

POSTIE PLUS LIMITED

**COMMUNICATIONS AND DISCLOSURE POLICY  
(As adopted by the Board on 22 October 2009)**

**1. INTRODUCTION**

**1.1 TYPE OF INFORMATION TO BE DISCLOSED**

As soon as Postie Plus Limited (“the Company”) is aware or becomes aware of 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 Company will immediately tell the NZX that information, unless the information is subject to the disclosure exceptions set out in the NZX Listing Rules.

**1.2 DISCHARGE OF OBLIGATIONS**

In discharging this obligation, the Company will ensure that company announcements:

- Are made in a timely manner
- Are factual
- Do not omit material information
- Are expressed in a clear and objective manner that allows investors to assess the impact of the information when making investment decisions.

**2. APPROVAL FOR RELEASES**

**2.1 PERIODIC DISCLOSURE**

For all periodic disclosure items, the Managing Director will have responsibility for providing the Board with a draft of the required disclosure and will seek approval from the Board prior to submission.

**2.2 CONTINUOUS DISCLOSURE**

In the event that a matter arises which, in the opinion of a Director, the Managing Director, the Company Secretary or a member of Senior Management is, or could be, impacted by the disclosure requirements of the NZX Listing Rules, that matter shall be referred either to the Company Chairman, the Managing Director or the Company Secretary. The person to whom such matter is referred will ensure that the matter is considered and discussed at first instance between the Company Chairman, the Managing Director and the Company Secretary, with or without the benefit of advice from the Company’s internal managers or external advisers as considered necessary.

**2.2.1 IMMEDIATE ANNOUNCEMENT**

In the event that an immediate announcement to the NZX is required, the Managing Director in consultation with the Company Secretary shall an announcement to the NZX

provided that the Managing Director and Company Secretary shall take reasonable steps to send a copy of the announcement to the Chairman, or otherwise make the Chairman aware of the announcement, prior to its release to the NZX and ASX.

An announcement will only be considered immediate if this is prescribed by the NZX or Listing Rules.

#### 2.2.2 ALL OTHER ANNOUNCEMENTS

All other announcements, that are not immediately required, shall be drafted by the Managing Director or Company Secretary and submitted to the Company Chairman for approval and, if time permits, to all Directors for comment.

#### 2.2.3 RESPONDING TO EXCHANGE INQUIRIES

If an inquiry comes from the NZX requesting specific information, the answers must be provided to the NZX within the timeframes specified. Usually this will require an immediate response.

If the Managing Director or Company Secretary is not available to address the matter then the Chief Financial Officer will provide a draft response for approval by the Company Chairman, or in the event that the Company Chairman is not available, the Chairman of the Audit Committee or another Director.

#### 2.2.4 COPY OF ANNOUNCEMENT TO DIRECTORS

The Company Secretary shall ensure that all Directors are provided with a copy of all announcements as soon as possible after release.

### 3. DISCLOSURE SOLELY THROUGH EXCHANGE PLATFORM

It is the policy of the Company to ensure that first disclosure of market sensitive information to the public is solely through the NZX Company Announcements Platforms. Once disclosure has been made through the NZX the Company may use other means of distributing the information including through its website.

Enquiries from the media, market analysts or shareholders are to be referred, at first instance, to either the Company Secretary, the Managing Director, the Company Chairman. The Company's Investor Relations advisor may be consulted. It shall be the policy of the Company that no director or employee of the company shall disclose any material information about the company to the media or to market analysts, unless such disclosure has been previously disclosed via the NZX or been approved by the Managing Director or Company Chairman, or in their absence, by another member of the Board.

### 4. ONGOING COMMUNICATION AND MONITORING

The Company Secretary shall be the person responsible for communication with the NZX and ASX on all listing matters, including continuous disclosure.

It shall be the responsibility of the Company Secretary to ensure that an understanding of the Company's disclosure obligations as set out in this protocol is promoted within the Company at Board and Senior Management level.

The Company Secretary shall have responsibility for monitoring to ensure that the Company's continuous disclosure obligations are complied with and for ensuring that the Board is kept informed at all times in relation to any compliance issues in this regard.