CONTINUOUS DISCLOSURE POLICY

1. INTRODUCTION

MOD Resources Limited (the "**Company**") is listed on both the Australian Securities Exchange ("**ASX**") and on the London Stock Exchange's Main Market. Accordingly, the Company is obliged to comply with the continuous disclosure regimes of both Australia and the United Kingdom.

In Australia, the continuous disclosure obligations are governed by the *Corporations Act 2001* (Cth) ("**Corporations Act**") and the Listing Rules of ASX ("**ASX Listing Rules**"), and in the UK they are governed by the European Union Market Abuse Regulation (596/2014) ("**MAR**") and the relevant provisions of the UK's Disclosure Guidance and Transparency Rules sourcebook ("**DTR**"). In the context of a takeover offer, or potential takeover offer, for the Company, including any approach from a third party that could lead to such an offer, regard should also be had to the takeover provisions of the Corporations Act as these contain additional requirements and restrictions in relation to announcements and the disclosure of inside information. These specific requirements and restrictions are not covered in this disclosure policy.

The purpose of this Continuous Disclosure Policy is therefore to assist the Company and its directors to comply with the Company's continuous disclosure obligations of both regimes so as to provide the Company's shareholders, the ASX and the LSE with timely, direct and equal access to information issued by the Company and to promote investor confidence in the integrity of the Company and therefore to maintain an orderly market in its securities.

Compliance with this Policy is vital. Failure to comply with disclosure, insider dealing or other market abuse legislation could expose the Company and its directors and other management to severe and irreparable reputational damage, significant fines and/or public censure. Market manipulation and insider dealing can also result in criminal liability.

The requirements of both the Australian and UK regimes should be considered separately. If it is considered that information should be disclosed under the requirements of one regime then it should be disclosed to both markets, regardless of whether such disclosure would be required under the other regime. In certain circumstances there are discrepancies between the two regimes, and these are explained below.

Regard must also be had to the large difference in time zones between the UK and Australia – the times when announcements may be made to both exchanges simultaneously are therefore limited. Generally, announcements can be made in the UK between 0800 and 1630 London time; and in Australia, between 0830 and 1930 (2030 during daylight savings) Sydney time. This generally allows for simultaneous announcements at market opening in London.

2. ROLES AND RESPONSIBILITIES

Responsibilities of the Board

The Board bears the primary responsibility for the Company's compliance with its continuous disclosure obligations and is therefore responsible for overseeing and implementing this Policy. The Board makes the ultimate decision on whether there is any materially price sensitive information that needs to be disclosed. It should be a standing agenda item at all Board meetings to consider any information that must be disclosed in accordance with the Company's continuous disclosure obligations.

Responsibilities of the Disclosure Officers

The Board has appointed the Chief Executive Officer (or Managing Director) and/ or the Company Secretary ("**Disclosure Officers**") with the principal responsibility for the application of this Policy and dealing with matters of public disclosure.

The Disclosure Officers are responsible for communicating with ASX and LSE with respect to all continuous disclosure matters. The Disclosure Officers play an important role in the Company's continuous disclosure compliance program and is responsible for:

- maintaining, and monitoring compliance with this Policy;
- liaising between themselves, the Board, the ASX and LSE in relation to continuous disclosure issues (primarily Company Secretary);
- overseeing and coordinating disclosure of information to the ASX and LSE, analysts, brokers, shareholders, the media, and the public;
- ensuring that any disclosures of information are factual, complete, balanced (i.e. both positive and negative information is disclosed) and expressed in a clear and objective manner that allows investors to assess the impact of the information when making investment decisions;
- coordinating education within the Company about its continuous disclosure obligations and disclosure compliance program;
- reviewing information obtained through the Company's reporting systems to determine whether the information is materially price sensitive information;
- maintaining an accurate record of all announcements sent to ASX and the LSE and all correspondence with ASIC and the FCA in relation to the Company's continuous disclosure obligations.

If you have any questions about this Policy, are unsure what action to take or if you have concerns that some matter or development has occurred which may constitute inside information and require disclosure, you must immediately contact a Disclosure Officer or, if they are not available, the Chairperson. You must NOT publicly disclose potential inside information until you have consulted with a Disclosure Officer or, if they are not available, the Chairperson.

If no Disclosure Officer or the Chairperson is available, in an emergency you can contact the Company's advisers in the UK and Australia:

UK – Memery Crystal – Michael Dawes -+44 20 724 5905

Australia – DLA Piper Australia - Scott Gibson - +61 8 6467 6238

Full details of the Company's disclosure principles are set out in Section 6 below

3. ANNOUNCEMENT OF INSIDE INFORMATION

The starting point under both the Australian and the UK regimes is that, subject to certain limited exceptions, the Company has an obligation to announce 'inside information' that a reasonable person would expect to have a material effect on the price or value of the Company's securities to the markets immediately to ensure that the markets are operating in full knowledge of all material facts relating to the Company.

What is inside information?

Inside information is characterised as information:

- of a precise nature which is not generally available;
- that relates, directly or indirectly, to the Company's securities or related securities or derivatives (for example, share options); and
- if it were made public, would likely have a significant or material effect on the price or value of the Company's securities or related securities or derivatives, by having an influence on persons who commonly invest in securities in deciding whether to acquire or dispose of those securities.

Where there is a protracted series of events, for example identifying and negotiating a potential transaction, each intermediate step may of itself constitute inside information – the test is whether each particular intermediate step, by itself, satisfies the above criteria of insider information.

The following provides a guide as to the type of information about the Company that is likely to constitute 'inside information' and therefore require announcement. This is not an exhaustive list. The determination of whether certain information is material price sensitive information which requires announcements necessarily involves the use of judgement. There will inevitably be situations where the issue is less than clear.

If you consider that certain information may require disclosure, consult a Disclosure Officer or, if they are not available, the Chairperson, without delay. Only persons authorised by the Board are permitted to disclose such information.

Matters relating to the Company or its subsidiaries (the "**Group**") which may constitute 'inside information' include:

- drilling results;
- a material change in the quantum or nature of the Group's mineral resources and/or reserves;
- a change in the Company's financial forecasts or expectations. As a guide, a variation in excess of 10% may be considered material. If the Company has not made a forecast, a similar variation from the previous corresponding period may be considered material;
- granting or renewal of a material licence, or the loss of or challenge to a material licence;
- changes in the Board or senior management, including resignations or new appointments;
- fundraisings, including debt financing;
- mergers, acquisitions/divestments, joint ventures or other material changes to the Group's assets;
- significant developments in regard to new projects or ventures;
- receipt of any takeover offer or approach in relation to a potential takeover offer – although note in particular that this may also be subject to strict obligations under relevant takeover legislation, and advice must be sought before any announcement is made;
- major new contracts, orders, or changes in suppliers or customers, including any offtake or royalty arrangements;
- litigation or other legal proceeding by or against any member of the Group;
- allegation of any breach of the law, whether civil or criminal, by any member of the Group, or any regulatory investigation, including in relation to any environmental matter or

any bribery or corruption;

- natural disasters, accidents, outbreaks of hostilities or any regime change that may have particular relevance to the Group; or
- any material threat to the solvency or financial position of the Group, including any threat by the Group's creditors or the appointment of any insolvency practitioner.

Schedule 1 to this document summarises the analysis of whether information is 'inside information' and requires disclosure under MAR and the ASX Listing Rules.

In determining whether information constitutes inside information, the Disclosure Officers and Board (if applicable) should bear in mind that the significance of the information in question will vary widely from company to company, depending on a variety of factors such as the company's size, recent developments and the market sentiment about the company and the sector in which it operates.

Disclosure Obligations

The ASX Listing Rules require that once a 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, it must **immediately** (i.e. promptly and without delay) provide the ASX with that information, subject to certain very limited exceptions set out below.

In the UK, MAR requires that a company must inform the public of inside information which directly concerns that company by announcing it through a regulatory information service in the UK **as soon as possible**, and it must not disclose inside information selectively (i.e. only to a limited circle of people), again subject to certain very limited exceptions as set out below. The DTR specifically state that selective disclosure cannot be made to any person simply because they owe the company a duty of confidentiality.

The ASX also has an 'ASX first' policy – ASX Listing Rule 15.7 requires that a company must not release information that is for release to the ASX to anyone until it has given the information to the ASX, and has received an acknowledgement from the ASX that the information has been released to the market on the ASX Market Announcements Platform.

In practice this means that, where possible, the Company should aim to release announcements to both markets simultaneously. This may not always be possible where a material event occurs outside of ASX market hours but within LSE market hours. In such a case, although the Company has an obligation under the ASX Listing Rules to release material price sensitive information through the ASX Market Announcements Platform before it is released to anyone else, the ASX recognises that sometimes events will occur outside of the hours of operation of the ASX Market Announcements office which require an immediate public announcement. It is understood that if a company has a pressing commercial or legal need to make a market sensitive announcement outside of the hours of operation of the ASX Market Announcements office, for example because of a regulatory obligation to announce to the LSE, provided the Company gives a copy of the announcement to the ASX Market Announcements office at the same time as it makes the announcement, so that it is queued for processing by the ASX Market Announcements office before the ASX next opens for trading, the ASX will generally not take any action against the entity for infringing ASX Listing Rule 15.7.

The overarching requirement is therefore that inside information must be disclosed to the relevant stock exchanges first. The Company should establish effective arrangements to deny access to inside information to persons other than those who require it for the exercise of their functions within the Company.

Selective Disclosure

Under MAR, depending on the circumstances, a company may be justified in selectively disclosing inside information to certain categories of recipient who require the information to perform their functions – for example, the company's professional advisers and counterparties to negotiations – provided they are under a duty of confidentiality. Selective disclosure cannot be made to a person simply because they owe the Company a duty of confidentiality – they must also require the information to perform their functions.

If a company makes a selective disclosure, to demonstrate compliance with the requirements of MAR the company should document the nature of the duty of confidentiality on which it is relying in releasing inside information. If the confidentiality obligation is not set out in writing, the company may wish to record the terms and, if appropriate, nature of the obligation. In addition, the company should record the rationale for such disclosure, specifically noting the necessity for such disclosure and how the disclosure of such information assists the company in the context of the particular matter. **Professional advice should be obtained in advance.**

In Australia, selective disclosure may be made under appropriate obligations of confidentiality and restrictions on dealing to ensure that the insider trading requirements under the Corporations Act are not breached. **Again, professional advice should be obtained in advance.**

You should always bear in mind that the more people inside information is selectively disclosed to, the higher the risk of a leak that would require a full public announcement.

Confidential Information and Delaying Disclosure

In certain limited circumstance the announcement of inside information may be delayed on the ASX and the LSE. Although the detail of the provisions of MAR and the ASX Listing Rules are different, the overall circumstances under which disclosure may be delayed are broadly the same in practice.

In the UK, under MAR disclosure of inside information to the public may only be delayed if **all** of the follow conditions are met:

- immediate disclosure is likely to prejudice the Company's legitimate interests;
- delaying the disclosure is not likely to mislead the public; and
- the Company is able to ensure the confidentiality of the information.

If any one of these three conditions ceases to apply then disclosure will be required.

In addition, if a company is faced with an unexpected and significant event, MAR allows for a short delay where necessary to clarify the situation (i.e. rather than hurrying out an incomplete or inaccurate announcement).

In Australia, under the ASX Listing Rules immediate disclosure may only be delayed if **all** of the following are satisfied:

- a reasonable person would not expect the information to be disclosed;
- the information is confidential and ASX has not formed the view that the information has ceased to be confidential; and
- one or more of the following applies:
    - it would be a breach of a law to disclose the information;
    - the information concerns an incomplete proposal or negotiation;

- the information comprises matters of supposition or is insufficiently definite to warrant disclosure;
- the information is generated for internal management purposes of the Company; or
- the information is a 'trade secret.'

As the Company is listed on both the LSE and the ASX, to delay disclosure the Company would need to satisfy the requirements of both regimes – it could not, for example, delay disclosure to the ASX but release it to the LSE.

Non-exhaustive guidance has been published on legitimate situations where disclosure may be delayed under MAR, and in most circumstances it is likely that these situations would also satisfy the ASX Listing Rules requirements for delayed disclosure:

- incomplete and confidential negotiations are being conducted which would likely be jeopardised by immediate disclosure – e.g. in relation to a potential acquisition or fundraising; or
- the company's financial viability is in grave and imminent danger, although not yet within the scope of insolvency law, and immediate disclosure would seriously prejudice the conclusion of rescue operations.

Conversely, delayed disclosure is considered likely to mislead the public, and therefore not be permitted in either jurisdiction, where the relevant inside information:

- is materially different to a previous announcement on the subject;
- regards the fact that the issuer's previously announced financial objectives are not likely to be met; or
- is in contrast to market expectations based on previous communications.

Under MAR, a company must keep a record of the time and date of its decision to delay disclosure. Where a company has delayed disclosure, immediately after the information is disclosed to the market it must immediately inform the Financial Conduct Authority ("**FCA**") that the information was delayed using the form available on the FCA's website[1], and, if requested by the FCA, provide the FCA with the reasons for why it was delayed.

The guidance in DTR2 provides that a short delay in disclosure may be acceptable if it is necessary to clarify the situation where a company is faced with an unexpected and significant event. DTR2 also requires a Company that has delayed the disclosure of inside information to prepare a holding announcement, to be released where the company believes that there is danger that inside information will leak before it is formally disclosed. To that end, the company must monitor for rumours or leaks. Any holding announcement should detail as much of the subject matter as possible, set out the reasons for why a fuller announcement cannot be made and include an undertaking to announce further details as soon as it is possible for the company to do so.

Under the ASX Listing Rules, as the requirement is to make an announcement to the ASX 'immediately' (i.e. promptly and without delay), if the information in the draft holding announcement is not sufficient to inform the market adequately, or where insufficient information is available to prevent securities trading on an uninformed basis, the Company may need to request a trading halt in its securities to allow sufficient time to prepare the appropriate form of announcement.

[1] https://marketoversight.fca.org.uk/electronicsubmissionsystem/MaPo_DDII_Introduction.

Dealing with Rumours

Where there is speculation or rumour in the market, for example in the press, regarding a company, that company is expected to carefully assess whether the speculation or rumour has given rise to a situation where the company has inside information that requires disclosure. Amongst other things, the company will need to consider whether confidentiality can still be ensured – if it can't, then an announcement will likely be required. A policy of 'no comment' would not suffice.

If ASX considers that there is, or is likely to be, a false market in a company's securities, and requests information from the company to correct or prevent the false market, the company must give ASX the information needed to correct or prevent the false market.

Only authorised spokespersons may make statements on behalf of the Company in relation to market rumours or speculation. Any person within the Company should report market speculation or rumours to the Disclosure Committee immediately.

Dealing with analysts

The Company must not give analysts or other select groups of market participants any non-public materially price sensitive information at any time, such as during analyst briefings, when responding to analysts' questions or when reviewing draft analyst research reports. The Company may clarify or correct any errors of interpretation that analysts make concerning already publicly available information, but only to the extent that the clarification or correction does not itself amount to giving the analyst non-public materially price sensitive information (such as correcting market expectations about profit forecasts). Any non-public materially price sensitive information that may be inadvertently disclosed during dealings with analysts should be immediately disclosed to the market.

All information given to analysts at a briefing, such as presentation slides, and any presentation material from public speeches given by Board members or members of management that relate to the Company or its business should also be given to the Disclosure Committee for immediate release to the market and posted on the Company's website. The information must always be released to the market before it is presented at an analyst or investor briefing.

Review of analyst reports

If requested, the Company may review analyst reports. The Company's policy is that it only reviews these reports to clarify historical information and correct factual inaccuracies (provided this can be achieved using information that has been disclosed to the market generally).

No comment or feedback will be provided on financial forecasts, including profit forecasts prepared by the analyst, or on conclusions or recommendations detailed in the report. The Company communicates this policy whenever asked to review an analyst report.

4. MARKET SOUNDINGS

A 'market sounding' (also known as 'wall crossing') is where a company or its advisers disclose inside information (for example, in relation to a potential transaction) to selected persons, prior to the formal announcement of that inside information, to gauge the interest of recipients in the potential transaction. For example, potential investors may be approached to gauge their interest in a possible fundraising or a potential acquisition that might require shareholder approval. Under MAR the 'market sounding' regime provides a 'safe harbour' from the offence of unlawful selective disclosure of inside information.

A person will fall into the MAR safe harbour provided the following conditions are met:

- the consent of the receiving party to receive the inside information is granted;

- the receiving party is notified of the prohibition on him using that information, on his own account or for the account of a third party, either actively or passively, in relation to company securities and related instruments; and
- the receiving party is notified of his obligation to keep the information confidential.

The company must retain written record of all instances of market soundings on its behalf in prescribed forms.

MAR is very prescriptive on the requirements for falling within the market soundings safe harbour, and typically a company would only conduct market soundings via its broker or other professional advisers, who will have detailed scripts to ensure that the regulatory requirements are adhered to. Accordingly, the Company and its directors should not seek to engage in market soundings – i.e. the selective disclosure of any inside information - without first taking professional advice.

The Corporations Act does not have an equivalent 'safe harbour' provision. However, in Australia market soundings can be conducted under appropriate obligations of confidentiality and restrictions on dealing to ensure that the insider trading requirements under the Corporations Act are not breached. **Again, professional advice should be obtained in advance.**

You also need to be very careful about the extent of the inside information disclosed during a market sounding. This should be kept to the minimum necessary. Where inside information is disclosed to an investor during a market sounding that investor cannot deal in the Company's securities until that inside information has been 'cleansed' – i.e. either it has been publicly announced, or it has ceased to be inside information. The information may cease to be inside information where, for example, it concerned a potential fundraising which the company has subsequently decided not to pursue. However, if other inside information was disclosed at the same time, or if the reason for abandoning the fundraising itself constitutes inside information, the recipient may still be an insider. It is therefore very important to carefully plan, and agree with advisers in both jurisdictions, what information will be disclosed in a market sounding, and to avoid a situation where the Company finds itself obliged to publicly announce information prematurely, which it might otherwise be permitted to delay disclosure of, because investors don't want to remain insiders.

5. INSIDER LISTS

As well as properly disclosing inside information, the Company must also restrict access to inside information to those who strictly need to access it within the Group. The Company will therefore maintain a permanent insider list for those directors, employees and other agents acting on its behalf who have access to inside information.

Along with a permanent insider list for the Company's employees with access to inside information on a day to day basis pursuant to their employment duties, the Company will maintain specific insider lists in relation to certain events or deals. The Company will take all reasonable steps to ensure that all persons on either the permanent insider list or a specific insider list provide acknowledgement in writing that they understand the responsibilities that arise due to their being on the lists.

Where requested, the Company must provide an insider list to the FCA 'as soon as possible' – which will be interpreted on the assumption that an insider list will be up-to-date at all times and that all previous versions are readily accessible.

In practice, the Company will want to consider how it will reproduce the insider list at any given moment and ensure that adequate procedures are put in place so that any request is directed to the right individual who can access the insider list and provide a copy.

Further details on the Company's obligations to maintain insider lists are set out in the Company's MAR Handbook provided by Memery Crystal.

6. DISCLOSURE PRINCIPLES

Set out below is a summary of the Company's disclosure principles, based on the information in the preceding sections.

Procedure for notifying possible inside information

If an event or issue or any other information that may be inside information is identified, it should be notified to a Disclosure Officer (or, failing them, the Chairperson) as soon as possible.

The fact that it may not be easy to work out whether the information will have a significant effect on the Company's share price, or that the information is uncertain (e.g. because events are changing or are unclear), should not delay this notification. Similarly, there should not be a delay in providing information on one part of the Group's business where it is uncertain as to whether or not it may be material to the whole Group, for example information from another part of the Group is not yet available.

The Disclosure Officer will to determine the significance of the event or issue and to form a view as to whether or not an announcement must be made. Where the information provided is uncertain or unclear, as much information as possible should be provided to help the Disclosure Officer to reach a view on it and updates should be provided promptly as more information becomes available.

Use of external advisers

Where the Disclosure Officer is uncertain about the need for an announcement or its timing, they should seek advice from the Company's external legal advisers. A record should be kept of the advice and reasons for the conclusion. The principal legal advisers are:

UK – Memery Crystal – Michael Dawes -+44 20 724 5905

Australia – DLA Piper Australia - Scott Gibson - +61 8 6467 6238

Drafting the announcement

A Disclosure Officer and the Company Secretary will co-ordinate the drafting of any relevant announcement, or holding announcement, as soon as practicable. The FCA expects there to be minimal delay between inside information being identified and an announcement being made unless a delay is permissible under MAR, whilst the ASX expects inside information to be disclosed immediately, i.e. promptly and without delay, unless a delay is permissible under the ASX Listing Rules. The circumstances under which an announcement can be delayed are set out in Section 3 above, but it will be for the Board and the Company's advisers to determine whether the delay of an announcement is permitted under MAR and the ASX Listing Rules.

Any announcement should be correct and complete. Unless it is a holding announcement, it should give the full story and not omit any material fact or anything likely to affect what is said. Board input will only be required in respect of matters that are clearly within the reserved powers of the Board (and responsibility for which has not been delegated to management) or matters that are otherwise of fundamental significance to the Company.

Approval and release of the announcement

Announcements that are not required or deemed necessary to be approved by the Board, are the responsibility of the Disclosure Officers and should be circulated to the Board for their information prior to or after the announcement has been made.

When Board approval is required, draft announcements should be circulated to the Board as soon as practicable.

Periodic reporting should be circulated to the Board for review as follows:

- Annual Financial Report – at least five business days before scheduled approval by the Board;
- Half Year Financial Report – at least four business days before scheduled approval by the Board; and
- Quarterly Activities Reports – at least three business days before scheduled release to the market.

Subject to the following paragraph, for matters reserved or the be considered by the Board, formal Board approval in the form of minutes / written resolution is not required before the announcement is released to all stock exchanges. However, it is expected that all Board members will be sent a copy of the proposed final (or near final) news release and should then reply back in writing to the person circulating the draft release (if this is not possible, then confirmation by phone or text message will suffice).

However, formal Board approval in the form of minutes / written resolution is required if:

- Required by law;
- Required by the ASX Listing Rules or DTRs;
- Required by a standing order or policy of the Company; or
- Requested by the Chair; CEO or Company Secretary.

Where an announcement is to be considered and approved by the Board, the Company Secretary, the Chief Financial Officer (where applicable) and the CEO must ensure that the Board is provided with all relevant information necessary to ensure that it is able to fully appreciate the matters dealt with in the announcement.

In the event that an announcement that would ordinarily require Board approval must immediately be disclosed to the market in order for the Company to comply with its continuous disclosure obligations under all relevant stock exchanges the Company is listed on, all reasonable effort must be made to have the announcement urgently considered and approved by the Board prior to release (and in particular, seek input from the Chairman of the Company).

However, if such approval cannot be obtained in advance, the procedure for making disclosures without Board approval as set out above is to be followed to ensure compliance with the Company's continuous disclosure laws and obligations. The announcement must then be considered by the Board at the first possible opportunity following its release to determine what, if any, further steps need to be taken by the Company.

Announcements in the UK are released through the regulatory news service ('**RNS**') and in Australia, through the ASX Market Announcements Platform. Generally, announcements can be made in the UK between 0800 and 1630 London time; and in Australia, between 0830 and 1930 (2030 during daylight savings) Sydney time. Outside of these hours, announcements can be submitted to the relevant platform and are embargoed until the market opens.

Ideally, announcements would be released at the same time on both ASX and LSE. Although the Company has an obligation under the ASX Listing Rules to release material price sensitive information through the ASX Market Announcements Platform before it is released to anyone else, the ASX recognises that sometimes events will occur outside of the hours of operation of the ASX Market Announcements office (either in Australia or overseas) which require an immediate public announcement. If a company has a pressing commercial or legal need to make a market sensitive announcement outside of the hours of operation of the ASX Market Announcements office, for example because of a regulatory obligation to announce to the LSE, provided the Company gives a copy of the announcement to the ASX Market Announcements office at the same time as it makes the announcement, so that it is queued for processing by the ASX Market Announcements office before markets in Australia next open for trading, ASX will generally not take any action against the company for infringing ASX Listing Rule 15.7.

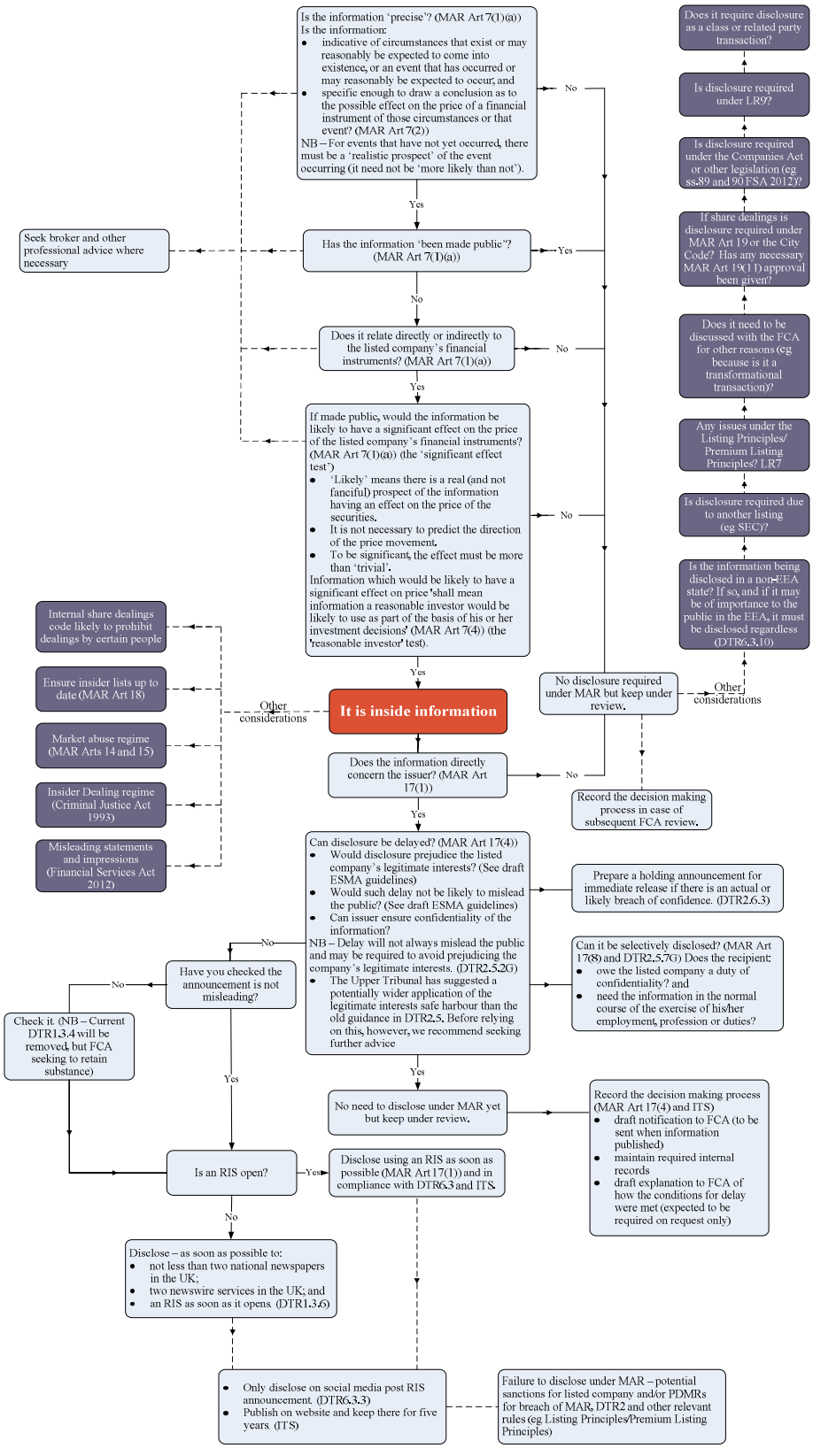
Accordingly, where the Company is obliged in one jurisdiction to make an immediate announcement, but the market is closed in the other jurisdiction, the Company should announce immediately to the market that is open and queue the announcement for release in the other jurisdiction as soon as its market opens.

Announcements must also be posted on the Company's website, allowing access free of charge on a non-discriminatory basis, no later than close of the business day following the day of release, and must be retained for five years. The inside information must be kept in an easily identifiable section of the website, organised in chronological order with the date and time of disclosure clearly indicated.

Memery Crystal LLP
2 November 2018

SCHEDULE 1

UK - Does information need to be disclosed under MAR?



Australia - Does information need to be disclosed under the ASX Listing Rules?