

INTRODUCTION

Challenger Exploration Limited (**The Company or The Group**) is committed to be a good corporate citizen operating with honesty, integrity and in a professional and respectful manner at all times in accordance with applicable laws.

The company is listed on the Australian Securities Exchange (**ASX**) and is required to comply with the ASX Continuous Disclosure rules.

The Company believes that investor and market confidence is critical to maintaining investor protection and market reputation. To ensure investor and market confidence, the Group is committed to providing Challenger's shareholders (**Shareholders**) and potential investors with timely and equal access to important company information.

PURPOSE

The Company has in place written policies on information disclosure and relevant procedures for the preparation, verification and release of announcements and periodic corporate reports.

This policy (**Policy**) sets out the standard for disclosure and communication that the Board of Directors of the Company (**Board**) seeks from all Group employees, managers and Directors as well as all contractors, consultants and advisers of the Group (**Representatives**). The objective of this policy is to:

- a) record and communicate the Company's commitment to continuous disclosure and effective shareholder communication;
- b) outline the processes that are followed by the Company to ensure compliance with its continuous disclosure obligations; and
- c) summarise the corporate governance standards adopted by the Company in its market and media communication practices.

CONTINUOUS DISCLOSURE

DISCLOSURE REQUIREMENTS

ASX LEGAL FRAMEWORK

In accordance with ASX Listing Rule 3.1 (as reinforced by Chapter 6CA of the *Corporations Act* 2001 (Cth) (**Corporations Act**)), the Company will immediately notify the market of any information concerning the Company or its associated entities which a reasonable person would expect to have a material effect on the price or value of shares and/or other securities in the Company.

NON-DISCLOSURE

The requirement to disclose information does not apply if, and only if, each of the following conditions is and remains satisfied:

- a) one or more of the following conditions apply:
 - (i) it would be a breach of a law to disclose the information;
 - (ii) the information concerns an incomplete proposal or negotiation (for example, a negotiation

- to enter into a new contract);
 - (iii) the information comprises matters of supposition or is insufficiently definite to warrant disclosure;
 - (iv) the information is generated for the internal management purposes of the Company; or
 - (v) the information is a trade secret; and
- b) the information is confidential and the ASX has not formed the view that the information has ceased to be confidential; and
 - c) a reasonable person would not expect the information to be disclosed.

Should information be characterised as complying with the above conditions, then the information will be kept confidential to the extent permitted by law until such time as the Directors determine that that information should be released to the market.

If the ASX considers that there is, or is likely to be, a false market in the Company's securities and asks the Company to give the ASX information to correct or prevent a false market, the Company must immediately give that information to the ASX. This obligation arises even if the Company considers that an exception to continuous disclosure obligation applies. All announcements (and media releases) must be:

- a) prepared in compliance with ASX Listing Rules continuous disclosure requirements;
- b) factual and not omit material information; and
- c) expressed in a clear and objective manner to allow investors to assess the impact of the information when making investment decisions.

PROCEDURES FOR DISCLOSURE

The Directors of the Company have the responsibility for the implementation of this policy and for deciding whether or not to disclose information or to take any necessary steps to protect the confidentiality of information. Directors are also responsible for developing and periodically reviewing this Policy and internal guidelines for the release of information, and for implementing appropriate reporting processes and internal controls.

The Company's protocol in relation to the review and release of ASX announcements (and media releases) is as follows:

- a) All key announcements at the discretion of the Managing Director are to be circulated to and reviewed by all members of the Board.
- b) Any relevant parties named in the announcement should also be given the opportunity to review the announcement prior to its release, to confirm all information is factually correct.
- c) All members of the Board will receive copies of all material market announcements promptly after they have been made.

The Board will monitor the content, effectiveness and implementation of this Policy on a regular basis. Any updates or improvements identified will be addressed as soon as possible.

AUTHORISED REPRESENTATIVES

The Company Secretary is responsible for all communications with the ASX and the administration of this Policy, such as:

- a) maintaining a copy of all announcements released.
- b) overseeing and co-ordinating disclosure of information to the relevant stock exchanges and shareholders; and
- c) providing guidance to Directors and employees on disclosure requirements and procedures.

SIGNIFICANT ANNOUNCEMENTS

Challenger's full Board will approve the text of any significant announcement of the Company. However, it is recognised that where a disclosure obligation arises that is urgent and not of a recurring nature (ie such as Company's quarterly, half-yearly and yearly periodic disclosure requirements), disclosure cannot be delayed to accommodate the availability of all Directors. Therefore, if disclosure is urgent, and approval by the full Board is not possible within the time frame available, then disclosure of that material information may be approved by the Directors who are available.

INTERNAL CONTROLS

The Company has internal control measures in place to review whether any price sensitive information has inadvertently been disclosed and whether that information has also been released to the ASX. The internal control measures include:

- a) channelling all requests for information by external parties to the Company Secretary or to a senior officer of the Company delegated by the Company Secretary;
- b) ensuring that the Board provides its approval for any announcement relating to the Company's regular financial reporting or general financial performance of the Company; and
- c) ensuring that the Directors approve of all disclosures made by the Company.

FORWARD-LOOKING INFORMATION

All public disclosure, including public oral disclosure, by the Company that contains forward-looking information, will include a cautionary warning with respect to such forward-looking information that is prepared and includes the following:

- a) identifies forward-looking information as such;
- b) cautions users of forward-looking information that actual results may vary from the forward-looking information and identifies material risk factors that could cause actual results to differ materially from the forward-looking information; and
- c) states the material factors or assumptions used to develop forward-looking information.

If any events or circumstances occurred in a period and are reasonably likely to cause future actual results to differ materially from any previously disclosed material forward-looking information or if the Company decides to withdraw material forward-looking information, the Company must disclose this and state the expected differences or the events and circumstances (including assumptions that are no longer valid) that led to the decision to

withdraw the forward-looking information.

TRADING HALTS

The Company may, in exceptional circumstances, submit a request to the ASX for a trading halt to prevent the emergence of a false or uninformed market for Challenger's securities and to manage disclosure issues. The decision to request a trading halt will be made by the Directors.

RUMOURS AND MARKET SPECULATION

The Company will not comment on market speculation and rumours. If market activity indicates that trading is being unduly influenced by rumours, then the Directors will decide if the Company should make a comment to the market.

NEW DEVELOPMENTS, ERRORS, OMISSIONS, INADVERTENT DISCLOSURES

If any Director, officer or employee of the Company becomes aware of a new development, circumstance or information that may constitute material information or an error or omission in the disclosure of material information, it must immediately advise at least one Director. The Directors will, after conducting a reasonable investigation of the information, ensure that any information, or correction, as the case may be, that is required to be disclosed, is promptly disclosed in accordance with applicable securities laws, policies, regulations and requirements of ASX.

If material information has been inadvertently disclosed to any person outside the Company that is not bound by an express confidentiality obligation or disclosed on some other unauthorised basis, the Company will cause such information to be publicly disclosed as soon as possible after learning of the inadvertent or unauthorised disclosure. In such circumstances, the Company will take immediate steps to ensure that disclosure is made to the public via press release and/or ASX announcement.

The Company will assess whether a trading halt of the Company's listed securities on the exchanges on which securities of the Company are listed should be requested until proper disclosure has been made.

EXTERNAL COMMUNICATIONS

In its communications with any third party in any context, the Company will comply with the continuous disclosure requirements set out above to ensure timely and accurate information about the Company is disclosed.

COMMUNICATION TO MARKET AND WITH MEDIA

AUTHORISED SPOKESPERSONS

The only persons authorised to make public statements to the market or to the media on behalf of, or attributable to, the Company are:

- a) the Chairman of the Board;
- b) the Managing Director; and
- c) the Company Secretary.

If any other employee or Director receives a request for comment from an investor, analyst or the media in relation

to any matter concerning Challenger, the employee or Director must advise that person that they are not authorised to speak on behalf of Challenger and must refer all enquiries to the authorised spokesperson.

Other officers and executives may only confer with the investors, analysts or the media in relation to a particular matter concerning the Company if they have obtained the prior express written approval of the Managing Director for the purpose of giving such approval.

COMPANY WEBSITE

All information disclosed to the ASX in compliance with this Policy will be placed promptly on Challenger's website, following receipt of confirmation from the ASX.

Challenger's website is: www.challengerex.com

COMMUNICATION AT SHAREHOLDER MEETINGS

OPEN FORUM

The Company will ensure that Shareholder meetings are conducted with the opportunity for Shareholders to ask questions of their Board and management of the Company.

SHAREHOLDER PARTICIPATION

The Board encourages Shareholders to participate at all Shareholders' meetings. To achieve this, the Company will:

- a) send a notice of meeting and related explanatory memorandum to Shareholders; and
- b) allow the Shareholders:
 - (i) reasonable time to ask questions of the Board; and
 - (ii) the opportunity to otherwise participate at the Shareholders meeting.

AUDITOR PRESENCE

The Company will request that the external auditors are present at the Shareholders' meetings to be available to answer Shareholder's questions about the conduct of, and questions arising from, the audit of the Company.

DEALING WITH SHAREHOLDERS' ENQUIRIES

The Company:

- a) is committed to dealing with Shareholders' enquiries promptly and courteously; and
- b) will ensure that its share register also deals with Shareholders' enquiries promptly and courteously.

PRESENTATIONS

Any new and substantive investor or analyst presentation will be released on the ASX Market Announcements Platform ahead of the presentation. Where practicable, the Company will consider providing shareholders the

opportunity to participate in such presentations. If participation is not practicable, the Company will consider making a recording or transcript of the presentation available on its website. In any event, if a transcript of an investor presentation is not made available to shareholders, the presenter will be made aware of the risk that market-sensitive information may inadvertently be discussed at the presentation that is not included in the presentation pack or written materials handed out at the presentation (e.g. in response to a question asked at the presentation).

BRIEFINGS

Periodically, Challenger conducts briefings to market analysts, investors, shareholders and media groups to discuss company information that has been released to the market. When conducting these briefings the Company adheres to the following protocols:

- a) only information that has been publicly released to the ASX will be discussed;
- b) questions raised in relation to price sensitive information not previously disclosed will not be answered;
- c) if price sensitive information or material information that has not been previously disclosed is inadvertently disclosed during the briefing, then that information will immediately be released to the ASX;
- d) slides and presentations used in briefings are to be given to the ASX for immediate release to the market and posted on the Company's website; and
- e) comments on market analysts' financial projections of Challenger are limited to pointing out:
 - (i) errors in factual information where the data is already in the public domain; and
 - (ii) underlying assumptions or sensitivities if the analyst's estimates are significantly at variance from current market range estimates.

SHAREHOLDER PRIVACY

The Company recognises the importance of Shareholder's privacy. To ensure the privacy, the Company will not disclose details of any of the Shareholders unless it is required to do by law.

INTERACTION WITH OTHER POLICIES

The Company will ensure that this Policy, in conjunction with the Securities Trading Policy, is complied with by all Representatives at all times.

POLICY BREACH

Breaches by any Challenger employee of this Policy and any other internal guidance, policy or document supporting this Policy may result in disciplinary action, including dismissal if deemed appropriate in more serious instances.