

## Disclosure of Information Policy

### Spenda Limited

Spenda Limited (Company) is listed on the Australian Securities Exchange (ASX). ASX Listing Rule 3.1 requires that listed companies notify the ASX once they become aware of any information that could reasonably be expected affect the Company's share price.

#### Policy

1. No officer or employee of the Company can disclose information regarding Spenda except in accordance with this policy.
2. All officers and employees are required to keep Company information such as sales and profits confidential and such information should only be distributed within the Company on a need to know basis.
3. In the event that any member of management, an employee or an officer of the Company becomes aware of any fact or circumstance which may give rise to a requirement to disclose information under the ASX Listing Rules, they will immediately inform the Managing Director or Company Secretary.
4. Disclosure of price sensitive information that is to be disclosed outside the Company must first be disclosed to the ASX.
5. Consideration of whether price sensitive information should be disclosed to the ASX is to be made by the Board of Directors.
6. 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.
7. All requests of invitations to speak externally on any topic relating to the Company must be referred to the Managing Director before accepting.
8. There may be occasions when officers or employees of the Company are approached by the media for public comment. On such occasions, the officer or employee should comply with the following:
  - a) refer the person to the Managing Director or Chairman of the Board;
  - 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 made the contact, the reason for the contact, and a summary of any other relevant information as soon as possible to the Managing Director or the Chairman.