



Star Combo Pharma Limited

ACN 615 728 375 (Company)

Continuous Disclosure Policy

Why does Star Combo have this Policy?

Star Combo must make timely and balanced disclosure of all matters that a reasonable person would expect to have a material effect on the price or value of Star Combo securities. Star Combo wants to promote fair markets, honest management and full and fair disclosure.

The purpose of this Policy is to:

- (a) summarise Star Combo's disclosure obligations;
- (b) explain what information needs to be disclosed;
- (c) identify who is responsible for disclosure; and
- (d) establish a framework to enable Star Combo to provide shareholders and the market with timely and balanced disclosure of relevant information about Star Combo.

Who is covered by the Policy?

This Policy applies to all of Star Combo's Directors and Employees.

Failure to comply strictly with this Policy may result in serious civil or criminal liability for Star Combo and its officers and could damage Star Combo's reputation. If you fail to comply with this Policy, it may lead to disciplinary action being taken against you, including removal or dismissal in serious cases.

You are not permitted to comment publicly on matters confidential to Star Combo.

You need to be aware of your obligation to keep non-public information about Star Combo confidential.

You must preserve the confidentiality of any price-sensitive information concerning Star Combo that you have. Disclosure of price-sensitive information must occur only in accordance with this Policy.

In some circumstances, you may be asked to sign a confidentiality agreement.

What has to be announced to the market?

Star Combo has continuous disclosure obligations under the Corporations Act and the Listing Rules, in addition to periodic and specific disclosure obligations.

Star Combo must immediately tell ASX any information concerning Star Combo of which Star Combo becomes **aware** that a reasonable person would expect to have a **material effect** on the price or value of Star Combo securities (**price-sensitive information**).

When is Star Combo aware of information?

Star Combo is **aware** of information if you have (or ought reasonably to have) come into possession of the information in the course of performing your duties as a Director or Employee.

A reasonable person would expect information to have a **material effect** on the price or value of Star Combo's shares if the information would, or

would be likely to, influence anyone who commonly invests in Star Combo's shares in deciding to buy or sell them.

Price-sensitive information may come from Star Combo's internal activities or from external sources, such as a business in which Star Combo invests or a court decision, as long as it 'concerns' Star Combo.

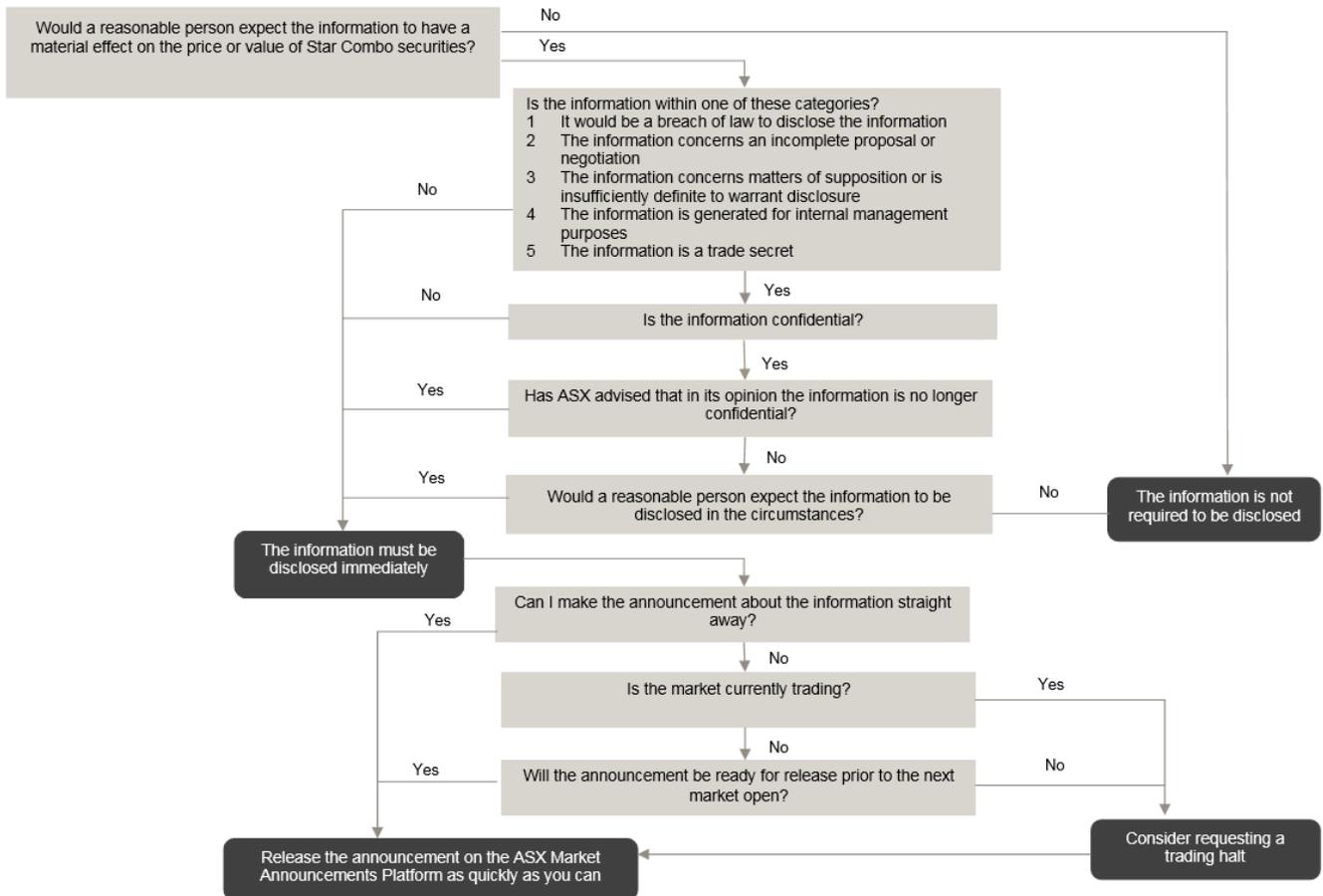
Annexure A sets out some examples of the kinds of **price-sensitive** information that Star Combo may have to disclose.

Does all information have to be announced?

Star Combo does not have to announce price-sensitive information if, and only if, each of the three following conditions is and remains satisfied:

- (a) One or more of the following five situations applies:
 - (i) it would be a breach of a law to disclose the information;
 - (ii) the information concerns an incomplete proposal or negotiation (for example, a negotiation to enter into a new contract);
 - (iii) the information comprises matters of supposition or is insufficiently definite to warrant disclosure;
 - (iv) the information is generated for internal management purposes;
 - (v) the information is a trade secret.
- (b) The information is confidential and ASX has not formed the view that it has ceased to be confidential (not in the public domain).
- (c) A reasonable person would not expect the information to be disclosed (for example, because the result of disclosure would be unreasonably prejudicial to Star Combo).

As soon as any one of the above three elements is no longer satisfied, for example if an incomplete proposal nears completion or information ceases to be confidential, Star Combo must disclose the information to ASX immediately.



Who is responsible for disclosing information?

What is the Disclosure Committee?

The Disclosure Committee is responsible for administering this Policy and is comprised of:

- the Chairman
- the CEO;
- the CFO; and
- the Company Secretary.

What does the Disclosure Committee do?

The Disclosure Committee is responsible for:

- (a) administering this Policy, monitoring its effectiveness and approving amendments to this Policy for recommendation to the Board;
- (b) ensuring that Star Combo complies with its disclosure obligations;
- (c) determining what information can or should be disclosed to the market;
- (d) overseeing and coordinating the disclosure of information to ASX, shareholders, analysts, stockbrokers, media and the public;
- (e) educating Directors and Employees (where appropriate) and raising awareness about this Policy;

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- (f) preparing (or overseeing the preparation of), reviewing and approving proposed external announcements, other than administrative or routine announcements, and consulting with appropriate members of the Board, management and external advisers where appropriate;
 - (g) implementing reporting processes and determining guidelines for materiality of information;
 - (h) ensuring that announcements relating to significant matters are referred to the Board; and
 - (i) approving the disclosure of information to ASX in relation to other matters.

In performing its functions the Disclosure Committee will act through such of its members as are reasonably available to perform the relevant function (whether one, two or three members on any occasion).

What is the Board's role?

The Board is responsible for approving this Policy and any amendments.

The Board must approve the text of all material announcements, including those relating to financial operating reports, financial projections, statements regarding future financial performance, changes to business strategy or other material updates.

The Board is responsible for monitoring compliance with Star Combo's continuous disclosure obligations.

What is the Company Secretary's role?

Administrative or routine ASX announcements may be prepared by the Company Secretary without requiring approval or formal consideration by the Disclosure Committee or the Board.

The Company Secretary is responsible for communication with ASX in relation to Listing Rule matters.

What should be included in ASX disclosure?

Where a decision is made by the Board or the Disclosure Committee to disclose information or to recommend disclosure of information, the Disclosure Committee must ensure that the information disclosed:

- (a) is balanced, factual and accurate; and
 - (b) is disclosed in accordance with the procedures set out in this Policy; and
 - (c) takes into account information previously disclosed by Star Combo to the market, including financial expectations, commentary on likely results and detailed business plans or strategies.
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Who should you report information you become aware of to?

If you become aware of information that is, or may be, price-sensitive, you should immediately refer that information to the Company Secretary or, if that is not possible, to another member of the Disclosure Committee.

How is information disclosed?

When must information be released to ASX?

Star Combo must immediately notify ASX of any undisclosed price-sensitive information in accordance with Star Combo's legislative and regulatory disclosure obligations and the procedures set out in this Policy.

If Star Combo becomes aware that information that should be released to ASX has become generally available or is available to a sector of the market, and that information has not been given to ASX, Star Combo must immediately give the information to ASX.

Disclosure of price-sensitive information to ASX must be made by Star Combo acting through the Company Secretary.

When can information be released to the public?

Star Combo must not publicly disclose price-sensitive information until that information has been given to ASX and Star Combo has received an acknowledgment from ASX that the information has been released to the market.

After an acknowledgment has been received from ASX, information disclosed in compliance with this policy should be provided by email to all directors and senior managers and promptly placed on Star Combo's website in the section containing investor information.

The Board may also determine that the disclosed information should be released to major news services and other news outlets.

Who is authorised to speak for Star Combo?

The number of Star Combo's authorised spokespersons will be kept to a minimum to avoid inconsistent communications and reduce the risk of material information being inadvertently disclosed to the market.

Only the following persons may act as Star Combo's authorised spokespersons:

- (a) the Chair, the CEO and the CFO;
- (b) on specific occasions, the Board may authorise other directors or executives to act as authorised spokespersons.

The Disclosure Committee must approve the content of all public comments proposed to be made by an authorised spokesperson.

Dealing with outsiders

What is insider trading?

It is unlawful for you to buy, sell or otherwise deal in Star Combo's shares while in possession of undisclosed price-sensitive information (for example, prior to the release of Star Combo's financial results).

It is also unlawful if you are in possession of undisclosed price-sensitive information, to encourage someone else to deal in Star Combo's shares or pass the information on to someone you know or suspect may use the information to do so.

Star Combo's policy on trading of Star Combo's shares is contained in Star Combo's Securities Trading Policy.

Can you speak to the media?

Only authorised spokespersons can speak to the media.

The Board may invite the media to attend Star Combo's presentations to investors and analysts.

How does Star Combo engage with analysts?

One-on-one and group briefings

Star Combo does not permit selective disclosure of material information. All investors are to be treated in a balanced and fair fashion. One-on-one and group briefings with investors or analysts will be restricted to discussion of previously disclosed information. If price-sensitive information is inadvertently disclosed at a briefing, Star Combo must immediately release that information to ASX.

Information provided to analysts and investors during a one-on-one or group briefing (such as slides) must be provided to ASX for release to the market and posted on Star Combo's website as soon as practical to ensure all shareholders and investors have equal access to Star Combo's information.

Analyst, shareholder and investor queries

In responding to analyst, shareholder and investor queries, an authorised spokesperson must:

- (a) only discuss information that has been publicly released;
- (b) ensure all responses are balanced, factual and truthful; and
- (c) confine comments on market analysts' financial projections to errors in factual information or underlying assumptions.

Where a query can only be answered by disclosing price-sensitive information, an authorised spokesperson must decline to answer that query. He or she should then refer the query to the Disclosure Committee so a formal decision can be made as to whether or not it is appropriate for Star Combo to disclose information in response to the query.

Analyst reports and forecasts

Where the Disclosure Committee resolves that Star Combo should comment on a report prepared by an analyst, Star Combo's comment must be restricted to information that has been publicly disclosed or information that is in the public domain.

Star Combo will not comment on analyst forecasts about Star Combo's earnings projections except:

- (a) where the forecast differs significantly from its published earnings projections (if relevant); or
- (b) to correct any factual errors in publicly issued information and company statements.

Star Combo will not endorse, or be seen to endorse, analyst reports or the information they contain. Star Combo will not:

- (a) externally distribute individual analyst projections or reports;
 - (b) refer to individual analyst recommendations on its website; or
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- (c) publicly comment on individual analyst recommendations or proprietary research (except where necessary to correct a factual error).

Where Star Combo becomes aware that the market's earnings projections for Star Combo differ significantly from published earnings projections or earnings estimates, Star Combo will issue a profit warning or company statement, if considered necessary by the Board to avoid a false market.

Can Star Combo respond to market speculation?

Star Combo will not comment on market speculation and rumour unless:

- (a) there are material factual errors contained in the speculation or rumour;
- (b) there is a move in the price of its securities which is reasonably referable (in the opinion of the Board) to the speculation or rumour; or
- (c) it receives a formal request from ASX or a regulator.

Any comments made by Star Combo in response to market speculation and rumour must be authorised by the Board and must be limited to correcting factual errors.

Star Combo is committed to ensuring that a false market is not created in respect of Star Combo securities. If ASX considers that there is, or is likely to be, a false securities market and asks Star Combo to give information to correct or prevent a false market, Star Combo will give ASX any information needed to correct or prevent the false market.

When is a trading halt appropriate?

In order to maintain a fully informed, fair and transparent market in respect of Star Combo securities, Star Combo may request a trading halt from ASX where:

- (a) confidential information about Star Combo is inadvertently made public and further time is required to enable Star Combo to prepare an appropriate public announcement; or
- (b) Star Combo is preparing to make a major company announcement and is concerned to prevent speculative or insider trading (for example, where Star Combo plans to announce a joint venture enterprise or profit warning).

The only persons authorised to request a trading halt are the Company Secretary or a member of the Disclosure Committee or the Board.

Communications

What should Star Combo's website include?

To ensure relevant information about Star Combo is readily available to shareholders, investors and stakeholders, Star Combo will provide the following information on its website:

- (a) all company announcements made to ASX;
- (b) annual reports and results announcements;
- (c) speeches and support material (including slides) given at investor conferences, briefings or presentations;
- (d) company profile and contact details; and
- (e) all written information provided to investors or stockbroking analysts.

All information posted on Star Combo's website must be approved by the Disclosure Committee and will be regularly reviewed and updated for accuracy and relevance.

When will Star Combo issue publications and other communications?

Where approved by the Disclosure Committee, Star Combo may issue company statements or publications regarding previously disclosed information, including:

- (a) press releases;
- (b) fact books and other corporate publications;
- (c) publications on Star Combo's website; and
- (d) email broadcast to Star Combo's shareholders and other key stakeholders.

Monitoring compliance

When will this Policy be reviewed?

The Disclosure Committee will review this Policy regularly (at least annually) to determine whether it is effective.

Star Combo encourages all of you to actively consider Star Combo's disclosure obligations and offer suggestions as to how to improve this Policy to the Company Secretary.

What training is required?

As part of Star Combo's commitment to its continuous disclosure obligations the Disclosure Committee will implement appropriate training programs for:

- (a) Directors; and
- (b) Employees who are likely to come into possession of price-sensitive information about Star Combo,

to ensure they are aware of Star Combo's continuous disclosure obligations and this Policy.

This Policy will be placed on Star Combo's website.

Definitions

ASX	ASX Limited ACN 008 624 691 or the stock market operated by it, as the context requires.
Board	The board of directors of Star Combo.
CEO	The chief executive officer of Star Combo.
CFO	The chief financial officer of Star Combo.
Chair	The chair of the Board.
Company or Star Combo	Star Combo Pharma Limited ACN 615 728 375.
Company Secretary	The company secretary of Star Combo.
Corporations Act	The <i>Corporations Act 2001</i> (Cth).
Director	A director of Star Combo.
Disclosure Committee	The committee described in ' What is the Disclosure Committee? ' on page 4 of this Policy.
Employee	An employee of or consultant to Star Combo.
Listing Rules	The listing rules of ASX, as amended from time to time.
Policy	The policy contained in this document, as amended from time to time.
you	Any Director or Employee.

Annexure A

Examples of price-sensitive information that might need to be disclosed include the following:

A transaction that will lead to a significant change in the nature or scale of Star Combo's activities.

A material acquisition or disposal.

The entry into, variation or termination of a material agreement.

Becoming a plaintiff or defendant in a material lawsuit.

The fact that Star Combo's earnings will be materially different from market expectations.

The appointment of a liquidator, administrator or receiver.

The commission of an event of default under, or other event entitling a financier to terminate, a material financing facility.

Under subscriptions or over subscriptions to an issue of securities.

Giving or receiving a notice of intention to make a takeover.

Any rating applied by a rating agency to an entity or its securities and any change to such a rating.
