



Continuous Disclosure Policy

Summary

This policy sets out how Mighty Kingdom meets both the letter and the spirit of the continuous disclosure requirements.





Authorisation

Adoption:	Board
Date:	11 December 2020
Version:	1.0

Amendment History

VERSION	AMENDMENT	COMMENCING
1.0	Initial document	11 December 2020





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1. Purpose of this policy

This policy sets out how Mighty Kingdom meets both the letter and the spirit of the continuous disclosure requirements.

2. Policy statement

Effective continuous disclosure of market sensitive information protects investors and the reputation of the market. Mighty Kingdom will provide investors with equal access to timely, accurate, balanced, and effective disclosures of market sensitive information. Mighty Kingdom will comply with its legal obligations and, where possible, strive to achieve best practice.

3. Who this policy applies to

This policy applies to all directors, officers, employees, and contract staff of Mighty Kingdom.

4. Responsibilities

The responsibilities under this Policy are:

- Determining what is market sensitive information is the responsibility of the Chair of the Board (or the complete Board if appropriate), the Managing Director, and the Executive Director with at least two participating in the determination.
- Approval for significant disclosures of confidential market sensitive information, requesting a trading halt, or requesting a voluntary suspension is by the Board in the normal course of business.
- Approval for urgent or minor disclosures of confidential market sensitive information or an urgent trading halt is by the Chair of the Board, the Managing Director, and the Executive Director with at least two participating in the determination.
- Administration of continuous disclosure is by the Company Secretary, see more detail below.
- Authorised spokespersons for matters covered in this Policy are the Chair of the Board, the Managing Director, the Executive Director, and the Company Secretary.

5. Market sensitive information

Information is considered market sensitive if "a reasonable person would expect the information to have a material effect on the price or value of the entity's securities". This test is deemed to be met "if the information would, or would be likely to, influence



persons who commonly invest in securities in deciding whether to acquire or dispose of the securities".

Market sensitive information includes material changes to a forecast in a prospectus, analyst briefing or company announcement or material differences in current period financial results from the previous corresponding period.

Appendix A has a non-exhaustive list of possible market sensitive information.

6. Disclosure obligation

Mighty Kingdom will disclose market sensitive information immediately when a director or executive officer has come into possession of the information in the course of the performance of their duties. Immediately means promptly and without delay with consideration given to the circumstances including:

- Where and when the information originated.
- The forewarning (if any) Mighty Kingdom had of the information.
- The amount and complexity of the information concerned.
- The need in some cases to verify the accuracy or bona fides of the information.
- The need in some cases to comply with specific legal requirements.
- The need for an announcement to be carefully drawn so that it is accurate, complete, and not misleading.
- The need in some cases for an announcement to be approved by the Board.

Mighty Kingdom is not obligated to release market sensitive information if:

- A reasonable person would not expect the information to be disclosed; and
- Such information is confidential and remains confidential to the company; and
- One of more of the following applies: it would be a breach of law to disclose the information; the information concerns an incomplete proposal or negotiation; the information comprises matters of supposition or is insufficiently definite to warrant disclosure; the information is generated for internal management purposes of the company; or the information is a trade secret.

7. Administration

The Company Secretary is responsible for the administration of this Policy including:

- Monitoring and ensuring compliance with continuous disclosure requirements.
- Reviewing and overseeing the disclosure of information to the stock exchange, analysts, brokers, shareholders, the media, and the public.
- Communicating with the ASX and lodging announcements.
- Advising the Board on legislative changes.
- Keeping records and reporting to the Board.
- Ensuring all directors and staff understand and are aware of the continuous



disclosure requirements.

8. Release procedure

Confidential market sensitive information must first be disclosed to the ASX. Formal confirmation from ASX that the information has been released to the market is required before any wider release.

If Mighty Kingdom becomes aware that there may have been inadvertent disclosure or leaking of material market sensitive information which has not been disclosed to the ASX, the Company Secretary will immediately issue formal ASX announcement.

9. Market speculation & rumour

Mighty Kingdom will monitor significant media outlets, including any relevant social media, for leaks or rumours that may require correction.

Mighty Kingdom will respond in a timely manner to a report, rumour, comment, or speculation that appears to contain or to be based on credible market sensitive information (whether the information is accurate or not) if:

- There is a material change in the market price or traded volumes of the company's securities which appears to be referable to the report, rumour, comment or speculation (in the sense that it is not readily explicable by any other event or circumstance).
- The market is not trading at the time, and the report, rumour, comment or speculation is of a character that when the market does start trading, it is likely to have a material effect on the market price or traded volumes of the company's securities.

10. Trading halt or voluntary suspension

Mighty Kingdom will consider requesting a trading halt if:

- There are indications that market sensitive information may have leaked ahead of an announcement, and it is having or is likely to have a material effect on the market price or traded volumes of the company's securities;
- The company has been asked by ASX to provide information to correct or prevent a false market; or
- The information is especially damaging and likely to cause a significant fall in the market price of the company's securities.

and in each such scenario:

- Where the market is trading, the company is not in a position to give an announcement to ASX straight away; or



- Where the market is not trading, the company will not be in a position to give an announcement to ASX before trading next resumes.

Mighty Kingdom will consider requesting a voluntary suspension if:

- The company has been in a trading halt, but the relevant disclosure issue is not resolved within the maximum period permitted for a trading halt; or
- The situation would warrant the granting of a trading halt, but the company does not believe that the relevant disclosure issue will be resolved within the maximum period permitted for a trading halt.

11. Investor & analyst briefings

The following requirements apply in relation to investor and analyst briefings:

- Any presentation materials for a new and substantive briefing will be released to the ASX prior to the briefing.
- Market sensitive information which has not been released to the ASX will not be disclosed at these briefings.
- Where possible, at least two company representatives should be present with at least one being the Managing Director, Executive Director or Company Secretary.
- Presentation materials will be posted on the company's website after the briefing.

12. Analysts reports

As a general practice, Mighty Kingdom does not comment on analyst's reports. If requested, the company may choose to correct errors of fact or underlying assumptions. Such corrections will only use publicly available information such as previous ASX announcements or non-confidential information.

13. Media relations & public statements

Except where specific approval is given by the Managing Director or Executive Director, only the spokespersons authorised by this policy are authorised to speak to the media.

Media interviews and public statements must not include confidential market sensitive information that has not been disclosed to the ASX, even on an embargoed basis.

14. Compliance

Any behaviour that is not in accordance with this policy must promptly be reported to your manager, the Managing Director or an executive, or auditors, who will advise the Board or the Audit and Risk committee. If applicable, the report can be via the Whistleblower Policy.



15. Access to this policy

The policy is available on the Mighty Kingdom website at <https://www.mightykingdom.com> and a copy will be provided to all new starters.

16. Review

This policy will be reviewed by the Board as required and at least annually.



Appendix A – Market sensitive information

The following (not exhaustive) could be market sensitive:

- A transaction that will lead to a significant change in the nature or scale of the entity's activities.
- A material acquisition or disposal.
- The granting or withdrawal of a material licence.
- The entry into, variation or termination of a material agreement.
- A change in the entity's financial forecast or expectation, or the fact that the entity's earnings will be markedly different from market expectations.
- A change in the control of the responsible entity of a trust.
- A proposed change in the general character or nature of a trust.
- An agreement between the entity (or a related party or subsidiary) and a director (or a related party of the director).
- A change in accounting policy adopted by the entity.
- Becoming a plaintiff or defendant in a material law suit.
- The commission of an event of default under, or other event entitling a financier to terminate, a material financing facility.
- The appointment of a receiver, manager, liquidator or administrator in respect of any loan, trade credit, trade debt, borrowing or securities held by it or any of its child entities.
- A transaction for which the consideration payable or receivable is a significant proportion of the written down value of the entity's consolidated assets – normally an amount of 5 per cent or more would be significant but a smaller amount may be significant in a particular case.
- A recommendation or declaration of a dividend or distribution.
- A recommendation or decision that a dividend or distribution will not be declared.
- Under subscriptions or over subscriptions to an issue.
- A copy of a document containing market sensitive information that the entity lodges with an overseas stock exchange or other regulator which is available to the public.
- Information about the beneficial ownership of securities obtained under Part 6C.2 of the Corporations Act 2001.
- Giving or receiving a notice of intention to make a takeover.
- Any rating applied by a rating agency to an entity, or securities of an entity, and any change to such a rating.
- A proposal to change the entity's auditor.

