

## DISCLOSURE POLICY

### Purpose & Scope

Hostech Limited (the Company) is listed on the Australian Securities Exchange (**ASX**) and is required to meet the requirements of ASX Listing Rule 3.1 (Continuous Disclosure) to keep the market informed of material events as they occur. This document describes the Company's policy on disclosing information in accordance with ASX Listing Rule 3.1. It also describes the Company's policy on communication with the ASX, analysts, the media and shareholders.

This policy will form a component of the induction process for all new employees, managers and Directors.

### Responsibilities

#### Directors, Executive Management & Employees

- a. Understand continuous disclosure regulations
- b. Report potentially material information immediately to either the Company Secretary or Managing Director

#### Company Secretary

- a. Liaise with the Managing Director on information to determine if there is a requirement for disclosure of that information under continuous disclosure regulations.
- b. Report material information to the ASX

### Policy

In the event that any member of management or a Director becomes aware of any fact or circumstance which may give rise to a requirement to disclose such information under the ASX Listing Rules, they will immediately inform the Managing Director or Company Secretary.

The Company Secretary, in conjunction with the Managing Director, will review the information and, if required, prepare an appropriate announcement. Prior to disclosure, each Director of the Company will be sent a copy of the proposed announcement to review its content and make comment or recommendations.

The Company, through the Company Secretary, will notify the ASX of any information it is determined is required to be disclosed.

## Attachment 7

If there is uncertainty over the requirement to disclose certain information, then the Company will seek external legal advice.

### ASX Listing Rule 3.1

In accordance with the ASX Listing Rules, the Company will immediately notify the ASX of information:

- a. concerning the Company that a reasonable person would expect to have a material effect on the price, or value, of the Company's securities; and
- b. that would, or would likely to, influence persons who commonly invest in securities .

Directors & Executive Management will make themselves aware of the continuous disclosure requirements in the ASX Listing Rules.

### Communication with ASX

The Board has designated the Company Secretary as the person responsible for communicating with the ASX. The Company Secretary is responsible for ensuring that Company announcements are made in a timely manner, that announcements are factual and do not omit any material information required to be disclosed under the ASX Listing Rules.

The Company Secretary and the Managing Director will ensure that Company announcements are expressed in a clear and objective manner that allows investors to assess the impact of the information when making investment decisions.

### Measures to avoid a false market in the Company's securities

The Company recognises that a false market in the Company's securities may result if the Company provides incomplete information to the ASX or if the Company fails to respond to market and media speculation that may, or may be likely to, have an impact on the price of the Company's securities.

The Company does not, in general, respond to market speculation or rumours unless required to do so by law or the ASX.

Where appropriate, the Company will request a trading halt from the ASX to prevent trading in the Company's securities by an inefficient and uninformed market until the Company is able to make an appropriate announcement to the market.

### Safeguarding confidentiality of corporate information to avoid premature disclosure

All employees are advised of the confidentiality of Company information. In addition, the Company imposes communication blackout periods for financial information between the end of financial reporting periods and the announcement of results to the market via the ASX.

Media contact and comment

The Board has designated the Managing Director or the Chairman (where appropriate) to speak to the press on matters associated with the Company. In speaking to the press, the Managing Director or the Chairman will not comment on price-sensitive information that has not already been disclosed to the ASX, however, they may clarify previously released information.

There may be occasions when Directors or employees are approached by the media for public comment. On such occasions, the Director(s) or employee(s) should comply with the following:

- a. refer the person to the Managing Director or Chairman of the Board as appropriate for comment;
- b. refrain from disclosing any information, documents or other forms of data to the person without prior consent of the Managing Director or the Chairman of the Board; and
- c. report the person who contacted the Director(s)/employee(s), the reason for the contact, and a summary of any other relevant information as soon as possible to the Managing Director or the Chairman.

Analyst briefings and responses to shareholder questions

The Company does conduct briefings and discussions with analysts and institutional investors. However, price-sensitive information will not be disclosed unless that particular information has been formally disclosed to the market via an ASX announcement. Slides and presentations used in briefings will also be released to the market immediately prior to the briefing.

When answering shareholder questions, price-sensitive information will not be discussed unless that particular information has been formally disclosed to the market via ASX announcement. Where a question can only be answered by disclosing price-sensitive information, the Company will decline to answer the question or take the question on notice and announce the information to the ASX when appropriate.

Reporting Financial Results

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

Communication with shareholders

The Company respects the rights of its shareholders and, to facilitate the effective exercise of those rights, the Company is committed to:

## Attachment 7

- a. communicating effectively with its shareholders;
- b. giving shareholders access to balanced and understandable information about the Company and corporate proposals; and
- c. making it easier for shareholders to participate in general meetings.

The Company will communicate with its shareholders in three main ways:

- a. through releases to the market via the ASX;
- b. through information provided directly to shareholders; and at general meetings of the Company; and
- c. through information available on the Company's website ([www.hostech.com.au](http://www.hostech.com.au)) .

In preparing for general meetings of the Company, the Company will draft the notice of meeting and the related explanatory information so that they provide all of the information that is relevant to shareholders in making decisions on matters to be voted on by them at the meeting. This information will be presented clearly and concisely so that it is easy to understand and not ambiguous.

The Company will use general meetings as a tool to effectively communicate with shareholders and allow shareholders a reasonable opportunity to ask questions of the board of Directors and to otherwise participate in the meeting.

The external auditor of the Company will attend each annual general meeting and will be available to ask questions about the conduct of the audit and the preparation and content of the auditor's report.

While the Company aims to provide sufficient information to shareholders about the Company and its activities, it understands that shareholders may have specific questions in relation to certain matters. To ensure that shareholders can obtain all relevant information to assist them in exercising their rights as shareholders, the Company makes available a telephone number and e-mail address for shareholders to make their enquiries. Shareholder enquiries should be made to:

Justyn Stedwell  
Company Secretary  
Phone: 03 9 698 7800  
Email: [mail@hostech.com.au](mailto:mail@hostech.com.au)

12 August 2009