

SCHAFFER CORPORATION LIMITED (“SFC”)

SFC CONTINUOUS DISCLOSURE POLICY

SFC Continuous Disclosure Policy

SFC is committed to complying with the continuous disclosure obligations of the Australian Stock Exchange (“ASX”) listing rules and Corporations Act. SFC also draws from the guidance principles for continuous disclosure set out in the Australia and Securities Commissions (“ASIC’s”) “Better Disclosure for Investors” Guidance Rule publication in order to formulate its continuous disclosure practices.

ASX’s Listing Rule 3.1 states that:

“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”

ASX’s Listing Rule 3.1 does not apply to particular information while all of the following are satisfied:

- A reasonable person would not expect the information to be disclosed;
- The information is confidential and ASX has not formed the view that the information has ceased to be confidential;
- One or more of the following applies:
 - It would be a breach of a 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 the internal management processes of the entity
 - The information is a trade secret

In fulfilling its obligations of continuous disclosure SFC has adopted and adheres to the following practices.

- SFC’s Managing Director and Chief Financial Officer/Company Secretary constitute the executive team charged with management of all elements of

the Company's activities. This team is responsible for assessing the materiality of information and drafting all disclosures. For administrative convenience, SFC's Company Secretary is the nominated officer of the Company responsible for communications with the ASX;

- Information is released firstly via electronic means via the ASX. Further dissemination to analysts and investors does not occur until after ASX confirms the information has been released to the market;
- The information is posted to SFC's website at www.schaffer.com.au in order to make the information accessible to the widest audience. Investor information is posted to an area on SFC's website separate from any promotional material about the Company or its products;
- SFC's Managing Director and Chief Financial Officer, and ALH's Managing Director are the officers authorised to speak on SFC's behalf at investor briefings and to the media. These officers understand that when speaking on behalf of the Company it is in respect of explanation and clarification of information previously released via the ASX. As these officers have knowledge of all information previously released to the ASX (they form part of the executive team responsible for the information disclosures), the risk of inadvertent disclosure of price sensitive information when speaking to investor briefings and the media is minimised. Presentations used in briefings which may have content which would trigger a continuous disclosure obligation are lodged with ASX prior to the briefing. All presentations are posted to SFC's website;
- Comments on analysts financial projections are confined to errors in factual information and underlying assumptions. The Company will not provide price sensitive information or earnings forecast guidelines to analysts unless it has already done so to the market via the ASX;
- Unless the executive team responsible for information disclosures believes it has an obligation to make a statement on a particular matter, SFC's policy is not to respond to market rumours or speculation.