



A.B.N. 64 063 656 333

Vietnam Industrial Investments Limited
POLICIES MANUAL

Corporate Disclosure

Principle 5: Make timely and balance disclosure

Continuous Disclosure to ASX

The Company's shares are listed on the ASX and as such the Company is required to comply with the continuous disclosure requirements set out in the ASX Listing Rules. The Executive Director is responsible for interpreting the Company's policy and where necessary informing the Board. The Company Secretary is responsible for all communications with the ASX. Such matters are advised to the ASX on the day they are discovered and all senior executives are responsible for monitoring the Group's internal and external environment for information or events potentially requiring disclosure.

In order to ensure that the Company meets its obligations with regard to the continuous disclosure requirements, the Company has adopted a Continuous Disclosure Policy.

The Continuous Disclosure Policy sets out the Company's obligations and its policies and procedures to ensure timely and accurate disclosure of price sensitive information to the market.

POLICY

The Policy

The following procedures will apply to safeguard against breaches of VII's continuous disclosure obligations:

- (a) directors and senior management must immediately notify the CEO (or Managing Director) and/or the Company Secretary as soon as they become aware of information that should be considered for release to the market (material information which is disclosable);
- (b) the CEO (or Managing Director) and/or Company Secretary will:
 - (i) review the material information reported;
 - (ii) determine, in consultation with all necessary parties as appropriate, whether any of the material information is required to be disclosed to the ASX; and
 - (iii) co-ordinate the actual format of disclosure with the relevant members of management.
- (c) Where a decision is made, that the item or information does not warrant an ASX release, the CEO (or Managing Director)/Company Secretary is to advise directors of the rationale for the decision.

Persons to Whom this Policy Applies

This policy applies to:

- * all directors of VII and its consolidated entities;
- * all members of senior management; and
- * all employees.



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Obligations

- (a) As soon as you become aware of information that:
- * is not generally available (ie. the information in question has not been included in any Annual Report, ASX Release or other publication of the Company); and
 - * which may be price sensitive (ie. it is likely to have a financial or reputation impact upon the Company that may be considered material).
- you must provide the CEO (or Managing Director) and/or Company Secretary with all necessary information to ensure that the matter is disclosed appropriately to all required parties.
- (b) in order that you can comply with your obligations under paragraph 5.3(a), you must ensure that you implement such procedures as you consider appropriate to ensure if any person who reports to you becomes aware of or is in possession of information that is not generally available and/or which may be price sensitive, that person will promptly notify you of such information.

Market Speculation and Rumours

The ASX interprets Listing Rule 3.1 as requiring VII to make a clarifying statement or announcement to the ASX in circumstances where VII becomes aware that speculation or comment is affecting the price or volume of trading in VII securities.

For example, when the market moves in a way that appears to be referable to the comment or speculation, VII has an obligation to make such disclosure as is necessary in order to correct a false market in VII securities and ensure investors are not trading on false or misleading information. Normally the ASX will indicate to VII when it believes this is required.

Release of Information to Others

VII must not release material price sensitive information to any person if that information is required to be disclosed to the ASX, until cleared by the ASX. The CEO (or Managing Director) and/or the Company Secretary or a nominee of the CEO (or Managing Director)/Company Secretary will advise all relevant parties when the ASX release has been announced by the ASX. All the information disclosed through ASX is to be promptly placed on the Company's investor website after clearance by ASX.

Presentations/Enquiries

For all information/presentations/briefings etc. which are to be provided to third parties, each individual is responsible for ensuring that a copy of the material is provided to the CEO (or Managing Director) and/or the Company Secretary prior to presenting that information externally.

All inquiries from third parties must be referred to the CEO (or Managing Director) and/or the Company Secretary. All material presented at an analyst briefing, bank or other third party must be approved by or referred through the CEO (or Managing Director) and/or the Company Secretary prior to the briefing.

All inquiries from the media must be referred to the CEO (or Managing Director) and/or the Company Secretary.



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Interview by Employees

No employee may give an interview or make a presentation unless express authority or specific permission is received from the CEO (or Managing Director).

An employee who is given permission by the CEO (or Managing Director) to give an interview or make a presentation must notify the CEO (or Managing Director) and/or the Company Secretary of the date and time for the interview and must give a copy of any presentation to the CEO (or Managing Director) and/or the Company Secretary.

MANAGEMENT OF THE POLICY

Specific Responsibilities

The CEO (or Managing Director) and/or the Company Secretary is responsible for:

- (a) liaising with the ASX in relation to continuous disclosure issues;
- (b) ensuring that the system for the disclosure of all material information to the ASX in a timely fashion is operating;
- (c) reviewing proposed announcement by VII to the ASX and liaising with the CEO (or Managing Director) or other members of the executive or Chairman in relation to the form of any ASX release;
- (d) liaising with the Board of Directors, as appropriate, in relation to the disclosure of information;
- (e) keeping a record of all ASX and other releases that have been made; and
- (f) periodically reviewing VII's disclosure procedures in light of changes to ASX Listing Rules or Corporations Act and recommending any necessary changes to the procedures.

Effective Date: 1 January 2015