

# Policy

## Continuous disclosure & market communications

SG-GP-LSC-2A3

2.0

26 July 2018



<b>Overview and main points</b>	<b>3</b>
1. Purpose	3
2. Application	3
3. Main points	3
4. Periodic disclosure	3
5. Summary of Continuous Disclosure process	3
<b>Legal concepts</b>	<b>4</b>
6. Continuous disclosure obligation	4
7. When is Sigma aware of information?	4
8. What amounts to a material effect on the price or value of Sigma shares?	4
9. What is meant by immediate?	5
10. What are the exceptions to immediate disclosure?	5
11. Penalties and consequences	6
<b>Disclosure Committee and role of the Board</b>	<b>7</b>
12. Establishment and members	7
13. Responsibilities of the Disclosure Committee	7
14. Role of the Board of Directors	7
<b>Individual Responsibilities under this Policy</b>	<b>9</b>
15. All Team Members' Responsibilities	9
16. Disclosure Officers	9
17. Head of Investor Relations responsibilities	9
18. General Counsel responsibilities	10
19. CFO responsibilities	10
20. CEO responsibilities	10
<b>Market communication</b>	<b>11</b>
21. Management of release to market	11
22. Communication to analysts, institutional investors, media and events	11
23. Corrections	12
24. Periodic disclosure and other disclosure required under the Corporations Act	12
25. Other communication	13
<b>Glossary and further information</b>	<b>14</b>
26. Glossary	14
27. Further information	15
28. Document control and related documents	15

## 1. Purpose

Sigma Healthcare Limited (Sigma) is listed on the ASX (which means that its shares are publicly traded on the Australian Securities Exchange). This policy sets out the way in which Sigma seeks to meet its continuous disclosure obligations under Chapter 3 of the ASX Listing Rules and the *Corporations Act 2001*.

## 2. Application

This policy applies to all directors, employees, consultants and contractors of Sigma, including all controlled entities, (Team Members) in relation to information that they have access to or become aware of while working or doing business with Sigma.

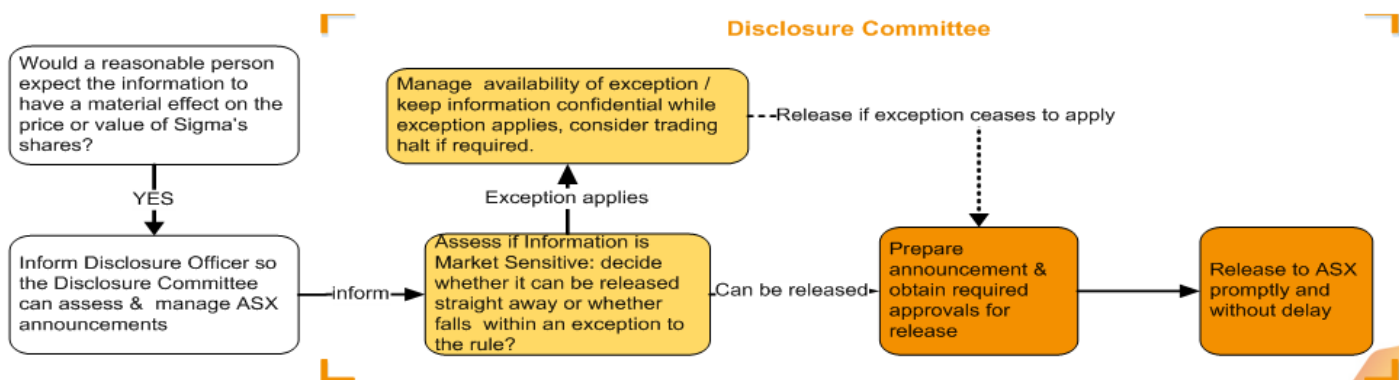
## 3. Main points

- When Sigma becomes aware of any Market Sensitive Information, it will notify the ASX promptly and without delay, unless an exception within the ASX Listing Rules applies.
- Sigma has established a Continuous Disclosure Committee (Disclosure Committee) to ensure that all releases of Market Sensitive Information are made in a timely manner, are accurate and not misleading and are presented in a clear, balanced and objective way. Team Members must notify a Disclosure Officer as soon as they become aware of information that may be Market Sensitive Information that has not been previously notified to the ASX, or if they believe any prior disclosure is inaccurate or incomplete.
- The confidentiality of information that may be Market Sensitive Information must be preserved until it has been assessed, and if applicable, disclosed in accordance with this Policy.
- Sigma must not release information that is required to be disclosed to the ASX to any media, investor, analyst, news service or member of the public until Sigma has received confirmation from the ASX that the information has been released to the market.

## 4. Periodic disclosure

Sigma also makes periodic disclosures pursuant to the ASX Listing Rules and Corporations Act. Periodic disclosures are generally prescribed by the ASX listing Rules and include by example half-year and annual reporting requirements and director interest notices. Periodic disclosures are reviewed by the Disclosure Committee or the General Counsel and Company Secretary as applicable, other than financial reports which are subject to a separate process of internal review and verification (see section 24 of this Policy).

## 5. Summary of Continuous Disclosure process



## 6. Continuous disclosure obligation

ASX Listing Rule 3.1 requires that once Sigma is or becomes aware of any information concerning it that a reasonable person would expect to have a material effect on the price or value of Sigma's securities, Sigma must tell the ASX that information immediately. This information is what is known as "Market Sensitive Information".

The disclosure obligation does not apply where the information is "generally available". Information is generally available if:

- it consists of a readily observable matter (for example change in regulatory decision);
- it has been made known in a manner that would, or would be likely to, bring it to the attention of persons who commonly invest in Sigma's shares and a reasonable period for it to be disseminated among such persons has elapsed (for example published in media); or
- it consists of deductions, conclusions or inferences made or drawn from other information that is generally available.

## 7. When is Sigma aware of information?

Under the ASX Listing Rules, Sigma will be aware of information if, and as soon as, any of its directors or officers has, or ought reasonably to have, come into possession of the information during the performance of their duties. The term "officer" has the same meaning as in the Corporations Act and includes directors, secretaries and certain senior managers.

The awareness concept extends beyond the information directors and senior managers in fact know to information that directors and senior managers "ought reasonably to have come into possession of". This effectively deems Sigma to be aware of information if it is known by anyone within Sigma and it is of such significance that it ought reasonably to have been brought to the attention of directors and senior managers. Because of this, Sigma requires reporting and escalation by Team Members to ensure that information which is potentially market sensitive is promptly brought to the attention of senior managers and directors. This is to ensure there are no gaps between the information they in fact know and the information they are deemed to know for the purposes of ASX Listing Rule 3.1.

## 8. What amounts to a material effect on the price or value of Sigma shares?

A reasonable person is taken to expect information to have a material effect on the price or value of Sigma shares if it would, or would be likely to, influence persons who commonly invest in securities in deciding whether to buy or sell those securities.

The following questions may be helpful in determining whether information is likely to have a material effect on the price of securities:

- Would this information influence my decision to buy or sell Sigma shares at their current market price?
- Would I feel exposed to an action for insider trading if I were to buy or sell Sigma shares at their current market price, knowing this information has not been disclosed to the market?

If the answer to either question is "yes", then that should be taken to be a cautionary indication that the information may be market sensitive. If it does not fall within the exceptions to immediate disclosure in ASX Listing Rule 3.1A (see below), it may need to be disclosed to the ASX.

Examples of information which is likely to have a material effect on the price or value of Sigma shares include:

- a transaction that will lead to a significant change in the nature or scale of Sigma's activities;
- a material acquisition or disposal;
- the granting or withdrawal of a material licence;

- the entry into, variation or termination of a material agreement;
- a change in circumstances relating to one or more of Sigma’s subsidiaries or equity investments which has a potential material impact on Sigma’s shares;
- a significant regulatory / market / industry event which has the potential to materially impact Sigma’s shares;
- becoming a party to a material litigation or other legal proceeding;
- the fact that Sigma’s earnings will be materially different from market expectations;
- the appointment of a liquidator, administrator or receiver;
- the commission of an event of default under, or other event entitling a financier to terminate, a material financing facility;
- under subscriptions or over subscriptions to an issue of securities (a proposed issue of securities is separately notifiable to the ASX under ASX Listing Rule 3.10.3);
- giving or receiving a notice of intention to make a takeover; and
- any rating applied by a rating agency to Sigma or its securities and any change to such a rating.

## 9. What is meant by immediate?

Market Sensitive Information must be disclosed to the ASX immediately upon Sigma becoming aware of the information, unless it falls within the carve-outs from disclosure in ASX Listing Rule 3.1A (see below). The word “immediately” does not mean “instantaneously”, but rather “promptly and without delay”.

How quickly Sigma can make an announcement of information to the ASX will be influenced by the circumstances confronting it at the time. Relevant factors may include:

- where and when the information originated;
- the forewarning (if any) the entity had of the information;
- the amount and complexity of the information concerned;
- the need to verify the accuracy or bona fides of the information;
- the need for an announcement to be carefully written so that it is accurate, complete and not misleading; and
- the need in some cases for an announcement to be approved by Sigma’s board or disclosure committee.

Where Sigma is not able to issue its announcement to the market straight away (particularly when the markets are trading), Sigma should consider requesting a trading halt awaiting the release of the announcement to ensure shares are not trading on ASX on an uninformed basis.

## 10. What are the exceptions to immediate disclosure?

Disclosure under ASX Listing Rule 3.1 is not required where each of the following elements is and remains satisfied:

**Element One** - one or more of the following 5 conditions apply:

1. it would be a breach of a law to disclose the information;
2. the information concerns an incomplete proposal or negotiation;
3. the information comprises matters of supposition or is insufficiently definite to warrant disclosure;

4. the information is generated solely for the internal management purposes of Sigma; or
5. the information is a trade secret; and

**Element Two** - a reasonable person would not expect the information to be disclosed; and

**Element Three** - the information is confidential and the ASX has not formed the view that the information has ceased to be confidential.

As soon as any of these elements are no longer satisfied (for example: the information is reported in the media and is therefore no longer confidential; or the ASX has made a request for Sigma to make an announcement because there is speculation), Sigma must immediately comply with its continuous disclosure obligations.

## 11. Penalties and consequences

Continuous disclosure is vital for the integrity of the market for Sigma's shares. Accordingly, consequences and penalties are very serious – including possible criminal sanctions.

Breaches of continuous disclosure obligations may result in fines up to \$110,000 and civil penalties up to \$1,000,000. Alternatively, if ASIC has reasonable grounds to suspect a breach it may issue an infringement notice imposing a penalty of up to \$100,000. Sigma may also be liable to pay damages to shareholders or any other person who suffers loss or damage because of the breach.

A director or senior manager who is involved in such a breach may be subject to civil penalties of up to \$200,000. They may also be liable to pay damages to anyone who suffers loss or damage because of the breach.

Additionally, an officer or employee of a listed entity who gives, or authorises/permits the giving of, materially false or misleading information to the ASX may commit a criminal offence.

## 12. Establishment and members

The Managing Director & CEO (CEO) has established the Continuous Disclosure Committee (Disclosure Committee) to have overall responsibility for the administration of this Policy. The members of the Disclosure Committee are:

- CEO
- CFO
- General Counsel and Company Secretary
- Head of Investor Relations

The Disclosure Committee will act through such of its members as are reasonably available.

## 13. Responsibilities of the Disclosure Committee

- Ensuring that Sigma complies with its disclosure obligations, and that announcements are made in a timely manner, are accurate and not misleading, and are presented in a clear, balanced and objective way.
- Deciding what information will be disclosed by Sigma to the ASX, and determining guidelines (financial and qualitative) for materiality of information.
- Approving material announcements for release to the ASX or requesting a trading halt in Sigma's shares – see below\* and refer Section 14 for a list of announcements about material matters reserved for approval by the Board.
- Reviewing analysts' reports and forecasts so that Sigma can understand what the market is expecting its earnings to be.
- Consulting on the content of announcements with Sigma's management and/or external advisers (as required) and with members of the Board on major announcements, including seeking their feedback where necessary.
- Reviewing Sigma's periodic disclosures, announcements and presentations.

\* This is subject to first obtaining approval for the announcement from the Board (acting by quorum) or if Board approval is not possible in the circumstances (weighing up the need to make announcement promptly and without delay), approval from the Chairman of the Board or in his/her absence, the Chairman of the Risk Management & Audit Committee (RMAC). If both are unavailable, or in emergency circumstances, the Disclosure Committee may provide approval. Any such decision and ASX release must be communicated to the Board immediately.

## 14. Role of the Board of Directors

- To review, and where appropriate, approve: half and full-year financial results; periodic trading update releases; other periodic disclosure documents associated with all material announcements; and any other announcements requested to be reviewed by the Board.
- Monitor the effectiveness of this Policy and Sigma's continuous disclosure compliance, through the RMAC.
- Approve any request for a voluntary suspension of Sigma's shares.
- Approve this Policy and any substantial amendments from time to time.
- Make decisions on whether to disclose any items of business considered by the Board. Continuous Disclosure is a standing item on the Sigma Board meeting agenda. Individual Directors also consider this when they become aware of information during their performance of their duties as a director.

### Approval of announcements on material matters

The Board should make decisions on all announcements relating to material matters. This is in addition to the matters reserved for Board decision under the Board's charter; and approving separately notifiable matters to the ASX in accordance with ASX Listing Rules.

Whether a matter is material or not and requires approval from the Board may be determined by the Disclosure Committee on a case by case basis. However, the following list of matters (without limitation) are considered material and announcements relating to these matters must be decided by the Board:

- **Trading halt** - any actual or proposed decision to request a trading halt. In exceptional circumstances, Sigma may request the ASX to halt trading in Sigma shares to prevent the emergence of a false or uninformed market in Sigma shares and to manage disclosure issues.
- **Earnings guidance** – any actual or forecast earnings guidance issued by Sigma, or if Sigma becomes aware that its actual or expected earnings (as communicated to the market) for a reporting period will not be achieved.
- **Market consensus** – where no guidance has been provided by Sigma, if Sigma becomes aware that its expected earnings for a reporting period will vary by an amount which will have a material effect on the price or value of Sigma's securities.
- **Net assets** – if Sigma becomes aware of a circumstance which will have a potential material impact on the value of the net assets of Sigma.
- **Dividends** – decisions by the Sigma Board concerning dividends.
- **Significant acquisitions or disposals** – the acquisition or disposal of a significant asset which will have a material effect on the price or value of Sigma shares.
- **Structure** – any material changes to the Sigma Group's structure (e.g. actual or proposed takeover or merger, a decision by the Sigma Board to implement a scheme of arrangement or to appoint an administrator).
- **Key Management Personnel** – changes to any of Sigma's key management personnel as identified in Sigma's Annual Report.

If Board approval is not possible in the circumstances (weighing up the need to make announcement promptly and without delay), approval from the Chairman of the Board or in his/her absence, the Chairman of RMAC should be obtained. If both are unavailable, or in emergency circumstances, the Disclosure Committee may provide approval. Any such decision and ASX release must be communicated to the Board immediately.



## 15. All Team Members' Responsibilities

- Read and familiarise themselves with this Policy;
- Immediately report to their line manager or to a Disclosure Officer if they become aware of any information that may be Market Sensitive Information that has not been previously disclosed, or if they believe any prior disclosure is inaccurate or incomplete; and
- Protect the confidentiality of any information that may be Market Sensitive Information.

Sigma also operates via subsidiary businesses and through investments in joint venture companies. To assist with the identification of information concerning those investments which may be market sensitive to Sigma's shares, the Disclosure Committee may appoint an Information Disclosure Officer (IDO) within those businesses. IDOs are responsible for providing information to the Disclosure Committee in a timely manner to assist the Disclosure Committee to make judgements about whether disclosure is to be made.

Team Members should have the following information ready:

- a general description of the matter;
- details of the parties involved;
- the relevant date of the event or transaction;
- the status of the matter (for example, final negotiations in progress, or preliminary negotiations only);
- the estimated value of the transaction;
- the estimated effect on finances or operations; and
- the names of any in-house or external advisers involved in the matter.

## 16. Disclosure Officers

The CEO, CFO, General Counsel and Head of Investor Relations have each been appointed as a Disclosure Officer. A Disclosure Officer's general obligations are:

- To review matters raised by Team Members to determine whether a Disclosure Committee meeting or an announcement is required;
- To attend and participate in Disclosure Committee meetings and actions in accordance with this Policy; and
- Provide input, review and provide clearance for announcements in accordance with this Policy.

## 17. Head of Investor Relations responsibilities

- Preparing a record of Disclosure Committee discussions, including documenting all decisions made and the reasons for decisions to announce or not to announce to the ASX;
- Ensuring announcements are made available for all stakeholders via appropriate channels for investors, shareholders, Team Members, media and analysts as relevant to the announcement; and
- In conjunction with the CEO and CFO, the conduct of Sigma's communications with analysts and investors, and monitoring Sigma's share price on a continuous basis and report unexpected movements to the Disclosure Committee.

## 18. General Counsel responsibilities

- Informing the Board and appropriate Team Members after a material announcement is made;
- Reviewing announcements and providing advice or procuring external advice on continuous disclosure matters;
- Reporting on continuous disclosure issues, as appropriate, to the RMAC and the Board;
- Periodically reviewing this Policy for legislative changes or developments in best practice and recommending to the Disclosure Committee any amendments that may be required; and
- Overseeing the preparation of, and authorising all lodgements with ASX including reviewing and approving announcements in conjunction with the CEO or his / her delegate which are separately notifiable to the ASX under other chapters of the ASX Listing Rules (see Section 24).

## 19. CFO responsibilities

- Reviewing and confirming any financial information included in any announcements;
- Reviewing and confirming that the actual or projected outcomes for any period are not materially different from any published guidance;
- Formulating quantitative guidelines for material information; and
- In conjunction with the Head of Investor Relations and CEO, managing Sigma's communications with analysts and investors, monitoring Sigma's share price on a continuous basis and reporting unexpected movements to the Disclosure Committee.

## 20. CEO responsibilities

- Determining, in conjunction with the General Counsel (GC), whether the announcement requires Board approval and co-ordinating the review and approval by the Chairman, the Chairman of RMAC or the Board as required;
- In conjunction with the CFO, reviewing and confirming any financial information included in any announcements;
- In conjunction with the CFO, reviewing and confirming that the actual or projected outcomes for any period are not materially different from any published guidance;
- In conjunction with the CFO, formulating quantitative guidelines for material information; and
- In conjunction with the Head of Investor Relations and CFO, managing Sigma's communications with analysts and investors, monitoring Sigma's share price on a continuous basis and reporting unexpected movements to the Disclosure Committee.

## 21. Management of release to market

### General rule

Sigma must not release information that is required to be disclosed to the ASX to any media, investor, analyst, news service or member of the public until Sigma has received confirmation from the ASX that the information has been released to the market.

After it has made an announcement to the ASX, Sigma (via the Head of Investor Relations) will post material announcements on Sigma's website (in the Investor Relations section).

### Authorised Spokespersons

The Chairman, the CEO, the CFO, the Head of Investor Relations and other persons authorised by these officers or by the Board from time to time, are the only Team Members who may speak to analysts, investors or other external parties in relation to Market Sensitive Information that Sigma has previously publicly disclosed to the ASX.

## 22. Communication to analysts, institutional investors, media and events

### Briefings

Sigma conducts briefings to analysts, investors and the media after periodic trading updates, half-year and full-year results announcements, or at other times as necessary.

Team Members also attend broker-sponsored investor conferences, industry, customer group or supplier events or conferences.

Sigma will not disclose any information which is, or potentially is, Market Sensitive Information, that has not already been disclosed to the ASX.

The following protocols will be followed for briefings:

- any written material to be used at a briefing must be provided in advance to a Disclosure Officer (who is not the author of the material) to allow a determination to be made if that material needs to be released to the ASX first because it contains Market Sensitive Information;
- a Disclosure Officer, or another person authorised by them, should be present at the briefing;
- appropriate records of the briefing should be kept for a reasonable period after the briefing;
- a Team Member will decline to answer a question that requires disclosing Market Sensitive Information that has not been disclosed to the ASX. In appropriate cases, they may take the question on notice and wait until the information is announced to the ASX before responding; and
- transcripts, audio files or webcasts are posted on Sigma's website, as appropriate.

### Analyst reports and forecasts

Analysts frequently prepare reports on Sigma's shares that contain performance and financial forecasts. Sigma acknowledges the importance of analyst reports in facilitating the operation of the market in an informed and efficient manner. However, Sigma will not endorse any such reports, or provide consensus information, and will restrict its comments to factual matters and information which has been previously disclosed to the ASX by Sigma. The following rules apply for analysts' reports:

- Sigma will not generally comment on analyst forecasts or disclose its own earnings projections. However, it may comment on analyst reports by clarifying historical information and correcting factual errors in analysts' assumptions which are significant to the extent that they may mislead the market (provided any clarification is confined to drawing the analyst's attention to information that has already been released to the ASX);

- Sigma will not include any analyst reports in its own corporate information, or post any analyst reports (including hyperlinks) on its website, but may use the reports internally;
- will include a disclaimer that Sigma is not responsible for, and does not endorse, the analyst report, in any response made to an analyst; and
- Sigma may consider making an announcement if it becomes apparent that the market's earnings projections materially differ from Sigma's own estimates.

If a draft report has been sent to Sigma for comments, it should be forwarded immediately to a Disclosure Officer.

#### Presentations to investors and analysts

Presentations to investors and analysts will usually be held in conjunction with the release of Sigma's financial results or the announcement of a major new initiative or development.

The material used in such presentations must be reviewed by the Disclosure Committee and released to the ASX immediately prior to making the presentation.

Year end and half year end investor and analyst presentations must also be reviewed and approved by the Disclosure Committee, RMAC and then the Board before release.

## 23. Corrections

#### Inadvertent disclosure or mistaken non-disclosure

If Market Sensitive Information is inadvertently made public or a Team Member becomes aware of Market Sensitive Information which should be disclosed, a Disclosure Officer must immediately be contacted so that appropriate action can be taken, including, if required, by making an announcement to the ASX.

#### False Markets

Under ASX Listing Rule 3.1, if the ASX considers that there is likely to be a false market in Sigma shares and asks Sigma to give it information to correct or prevent a false market, then Sigma must give ASX the information needed to correct or prevent the false market. Sigma is also required to make a clarifying statement to the ASX in circumstances where it becomes aware that speculation or comment is, or is likely to, create a false market in Sigma shares. The ASX does not expect Sigma to respond to all media comment and speculation. However, Sigma has a positive obligation to make disclosure to prevent a false market being formed when:

- media comment or speculation becomes reasonably specific; or
- there is evidence that, or ASX forms the view that, the rumour or comment is likely to have an impact on the price of Sigma shares, for example, the market moves in a way that appears to relate to the comment or speculation.

If Team Members consider that speculation or comment is likely to create a false market, Team Members should inform a Disclosure Officer so the matter of making a corrective announcement can be considered by the Disclosure Committee.

## 24. Periodic disclosure and other disclosure required under the Corporations Act

In addition to its continuous disclosure obligations under Chapter 3 of the ASX Listing Rules, Sigma must also meet the requirements of Chapter 4 of the ASX Listing Rules in relation to periodic disclosure and other Chapters of the ASX Listing Rules and the Corporations Act 2001 related to notifying the ASX and / or ASIC of dealings in securities, changes in shareholding, capital raisings, significant transactions etc. Sigma's announcements for periodic disclosure are reviewed by the Disclosure Committee, other than financial reports which are subject to a separate process of internal review and verification.

Announcements and notifications to the ASX and/or ASIC relating to routine administrative matters such as notification of changes in director’s interest, on market share buy-back notices, changes in substantial shareholding etc. are reviewed and approved for release by the General Counsel & Company Secretary.

Any Team Member who becomes aware, while preparing a periodic disclosure, of any potentially Market Sensitive Information, must immediately refer the matter to a Disclosure Officer for consideration by the Disclosure Committee, regardless of whether the periodic disclosure document is ready for release.

**Pre-results blackout periods**

To prevent inadvertent disclosure of Market Sensitive Information, during the period between the end of a relevant financial reporting period and the date of the results announcement relating to that financial reporting period, Team Members are required not to discuss any financial information with investors, analysts or the media, unless the information being discussed has previously been disclosed to the ASX.

During the pre-results blackout periods:

- discussions with broking analysts should be kept to a minimum;
- if a meeting cannot be avoided, there should be no discussion on financial information;
- avoid commenting on broker research in this period, particularly “pre-result” analysis; and
- meetings with institutions may continue, although discussions should focus on strategy and not numbers.

Team Members must also comply with the requirements of Sigma’s Share Trading Policy during the pre-results blackout periods, which prohibits Team Members from dealing in Sigma shares during that time. Sigma’s blackout periods are set out in Sigma’s Share Trading Policy and are as follows:

Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec

**25. Other communication**

**One to one meetings and discussions**

In the case of one-on-one meetings or discussions with analysts, investors, governments, prospective partners and media representatives (including responses to queries), it is the responsibility of the Team Member involved in the meeting or responding to an enquiry to ensure that material information which has not been released to the ASX is not disclosed. If the Team Member is in doubt concerning a response, the response must not be given until it has been reviewed by the Disclosure Committee.

**Media Releases, conferences & Social Media**

All media releases dealing with material information are to be reviewed prior to release by the Disclosure Committee. Media releases relating to matters requiring announcement to the ASX must not be made until confirmation of disclosure on the ASX has been received.

It is the responsibility of any Team Member making a presentation to a conference to ensure that material information which has not been released to the ASX is not disclosed in the presentation. If the Team Member is in doubt concerning the content of the presentation, the presentation must be submitted for review by the Disclosure Committee.

Team Members must not (or through others) publish information on the internet (including on chat rooms or via Social Media) where the subject matter relates to Sigma, unless required by their employment and then only to the extent necessary to properly perform their role. Refer to Sigma’s Code of Conduct & Social Media Policy.



## 26. Glossary

### Interpretation

In this policy, unless the context otherwise requires:

- the singular includes the plural and vice versa;
- another grammatical form of a defined word or expression has, when capitalised or otherwise used, a corresponding meaning;
- a reference to a person (or someone else) includes an individual, body corporate, partnership, firm, association or other entity;
- the meaning of general words is not limited by specific examples introduced by including, for example or similar expressions;
- unless otherwise stated, a reference to a section is to a section of this policy; and
- headings are for convenience only and do not affect interpretation.

### Definitions

In this policy (unless the context otherwise requires):

<i>ASIC</i>	Australian Securities and Investments Commission
<i>ASX</i>	means Australian Stock Exchange, ASX Limited
<i>Board</i>	means the Directors of Sigma from time to time, acting as a board
<i>CEO</i>	means the Managing Director and Chief Executive Officer of Sigma
<i>CFO</i>	means the Chief Financial Officer of Sigma
<i>Chairman</i>	means chairman of the Board
<i>Closed or blackout period</i>	is described in Sigma's Share Trading Policy and section 24 of this policy
<i>Company Secretary</i>	means the company secretary of Sigma
<i>Director</i>	means a director of Sigma
<i>Disclosure Committee and Disclosure Officer</i>	means the Continuous Disclosure Committee established under this policy and Disclosure Officer means a Team Member appointed to the Disclosure Committee (see sections 12, 13 and 16). References in this Policy to the Disclosure Committee are to be interpreted as references to the relevant available member or members, and the actions of those members will be the action of the Disclosure Committee for the purposes of this Policy
<i>GC</i>	means the General Counsel of Sigma
<i>Head of Investor Relations</i>	means Sigma's Corporate Affairs Manager named in Sigma's Annual Report and on Sigma's website as the contact point for investor, media or government enquiries in relation to Sigma
<i>IDO</i>	Information Disclosure Officer as described in section 15
<i>Market sensitive information</i>	is defined in section 5 of this policy

<i>RMAC</i>	Sigma Risk Management and Audit Committee
<i>Sigma and Sigma Group</i>	means Sigma Healthcare Limited ABN 15 088 417 403 (ASX: SIG) and Sigma Group means Sigma and its controlled entities
<i>Sigma shares</i>	means securities issued or made available by any member of the Sigma Group; and securities issued or made available by any person in or over, or relating to or deriving value from those securities
<i>Team Member</i>	means any full time, part time or casual employee of the Sigma Group and extends to any secondee, contractor or consultant or adviser

## 27. Further information

### Monitoring compliance

Non-compliance with this Policy and Sigma's continuous disclosure obligations may breach the Corporations Act or the ASX Listing Rules and damage Sigma's reputation. Breaches may result in disciplinary action including dismissal.

Sigma may audit compliance with this policy by any Team Member (or any of their associates). Upon request, Disclosure Officers, IDOs and other Team Members must provide certification of compliance with this policy (or details of any non-compliance).

### More information

The Head of Investor Relations and General Counsel are responsible for making Team Members aware of this Policy and arranging appropriate training for Team Members who handle Market Sensitive Information or interact with external parties. If you have any questions arising from this policy, please contact either the Head of Investor Relations or General Counsel.

### Share Trading Policy

This policy should be read in conjunction with the Sigma's Share Trading Policy.

## 28. Document control and related documents

Name of document	Continuous Disclosure and Market Communications Policy	SG-LSC-GP-2A2
Document Author	Senior Legal Counsel	
Document Approver	Board	
Document Reviewers	CFO	RMAC
Review Period	Two-yearly	
Related documents	Code of Conduct, Share Trading Policy	
Change record	Version	2.0
	Publish date	26 July 2018
		Change Notes
		Rebranding, review and update of 'Continuous Disclosure Policy – May 2013' including to establish Disclosure Committee