



POLICY NAME:	Market Disclosure Policy
EFFECTIVE FROM:	17 June 2005
Last Revised	15 August 2008

1.0 Purpose

Hastie Group Limited (**Hastie** or the **Company**) is committed to the highest standards of market disclosure and complying with the Corporations Act and all Listing Rules in that regard.

2.0 Policy

Hastie will:

- provide relevant information about the Company, its performance and activities to the market in strict compliance with its disclosure obligations under Australian law;
- avoid selectively disclosing Price Sensitive Information; and
- take all reasonable steps to ensure that all shareholders and other interested parties have equal access to information that is made available to the market.

'Price Sensitive Information' is information concerning the business of the Company that a reasonable person would expect to have a material effect on the price or value of the Company's shares.

3.0 Continuous and Periodic Disclosure

Responsibility for disclosure

Hastie's Group Managing Director & CEO (or in his absence the Finance Director) has the principal responsibility for complying with the Corporations Act and the ASX listing rules concerning continuous and periodic disclosure.

Additionally the Company Secretary is responsible for monitoring all potential disclosure requirements and ensuring that they are promptly considered, and is also responsible for co-ordinating communication with the ASX.

Website

The Company will maintain a website incorporating copies of Price Sensitive Information releases, and the Company Secretary is responsible for ensuring that the website is updated in compliance with ASX Recommendations.

Internal processes to identify and report information that may be Price Sensitive

Employees shall notify their divisional CEO, the Company Secretary or the Group Managing Director & CEO if they become aware of an issue that could develop into Price Sensitive Information (for example, a dispute that could lead to major legal action or termination of a major contract, or the potential award of a very large order).

Employees shall ensure that Price Sensitive Information is not disclosed to anyone outside the Company until ASX is notified and Hastie has received an acknowledgment that the ASX has released the information to the market. Employees may only review the information with company colleagues (or Hastie's professional advisors) who need to know about the Price Sensitive Information to do their job properly. If a manager learns that information that may be Price Sensitive Information has ceased to be confidential, he or she shall immediately notify the divisional CEO, Company Secretary or Group Managing Director & CEO of that fact.

Avoiding selective disclosure

Hastie employees must take care not divulge non-public Price Sensitive Information to anyone before it is filed with ASX and publicly disclosed. Those people are likely to include brokers, analysts, investment advisers, investors and certain others (in general, securities market professionals or holders of a company's securities who may trade on the basis of the information).

Particular care should be taken at any analyst or investor briefings not to disclose any Price Sensitive Information which has not been previously released to the ASX either generally, in presentation materials or in response to questions asked at those briefings.

In the event an employee believes they may have inadvertently divulged potentially Price Sensitive Information they must immediately inform the Company Secretary or Group Managing Director & CEO.

Market rumours or correcting a false market

The Company will not generally comment on market rumours or market speculation. However, under Listing Rule 3.1B, ASX may require disclosure if ASX considers that there is, or is likely to be, a false market in the Company's shares.

Reporting to directors

The Group Managing Director & CEO and the Company Secretary shall:

- ensure that directors are promptly provided with a copy of all information disclosed to ASX;
- report promptly to directors on any matters that were seriously considered for disclosure to ASX, but where it was determined that matter not be disclosed, explaining the reasons for that determination
- copy directors with any communications with the ASX concerning actual or potential breaches of the Continuous or Periodic Disclosure rules.

4.0 Compliance

The Company is committed to ensuring compliance with its continuous disclosure obligations. Breach of this policy may lead to disciplinary action being taken against the relevant officers or employees, as well as attracting criminal and civil penalties under the Corporations Act.