

Information for stakeholders

# Continuous Disclosure Policy



---

## Purpose

Sonic Healthcare Limited is a listed company on the Australian Securities Exchange (ASX) and therefore must meet the requirements of ASX Listing Rule 3.1 (Continuous Disclosure) and the Corporations Act 2001 to keep the market informed of material events as they occur. This document describes the policy for Directors and other Designated Officers who become aware of material information which may require disclosure under the ASX Listing Rules.

---

## ASX Listing Rule 3.1

‘Once an entity 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 the entity’s securities, the entity must immediately tell ASX that information.’

A reasonable person would be taken to expect information to have a material effect on the price or value of securities if the information would, or would be likely to, influence persons who commonly invest in securities in deciding whether or not to subscribe for, or buy or sell, the Company’s securities.

A confidentiality agreement will not alone prevent an entity from complying with its obligation to give ASX information for release to the market.

Examples:

The following information would require disclosure under this rule:

- a material change in the Company’s financial forecast versus its guidance or market expectation
- a transaction that will lead to a significant change in the nature or scale of the Company’s activities
- a material acquisition or disposal
- giving or receiving a notice of intention to make a takeover
- a material change in accounting policy adopted by the entity
- becoming a plaintiff or defendant in a material law suit
- the appointment of a liquidator, administrator or receiver
- an event of default under a material financing facility.

---

## Policy

- Directors and other Designated Officers will make themselves aware of the continuous disclosure regulations in the ASX Listing Rules
- Directors and other Designated Officers must be aware of the importance of safeguarding the confidentiality of corporate information to avoid premature disclosure
- In the event that any Director or Designated Officer becomes aware of any fact or circumstance which may give rise to a requirement to disclose such information under the Listing Rules, they will immediately inform either the Company Secretary, the Managing Director or the Chairman
- Prior to disclosure, the Company Secretary, in conjunction with the Managing Director and/or the Board Chairman, will review the information to enable a judgement as to the appropriate disclosure to be made
- If there is uncertainty as to whether disclosure is required then the Company will seek external legal advice
- The Company, through the Company Secretary, will notify the ASX of any information it has determined is required to be disclosed, ensuring that such information is not released to any other party prior to the ASX confirming its release to the market
- The form of the announcement to the ASX will take into consideration the importance of market announcements being accurate, balanced and expressed in a clear and objective manner that allows investors to assess the impact of the information when making investment decisions.
- The Company Secretary ensures the information is promptly posted on the Company’s website after disclosure to the ASX
- Directors of Sonic Healthcare Limited will be sent copies of all market announcements promptly after they have been released
- All contact from the media regarding the Company must be referred to Sonic’s Managing Director

- The Company's investor relations program facilitates effective two-way communication with investors and analysts. All investor relations are conducted or monitored by the Managing Director, Finance Director or Company Secretary and are limited to discussion of non-price sensitive information and material previously announced on the ASX platform. In addition to large/institutional investors, the Company seeks to engage with retail shareholder groups, including meeting with representatives of the Australian Shareholders' Association at least annually
- Materials for presentations to analysts on aspects of the Company's operations which include new and substantive information are released to the ASX and posted on the Company's website ahead of the presentation
- The Directors and Company Secretary will remain alert to the possibility that a 'false market' could emerge in relation to the Company's securities due to speculation, media articles/posts and/or incomplete availability of information. Media are monitored for any relevant information and investigations will be made to determine the cause if any unusual trading or share price movements are observed. If the view is formed that a false market is emerging, appropriate action will be taken which may include requesting a trading halt until a clarifying announcement can be made.

---

## Shareholder and Public Communication

Sonic will continue to maintain a company website to complement the official release of material information to the market. This enables broader access to Company information by investors and other stakeholders. The following information can be accessed electronically:

- Company announcements to the ASX
- Annual Reports
- Notices of Meeting and Explanatory Memorandum
- Current and prior years financial data and press releases
- Corporate governance information.

---

## Review

This policy is periodically reviewed to check that it is operating effectively and to consider whether any changes are required.