;
- 5.2 Each of the Officers and Committees described in paragraph 5.1 has a duty to promptly notify the Company Secretary of any matter which may have a material impact on the price or value of the Company's shares; and
- 5.3 In this policy "matter" includes circumstances involving market speculation and rumour concerning the Company or its shares which may lead to a false market in the Company's shares.

- 5.4 The Managing Director and Company Secretary must assess the materiality of the matter reported to determine whether the Company has a duty to make disclosure;
- 5.5 If the Managing Director considers the matter under consideration may have a material impact on the price or value of the Company's shares, the matter must be reported forthwith to the Chairman and each Director together with the appropriate form of disclosure to be made; and
- 5.6 The Chairman must approve the form of the disclosure or otherwise deal with the reported matter. Subject to the direction of the Chairman, the Secretary must then disclose the matter immediately to the market and post the disclosure on the Company's website.
- 5.7 Where disclosure is required to be made the disclosure must be timely, factual, not omit material information and expressed in a clear and objective manner.

## **6. Communications with securities exchange**

The Company Secretary is responsible for communications with the relevant securities exchange on which the Company is listed.

Information will be released to the Australian Securities Exchange in accordance with this Policy.

## **KEY CORPORATE GOVERNANCE STANDARDS ON COMMUNICATIONS**

### **7. Key corporate governance standards on communication**

The Company has adopted a corporate governance framework that is designed to ensure:

- timely and accurate information is provided equally to all shareholders and market participants regarding the Company including its financial situation, performance, ownership, strategies, activities and governance;

- channels for disseminating information are adopted which are fair, timely and cost-efficient; and
- the Company does not communicate material price, or value sensitive information to any external party prior to that information being disclosed to all shareholders and market participants in compliance with its continuous disclosure obligations.

The specific processes adopted by the Company to implement these corporate governance standards are set out below.

### **8. Communication of disclosable information on the website**

All information released to the securities exchange will be available through the Company's website on the same business day as the announcement to the relevant securities exchange.

The Company's website address is:  
[www.tasmanianperpetual.com.au](http://www.tasmanianperpetual.com.au)

### **9. Authorised spokespersons**

The only employees authorised to make any public statement on behalf of, or attributable to the Company, are those who have the prior approval of the Managing Director.

### **10. Rumours and market speculation**

Subject to the Company's obligations under paragraph 4 above, the Company will not generally comment on rumours or market speculation.

### **11. Trading halts**

In order to facilitate an orderly, fair and informed market it may be necessary to request a trading halt from a securities exchange. The Board in consultation with the Managing Director will make all decisions relating to a trading halt.

## 12. Financial calendar

The Company follows a calendar of regular disclosure to the market on the Company's financial and operational results. The calendar, which is posted on the website, includes target dates for the release of half year and full year results, other financial information, shareholder meetings and business briefings.

The Company's financial calendar can be accessed at: [www.tasmanianperpetual.com.au](http://www.tasmanianperpetual.com.au)

At these briefings and meetings:

- No information of the kind outlined in paragraph 4 will be disclosed unless it has been previously released to the market.
- If material information of the kind outlined in paragraph 4 is inadvertently released it will immediately be released to the securities exchange and be available on the Company's website.

## 13. Analyst and investor briefings

The Company recognises the importance of the relationship between the Company and investors and analysts.

From time to time the Company conducts analyst and investor briefings. In these cases the following protocols will apply:

- No information of the kind outlined in paragraph 4 will be disclosed at these briefings unless it has been previously or is simultaneously released to the market.
- If material information of the kind outlined in paragraph 4 is inadvertently released it will immediately be released to the market via the securities exchange and be available on the Company's website.
- Questions at briefings that deal with material information not previously disclosed will not be answered.
- The Company will ensure a copy of the presentation material is available on the Company's website.

## 14. Analysts' reports & estimates

Where requested to do so, the Company may review analysts' research reports but will confine comments to factual matters and material previously disclosed.

The Company may comment on analysts' earnings' estimate to the extent of:

- acknowledging the current range of estimates;
- questioning an analyst's assumptions or sensitivities if the analyst's estimate is significantly at variance from current market range estimates; and
- advising factual errors where data is already in the public domain.

Forecast information will not be provided by the Company unless it has already been disclosed to the market.

## 15. Consultants & professional advisers

The Company will require any consultant or professional adviser engaged to undertake work on behalf of the Company or any of its subsidiaries to abide by this Policy.

## 16. Breaches

Failure to comply with this Policy may lead to a breach of applicable legislation or with securities exchange Listing Rules or other regulations particularly in relation to continuous disclosure which in turn may lead to personal penalties for directors and officers. Breaches of this Policy may lead to disciplinary action being taken, including dismissal in serious cases.

## 17. Review

The Board will regularly evaluate this Policy to determine whether the Policy is effective in ensuring accurate and timely disclosure in accordance with the Company's disclosure obligations.

## **18. Additional information**

If you have any questions arising from the Company's Market Disclosure and Communications Policy, you may contact one of the persons listed below.

### **Mark Scanlon**

Managing Director  
Tasmanian Perpetual Trustees Limited  
23 Paterson Street  
LAUNCESTON TAS 7250  
Tel: 61 3 6348 1176  
Email: markscanlon@tptl.com.au

### **Paul Viney**

Secretary  
Tasmanian Perpetual Trustees Limited  
23 Paterson Street  
LAUNCESTON TAS 7250  
Tel: 61 3 6348 1170  
Email: paulviney@tptl.com.au

## **19. References**

Tasmanian Perpetual Trustees Limited Corporate Delegations Policy

Directors and Officers Dealing in Company Shares

## **20. Monitor and Review:**

The Company's Business Risk and Compliance Committee will review annually the Company's adherence to the procedures set out in this document.

Approved on 26 August 2008.