



Continuous Disclosure Policy

Purpose

The oOh!media Group (**oOh!, we, our, us, the Company**) must comply with the law and Australian Securities Exchange (**ASX**) Listing Rules and the Corporations Act in respect of matters of market disclosure. This policy is designed to ensure oOh!:

- keeps the market 'continuously informed' of information that may have a 'material effect' on the price or value of oOh! shares or other securities¹;
- responds if ASX suspects a 'false market' is developing in oOh! shares; and
- provides shareholders with effective information flows and ensure they are kept informed of all major developments affecting oOh!'s state of affairs.

Structure and contents of this policy

How we keep the market continuously informed	Disclosure is facilitated by Disclosure Committee	2
	What is 'price sensitive information'	2
	What all employees must do	3
	What some specialist employees must do	3
Protections against a false market	What is a false market	3
	What employees must do to help avoid a false market	3
Avoiding selective disclosures / inadvertent breaches	Scheduled financial performance announcements	4
	Open briefings and public speeches	4
	One on one briefings and site visits	5
	Electronic communication with shareholders	5
Effective communication with shareholders	Blackout periods	5
	Intent	5
	Website	6
	Other forms of communication	6
This policy	Further information	7
	Access to this policy	7
	Monitoring and review	7
Annexures	Consequences of breaching this policy	7
	A – Summary of ASX Continuous Disclosure Rule	8
	B – Specialist Operations supporting Continuous Disclosure	9

¹ For detail on the Continuous Disclosure Rule see Annexure A.

How we keep the market continuously informed

Disclosure is facilitated by the Disclosure Committee

1. Compliance with continuous disclosure rules is facilitated at oOh! by the Disclosure Committee², whose members are the Chief Executive Officer (CEO), the Chief Financial Officer (CFO) and the Company Secretary. It can be augmented by Board members³.
2. The Disclosure Committee arranges for oOh! to make appropriate disclosures to the ASX if required by the continuous disclosure rules. Timing is critical as, once 'the Company' becomes 'aware' of relevant information, many disclosures must be made to the ASX 'immediately' after. It follows that **the Disclosure Committee cannot be effective unless its members receive relevant information from staff immediately upon staff becoming aware of the information.**
3. For these purposes, the relevant information is 'price sensitive information' about oOh! that is not known to the market.

What is 'price sensitive information'?

4. Information is 'price sensitive information' when it would likely have a material effect on the price or value of the Company's shares if it were known. This includes if a reasonable person would expect it to affect an investor's decision to buy, sell or hold oOh! shares.
5. Whether or not information is price sensitive depends on the facts in any case, but generally non-public information which relates to an impact to oOh! Group revenue or profit of 5% or more is potentially price sensitive. As an example, win or loss of a major commercial contract which contributes 5% or more of Group revenue.
6. Price sensitive information about oOh! includes matters of supposition, intentions and things too indefinite to warrant being publicised and could include information about any of the following (this list is not exhaustive):
 - sales figures and profit forecasts;
 - liquidity and cashflow;
 - changes in capital structure, e.g. securities/rights issues and buy backs;
 - borrowings;
 - mergers, acquisitions, reconstructions, takeovers;
 - significant litigation;
 - possible regulatory investigation;
 - significant changes in operations;
 - significant changes in industry;
 - new products/services/technology;
 - proposed dividends/dividend policies;
 - management restructuring or Board changes; and/or
 - significant new or terminated contracts or customers.

Information is 'inside information' if it is not known to the market as a whole, but only to 'insiders'.

Inside information may or may not be 'price sensitive'. Despite that, the term 'inside information' is often used as a short-hand reference to 'non-public price-sensitive information', particularly in the context of insider trading (see paragraph 10).

² For information on the role, responsibilities and process of this Committee see Annexure B.

³ See Annexure B – rapid response processes

What all employees must do

7. **Tell the Disclosure Committee immediately**

All oOh! employees must act immediately to bring to the attention of a member of the Disclosure Committee any price sensitive inside information they receive or of which they become aware. Delays may result in breach of the continuous disclosure rules⁴.

Note: If in doubt, report: If in doubt whether information you have received or become aware of is price sensitive/inside information, assume it is and report it to a member of the Disclosure Committee anyway.

8. **Verify information on request**

All oOh! employees must also act immediately to verify information if a member of the Disclosure Committee directs this.

9. **Keep information strictly confidential**

Some exceptions⁵ to the requirement for continuous disclosure (for example in respect of an incomplete transaction or information prepared for internal management purposes) apply only while the price sensitive information is kept strictly confidential.

Any leak of price sensitive information may force oOh! to have to make early disclosure to the market of a matter which may result in significant commercial disadvantage. Therefore employees must treat all price sensitive information as highly confidential. You must not disclose it (even within oOh!) except to a member of the Disclosure Committee or as strictly necessary for you and others to perform their roles for oOh!.

10. **No insider trading**

When you hold oOh! price sensitive inside information, it is a criminal offence (called 'insider trading') to trade in oOh! shares: see also [Share Trading Policy](#). Accordingly, if you think you have price sensitive information, you must not trade in oOh! shares until a member of the Disclosure Committee has confirmed to you that the information is not price sensitive inside information.

11. **Do not commit a crime**

Breaching continuous disclosure rules and insider trading are serious criminal offences attracting fines, financial and reputation damage and imprisonment. Consequences for breach of this policy are also noted in paragraph 40.

What some specialist employees must do

12. **The Executive Leadership Team** must:

- include continuous disclosure as a standing agenda item at senior management meetings; and
- assist the Disclosure Committee in implementing policies, procedures and education determined in accordance with this policy.

13. **The Communications team** must arrange for the distribution of a daily news feed of media reports regarding oOh! to senior managers.

14. Annexure B sets out the special roles and responsibilities in respect of market disclosure of:

- the Disclosure Committee; and
- CEO, CFO and Company Secretary; and
- the Board / Non-executive Directors.

A false market and what you must do

What is a false market?

1. A false market exists if there is material misinformation or materially incomplete information in the market which is compromising the market establishing a proper price for oOh!'s shares. It may arise from an unfounded market rumour or be due to a partial leak of price sensitive information.

What employees must do to help avoid a false market

15. ASX Listing Rule 3.1B provides that if the ASX considers that there is or is likely to be a false market in oOh!'s securities, and requests information from oOh! to correct or prevent the false market, oOh! must give the ASX the information needed to correct or prevent the false market.
16. Any employee who becomes aware of unusual or unexpected price movements, media coverage, or other circumstances that suggest a 'false market' in oOh!'s securities, must report the concern to a member of the Disclosure Committee immediately.

Avoiding selective disclosures / inadvertent breaches

Scheduled financial performance announcements

17. Throughout the year, oOh! makes scheduled announcements about our performance. We lodge these with the ASX, with all supporting information, before we communicate them to anyone outside oOh! or the wider oOh! team.
18. Following release on the ASX platform, all ASX announcements are then promptly published on the oOh! website.
19. Following the release of scheduled financial performance announcements, any comment we make to an analyst or investor in relation to their report or their financial projections is confined to addressing errors in factual information and underlying assumptions.

Open briefings and public speeches

20. We give advance notice of open briefings about our results and other significant announcements to the ASX and on the oOh! website. Before the presentation begins, we lodge all presentation materials with the ASX. We publish them on our website promptly after releasing to ASX. Any webcasts of briefings are accessible on the oOh! investor site⁶ for at least six months.
21. Some public speeches by oOh! executives at conferences and forums are classified as open briefings (if they may contain material price sensitive information). In these cases, we follow the same procedures as for open briefings. Any open briefings or public speeches for which presentation materials and speeches will be lodged with the ASX must have the prior approval of the CEO.

⁴ For detail on the Continuous Disclosure Rule see Annexure A.

⁵ For exceptions see Annexure A

⁶ <https://investors.oohmedia.com.au/investor-centre/?page=presentations---webcasts>

One on one briefings and site visits

22. From time to time, oOh! holds one on one briefings with members of the financial community, including analysts and investors, or hosts them at our sites. At these briefings and site visits, we will not provide any information which may affect the price of oOh! securities, unless it has been announced previously to the ASX.
23. During an analyst briefing, if we are concerned that the analyst's forecast diverges from our own expectations, we will not use the briefing to manage an analyst's expectations. If necessary, we will make a public ASX release.
24. Meetings with investors and analysts will, wherever possible, include two oOh! representatives to assist in ensuring compliance with this policy.
25. All information given to analysts at a briefing, such as presentation slides, and any presentation material from public speeches given by Board members or members of management that relate to oOh! or its business will be given to the Company Secretary for immediate release to the ASX and posted on oOh!'s website. This information must always be released to ASX before it is presented at an analyst or investor briefing.

Media and financial communications

26. oOh! monitors our routine communication with the media and the financial community, to avoid the risks of inadvertently making a 'selective disclosure' of sensitive information to a specific audience before it has been notified to the market via the ASX. Only persons authorised under the Delegated Authority Policy, or their delegates, are permitted to talk to investors and the financial community.
27. Only authorised persons are permitted to make a comment or respond to media enquiries (see [External Communications Authority Practice Note](#), issued under [Delegated Authority Policy](#)). If any oOh! employee is approached by a representative of the media, you should:
 - note all contact details and the information required without responding to questions/issues;
 - tell the media representative that arrangements will be made for someone to contact them; and
 - send the matter to our Company Secretary immediately.

Blackout periods

28. In order to avoid the risk of inadvertently disclosing information that is incomplete or uncertain, oOh! enacts a communication 'blackout' between the end of our Full Year and Half Year reporting periods and the announcement of the relevant financial results. We do not hold one on one briefings with investors or analysts during blackouts. Nor do we hold any open briefings to discuss anything other than information which has been announced to the ASX.

Deviating from a blackout period can be approved only in advance and by the Chair of the Board, the Chair of the Audit, Risk and Compliance Committee or the CEO, as set out more specifically in the [Share Trading Policy](#).

Effective communication with shareholders

Communicating with shareholders and investor relations

29. We aim to ensure that shareholders are kept informed of all major developments affecting our state of affairs and to communicate with shareholders accurately and in plain language.

We also recognise that potential investors and other interested stakeholders may wish to obtain information about oOh! from time to time.

To achieve this, we communicate information regularly to shareholders and other stakeholders through a range of forums and publications. All price sensitive disclosure is first made available on the ASX Market Announcements Platform.

30. We also have an investor relations program in place to facilitate communication with investors.

Website

31. One of oOh!'s key communication tools is its website located at www.oohmedia.com.au. oOh! endeavours to keep its website up-to-date. Important information about oOh! can be found under the tabs marked 'About' and 'Investors' on its website.

32. In addition to the material specifically referred to below, the Governance section within the 'Investors' tab of the website includes details of the following:

- oOh!'s constitution;
- oOh!'s Board and Board Committee charters; and
- oOh!'s core corporate governance policies

33. The website also contains a facility for shareholders to direct inquiries, and a link to the registry site to elect to receive communications from us via email (or to elect to discontinue receiving email communications).

Other forms of communication

34. Measures for communicating the following important aspects of oOh!'s affairs include:

- **Announcements lodged with the Australian Securities Exchange (ASX):** All ASX announcements made to the market, including annual and half year financial results, are posted on our website as soon as they have been released by ASX.
- **Half-Year, Full-Year Financial Reports and Annual Report:** oOh!'s Financial Reports and Annual Report are available on its website and contain important information about our activities and results for the previous financial year. Shareholders can elect to receive our Annual Report as an electronic copy or in hard copy.
- **Presentations:** Copies of all new and substantive investor or analyst presentations are first released to ASX and then posted on our website. Where appropriate, we use webcasting or teleconferencing of these presentations and briefings.
- **Notice of meeting:** We place the full text of all notices of meetings and explanatory material on our website. We encourage shareholders to provide email addresses so that notices of meeting and explanatory material can be sent to shareholders via email.
- **Annual General Meeting (AGM):** We encourage full participation of shareholders at our AGM each year. oOh! increasingly provides virtual and in person access to our AGM. For those shareholders who are unable to attend in person, oOh! provides a full transcript of the Chair's and the Chief Executive Officer's addresses on its website. Shareholders who are unable to attend in person are encouraged to appoint a proxy ahead of the meeting (including electronically).

Shareholders may ask questions about, or make comments on, the management of oOh! either ahead of the AGM by submitting a written question or at the AGM.

Our external auditor attends each AGM and is available to answer shareholder questions about the conduct of the audit and the preparation and content of the auditor's report. Shareholders are also provided with a reasonable opportunity to ask

questions of the auditor at the AGM or alternatively may submit written questions to the auditor prior to the AGM as permitted under the *Corporations Act 2001* (Cth). It is oOh!'s standard approach to determine all resolutions put to each AGM by way of a poll.

- **Media Releases:** oOh! makes non-material announcements about its activities from time to time via media releases and other public alerts. Copies of all media releases made by oOh! are posted on our website.

For shareholders seeking further information

35. oOh! provides Sydney Office contact details and an online query form under the Contacts section of the oOh! investor centre on the oOh! website. Information is also communicated to shareholders via periodic mail outs, or by email to shareholders who have provided their email address.
36. Our investor relations team can add shareholders to this email list and are also available to answer other queries via investors@oohmedia.com.au.

This Policy

Access to this policy

37. This policy will be made available in the Corporate Governance section of the Group's website and on the Group's intranet.

Monitoring and review

38. The effectiveness of this policy is monitored by the Board Audit, Risk and Compliance Committee.
39. This policy will be reviewed regularly by the Board and any amendments will be communicated to all oOh! leaders and as appropriate to all employees.

Consequences of breaching this policy

40. oOh! takes the continuous disclosure rules very seriously. Breach of this policy may lead to disciplinary action against an employee, including dismissal in serious cases.

Breach of this policy can also result in oOh! being in breach of the law and individuals being complicit in that, which may have significant legal consequences, including fines and imprisonment.

Annexure A

Continuous disclosure requirements of the ASX Listing Rules

ASX Listing Rule 3.1 provides that oOh! must notify the ASX immediately if oOh! is aware of any information concerning it that a reasonable person would expect to have a material impact on the price or value of oOh! shares or other securities. Before we give this information to any other person, or release it on the oOh! website, we must have the ASX's acknowledgement that the information has first been released to the market through the ASX Market Announcements platform.

Exceptions to the rule: We do not have to notify the ASX if each of the following 3 conditions is satisfied in relation to the information:

1. One or more of the following 5 situations applies:
 - it would breach the law to disclose the information;
 - the information concerns an incomplete proposal or negotiation;
 - the information is speculation or is not sufficiently definite to warrant disclosure;
 - the information is generated for our internal management purposes; or
 - the information is a trade secret; and
2. The information is confidential, and the ASX has not decided otherwise (no leaks); and
3. A reasonable person would not expect the information to be disclosed.

Confidentiality and response to loss of confidentiality: If any of the 3 conditions above is no longer satisfied, we may be required to disclose the information to the ASX immediately, including if confidential information is leaked. A leak can force us make a premature announcement, regardless of where the leak originates - media or analyst reports, rumours, sudden and significant unexplained shifts in share price and volumes, etc.

The ASX can also require oOh! to correct information or prevent what is called a 'false market' in oOh! securities. This generally happens when a reasonably specific rumour or media comment we have not confirmed or clarified is impacting the price of oOh! securities, or the ASX believes it will.

Consequences for oOh! and individuals: If we fail to notify the ASX as required, it could expose oOh! and individual employees to:

- unwanted publicity, damaging oOh!'s reputation and the value of our securities;
- the ASX suspending trade in oOh! shares or, in extreme cases, delisting oOh!;
- ASIC infringement notices;
- investigations under the Australian Securities and Investments Commission Act 2001 (Cth);
- civil liability for loss or damage suffered by any person as a result of the failure;
- class action litigation;
- criminal liability and substantial monetary fines under the Corporations Act; and/or
- criminal and civil penalties, or imprisonment, for oOh!'s officers (including directors), employees or advisers involved in an infringement of the disclosure rule.

Annexure B

Special roles & ASX engagement supporting proper disclosure

Role of our Disclosure Committee

The oOh! Board appointed our Disclosure Committee to take responsibility for compliance with oOh!'s continuous disclosure obligations. It is comprised of the CEO, CFO, and any person appointed to the office of Company Secretary.

Responsibilities of the Disclosure Committee

The Committee's responsibilities include:

- reviewing information which is brought to its attention to determine if there is a disclosable matter, (including whether any Listing Rule non-disclosure exception applies) and, before concluding that there is any disclosable matter, joining to the discussion Chair of Audit Risk and Compliance Committee (**ARCC**) (or, if the Chair of ARCC cannot readily be contacted and immediate disclosure is required, the Chair of the Board⁷);
- securing approval from the Board if the subject matter of the disclosure is within the reserved powers of the Board⁸;
- overseeing and coordinating disclosure of information to ASX, analysts, brokers, shareholders, the media and the public;
- establishing and maintaining oOh!'s disclosure policies and procedures and ensuring that there is an adequate system in place for the disclosure of all material information to the ASX and other authorities in a timely fashion;
- considering any enquiries received from the ASX, including any 'false market' response letters;
- reviewing, and advising our Board on any infringement notice or written statement of reasons issued to oOh! by ASIC; and
- educating management and staff on our disclosure policies and procedures.

Meetings of the Disclosure Committee

The Committee meets as required and at short notice when necessary. Its meetings and decisions may be made electronically (including by telephone, email or other electronic means).

Process upon learning of potentially price sensitive information

Upon learning of information that is potentially price sensitive a Committee member must determine immediately whether the matter is of such significance to call a meeting of the full Committee without delay.

The Committee will:

- review information reported to it and seek any advice that is needed to interpret it (provided that disclosure cannot be delayed if the information is obviously

⁷ If both the ARCC Chair and Board Chair are not available, the Disclosure Committee must use its best endeavours to engage another non-Executive director in the decision. Ultimately, if immediate disclosure is required and this extended discussion cannot be achieved within that timeframe, the Disclosure Committee must prioritise compliance with the minimum requirements of continuous disclosure under the law and the ASX Listing Rules, engaging with the ARCC Chair or Board Chair as soon as possible after.

⁸ For detail on 'reserved powers' of the Board – see under *Role of our Board* on page 11.

- 'material price sensitive');
- determine whether – or not - any of the information must be disclosed to the ASX, including the Chair of ARCC or Chair of Board⁷ if required as noted above;
- consider whether a 'trading halt' is necessary to facilitate an orderly, fair and informed market for oOh! securities;
- coordinate the actual form of ASX disclosure with oOh! management;
- ensure all ASX disclosures of price sensitive information are approved by:
 - the Chair of ARCC (or, if the Chair of ARCC cannot be readily contacted and immediate disclosure is required, by Chair of the Board⁷) and
 - oOh!'s CEO and CFOor by the Board, if the subject matter of the disclosure is one within the reserved powers of the Board⁸; and
- ask our Company Secretary to prepare for a future announcement if information is not yet disclosable.

If a member of the Disclosure Committee is not available the remaining members should continue to meet without delay to consider the potential continuous disclosure matter. In such circumstances, the Disclosure Committee members may also invite the Chair of ARCC or the Chair of the Board to join the Disclosure Committee in the absence of a member.

Reporting to Chair

The Committee shares all its deliberations with the Chair of the Board or, in their absence, the Chair of the Audit, Risk and Compliance Committee, without delay.

Roles of our CEO & CFO

In addition to forming part of the Disclosure Committee, the CEO and CFO:

- must approve all ASX announcements relating to a decision of the Disclosure Committee;
- are authorised, when acting together, to request a trading halt with the ASX. They will alert and keep the Chair of the Board informed of any such request.

If Board members cannot be reached in time to approve any matter that requires Board approval, but also immediate disclosure under the ASX Listing Rules, the CEO and CFO acting together may authorise disclosure to ensure our compliance with continuous disclosure rules.

Role of our Company Secretary

Our Company Secretary has primary responsibility for all communication with the ASX in relation to ASX Listing Rule matters.

In particular, the Company Secretary is responsible for:

- liaising with the ASX about continuous disclosure, and other disclosure obligations under Chapters 3 and 4 of the Listing Rules;
- lodging announcements with the ASX in relation to continuous disclosure matters;
- implementing procedures to ensure that oOh!'s ASX PIN and individual passwords are secure;
- ensuring senior management are aware of this Continuous Disclosure Policy and related procedures, and of the principles underlying continuous disclosure;
- ensuring this Continuous Disclosure Policy is reviewed and updated as

- necessary;
- developing template ASX announcements and trading halt requests;
 - maintaining an accurate record of all announcements sent to the ASX and all correspondence with ASIC in relation to oOh!'s continuous disclosure obligations;
 - sending to the Board copies of all information disclosed to the ASX as a result of oOh!'s compliance with continuous disclosure rules, other than changes in individual director's interests in the Company, or otherwise as directed by the Board;
 - liaison between ASX and CEO/CFO in respect of ASX actions, as set out in the latter sections of this Annexure B.

Role of our Board

The Chair of ARCC (or, if the Chair of ARCC cannot readily be contacted and immediate disclosure is required, the Chair of the Board⁷) is to be included in the deliberations of the Disclosure Committee as set out above.

Otherwise, Board approval and input is required only for matters that are clearly within its reserved powers (where responsibility has not been delegated to management), or otherwise of fundamental significance to oOh!. Such matters include:

- half year and full year performance;
- significant profit upgrades or downgrades;
- dividend policy, guidance or declarations;
- company transforming transactions or events; and
- any other matters that are determined by our CEO, Disclosure Committee or Chair of the Board to be of fundamental significance to oOh!.

Except as set out above, no other announcement requires Board approval (as opposed to simply being circulated 'for their information' after an announcement has been made).

If an announcement is to be considered and approved by our Board, our Company Secretary and Disclosure Committee must provide all relevant information necessary to ensure that our Board is able to fully appreciate the matters dealt with in the announcement.

Rapid Response Process

If an announcement that requires Board approval must be disclosed to the market immediately, all reasonable effort will be made to have it urgently considered and approved by our Board before release.

However, if such approval is not possible, our CEO and CFO (or, in the absence of either or both, the Chair of the Board or/and the Chair of ARCC) may authorise disclosure to ensure our compliance with continuous disclosure rules. The announcement must be considered by our Board at the first possible opportunity following its release to determine what, if any, further steps need to be taken by oOh!.

Monitoring role

Non-executive Directors of oOh! must:

- include continuous disclosure as an agenda item at every Board meeting and consider whether any matters reported to or discussed at the meeting should be disclosed to

ASX; and

- inform the Disclosure Committee if they learn of any information that may be considered price sensitive and that is not already being monitored to ensure it falls within the exceptions to release to the ASX.

Notifications to the ASX

Following a decision by our Disclosure Committee, the Company Secretariat makes all announcements to the ASX, using the ASX Lodgement Procedures. The procedures are designed to ensure all announcements are presented with accuracy and do not mislead the market. Our CEO or CFO must approve all announcements relating to a decision of the Disclosure Committee.

If the Disclosure Committee decides that circumstances are developing, but the information is not disclosable yet, our Company Secretary will prepare a draft announcement to facilitate an immediate release if it becomes disclosable later.

Our Board receives copies of all information disclosed to the ASX as a result of oOh!'s compliance with continuous disclosure rules other than changes in individual directors' interests in the Company.

Rapid Response Process

If our CEO and CFO are unavailable, the following individuals may authorise a disclosure following a decision of the Disclosure Committee:

- the Chair of the Board; or
- the Chair of the Audit, Risk and Compliance Committee; or
- if both the Chair of the Board and Chair of the Audit, Risk and Compliance Committee are unavailable, our Company Secretary.

Verification and authorisation

oOh! has put in place a review process which includes verification testing of content of market announcements and review and sign-off by management and the Board as appropriate.

Market announcements will be accurate, balanced and expressed in a clear and objective manner that allows investors to assess the impact of the information when making investment decisions.

oOh! has also implemented a process to include the title of the body (e.g. Board, Disclosure Committee) or the name and title of the officer of oOh! who has authorised the announcement to be given to ASX, as required by the ASX Listing Rules.

Trading halts

In some circumstances, the Disclosure Committee may decide a 'trading halt' is required if the market is or will be trading after oOh! learns it needs to disclose information, (for example, if a leak of confidential information is having an effect on our share price, a media comment about oOh! warrants a response, or the ASX asks us for information), but we are not in a position to make an immediate disclosure.

Only our CEO and CFO together are authorised to request a trading halt with the ASX relating to a decision of the Disclosure Committee. They will alert and keep the Chair of the Board informed of any request.

Rapid Response Process

If our CEO and CFO are unavailable, the following individuals are authorised to request a trading halt following a decision of the Disclosure Committee:

- the Chair of the Board; or
- the Chair of the Audit, Risk and Compliance Committee; or
- if both the Chair of the Board and Chair of the Audit, Risk and Compliance Committee are unavailable, our Company Secretary.

If only one of the CEO and CFO is unavailable, the other will act jointly with the Chair of the Board, Chair of Audit, Risk and Compliance Committee or Company Secretary, as the case may be.

ASX price query letters and aware letters

From time to time, the ASX may query unexplained movements in our share price or trading volumes. The ASX may provide oOh! with a short period to respond to their questions and will publish both their letter and our response on the ASX Market Announcements Platform.

In addition, from time to time, oOh! could be required to make a premature announcement of incomplete information in order to comply with the continuous disclosure rules. In order to be in a position to deal promptly and accurately with any ASX query:

- our Company Secretary must have a system in place for rapid discussion and review of our response;
- draft language should be prepared in advance if we believe confidentiality may be lost in relation to specific information; and
- all of our responses must take account of likely future announcements, so that our response does not appear, in hindsight, to have been less than clear and transparent.

False Market

ASX Listing Rule 3.1B provides that if the ASX considers that there is or is likely to be a false market in oOh!'s securities, and requests information from oOh! to correct or prevent the false market, oOh! must give the ASX the information needed to correct or prevent the false market.

March 2023