

## Objective

This Policy directs Suncorp's approach to:

- Complying with the continuous disclosure obligations imposed by law and the disclosure of material information in a timely, balanced and transparent manner to the Market; and
- Avoiding the disclosure of information on a selective basis that has not been published, lodged or widely disseminated.

The key objective of this Policy is to ensure that Suncorp complies with its legal obligations in respect of the disclosure of material information. This includes meeting its obligations under the Corporations Act 2001, the Australian Securities Exchange ("ASX") Listing Rules and ASX Guidance Note 8, the Australian Prudential Regulation Authority's Prudential Standard APS 330 Public Disclosure ("APS 330") and other applicable regulatory requirements. This Policy is intended to protect Suncorp's reputation, ensuring all reasonable steps are taken to comply with its continuous disclosure obligations.

Refer to the Key Terms section of this Policy for full definitions of the defined terms used in this Policy.

## Application

This Policy outlines the key principles of continuous disclosure which apply to all Employees, Officers and Contingent Workers.

## Policy Statements

### **1. Suncorp is committed to fair and timely Market disclosure in accordance with legal requirements and has appropriate governance arrangements to ensure compliance**

Suncorp has continuous disclosure obligations. Once Suncorp becomes aware of any information that a reasonable person would expect to have a material effect on the price or value of Suncorp Group Limited's securities, Suncorp's Corporate Disclosure Officer will immediately disclose that information to the ASX, unless an exception applies.

Suncorp's Corporate Disclosure Officer is ultimately accountable for ensuring Suncorp's compliance with its continuous disclosure obligations. The Chief Financial Officer ("CFO") or in their absence, the Chief Legal Officer, is designated as Suncorp's Corporate Disclosure Officer.

Suncorp has also established a Disclosure Committee to assist the Corporate Disclosure Officer in ensuring compliance with Suncorp's continuous disclosure obligations. The Disclosure Committee consists of the Chief Executive Officer and Managing Director ("CEO&MD"), CFO, Chief Legal Officer and the Head of Investor Relations.

### **2. Suncorp ensures equal access to Price Sensitive Information for all Analysts, investors, shareholders and the Market**

Suncorp will avoid disclosing any Price Sensitive Information on a selective basis. Specifically, Suncorp will not:

- Disclose Price Sensitive Information at any meeting with an investor or Analyst without formally disclosing it to the Market beforehand;
- Comment on Price Sensitive Information not already disclosed to the Market; or
- Answer any questions raised in relation to Price Sensitive Information not already disclosed to the Market. If such question is taken on notice and the answer would involve the release of Price Sensitive Information, the information will be released through the ASX before responding.

The Corporate Disclosure Officer will ensure the Market is fully informed of its strategy and financial performance by providing equal access to information for all Analysts, investors and shareholders.

### **3. Suncorp provides the ASX with all material briefings prior to Market release**

The Corporate Disclosure Officer will ensure all material information is released to the ASX prior to any briefings with the media, Analysts, investors and shareholders. Information released to the ASX will also be published on the Suncorp Group website after it has been released to the ASX and is retained for at least three years. An exception is permitted if a strict embargo is in place, the ASX is not trading and an announcement is made prior to it reopening.

### **4. Suncorp is to ensure the confidentiality of Price Sensitive Information about corporate transactions**

Suncorp will seek to protect the confidentiality of Price Sensitive Information pertaining to corporate transactions. The obligation of confidentiality forms part of Suncorp's code of conduct, which applies to all Officers, Employees and Contingent Workers. Suncorp will also obtain appropriate confidentiality undertakings from third parties.

Suncorp will take appropriate action should any Price Sensitive Information be leaked.

### **5. All breaches of continuous disclosure obligations are to be immediately reported and actioned**

If Employees or Contingent Workers (other than Officers) suspect or become aware of information that may require disclosure or if any Price Sensitive Information is inadvertently disclosed before release to the ASX, they must immediately report such information to their relevant Senior Leadership Team ("SLT") member and the Corporate Disclosure Officer.

If Officers suspect or become aware of information that may require disclosure or if any Price Sensitive Information is inadvertently disclosed before release to the ASX, they must immediately report any such information to the Corporate Disclosure Officer.

The Corporate Disclosure Officer will arrange for an announcement to be made to the ASX and published on the Suncorp Group website as soon as practicable.

### **6. Suncorp nominates Authorised Spokespersons to deal with the Market**

To ensure the integrity of all information disclosed to the Market, only Authorised Spokespersons may disclose matters concerning Suncorp to the Market. At all times, Authorised Spokespersons must be aware of the need to avoid selectively disclosing information which is not publicly available.

All meetings with Analysts, investors or shareholders are coordinated by the Investor Relations team and the Investor Relations team will maintain records of the information disclosed at these meetings.

### **7. Meetings with Analysts, investors and shareholders are to be appropriately monitored and recorded**

To ensure that Suncorp complies with its continuous disclosure obligations, meetings with Analysts, investors or shareholders will be monitored. Where practicable, Suncorp will provide live webcasts of its Annual General Meeting and results presentations on the Suncorp Group website and subsequent access on the Suncorp Group website to enable viewing at a later time.

## **8. Suncorp institutes Market briefings Blackout Periods in the lead-up to the release of its half-year and full-year results announcements**

Suncorp institutes Market briefing Blackout Periods in the lead-up to the release of the half-year and full-year results announcements. During the Blackout Period, Suncorp will not discuss its financial performance or forecasts with Analysts, investors, shareholders or the media, unless that information has already been disclosed to the ASX. There are limited exceptions where meetings cover only general background/historical information regarding Suncorp. Prior approval for such meetings will be obtained from the Corporate Disclosure Officer and the meetings will be attended by members of the Investor Relations team.

## **9. Suncorp will monitor and appropriately respond to Analysts' reports and Consensus Forecasts**

Suncorp recognises the important role Analysts play in assisting the establishment of, and maintaining, an efficient market with respect to Suncorp Group Limited's securities. However, Suncorp is not responsible for, and does not endorse, any Analyst's report that contains commentary on Suncorp.

Suncorp's internal calculation of Analysts' Consensus Forecasts is only to be distributed by release to the ASX and will not be distributed to Analysts on a selective basis. No comment or feedback is provided on financial forecasts, including profit forecasts prepared by Analysts, or on conclusions or recommendations set out in an Analyst report.

## **10. Suncorp does not respond to Market speculation or rumours unless required to do so by law or the ASX**

Suncorp does not respond directly to Market speculation or rumours, unless required to do so under its continuous disclosure obligations or as otherwise required by law. However, where Suncorp becomes aware that a False Market in Suncorp Group Limited's securities exists or is likely to exist, the Corporate Disclosure Officer may consider initiating a trading halt or releasing an announcement to the ASX ensuring all market participants are equally informed.

## **11. Suncorp has appropriate processes and procedures to ensure accurate and timely disclosures in accordance with Prudential Standards**

Suncorp has internal controls, processes and procedures in place to ensure compliance with disclosure requirements under the applicable Prudential Standards, including the requirements under APS 330.

# Roles and Responsibilities

## Board

- Board members have an ongoing responsibility to raise with the Corporate Disclosure Officer any information of which they are aware that may require disclosure;
- Considers any proposed ASX announcements referred to it by the Corporate Disclosure Officer; and
- Oversees Suncorp's compliance with this Policy.

## Corporate Disclosure Officer

- Ensures compliance with continuous disclosure requirements, including:
  - Assessing the potential materiality of information and making decisions on information to be disclosed to the Market;
  - Overseeing and coordinating the disclosure of information to the ASX, Analysts, investors, shareholders, media and the public;

- Seeking to ensure that any announcements are made in a timely manner, are not misleading, do not omit material information and are presented in a clear, balanced and objective way; and
  - Referring any announcement considered to be a matter of key significance to the Board or a sub-committee of the Board for consideration.
- Maintains and periodically updates this Policy and any related procedures; and
  - Educates Officers and Employees on this Policy and related procedures and ensures Contingent Workers have access to these documents.

## Employees

- Be familiar with, and always act in accordance with, their relevant Function's processes and procedures to ensure compliance with this Policy; and
- Immediately reports any potential or actual compliance breaches to the relevant Senior Leadership Team member and the Corporate Disclosure Officer.

## Investor Relations Team

- Ensures effective engagement with Analysts, investors and shareholders including arranging meetings and identifying, building and maintaining relationships;
- Supervises Suncorp's continuous disclosure and Market communications requirements;
- Monitors the Consensus Forecasts of Analysts' predictions for Suncorp's financial performance and profits;
- Manages the shareholder communications on the Suncorp Group website and other retail shareholder communications including dividend statements, any communications from the Chairman, and shareholder benefits announcements;
- Supervises Suncorp's financial reporting for the half-year and full-year results, APS 330 requirements and the Annual General Meeting, including preparation of presentations and Analyst information; and
- Manages the relationship with credit rating agencies and coordinates annual rating reviews.

## Senior Leadership Team

- SLT members have an ongoing responsibility, and by a standing item at the conclusion of each meeting of the SLT, are required to notify the CEO&MD if they are aware of information, or if information has emerged from the meeting, that may require disclosure.
- The Corporate Disclosure Officer or the Disclosure Committee may from time to time request the participation of other members of the SLT in:
  - The decision-making process regarding the disclosure of certain information; and
  - The preparation and approval of the content of ASX announcements, as required.

# Key Terms

Analysts	Investment analysts at major brokerage firms, institutional investment firms and credit rating agencies that produce written research, earnings forecasts and valuations on Suncorp Group Limited.
Authorised Spokesperson	<p>The following people are authorised to speak to Analysts, investors, shareholders and media with regard to the financial affairs of Suncorp:</p> <ul style="list-style-type: none"><li>— The Chairman, CEO&amp;MD and CFO;</li><li>— SLT members; and</li><li>— The Head of Investor Relations and Executive Manager External Relations.</li></ul> <p>Where appropriate, other senior executives may act as spokespersons following authorisation from their appropriate SLT member and the Corporate Disclosure Officer. Other Investor Relations Professionals and Corporate Affairs Managers may act as spokespersons if authorised by the Corporate Disclosure Officer.</p>
Blackout Period	As a general rule, the 'Blackout Period' commences at the conclusion of the financial reporting period and meetings with the Market are generally not held until the results have been released. The Corporate Disclosure Officer may elect to vary the date of the commencement of the Blackout Period or extend any Blackout Period where appropriate.
Consensus Forecast	Average of Analysts' earnings and dividend forecasts and company valuations.
False Market	A 'False Market' refers to a situation where there is material misinformation or materially incomplete information in the market which is compromising proper price discovery in relation to Suncorp Group Limited securities, for example where there is false or mis-leading information concerning Suncorp, including a false rumour circulating in the Market.
Market	Capital market participants with the ability to influence the Suncorp Group Limited share price including but not limited to investment Analysts, investors, traders and regulators.
Price Sensitive Information	<p>Information that would, or would be likely to, influence persons who commonly invest in securities in determining whether to acquire or dispose of securities, including but not limited to:</p> <ul style="list-style-type: none"><li>— A change in financial forecast;</li><li>— An alliance, joint venture or acquisition;</li><li>— A change in credit rating; or</li><li>— An unexpected potential liability.</li></ul>