



10 Bank Street, Suite 830
White Plains, NY 10606
www.fluencecorp.com

**FLUENCE CORPORATION LIMITED
ACN 127 734 196
("Company")**

COMMUNICATION AND DISCLOSURE POLICY

Updated 14 September 2017

Contents

[COMMUNICATION AND DISCLOSURE POLICY](#) 3

COMMUNICATION AND DISCLOSURE POLICY

Listing Rule 3.1 of the Australian Stock Exchange (“ASX”) requires listed entities to immediately notify the ASX when it becomes aware of any information that a reasonable person would expect to have a material effect on the listed entity’s securities.

1. PURPOSE

This document sets out the Company’s policies and procedures which are aimed at ensuring the Company complies with Listing Rule 3.1.

2. DEFINITIONS

2.1 In this Charter:

Board means the Board of the Company;

Policy means this Communication and Disclosure Policy as amended from time to time; and

Senior Management means employees of the Company who manage the Company pursuant to the directions and delegations of the Board.

3. RESPONSIBILITIES

3.1 Directors and Senior Management must:

3.1.1 understand the continuous disclosure requirements set out in the ASX Listing Rules;

3.1.2 convey all potentially material information to the Company Secretary or Chairman immediately after obtaining or becoming aware of such information; and

3.1.3 convey all information that would or would likely influence persons who commonly invest in securities to the Company Secretary or the Chairman.

3.2 The Company Secretary must:

3.2.1 determine, in liaison with the Chairman, whether information conveyed to the Secretary must be disclosed to the ASX;

3.2.2 prepare an appropriate announcement in conjunction with the Chairman, ensuring that the material information is reported in an objective and complete manner; and

- 3.2.3 report material information to the ASX following the approval of the Board, ensuring that information reported is factual and does not omit any material information required to be disclosed under the ASX Listing Rules.

4. POLICY

- 4.1 The Company is committed to ensuring all investors have equal and timely access to material information concerning the Company.
- 4.2 The Company will not disclose price-sensitive information in any forum unless it has been previously disclosed to the ASX.
- 4.3 The Company is committed to:
 - 4.3.1 communicating effectively with its shareholders;
 - 4.3.2 providing shareholders with timely access to balanced information concerning the Company;
- 4.4 The Company will communicate with its shareholders by:
 - 4.4.1 market releases via the ASX;
 - 4.4.2 information provided directly at meetings of shareholders; and
 - 4.4.3 information provided directly on the Company's website.