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# ikeGPS Group Limited

## Continuous Disclosure Policy

### Policy

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<b>Written/updated by</b>	Chris Birkett, CFO
<b>Approved by</b>	Glenn Milnes, CEO Board of Directors
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## 1. BACKGROUND

ikeGPS (KE) recognises that the cornerstone of New Zealand and international securities laws is full and fair disclosure of material information and that the broad, timely, non-exclusionary distribution of information to the public is crucial to the efficiency and integrity of the capital markets. Any selective disclosure of material, non-public information about IKE would undermine market integrity and investor confidence in the fairness of the disclosure process and could lead to liability under insider trading legislation or breach the NZX and/or ASX listing rules.

## 2. INTENT

IKE is listed on the New Zealand Stock Exchange and Australian Securities Exchanges, and IKE is bound by continuous disclosure obligations under the Listing Rules of both Exchanges and the Financial Markets Conduct Act. IKE is committed to keeping the securities markets informed of Material Information relating to the Company and its shares and promoting investor confidence by ensuring that trade in its securities takes place in an efficient, well-informed market at all times.

The purpose of this Policy is to:

- Ensure that IKE complies with its continuous disclosure obligations;
- Ensure timely, accurate and complete information is provided to all shareholders and market participants; and
- Outline responsibilities in relation to the identification, reporting, review and disclosure of Material Information relevant to IKE.

For the purposes of this Policy, Material Information means any information that if it were generally available to the market, a reasonable person would expect to have a material effect on the price of Air New Zealand's shares.

This Policy should be considered in conjunction with IKE's Securities Trading Policy.

## 3. SCOPE

This Policy applies to all directors, employees, contractors and other representatives of IKE.

## 4. GUIDANCE

To apply this Policy, procedures relating to the disclosure of material information about IKE have been developed. The key elements of the framework are summarised as follows:

- IKE's Chief Financial Officer is responsible for administering the Policy.
- All material information shall be lodged promptly and without delay with the NZX and ASX.
- The information will also be published on IKE's internet site,
- No undisclosed material information will be disclosed in any meeting or conference call with investors or analysts.
- One-on-one discussions with investors or analysts shall serve only as opportunities to provide background to previously disclosed information.

- Any inadvertent disclosure of material information during investor meetings or calls will be immediately released to the NZX and ASX.
- To avoid inadvertent disclosure, IKE comments on analyst reports will be restricted to information the company has publicly issued and information that is in the public domain.
- IKE will not generally comment on analyst forecasts. However, if a media or analyst report appears to contain credible market sensitive information, IKE may respond to correct or prevent a false market. Further if IKE becomes aware that in general the market's earnings projections materially differ from its own estimates, IKE may consider it appropriate to issue a statement indicating the magnitude of the difference.
- IKE will maintain an insider list when conducting a confidential transaction if it considers it appropriate.
- IKE will enter into confidentiality agreements with advisors and other service providers before passing on confidential information

## 5. ROLES AND RESPONSIBILITIES

The responsibilities of specific groups are:

### **Chief Financial Officer**

Oversight of the continuous disclosure policy as a function of the responsibility of managing IKE's legal risk. To continuously monitor IKE's disclosure obligations under the Listing Rules of NZX and ASX and ensure timely disclosure of all material information to the NZX and ASX. Release of material information to the NZX and ASX after approval. Manage all communications with the NZX and ASX following release of material share price information.

### **IKE Employees**

Report for investigation any known or suspected instances of non-compliance (including inadvertent or accidental instances) or events that give rise to a risk of non-compliance.