

# SkyCity Entertainment Group Limited

## Continuous Disclosure Policy

Policy Owner	General Counsel & Company Secretary
Policy Approver	Board
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## Table of Contents

Purpose and scope .....	3
Policy statement .....	3
Policy principles .....	3
Continuous disclosure.....	4
Key accountabilities.....	6
Compliance statement.....	7
Breach of Policy .....	7
Relevant documents.....	8
Revisions.....	8

## Purpose and scope

As a company listed on the New Zealand and Australian stock exchanges, SkyCity Entertainment Group Limited (**SkyCity**) is bound by continuous disclosure obligations under the NZX and ASX Listing Rules and relevant legislation.

This Continuous Disclosure Policy (**Policy**) sets out SkyCity's approach to continuous disclosure.

The purpose of this Policy is to:

- ensure that SkyCity complies with its continuous disclosure obligations;
- ensure timely, balanced and accurate information is provided to all shareholders and market participants; and
- outline mandatory requirements and responsibilities in relation to the identification, reporting, review and disclosure of material information relevant to SkyCity.

This Policy applies to all entities within the group of bodies corporate ultimately owned or controlled by SkyCity (together the '**Group**') and all employees, contractors, and sub-contractors of the Group.

Specific obligations apply to directors, the Disclosure Officer, the Disclosure Committee and members of the Senior Leadership Team (**SLT**).

## Policy statement

SkyCity is committed to providing timely, balanced and accurate information to the market consistent with its legal and regulatory obligations.

SkyCity believes high standards of reporting and disclosure are essential for proper accountability and transparency between SkyCity and its investors, employees and stakeholders.

This Policy should be considered in conjunction with SkyCity's Securities Trading Policy, which deals with the trading of SkyCity's financial products by directors and employees of SkyCity.

## Policy principles

SkyCity is legally obliged to disclose certain information to the market under the NZX and ASX Listing Rules and relevant legislation.

No one is permitted, until appropriate market disclosure has been made, to communicate to anyone any material information concerning the business of the Group (except in accordance with this Policy).

Any person who is aware of information which is, or may be, material information relating to the Group, and which is not already public information, must escalate that information in accordance with the procedures set out in this Policy.

## Continuous disclosure

### 1. Prompt notification of material information

Information which is, or may be, material information must be escalated to the Disclosure Officer, an appropriate Disclosure Committee member or another member of the SLT promptly and without delay. To assist in this obligation, the Disclosure Committee and their direct reports will put in place processes to assist in ensuring that relevant information which may require disclosure is immediately escalated to them by their direct reports. The source of the material information is not relevant - it does not matter whether it is sourced from within SkyCity or a third party.

Material information is information that a reasonable person would expect, if the information was generally available to the market, to have a material effect on the price of securities of SkyCity (i.e. its shares and bonds). This information must relate to SkyCity's particular securities or to SkyCity itself, rather than to securities generally or issuers generally. The test is an objective test and whether or not a reasonable person would require disclosure will depend on the facts and circumstances. If you have any doubt whether information may be material information you should err on the side of caution and discuss it with the Disclosure Officer or a member of the Disclosure Committee.

SkyCity will promptly and without delay notify the market as soon as it becomes aware of any material information. Notification of material information will be made by way of an announcement to the NZX and ASX.

In certain circumstances, the Listing Rules permit SkyCity to not disclose material information, but this is a decision for the Disclosure Committee in each instance.

All potentially material information, and all material information held under Listing Rule "safe harbours", must be kept strictly confidential and only disclosed on a "need to know" basis. Confidentiality arrangements must be in place before disclosure externally.

Disclosure of material information will be a standing agenda item at every Board and SLT meeting. These forums will consider whether there is any material information that needs to be publicly disclosed.

### 2. Notice of specific information/events

SkyCity has periodic disclosure obligations and an obligation to notify the NZX and ASX of certain events under the Listing Rules.

This Policy applies equally to SkyCity's periodic/specific disclosure obligations.

### 3. Market speculation

SkyCity will generally not comment on market speculation or rumour unless:

- a false market exists; or
- it is otherwise required to do so under the Listing Rules.

### 4. Trading halts

In order to facilitate an orderly, fair and informed market in respect of SkyCity's securities, it may be necessary to request a trading halt from the NZX and ASX.

The Disclosure Committee, in consultation with the Board, will make all decisions relating to seeking a trading halt.

### 5. Investors and analysts

Presentations and responses to, or meetings with, investors and analysts are opportunities to provide background to previously disclosed information only. No undisclosed material information will be disclosed in any such presentation, response or meeting.

SkyCity does not endorse analyst reports or comment on them other than:

- in relation to publicly available information; or
- where it considers those reports are informing a false market.

Other relevant information made available to investors and analysts is published on SkyCity's corporate website.

If SkyCity becomes aware that in general the market's earnings projections materially differ from its own expectations, or that a false market may exist, SkyCity may consider it appropriate to issue earnings guidance or other statements.

### 6. Authorised spokespersons

Only authorised spokespersons may comment publicly on SkyCity's behalf.

SkyCity has appointed the Board Chair, the Chief Executive Officer and the Chief Financial Officer (or their delegate in each case in their absence) as authorised spokespersons of SkyCity. The Chief Executive Officer may delegate authority to other specified executives to make external comment, as may be appropriate from time to time.

Authorised spokespersons must ensure all public comments are within the bounds of information that is either already in the public domain, or not material.

## Key accountabilities

The following key accountabilities apply:

Who	Key accountabilities
Board	<ul style="list-style-type: none"> <li>The Board will consider at each Board meeting and as otherwise required whether there is any information that may require disclosure in accordance with this Policy.</li> <li>Any 'price sensitive' or otherwise material market disclosure (including, for the avoidance of doubt, any disclosure which includes a profit projection or forecast) must be approved by the Board.</li> <li>A copy of each market disclosure will be made available to the Board once released to the NZX and ASX.</li> </ul>
Disclosure Committee	<ul style="list-style-type: none"> <li>A Disclosure Committee has been established to manage SkyCity's disclosure obligations.</li> <li>The Disclosure Committee comprises the Chief Executive Officer, Chief Financial Officer, and General Counsel and Company Secretary, and is responsible for: <ul style="list-style-type: none"> <li>ensuring the Group complies with its continuous disclosure obligations;</li> <li>approving the form, content and release of market disclosures, and applying an appropriate flag to such disclosures;</li> <li>escalating 'price sensitive' or otherwise material market disclosures to the Board for approval;</li> <li>determining, in consultation with the Board, whether a trading halt is required, and, in the event that it is, requesting a trading halt from the NZX and ASX; and</li> <li>monitoring all company market disclosure practices and overseeing and coordinating the disclosure of information to the NZX and ASX, shareholders, analysts, stockbrokers, media and the public.</li> </ul> </li> </ul>
Disclosure Officer	<ul style="list-style-type: none"> <li>The General Counsel and Company Secretary has been appointed the Disclosure Officer.</li> <li>The Disclosure Officer is responsible for: <ul style="list-style-type: none"> <li>considering any information reported to them under this</li> </ul> </li> </ul>

Who	Key accountabilities
	<p>Policy by the Board, the SLT, and/or any individual member of the SLT;</p> <ul style="list-style-type: none"> <li>- determining, as a member of the Disclosure Committee, whether information should be disclosed to the market, including whether or not any exception to market disclosure applies;</li> <li>- recording key decisions regarding continuous disclosure matters;</li> <li>- determining, as a member of the Disclosure Committee, after appropriate consultation with the Board, whether a trading halt is required; and</li> <li>- ensuring the timely release of information to the NZX and ASX following its approval and making the market disclosure available to the Board and Chief Executive Officer.</li> </ul> <ul style="list-style-type: none"> <li>• The Disclosure Officer is the primary liaison person for all communications with the NZX and ASX.</li> </ul>
Senior Leadership Team	<ul style="list-style-type: none"> <li>• The SLT will consider at each SLT meeting whether there is any information that may require market disclosure in accordance with this Policy.</li> <li>• Each member of the SLT is also responsible for identifying and reporting to the Disclosure Officer any matters that might need to be disclosed under this Policy.</li> </ul>
Employees	<ul style="list-style-type: none"> <li>• All employees must immediately disclose the full details of any material information, or any information that may potentially become material information that comes to their attention, to their Manager, an appropriate Disclosure Committee member or the Disclosure Officer.</li> </ul>

## Compliance statement

This Policy forms part of the Corporate Governance Statement and has been developed having regard to the compliance obligations to which SkyCity must comply, including those noted under relevant documents.

## Breach of Policy

Breach of this Policy may be regarded as misconduct, which may lead to disciplinary action (including termination of employment or engagement).

Potential or actual breaches of obligations outlined in this Policy must be escalated

according to Issue and Incident Management Standards.

It is important that all persons that this Policy applies to are familiar with its requirements as SkyCity will be deemed to be aware of information as soon as a director or senior manager of the Group has, or ought reasonably to have, come into possession of the information in the course of the performance of their duties. In the event that the Listing Rules are breached (inadvertently or otherwise), financial penalties and censures may be imposed.

## Relevant documents

### Related internal documents

- Securities Trading Policy

### External sources of obligations

- Financial Markets Conduct Act 2013 (NZ)
- Corporations Act 2001 (Aus)
- Listing Rules of NZX Limited and ASX Limited (as they apply to SkyCity)

## Revisions

Version	Approval Date	Effective Date	Implementation Date	Details
1.0	June 2019	June 2019	June 2019	<ul style="list-style-type: none"> <li>• Implementation of Policy.</li> </ul>
2.0	October 2024	October 2024	October 2024	<ul style="list-style-type: none"> <li>• Updated to align with new Policy Management Policy requirements.</li> <li>• Review cycle updated to every three years.</li> <li>• Consolidated to reflect a more simplified, principles-based approach.</li> </ul>