

CONTINUOUS DISCLOSURE AND SECURITY HOLDER COMMUNICATION POLICY

Abacus Property Group (**APG**) is listed on the Australian Stock Exchange. APG is committed to promoting security holder confidence by ensuring that trade in its securities takes place in an efficient and informed market place. This policy sets out:

- (a) APG's commitment to the continuous disclosure rules; and
- (b) APG's commitment to ensuring accurate and timely communications with security holders.

CONTINUOUS DISCLOSURE

Listing Rule 3.1 requires disclosure of any information concerning APG of which it is or becomes aware, which a reasonable person would expect to have a material effect on the price or value of APG securities. The disclosure must be made promptly and without delay once APG becomes aware of the information. Section 674 of the Corporations Act reinforces this listing rule by creating criminal and civil penalties for non-compliance.

The requirement to disclose does not apply to particular information where the following are satisfied:

- (a) A reasonable person would not expect the information to be disclosed.
- (b) The information is confidential and ASX has not formed the view that the information has ceased to be confidential.
- (c) One or more of the following applies:
 - it would be a breach of 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 the entity; or
 - the information is a trade secret.

Even if the exceptions outlined above do apply, APG may be required to provide information to correct or prevent a false market in APG securities.

TYPE OF INFORMATION TO BE DISCLOSED

Relevant information is any that may affect the value of APG securities or influence investment decisions or if it is information in which security holders have a legitimate interest. The following list indicates the type of information that would be disclosed:

- A change in APG's financial earnings forecasts or consensus expectations of 10% or more.
- Any significant transaction – generally defined as one for which the consideration payable or receivable is a significant proportion of APG's consolidated assets.
- Giving or receiving a notice of intention to make a takeover.



- A change in accounting policy which would have a material effect on APG's financial results.
- An agreement between APG (or a related party or subsidiary) and a director (or a related party of the director).

MATERIALITY

Information having a material effect on the price of value of securities is information that is likely to influence persons who normally invest in securities in deciding whether or not to buy or sell the securities.

Material information may have a monetary threshold (eg a transaction where the consideration is over 5% of the written down value of consolidated assets), but may also include:

- whether a matter will significantly damage APG's image or reputation;
- whether a matter will significantly affect APG's ability to carry on its normal business; or
- whether the matter involves any breach of any law or regulation.

BECOMING AWARE OF INFORMATION

APG will be deemed to have become aware of information if a director or executive officer has, or ought reasonably to have, come into possession of the information in the course of the performance of their duties. This information should immediately be brought to the attention of the Managing Director.

RESPONSIBILITIES

The Managing Director is primarily responsible for ensuring that APG complies with its disclosure obligations. In consultation with the Board, as appropriate, and relevant staff, the Managing Director will decide what information is to be disclosed and the form of its disclosure. Where information may be excepted from the requirement to disclose, the Managing Director will take steps to protect its confidentiality.

It is the responsibility of directors and staff to ensure that the Managing Director is made aware of information that should be considered for disclosure. It is the responsibility of directors and all staff to maintain the confidentiality of information which has not been released to the market.

COMMUNICATION OF INFORMATION

All announcements are posted to the APG website immediately after release to the ASX. All announcements made by APG since its listing in November 2005 are available through our website at www.abacusproperty.com.au.

MEDIA AND ANALYSTS

Abacus has a 'no comment' policy on media speculation and rumours, which must be observed by all employees.

Only the Chairman, Managing Director, Chief Investment Officer and Head of Investor Relations are authorized to talk with representatives of the media. The Managing Director if required can designate additional personnel as authorized Abacus spokespersons. Authorised Abacus spokespersons are permitted to discuss their area of responsibility only.

COMMUNICATIONS WITH SECURITY HOLDERS

APG is committed to dealing fairly, transparently and openly with current and prospective security holders. APG commits to dealing promptly with security holder enquiries.



MARKET ANNOUNCEMENTS

Market announcements are posted to our website immediately after release to the market. All market announcements made by APG since its listing in November 2002 are currently available on our website.

When Abacus provides financial results briefings to analysts or media, the material on which the briefing is based (such as slides or presentations) is released to the market prior to the briefing. No material information that has not previously been released to the market is covered in such briefings.

Following a market announcement an automatic email is sent to all Directors which includes a copy of the market announcement.

INSIDER TRADING

The insider trading rules are an important adjunct to the continuous disclosure regime in ensuring that security holders are given fair access to material information regarding securities. Abacus seeks to limit the opportunity for insider trading in its own securities through this policy, its trading policy and the dealing rules applying to its directors.

FINANCIAL REPORTING

Transparent and prompt financial reporting is a key element of listed company disclosure. APG produces half-yearly and yearly financial reports and an annual report in accordance with the Corporations Act and listing rules.

Abacus aims to report promptly, comply with all applicable laws, listing rules and accounting standards in its financial reporting and to report in a way which is easy to understand and conveys the materiality of the matters discussed.

OTHER INFORMATION

General information of interest about APG is posted to our website.

SECURITY HOLDER MEETINGS

Security holder meetings are an opportunity for security holders to hear from and question the Board and management of APG. The chair of the meeting, generally the Chairman, is responsible for the conduct of the meeting.

APG conducts its annual and extraordinary general meetings in accordance with the Corporations Act, the ASX Listing Rules and the constitutions of the Abacus Trust, Abacus Income Trust, Abacus Group Projects Limited and Abacus Group Holdings Limited.

REPORTS TO SECURITY HOLDERS

APG corresponds periodically with all security holders to update them on APG's activities and progress.

GENERAL INTERACTION

APG deals with security holder enquiries promptly and courteously and takes measures to ensure its securities registry also does so.



GENERAL INTERACTION

APG recognizes that privacy is important and will not disclose registered security holder details unless required by law. Security holder details will only be used in accordance with applicable privacy laws.

ADOPTED:

LAST BOARD REVIEW: 17 February 2020, 15 February 2018

COMPLIANCE AND RISK REVIEW: 17 February 2020, 31 October 2019