

### Continuous Disclosure Policy of Beston Global Food Company (BGFC or the Company)

#### Introduction

Once listed on the ASX, BGFC is committed to complying with its continuous disclosure requirements with the ASX Listing Rules and the Corporations Act to ensure the Company discloses to the ASX any information concerning the Company which is not generally available and which a reasonable person would expect to have a material effect on the price or value of the Company's shares.

The purpose of this Policy is to assist employees, particularly executives, officers and managers, to understand BGFC's continuous disclosure obligations and to set out the procedures that must be followed for the release of information to the ASX, the investment community, the media and the public. It is important that all employees with access to information which may have a material effect on the price or value of BGFC's shares read, understand and abide by this policy.

#### Continuous Disclosure Obligation

The ASX Listing Rules require BGFC, if it becomes aware of any information concerning BGFC that a reasonable person would expect to have a material effect on the price or value of BGFC's securities, to immediately disclose that information to the ASX.

Disclosure is not required where:

- a reasonable person would not expect the information to be disclosed, **and**
- the information is confidential and the ASX has not formed the view that the information has ceased to be confidential, **and**
- one or more exceptions applies. These exceptions include where the information relates to an incomplete proposal or negotiation, comprises matters which are not sufficiently definite to warrant disclosure, is a trade secret or is generated for internal management purposes.

#### Employee Becoming Aware of Information

Where an employee becomes aware of information which is not generally available and which the employee believes may have a material effect on the price or value of BGFC's shares, the employee must immediately inform the either the Executive Chairman or Company Secretary of this information.

#### Disclosure of Information

The following procedures are to be followed when any information concerning BGFC is being considered for disclosure to the ASX:

- The information is to be referred to and reviewed by the Executive Chairman and the Company Secretary, unless they have formally delegated these powers to another Director or executive officer, in which case it would be their delegates.

## Continuous Disclosure Policy

- The Executive Chairman and Company Secretary are to determine whether or not BGFC's continuous disclosure obligations require the information to be disclosed to the ASX. In appropriate circumstances, they may consult the other Directors.
- Announcements relating to significant matters such as results, guidance to the market, major acquisitions or divestments or other corporate matters which involve significant financial or reputational risk should be referred to the Board for approval (provided it is feasible to do so having regard to BGFC's continuous disclosure obligations).
- The Company Secretary is to immediately disclose the information to the ASX when it is determined that the continuous disclosure obligations require such disclosure.
- All information which is disclosed to the ASX is to be placed on BGFC's website and electronically disseminated to the media and database lists immediately following confirmation from the ASX of receipt of the disclosure.

### **Communications with the ASX**

All communications regarding disclosures between BGFC and the ASX, and the actual making of disclosures by BGFC to the ASX, are to be conducted by the Company Secretary or an authorised representative of the Company Secretary. No other employee of BGFC is authorised to deal or otherwise communicate with the ASX on disclosure matters unless authorised to do so by the Executive Chairman.

### **Briefings and Presentations**

Information provided at briefings and presentations is subject to the continuous disclosure obligations. The following procedures are to be followed in relation to briefings and presentations:

- Material to be presented at a briefing/presentation is to be provided in advance to the Company Secretary to enable consideration to be given to whether any disclosure to the ASX is required.
- Where practicable, a briefing/presentation should be attended by at least two Company representatives. Where this is not possible, the person making the briefing/presentation is required to keep an appropriate file note or other record of the proceedings.
- Care must be taken in answering questions at the briefing/presentation to ensure that there is no disclosure of price sensitive information which has not been previously disclosed to the ASX. A question raised at the briefing should not be answered if it would result in the disclosure of price sensitive information that has not been previously disclosed to the ASX.

### **Rumours and market speculation**

Subject to its obligations under the ASX Listing Rules, BGFC will not generally comment on rumours or market speculation.