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## CONTINUOUS DISCLOSURE POLICY

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### **Introduction**

In accordance with the ASX Listing Rules, Karoon Gas Australia Limited (**Karoon** or **Company**) will immediately notify the ASX of information concerning Karoon that a reasonable person would expect to have a material effect on the price or value of Karoon's securities ("**price sensitive information**").

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

Upon confirmation of receipt from the ASX, Karoon will post all information disclosed to ASX in accordance with this Policy on Karoon's website.

### **Internal Notification and Decision-Making Concerning the Disclosure Obligation**

The Board has appointed the Company Secretary as the person responsible to ensure that a system is in place for overseeing and coordinating disclosure of information to the ASX as well as communicating with the ASX.

The Company Secretary is responsible for ensuring that ASX announcements are made in a timely manner. ASX announcements will be vetted by the Company Secretary to ensure that the announcements are factual, complete, balanced (both positive and negative) and expressed in a clear and objective manner that allows investors to assess the impact of the information when making investment decisions.

Division managers are responsible for ensuring that all material information which could be price sensitive information is provided to the Company Secretary as soon as they become aware of it. The Company Secretary will determine whether information is to be disclosed to the ASX.

### **Promoting and Monitoring Compliance**

The Company Secretary is responsible for monitoring compliance with this policy on a daily basis. All ASX announcements will be reviewed by the Company Secretary to ensure compliance with this Policy.

### **Confidentiality**

Karoon will take appropriate measures to safeguard the confidentiality of price sensitive information to avoid premature disclosure.

### **Measures for Seeking To Avoid the Emergence of a False Market in Karoon Securities**

Karoon recognises that a false market in Karoon's securities may result if Karoon provides incomplete information to the ASX or if Karoon fails to respond to market and media speculation that may or may not be likely to have an impact on the price of Karoon's securities.

While Karoon does not, in general, respond to market speculation or rumours unless required to do so by law or the ASX, Karoon is committed to disclosing as much information as is possible, without serious implications to Karoon, to a wide audience of investors

through media releases of important milestones, including information that may not strictly be required under continuous disclosure requirements.

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

### **Media Contact and Comment**

The Board has appointed the External Relations Team to speak to the press on matters associated with Karoon. In speaking to the press, the External Relations Team will not comment on price sensitive information that has not already been disclosed to ASX, however, they may clarify previously released information.

### **External Communications Including Analysts Briefings and Responses to Shareholder Questions**

Karoon discloses its financial and operational results to the market at least each half year as well as informing the market of other events throughout the year as they occur. Half-yearly financial reports, media releases and AGM speeches are all lodged with the ASX and subsequently posted to Karoon's website. As all financial information is disclosed through the ASX, Karoon 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, Karoon conducts briefings and discussions with analysts and institutional investors. However, price sensitive information will not be discussed unless it has been previously disclosed to the market via an ASX announcement. Slides and presentations used in briefings will also be released immediately prior to the briefing to the market via the ASX and posted on Karoon's website.

If any new price sensitive information is to be disclosed 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. Briefing materials may also include information that is not strictly required under continuous disclosure requirements including where Karoon believes additional disclosure is appropriate and in accordance with good governance. Briefing materials will be posted to Karoon's website as soon as the ASX confirms that the information has been received.

### **Periodic Disclosure**

Karoon is committed to the full and accurate reporting of its financial results. Consequently, when complying with its periodic disclosure requirements Karoon will provide commentary on its financial results. The purpose of the commentary will be to clarify and balance the information in the financial results and it will be delivered in a manner that is neutral, free from any bias and easy to understand. This may involve the provision of both positive and negative information that Karoon believes is necessary to keep investors fully informed.



Robert Hosking

**Managing Director**



David Klingner

**Chairman**

Approved by the Board on 9<sup>th</sup> July 2015