



A.B.N. 64 063 656 333

Vietnam Industrial Investments Limited
POLICIES MANUAL

CORPORATE DISCLOSURE

Continuous Disclosure to ASX

The Company's shares are listed on the ASX and as such the Company is required to comply with the continuous disclosure requirements set out in the ASX Listing Rules. The Chief Executive Officer ("CEO") (or Managing Director) is responsible for interpreting the Company's policy and where necessary informing the Board. The Company Secretary is responsible for all communications with the ASX. Such matters are advised to the ASX on the day they are discovered and all senior executives are responsible for monitoring the Group's internal and external environment for information or events potentially requiring disclosure. The CEO or Managing Director reports to the Board of Directors any information concerning the Company that a reasonable person would expect to have a material effect on the price or value of the Company's securities.

The general rule, in accordance with ASX Listing Rule 3.1, is that once the Company 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 Company's securities, the Company must immediately disclose that information to the ASX.

In order to ensure that the Company meets its obligations with regard to the continuous disclosure requirements, the Company has adopted a Continuous Disclosure Policy.

The Continuous Disclosure Policy sets out the Company's obligations and its policies and procedures to ensure timely and accurate disclosure of price sensitive information to the market.

POLICY

The Policy

The following procedures will apply to safeguard against breaches of VII's continuous disclosure obligations:

- (a) directors and senior management must immediately notify the CEO (or Managing Director) and/or the Company Secretary as soon as they become aware of information that should be considered for release to the market (material information which is disclosable);
- (b) the CEO (or Managing Director) and/or Company Secretary will:
 - (i) review the material information reported;
 - (ii) determine, in consultation with all necessary parties as appropriate, whether any of the material information is required to be disclosed to the ASX; and
 - (iii) co-ordinate the actual format of disclosure with the relevant members of management.
- (c) in determining whether any of the material information is required to be disclosed, the CEO (or Managing Director) and/or Company Secretary shall take into consideration the safeguarding of confidential corporate information to avoid premature disclosure.
- (d) Where a decision is made, that the item or information does not warrant an ASX release, the CEO (or Managing Director)/Company Secretary is to advise directors of the rationale for the decision.



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Persons to Whom this Policy Applies

This policy applies to:

- * all directors of VII and its consolidated entities;
- * all members of senior management; and
- * all employees.

Obligations

- (a) As soon as you become aware of information that:
- * is not generally available (ie. the information in question has not been included in any Annual Report, ASX Release or other publication of the Company); and
 - * which may be price sensitive (ie. it is likely to have a financial or reputation impact upon the Company that may be considered material).

you must provide the CEO (or Managing Director) and/or Company Secretary with all necessary information to ensure that the matter is disclosed appropriately to all required parties.

- (b) in order that you can comply with your obligations under paragraph 5.3(a), you must ensure that you implement such procedures as you consider appropriate to ensure if any person who reports to you becomes aware of or is in possession of information that is not generally available and/or which may be price sensitive, that person will promptly notify you of such information.

Market Speculation and Rumours

The ASX interprets Listing Rule 3.1 as requiring VII to make a clarifying statement or announcement to the ASX in circumstances where VII becomes aware that speculation or comment is affecting the price or volume of trading in VII securities.

For example, when the market moves in a way that appears to be referable to the comment or speculation, VII has an obligation to make such disclosure as is necessary in order to correct a false market in VII securities and ensure investors are not trading on false or misleading information. Normally the ASX will indicate to VII when it believes this is required.

Review of Announcements

The Company's protocol in relation to the review 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) All members of the Board are required to seek to provide to the Managing Director (or in his/her absence, the Company Secretary) with verbal or written contribution of each key announcement, prior to its release.
- (c) 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.
- (d) The Managing Director (and in his/her absence, the Chairman) is to be given the final signoff before release to the ASX of the announcement.



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Release of Information to Others

VII must not release material price sensitive information to any person if that information is required to be disclosed to the ASX, until cleared by the ASX. The CEO (or Managing Director) and/or the Company Secretary or a nominee of the CEO (or Managing Director)/Company Secretary will advise all relevant parties when the ASX release has been announced by the ASX. All the information disclosed through ASX is to be promptly placed on the Company's investor website after clearance by ASX. The Company Secretary is to maintain a copy of all announcements released.

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.

Presentations/Enquiries

For all information/presentations/briefings etc. which are to be provided to third parties, each individual is responsible for ensuring that a copy of the material is provided to the CEO (or Managing Director) and/or the Company Secretary prior to presenting that information externally.

All inquiries from third parties must be referred to the CEO (or Managing Director) and/or the Company Secretary. All material presented at an analyst briefing, bank or other third party must be approved by or referred through the CEO (or Managing Director) and/or the Company Secretary prior to the briefing.

All inquiries from the media must be referred to the CEO (or Managing Director) and/or the Company Secretary.

Interview by Employees

No employee may give an interview or make a presentation unless express authority or specific permission is received from the CEO (or Managing Director).

An employee who is given permission by the CEO (or Managing Director) to give an interview or make a presentation must notify the CEO (or Managing Director) and/or the Company Secretary of the date and time for the interview and must give a copy of any presentation to the CEO (or Managing Director) and/or the Company Secretary.

MANAGEMENT OF THE POLICY

Specific Responsibilities

The CEO (or Managing Director) and/or the Company Secretary is responsible for:

- (a) liaising with the ASX in relation to continuous disclosure issues;
- (b) ensuring that the system for the disclosure of all material information to the ASX in a timely fashion is operating;
- (c) reviewing proposed announcement by VII to the ASX and liaising with the CEO (or Managing Director) or other members of the executive or Chairman in relation to the form of any ASX release;



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- (d) liaising with the Board of Directors, as appropriate, in relation to the disclosure of information;
- (e) keeping a record of all ASX and other releases that have been made; and
- (f) periodically reviewing VII's disclosure procedures in light of changes to ASX Listing Rules or Corporations Act and recommending any necessary changes to the procedures.

Effective Date: 13 November 2017