

CORP 140 – Continuous Disclosure Policy

Purpose and Scope

This policy ensures Coventry Group Ltd (CGL) fosters a culture of corporate compliance, ethical behaviour and good corporate governance.

This Continuous Disclosure Policy is intended to ensure that CGL will make timely and balanced disclosure of all matters concerning it that a reasonable person would expect to have a material effect on the price or value of its securities (Australian Securities Exchange (ASX) code: CYG).

Policy

It is a requirement that CGL discloses to the ASX immediately any information concerning it that a reasonable person would expect to have a material effect on the price or value of its securities (ASX code: CYG). This policy is in place to ensure that all investors have equal and timely access to material information concerning Coventry Group – including its financial position, performance, ownership and governance.

The directors, officers and employees of CGL understand the importance that all corporate information is kept confidential prior to market announcements, and all have a responsibility to comply with this policy and its obligations. The CORP 300 – Media Policy is to be read in conjunction with this policy and states that any engagement with the general media is with the expressed permission from the Chief Executive Officer or Chief Financial Officer.

CGL understand the importance of ensuring that market announcements are accurate, balanced and expressed in a clear and objective manner that allow investors to assess the impact of the information when making investment decisions.

Potential disclosure issues associated with analyst briefings and responses to security holder questions will be managed by publishing any significant information that may arise from such briefings onto the ASX and the CGL websites.

Process

To ensure CGL avoids the emergence of a false market in its securities, the following processes must be followed:

- Ensure any engagement with the general media, is with the expressed permission from the Chief Executive Officer or Chief Financial Officer.
- Media responses should always be 'on the record'. They are to be truthful and accurate and not include speculation, guesswork or personal opinion.
- Direct any general media contact to the Chief Executive Officer or Chief Financial Officer immediately.
- Report emerging issues or potential media and public sensitivity relating to the organisation, including critical incidents to the immediate attention of the Chief Executive Officer or Chief Financial Officer.
- All market announcements are to be approved by the Chairman of the Board prior to being published on the ASX and the CGL websites.

Associated Documents

- CORP 800 – Media Policy
- ASX Listing Rules Guidance Note 8 *Continuous Disclosure: Listing Rules 3.1 – 3.1B*
- ASIC Regulatory Guide 62 *Better disclosure for investors*

Policy History

Description	Reference #	Date	Authority
Original Policy	CORP 140	June 2019	Board
Minor Update	CORP 140	June 2020	
Revision #1	CORP 140 01	June 2022	Board
Values Logo Update	CORP 140 01	August 2023	
Next Review Due		June 2024	

