

## **MARKET DISCLOSURE POLICY**

### **CONTEXT**

Accent Resources N.L. (ACS or the Company) is committed to prompt disclosure of market sensitive information concerning the Company so that trading in its securities can take place in an informed market.

This policy promotes compliance by ACS with processes and procedures directed toward ensuring that the Company meets the continuous disclosure requirements of the Australian Securities Exchange (ASX).

### **SCOPE**

- a. The system for reporting and escalating potentially market sensitive information to the Board;
- b. The role of the Board in assessing potentially market sensitive information and determining whether it requires disclosure under ASX Listing Rule 3.1 ("Listing Rules");
- c. The delegations for issuing Market Releases;
- d. The framework for communications with investors, analysts and market participants;
- e. The procedures to promote understanding of compliance by employees and Responsible Officers; and
- f. Authorised spokespersons.

### **OTHER RELATED POLICIES**

This policy operates alongside our Investor Communication policy and processes; and is underpinned by the Code of Conduct of ACS.

### **IDENTIFYING AND ESCALATING MARKET SENSITIVE INFORMATION**

ACS is required to disclose to the market information concerning the Company which a reasonable person would expect to have a material effect on the price or value of ACS shares (market sensitive information) unless an exception applies under the Listing Rules.

Market sensitive information must be disclosed immediately the Company becomes aware of it, which means promptly and without delay.

Given the size and geographic spread of the Company's operations, the Board receives all information which may require disclosure. The determination of materiality and the decision as to whether information requires disclosure or whether an exception applies under the Listing Rules is the responsibility of the Board.

The type of information that requires disclosure varies and is assessed in each instance on its own merits. As a general guide, the following are examples of information may be market sensitive and require a formal disclosure under the Listing Rules:

- i. Major operational developments or setbacks;

- ii. Major environmental incidents;
- iii. Serious accidents;
- iv. Major variations in actual or expected financial performance, including potential revision to those items in respect of which guidance has been given;
- v. Major new contracts or changes to major suppliers;
- vi. Significant legal issues or lawsuits;
- vii. Events or changes affecting formal resource and reserve statements;
- viii. Adverse or other major government decisions; and
- ix. Significant investment, financial or hedging transactions.

## **ROLE OF THE BOARD**

The Board is responsible for compliance with the Company's continuous disclosure obligations.

The Board, either in full or to nominated directors it authorises from time to time, will assess potentially market sensitive information, determine its materiality and make a decision as to whether disclosure is required under the Listing Rules.

The content of any disclosure will be assessed and approved by the Board in full or the directors it nominates for that purpose.

## **ISSUING MARKET RELEASES**

The Company discloses market sensitive information by way of a release to the ASX, prior to release to the media and publication on the Company's website.

A Market Release must not be made other than in accordance with this Policy and any other related policies.

Market Releases should be accurate, balanced and expressed in a clear and objective manner that allows investors to assess the impact of the information when making investment decisions.

## **COMMUNICATIONS WITH THE INVESTMENT COMMUNITY AND SECURITY HOLDERS**

In communications with the investment community and security holders, it is important that only publicly available information and information which is not price sensitive is referred to or provided.

Subject to its continuous disclosure obligations, ACS will not comment on rumours or market speculation. ACS imposes a blackout period on personnel during certain periods including the two weeks leading up to releases of financial results. During these periods ACS will not comment on production or financial performance, performance in relation to anything in respect of which guidance has been given, or the outlook of the Company.

It is acknowledged that certain personnel, including directors, will be privy to non-public material information (which falls within the exemptions to disclosure contemplated by the ASX listing rules), under the proviso that such information is kept confidential. Internal procedures and measures apply to protect the confidentiality of the information held by our personnel.

All presentation materials with an investor or equity analyst focus are provided as a Market Release and then made available on the Company website. The ASX Announcements

section of the Company website also provides security holders and other interested parties with access to relevant public information including Market Releases, annual general meeting materials, media releases, financial data in relation to ACS and a listing of key dates of disclosure to the market, including target dates for the release of financial and operational results and security holder meetings.

## **PROMOTION OF THE UNDERSTANDING OF COMPLIANCE BY DESIGNATED PERSONNEL**

Designated personnel potentially exposed to market sensitive information may be required to periodically undertake scenario-based training. Such training may cover the Company's continuous disclosure obligations, the operation of this policy and the related policies and procedures and the specific duties of designated personnel to:

- Ensure that confidentiality of information is preserved to avoid premature disclosure; and
- To report and escalate information which may require disclosure.

## **AUTHORISED SPOKESPERSONS**

Currently, only designated board members have authority to communicate publicly on behalf of ACS. The Company Secretary has primary responsibility for all communications with the ASX.

Queries regarding continuous disclosure and this policy should be directed to the Company Secretary.

## **TRADING HALTS**

The Company may request a trading halt in order to prevent trading in our securities taking place on an uninformed basis, to correct or prevent a false market or to otherwise manage the Company's disclosure obligations. Any such request for a trading halt may only be authorised by the Board.

## **REVIEW OF POLICY**

This policy will be reviewed periodically to ensure that it is operating effectively and remains current to Company procedures and Board delegations.

### **Issued by:**

Accent Resources NL Board of Directors  
May 2020