

## Continuous Disclosure Policy and Communications Strategy

### 1. Introduction

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Imugene Limited (the Company) is listed on the Australian Securities Exchange (ASX) and is required to meet the requirements of ASX Listing Rule 3.1 (Continuous Disclosure) to keep the market informed of material events as they occur. This document describes the Company's policy on disclosing information in accordance with ASX Listing Rule 3.1. It also describes the Company's policy on communication with its shareholders and the market in general.

### 2. Communication to stakeholders

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This Policy provides that information will be communicated to shareholders and the market through:

- (a) the Annual Report which is distributed to shareholders (usually with the Notice of Annual General Meeting);
- (b) the Annual General Meeting and other general meetings called to obtain shareholder approvals as appropriate;
- (c) the Half-Yearly Directors' and Financial Reports;
- (d) Quarterly Activities and Cash Flow Reports; and
- (e) other announcements released to ASX as required under the continuous disclosure requirements of the Listing Rules and other information that may be mailed to shareholders.

### 3. Communication channels

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The Company will actively promote communication with shareholders through a variety of measures, including the use of the Company's website and email. The Company's reports and ASX announcements will be available for viewing and downloading from its website, [www.imugene.com](http://www.imugene.com), or the ASX website: [www.asx.com.au](http://www.asx.com.au) under ASX code "IMU".

The Board encourages full participation of shareholders at Annual General Meetings and general meetings and uses these meetings to assist shareholders in understanding the Company's objectives and strategies in relation to its business activities.

The Company's Annual Report is the main vehicle for communicating with shareholders on the activities and performance of the Company in the previous 12 months. The Annual Report will be posted on the Company's website and will be downloadable.

In accordance with the Listing Rules, the Company will notify the ASX immediately of information:

- (a) concerning the Company that a *reasonable person* would expect to have a *material effect* on the price or value of Imugene's securities; and
- (b) that would, or would be likely to, influence persons who commonly invest in securities in deciding whether to acquire or dispose of the Company's securities.

This also applies to information that the market requires to correct or prevent a false market where trading in the Company's securities occurs in the absence of material price-sensitive information; or on the basis of information that is inaccurate or misleading. In such a circumstance, and in compliance with the Listing Rules, Imugene will give the ASX the information needed to correct or prevent the false market.

#### **4. Determining "disclosable" information**

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In accordance with legal, statutory and ASX listing requirements (particularly Listing Rule 3.1), the Company will disclose all information concerning it, of which it is or becomes aware, that a reasonable person would expect to have a material effect on the price or value of its securities.

Information will be taken to have a material effect on the price or value of the Company's securities if a reasonable person would expect the information to, or be likely to, influence persons who commonly invest in securities in deciding whether or not to trade the securities.

The Managing Director and Company Secretary in consultation with the Chairman and/or Board, have responsibility for determining whether a particular piece of information is material or falls within the exception, otherwise the information should be provided to the ASX for a determination.

#### **5. Continuous disclosure compliance**

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The Board and Company Secretary has responsibility for:

- (a) ensuring employees (including Directors and Officers) receive a copy of this policy statement as well as a copy of Guidance Note 8 of the Listing

Rules, which highlights the general principles and obligations set out in Chapter 3 of the Listing Rules pertaining to Continuous Disclosure;

- (b) conducting education sessions for new staff members;
- (c) ensuring that the Company has an effective reminder system regarding the obligations of employees to notify the Managing Director or Company Secretary of matters that may be disclosable under this Policy, and to otherwise comply with this Policy. This may be via email, in staff meetings or by refresher courses conducted annually;
- (d) including in the reminder system a requirement that all staff members report potential breaches of this policy directly to the Company Secretary; and
- (e) ensuring that Company Officers are briefed in detail regarding the continuous disclosure regime.

## **6. Announcements**

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Imugene recognises that non-public, material information (which may include positive as well as negative information affecting the prospects for Imugene), must be released in a timely manner and when released, must be made broadly available to the market. Accordingly, all new material information in the first instance will be released to the ASX.

The procedure for the release of ASX announcements is as follow:

- (a) the Board shall review and provide written approval to the Company Secretary in respect of all key announcements prior to release to the market;
- (b) any relevant parties named in the announcement shall review for factual accuracies in respect of information attributable to them and provide written consent for inclusion of the names in the announcement to the Company Secretary;
- (c) the Managing Director (or in his absence the Chairman) is to give the final sign-off before release to the ASX;
- (d) all announcements are to be released electronically by the Company Secretary; and
- (e) all announcements released are to be posted on the Company website as soon as practicable; and

As a policy matter, Imugene will not comment on rumours unless, in the circumstances, this would amount to a breach of Listing Rule 3.1B or other applicable laws.

## **7. Dealing with the media and analysts**

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All media enquiries relating to Imugene are to be coordinated by the Managing Director, in consultation, with the Chairman. Media comment will be made only by the Chairman or Managing Director or other authorised Company spokesperson.

The Managing Director in consultation with the Chairman will approve all press releases referring to material issues prior to release.

Imugene will actively seek to provide private briefings to analysts, institutions and stockbrokers to enhance their understanding of the Company. However, these private briefings must not involve the disclosure of price-sensitive information. If any new information is provided in the presentation, a copy must be lodged with the ASX prior to that meeting. If price-sensitive information is inadvertently disclosed at a private briefing, then the information must be announced to the ASX as soon as practicable.

If an analyst asks a question at a private briefing which touches on a price-sensitive area, then the Imugene spokesperson can only use publicly available information in the answer. Where this is not possible, then the Imugene spokesperson should decline to answer the question or take it on notice and answer it after a general disclosure to the ASX has been made. As such, at any private briefing at least two executives should be present and a detailed record of the meeting be taken.

In respect of telephone conversations with investors, analysts and the media, a record should be made of the conversation.

## **8. Dealing with shareholders**

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Imugene will use annual general and other general meetings to communicate with shareholders about its financial performance and business strategy. At all shareholder meetings, Imugene will actively encourage and allow a reasonable opportunity for shareholder participation.

In all other cases, depending on the nature of the enquiry, the Managing Director, Company Secretary or Share Registry will deal with private shareholder enquiries.

## **9. Disclosure of information**

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This policy will be made available, and updated as required, on the Company's website in a clearly marked corporate governance section.