

# COPPERMOLY LTD

## CONTINUOUS DISCLOSURE POLICY

The continuous disclosure policy requires all Directors, employees, consultants and contractors to inform the Managing Director or in his absence the Company Secretary of any potentially material information as soon as practicable after they become aware of that information.

Information is material if it is likely that the information would influence persons who commonly invest in securities in deciding whether to subscribe for, buy or sell or hold the Company's securities.

Information need not be disclosed only if the ASX listing rules provide for non-disclosure. In the event of a Disclosure Document (prospectus, etc) a different standard of disclosure applies and no ASX "carve-outs" apply.

The obligation to keep "management" fully informed of any significant internal issue relating to or affecting the Company is central to the training and development of all Coppermoly employees, contractors and consultants.

Senior personnel, in particular, must have clearly understood and documented accountability to:

- A. Ensure that all reporting staff report any "material" event or development within their area of responsibility to their manager as soon as practicable. The manager is to ensure that any material event or development is communicated to one or more of the Managing Director and Company Secretary.
- B. Ensure that each department or work area within his or her division or area of responsibility carries out, or is involved in, a review to discuss and agree upon the types of events or developments that are most likely to be "material" and potentially disclosable; and
- C. Report immediately any event or development that he or she believes may be potentially disclosable.

Company personnel are not responsible for determining whether or not information is disclosable; rather, each affected individual must ensure that the information is known by his or her manager and the Managing Director or Company Secretary.

The Managing Director is responsible for interpreting and monitoring the Company's disclosure policy and where necessary informing the Board. The Company Secretary is responsible for all communications with ASX.

Disclosure to the ASX is effected by sending the information for release to ASX's Company Announcements Platform via lodgment of a PDF on-line at the ASX website. The information is then released to the market. All relevant announcements and other information are placed on the Company's website.

The Company's Directors, employees, contractors and consultants are also required to ensure that information concerning the Company, that would be material to its share price, is not released to shareholders, media or other parties until it has been given to the ASX and has received an acknowledgement from ASX that it has released the information to the market (Listing Rule 15.7).

The Company monitors the share price movements of the Company to identify any unusual fluctuations which may signal a possible leakage of Disclosure Material not already disclosed to the market through ASX.

Information need not be disclosed only if the ASX listing rules provide for non-disclosure.

It is a Company Policy that only Directors or the Company Secretary should attend to enquiries from the media or shareholders.



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Peter Swiridiuk  
Managing Director

18 November 2009

Reviewed at Board Meeting held on 18<sup>th</sup> November 2009.