



Continuous Disclosure and Financial Markets Communication Policy

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GrainCorp

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1. Continuous Disclosure Policy

1.1. Introduction

GrainCorp's securities are listed on the ASX. As a listed entity, GrainCorp has obligations under the Corporations Act and ASX Listing Rules to keep the market fully informed of matters which may have a material effect on the price or value of GrainCorp's securities (unless an exception applies). Breaches of these obligations can impose onerous civil and criminal penalties on listed entities as well as on their directors and officers. GrainCorp discharges these obligations by releasing information to the ASX in the form of ASX Announcements.

1.2. GrainCorp's commitment to continuous disclosure

GrainCorp is committed to:

- ensuring that shareholders and the market are provided with timely and balanced disclosure of all material matters concerning GrainCorp;
- complying with continuous disclosure obligations contained in the ASX Listing Rules, the ASX Principles and Recommendations and the Corporations Act; and
- ensuring that all stakeholders have equal and timely access to externally available information issued by GrainCorp.

1.3. Purpose of this Policy

This Policy is designed to support GrainCorp's commitment to comply with its continuous disclosure obligations at all times by establishing procedures for:

- Executives and other employees to identify material price sensitive information;
- reporting such information to the Continuous Disclosure Committee for review;
- ensuring GrainCorp achieves best practice in complying with its continuous disclosure obligations under the Corporations Act and ASX Listing Rules; and
- ensuring GrainCorp, as well as its individual Directors and officers, does not contravene the Corporations Act and ASX Listing Rules.

1.4. GrainCorp's Continuous Disclosure Policy, Procedures and Obligations

The Policy

This Policy embraces the principles contained in ASX Listing Rule 3.1, the ASX Listing Rules' Guidance Note 8: "Continuous Disclosure: Listing Rules 3.1 - 3.1B" and the Recommendations' Principle 5 (make timely and balanced disclosure).

This Policy is divided into two sections covering continuous disclosure and financial markets communication.

The Disclosure Officer is responsible for the general management of this Policy including all communications with the ASX, and is convenor of GrainCorp's Continuous Disclosure Committee (refer section 3.1).

The Investors & Media section on GrainCorp's website www.graincorp.com.au contains announcements and presentations in accordance with this Policy and the Corporate Governance section on GrainCorp's website contains a copy of this Policy.

The Procedures

The following procedures apply to safeguard against inadvertent breaches of GrainCorp's continuous disclosure obligations:

- Directors and senior management (including Business Unit Managers) must immediately notify the Disclosure Officer and the Managing Director & CEO as soon as they become aware of information that is not (or they suspect is not) generally available to the public and may be price sensitive or any matters which could develop into price sensitive information, including, but not limited to, any such information that is disclosed to them by an employee of GrainCorp through the procedure described in the "Obligations" section below. In addition, if any director or member of senior management becomes aware that:
 - there may have been inadvertent disclosure of material price sensitive information (which has not yet been disclosed to the ASX) during any communication with external parties; or
 - confidential GrainCorp information may have been leaked (whatever its source), he or she should immediately notify the Disclosure Officer and the Managing Director & CEO.
- The Disclosure Officer and Managing Director & CEO will:
 - review the information reported; and
 - notify and convene meetings of the Continuous Disclosure Committee as and when required, in which case the procedure in section 3.1 below will apply.

Obligations

As soon as any employee becomes aware of information concerning GrainCorp:

- that is not or suspected to be not, generally available to the public (i.e. the information in question has not been included in an ASX Announcement or other publications); and
- which may be material price sensitive information,

then they must immediately provide the following information (as applicable) to their Business Unit Manager or the Company Secretary:

- a general description of the matter;
- details of the parties involved;
- relevant date of the events or matters in question;
- status of the matter (e.g. final/negotiations, in progress/preliminary negotiations only);
- estimated transaction value;
- estimated effect on GrainCorp's finances or operations; and
- names of any in-house or external advisers involved.

Information should also be notified even if it appears to fall within the exception in ASX Listing Rule 3.1A (see section 2.3 below).

If the employee has doubt as to whether information concerning GrainCorp is material price sensitive information, the employee must report that information to their Business Unit Manager or the Company Secretary and must not disclose that information to anyone outside GrainCorp before the ASX is notified without the prior approval of the Disclosure Officer.

2. Disclosure principles – requirements of ASX Listing Rules Chapter 3

2.1. ASX Listing Rule 3.1 – immediate notice of material information

GrainCorp must immediately notify the market via an ASX announcement of any material price sensitive information concerning GrainCorp. GrainCorp is required to comply with this obligation pursuant to sections 674 and 674A of the Corporations Act. In this context, the ASX has confirmed in Guidance Note 8 that “immediately” means “promptly and without delay”. ASX Listing Rule 15.7 also requires that GrainCorp must not release information that is for release to the market to any person until it has given the information to the ASX and has received acknowledgment that the ASX has released the information to the market.

2.2. What is ‘material’ information?

Information is ‘material’ if there is a substantial likelihood that the information would influence investors in deciding whether to buy, hold or sell GrainCorp Securities.

‘Materiality’ is assessed using a qualitative test, taking into consideration GrainCorp’s business activities, size and place in the market.

2.3. Exception to ASX Listing Rule 3.1

Pursuant to ASX Listing Rule 3.1A, ASX Listing Rule 3.1 does not apply to particular information when 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 5 situations 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 the internal management purposes of GrainCorp; or
 - the information is a trade secret.

The obligation to disclose the information to the ASX arises even though two of the above three requirements remain satisfied. “Confidential” means confidential as a matter of fact. GrainCorp

may give confidential information to its advisers and will continue to satisfy the exception as GrainCorp retains control over the use and disclosure of the information.

However, the ASX would be likely to consider that information has ceased to be confidential if the information, or part of it, becomes known selectively or generally, whether inadvertently or deliberately.

For example, where there is rumour circulating or media comments about the information and the rumour or comment is reasonably specific, this will generally indicate that confidentiality has been lost. It is important that Employees and advisers, who have access to information which is confidential, strictly maintain the confidentiality of that information.

2.4. Listing Rule 3.1B – False Market

If the ASX considers that there is or is likely to be a false market in GrainCorp Securities, and asks GrainCorp to give it information to correct or prevent a false market, GrainCorp must give the ASX the information needed to correct or prevent the false market.

The obligation to give information under Rule 3.1B arises even if the exception under Rule 3.1A applies.

The ASX would consider that there is, or is likely to be, a false market in GrainCorp Securities if GrainCorp has information that has not been released to the market because it falls under the exception provided by Rule 3.1A but there is a reasonably specific rumour or media comment in relation to GrainCorp, that has not been confirmed, clarified, or denied by GrainCorp in an ASX Announcement and there is evidence that the rumour or comment is having, or ASX forms the view that the rumour or comment is likely to have, an impact on the price of GrainCorp Securities then the ASX can compel GrainCorp to make an appropriate ASX Announcement.

In the event that the Board or any member of the Continuous Disclosure Committee is aware that GrainCorp is relying on an exception to its continuous disclosure obligations, they must notify each other member of the Continuous Disclosure Committee and the Continuous Disclosure Committee may request the Disclosure Officer (or other any person it thinks fit) to monitor:

- the market price of GrainCorp Securities;
- major national, local and industry media reporting;
- any investor blogs, chat-sites or other social media that GrainCorp is aware of that regularly post comments about GrainCorp; and
- enquiries from analysts or journalists,

for signs that the information to be covered in a potential ASX Announcement may have leaked and, if it detects any such signs, to initiate discussions with the ASX as soon as practicable.

3. Disclosure responsibilities and procedures

3.1. GrainCorp Continuous Disclosure Committee

GrainCorp's Continuous Disclosure Committee is responsible for making decisions about what information is to be disclosed to the market in accordance with the ASX Listing Rule requirements. However, without limiting section 3.4, if the Chairman of the Board, the Managing Director & CEO

or the Continuous Disclosure Committee considers that an announcement is of such a nature that it ought to be reviewed and approved by the Board or the Board has directed that the nature of such an announcement requires Board approval, then the Disclosure Officer must:

- (a) take all steps necessary to convene a Board meeting as soon as practicable to consider and approve the announcement; and
- (b) take such other steps as the Continuous Disclosure Committee determines are necessary to comply with GrainCorp's continuous disclosure obligations, including, if necessary, liaising with ASX to request a trading halt or suspension from trading until the Board is able to meet. The members of GrainCorp's Continuous Disclosure Committee include:
 - a. the Chair of the Board;
 - b. the Managing Director & CEO;
 - c. the Chief Financial Officer;
 - d. the Disclosure Officer (who, for administrative convenience only, is primarily responsible for overseeing and coordinating all communication with the ASX, investors, analysts, brokers, the media and the public); and
 - e. any other person nominated by the Board from time to time (which may include the Group General Counsel, Head of Corporate Affairs & Government Relations, General Manager – Corporate Development and Investor Relations or the Investor Relations Manager).

A quorum of the Continuous Disclosure Committee is two members. If a quorum cannot be formed from the Continuous Disclosure Committee members listed above, the following will be added as members of the Continuous Disclosure Committee (in the order specified), until a quorum can be formed:

- the chair of the Audit and Risk Committee;
- the chair of the People, Remuneration and Nominations Committee; and
- any other director of GrainCorp.

The Continuous Disclosure Committee must ensure that ASX announcements:

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

The reasons for decisions taken by the Continuous Disclosure Committee leading to disclosure or non-disclosure of a particular matter are to be documented by the Disclosure Officer. The Continuous Disclosure Committee may consult with the Board, senior management and external advisers as it considers necessary, including where there is doubt as to whether certain information should be disclosed.

The Continuous Disclosure Committee must ensure that the Board receives copies of any material market announcements promptly after them having been made.

3.2. Materiality guidelines – price sensitive information

As a general rule, non-public information concerning GrainCorp that a reasonable person would expect to have a material effect on the price or value of GrainCorp Securities must immediately be disclosed to the ASX. In addition, Chapter 3 of the ASX Listing Rules requires requisite information to be disclosed in relation to any of the following specific matters GrainCorp may be involved in:

- GrainCorp receiving a takeover bid;
- GrainCorp conducting a buy-back of its securities;
- changes to GrainCorp's capital structure;
- release of restricted or escrowed securities;
- issue, lapse or exercise of options;
- meetings of security holders;
- changes to the address of the registered office, telephone or facsimile number;
- changes to the address of the office which a register of GrainCorp Securities are kept;
- changes to chairperson, directors or secretary;
- documents sent to security holders;
- any ownership limits;
- certain requisitions from shareholders;
- disclosure of directors' interests; and
- notice of a record date or change of record date.

Chapter 3 of the Listing Rules also provides examples of specific information the ASX would require to be disclosed if material.

3.3. Immediate market disclosure via ASX

GrainCorp's Continuous Disclosure Committee must immediately notify the ASX once it becomes aware of any information which meets the materiality test and which does not fall within the exception to ASX Listing Rule 3.1. GrainCorp must not release information publicly that is required to be disclosed via the ASX until it has given the information to the ASX and has received acknowledgment that the ASX has released the information to the market. Following which GrainCorp can then disseminate the released information via communication methods such as GrainCorp's website, a press release, email, or a mail-out.

3.4. Significant announcements

Any proposed announcements regarding a matter of significance for GrainCorp, such as future prospects, must be referred by the Managing Director & CEO to the Chairman (or any other director appointed in the Chairman's absence) who will determine whether the Board or relevant Board Committee should consider the relevant disclosure.

3.5. Disclosure to the ASX

At least two members of GrainCorp's Continuous Disclosure Committee must review and approve disclosure documents before being released to the market.

3.6. Correcting and updating information

If GrainCorp discovers that information released to the ASX has become materially incorrect due to subsequent information or in error, GrainCorp must release an ASX Announcement correcting or updating the relevant statement immediately following the discovery of the inaccuracy or error.

4. Market speculation, rumours and external communication

4.1. No comment policy

GrainCorp does not respond to market speculation or rumours unless required to do so by law, the ASX Listing Rules or a request from the ASX for information to correct or prevent a false market in GrainCorp Securities. Comments made in response to market speculation or rumour are the decision of GrainCorp's Continuous Disclosure Committee.

4.2. Managing market speculation and rumours

If unauthorised information is disclosed by way of market speculation or rumours and the information which is the subject of the unauthorised disclosure meets the materiality test and does not fall within the exception to ASX Listing Rule 3.1, GrainCorp must disclose the information to the ASX as soon as practicable.

4.3. Statements regarding market speculation and rumours

A statement in relation to market speculation or a rumour must be issued where:

- GrainCorp's Continuous Disclosure Committee considers that GrainCorp has an obligation at that time to make a statement to the market about a particular matter; or
- GrainCorp is required to respond to a formal request for information from the ASX.

For example, a statement may be required to correct or prevent a false market in accordance with ASX Listing Rule 3.1B.

Statements in relation to market speculation or rumour are to be prepared and approved by at least two members of GrainCorp's Continuous Disclosure Committee and referred to the Managing Director & CEO or the Chairman (or any other director appointed in the Chairman's absence) who will determine whether the statement should be considered by the Board or relevant Board Committee.

4.4. Authorised spokespersons (general)

Information regarding GrainCorp may only be disclosed to the media by the Managing Director & CEO, the Chief Corporate Affairs Officer or the Head of Corporate Affairs & Government Relations, or other authorised spokespersons appointed by the Board or GrainCorp's Continuous Disclosure Committee from time to time.

4.5. No embargo of information

Directors and Employees (including directors) must not disclose information publicly (e.g. to analysts or journalists) under an embargo arrangement in relation to any matter that is potentially the subject of this Policy.

5. Trading halts

5.1. Trading halts

It may be necessary for GrainCorp to request a trading halt from the ASX to ensure that fair and orderly trading in GrainCorp Securities is maintained on a fully informed basis and to manage continuous disclosure obligations.

Subject to section 3.1 above, it is the responsibility of the Chairman and the Managing Director & CEO, in consultation with the Disclosure Officer, to make all decisions in relation to trading halts.

6. Financial Markets Communication Policy

The Financial Markets Communication Policy operates in conjunction with the Continuous Disclosure Policy.

6.1. GrainCorp's contact with the market

Throughout the year, GrainCorp follows a calendar of regular disclosures to the market on its financial and operational results. GrainCorp's senior management interacts regularly with the market in a variety of ways, including the Annual General Meeting, results briefings, investor days, site visits, market announcements, one-on-one meetings and briefings, meetings and educational sessions.

In addition, GrainCorp provides background and technical information to investment community stakeholders (such as investors, sell side analysts and sales desk brokers) to support major announcements made to the ASX and minor announcements made about GrainCorp's on-going business activities.

7. Analyst and investor briefings

7.1. Guiding principle – prohibition on selective disclosure

GrainCorp must not communicate material price sensitive information to an investment community stakeholder except where that information has previously been disclosed to the market on the ASX Market Announcement Platform.

7.2. Authorised spokespersons

GrainCorp representatives authorised to speak to investment community stakeholders on behalf of GrainCorp are:

- the Chairman of the Board
- the Managing Director & CEO;
- the Chief Financial Officer;
- the Group General Counsel;
- the Head of Corporate Affairs & Government Relations;
- the Company Secretary;
- the General Manager – Corporate Development and Investor Relations;
- the Investor Relations Manager; and
- any delegate nominated by the GrainCorp Continuous Disclosure Committee for that purpose.

The Chairman is the authorised spokesperson on behalf of the GrainCorp Board.

7.3. Confine comments to factual matters and previously disclosed information

Authorised GrainCorp spokespersons must not comment on material price or value sensitive issues that have not previously been disclosed to the market. To avoid inadvertent disclosure,

GrainCorp's authorised spokespersons must confine comments to factual and objective matters and previously disclosed information and should clarify publicly released information with GrainCorp's Continuous Disclosure Committee prior to communication with investment community stakeholders.

7.4. Referral of requests for comment

If any employee, other than those listed in section 7.2, receives a request for comment from an investment community stakeholder in relation to any matter concerning GrainCorp they must advise that person that they are not authorised to speak for GrainCorp and must refer the enquiries to GrainCorp's Investor Relations Manager. A request for comment from the media must be referred to the Head of Corporate Affairs & Government Relations to respond.

7.5. Briefings during blackout periods

During the time (i) between the end of GrainCorp's financial reporting periods (30 September and 31 March) and the announcement to the ASX of the financial results for those periods and (ii) during the period two weeks before GrainCorp's AGM, further restrictions are imposed to help ensure that GrainCorp does not inadvertently disclose material price sensitive information. Generally, GrainCorp may respond to requests for background information but will not hold meetings or briefings with individual or institutional investors, analysts or media representatives in relation to financial information, unless the Managing Director & CEO decides that it is appropriate for GrainCorp to do so and the meeting or briefing will be the subject of a specific announcement to the market through the ASX. Only the Managing Director & CEO or Chief Financial Officer may respond to questions from the financial community during the aforementioned periods.

8. Open briefings

8.1. Open briefings to investment community stakeholders

GrainCorp may hold open briefings (i.e. where all members of a relevant group are invited) with institutional investors and/or stockbroking analysts to discuss information that has been previously released to the market.

For the purpose of this policy, public speeches and presentations by GrainCorp's Chairman, the Managing Director & CEO, Chief Financial Officer or a member of the Executive will be classed as 'open briefings'. All meetings that are not open meetings are treated as one-on-one briefings by this Policy.

8.2. Briefing materials

Any written materials to be used at briefings must adhere to this Policy to ensure all information has previously been disclosed to the market or may require disclosure. Any information that requires disclosure must be referred to the Disclosure Officer who may in their discretion confer with the Continuous Disclosure Committee.

All information proposed to be used at a briefing (including any new and substantive presentation to be given to analysts or investors) will, if not previously disclosed, be disclosed to the market by

the Disclosure Officer via an ASX Announcement in advance of the briefing and placed on GrainCorp's website as soon as practicable following the receipt of confirmation that ASX has released the information to the market.

8.3. Answering questions at briefings

Where a question raised at a briefing can only be answered by disclosing material price sensitive information, an answer to the question must be declined until GrainCorp announces the information publicly by an ASX Announcement.

8.4. Inadvertent disclosure

If any Employee participating in a briefing considers that information has been raised that might constitute previously undisclosed material price sensitive information, they must immediately refer the matter to the Managing Director & CEO and the Disclosure Officer in accordance with section 1.4 above.

9. One-on-one briefings

9.1. One-on-one briefings with investment community stakeholders

From time to time, GrainCorp may participate in one-on-one briefings with investment community stakeholders. It is in the interests of GrainCorp's shareholders that stakeholders have a thorough understanding of GrainCorp's business operations and activities.

For the purposes of this Policy a one-on-one briefing includes any communication between GrainCorp and an investment community stakeholder including, for example, phone calls made to GrainCorp's Head of Corporate Affairs & Government Relations or Investor Relations Manager, and face to face meetings.

9.2. Briefing materials

Any written materials to be used at one-on-one briefings must adhere to this Policy to ensure all information has previously been disclosed to the market or may require disclosure. Any information that requires disclosure must be referred to the Disclosure Officer.

9.3. Disclosable information

At one-on-one briefings GrainCorp may provide background and previously disclosed technical information to further assist in understanding GrainCorp's business activities.

Particular care should be taken when answering sell side analyst questions which raise issues outside of the intended scope of the discussion. If a question can only be answered by disclosing material price sensitive information the question must be taken on notice or an answer should be declined.

9.4. Attendees and file notes

A minimum of one GrainCorp representative authorised to speak to investment community stakeholders under section 7.2 must be present at one-on-one briefings. File notes of one-on-one briefing discussion points must be made and retained by GrainCorp for a reasonable period.

9.5. Inadvertent disclosure

If any Employee participating in a one-on-one briefing considers that information has been raised that might constitute previously undisclosed material price sensitive information, they must immediately refer the matter to the Managing Director & CEO and the Disclosure Officer in accordance with section 1.4 above.

10. Sell Side Analyst Reports

10.1. Review of analyst reports

GrainCorp recognises the important role sell side analysts play in assisting the establishment of an efficient market with respect to GrainCorp Securities. However, GrainCorp is not responsible for, and does not endorse, analyst reports that contain commentary on GrainCorp.

From time to time GrainCorp representatives authorised to speak with investment community stakeholders may review and comment on analyst reports directly with the author analyst.

10.2. Usage of analyst reports

Incorporating analyst reports in any GrainCorp corporate information, including GrainCorp's website must be approved by GrainCorp's Continuous Disclosure Committee and the author analyst.

10.3. Review of analyst reports

A review and feedback to the author analyst must be limited to objective and factual information only (e.g. historical financial data previously disclosed to the market). No comment must be given on subjective elements such as financial forecasts, strategy, industry and market competition.

GrainCorp will not provide undisclosed material price or value sensitive information in response to analyst or other market reports. The information may be reviewed only to correct factual inaccuracies on historical matters. Any correction of factual inaccuracies by GrainCorp does not imply endorsement of the content of these reports. However, if a director or member of senior management of GrainCorp becomes aware of a material divergence between an analyst's or consensus forecast and GrainCorp's own forecasts or earnings expectations, he or she must liaise with the Continuous Disclosure Committee so that the necessity for an announcement to the ASX and/or trading halt can be considered in accordance with the procedures set out in sections 3 and 4 above.

11. Compliance and Review

11.1. Compliance

GrainCorp adopts a number of measures to ensure compliance with this Policy, these include:

- Distributing a copy of this Policy to all Employees (present and future) and making this Policy available on GrainCorp's website to promote understanding of GrainCorp's continuous disclosure obligations and the measures GrainCorp adopts under this Policy;
- Educating Employees of their obligations under this Policy; and
- The Disclosure Officer conducting periodic reviews of the passage of information through management of the Company to the Board and/or the Continuous Disclosure Committee (as applicable).

11.2. Review of Policy

This Policy will be reviewed every two years (or earlier if required) and updated as necessary. Any amendments to the Policy must be approved by the Board. The Company Secretary is hereby authorised to make administrative and non-material amendments to this Policy provided that such amendments are notified to the Board at or before its next meeting.

12. Policy Breaches

GrainCorp regards its continuous disclosure obligation very seriously. Any breach of the law or this Policy or both will be regarded by GrainCorp as serious misconduct and a breach of GrainCorp's Code of Conduct, which may lead to disciplinary action including, but not limited to, dismissal.

13. Definitions

Unless the context requires, capitalised terms in this policy have the following meaning:

ASX means the Australian Securities Exchange Limited.

ASX Announcement means documents released to the ASX Market Announcement Platform on behalf of GrainCorp including, but not limited to media releases, financial reports, investor presentations and ASX Appendices.

ASX Listing Rule means the official listing rules of the ASX.

ASX Principles and Recommendations means the Corporate Governance Principles and Recommendations (4th edition) issued by the ASX Corporate Governance Council.

Board means board of directors of GrainCorp.

Continuous Disclosure Committee means the committee described by section 3.1.

Corporations Act means the *Corporations Act 2001* (Cth).

Disclosure Officer means GrainCorp's Company Secretary.

Employee means an officer, employee or contractor of GrainCorp.

GrainCorp means GrainCorp Limited, and where relevant, its related bodies corporate.

GrainCorp Securities means Securities issued by GrainCorp.

Material price sensitive information means information concerning GrainCorp that a reasonable person would expect to have a material effect on the price or value of GrainCorp Securities.

Securities means ordinary shares, preference shares, debentures, convertible notes, subordinated debt and financial products (such as warrants, options, performance rights, contracts for difference and other derivatives) relating to, or which operate to limit, leverage or increase the economic risk in holding, those securities, and any other financial products which the Board determines from time to time should be included in this definition, whether or not the securities or the financial products are issued or created by GrainCorp or third parties.

Policy means this Continuous Disclosure & Financial Markets Communication Policy.

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