# CONTINUOUS DISCLOSURE POLICY

## 1. PURPOSE

The purpose of this Continuous Disclosure Policy is to provide a framework for compliance with all applicable legalisation and regulations governing the Company's corporate disclosure obligations, including the rules and regulations prescribed by the Australian Securities Exchange ("ASX") and the Toronto Venture Exchange ("TSX-V") (together referred to as the "Exchange").

The Company considers compliance with its continuous disclosure obligations essential to maintaining investor confidence in management of the Company and the integrity of the market for the securities of both the Company and its TSX-V listed subsidiary, Harvest One Cannabis Inc ("Harvest One").

The objective of this Policy is to ensure that all communications released by the Group to shareholders and the broader investment community are:

- a) factual and do not omit material information;
- b) expressed in a clear and objective manner to allow investors to assess the impact of the information when making investment decisions; and
- c) disseminated without delay in compliance with the continuous disclosure requirements of the ASX and TSX-V.

The Continuous Disclosure Policy covers the first public disclosure of all market sensitive information released by the Group and extends to all forms of media including oral statements, interviews and presentations by senior management and information posted on the Group's various websites and other electronic communications.

### 2. DISCLOSURE OF MATERIAL INFORMATION

The general rule underpinning the Company's continuous disclosure obligations is that once the Company becomes aware of any information concerning it that a reasonable person would expect to have a material effect on the price or value of the Company's securities, the Company must immediately disclose that information to the ASX.

Similar obligations apply to the Company's subsidiary, Harvest One, in respect of its listing on the TSX-V.

#### 3. **RESPONSIBILITIES**

The Disclosure Officers of the Company are its Chairman, Managing Director and Company Secretary.

The Managing Director, in consultation with the Chairman and Company Secretary, is primarily responsible for determining whether particular information is market sensitive and must therefore be disclosed. The Managing Director is also primarily responsible for the factual accuracy of the content of all market announcements and the timely disclosure of market sensitive information in accordance with the relevant rules and regulations of the Exchange. The Company Secretary is responsible for:

- a) overseeing and co-ordinating disclosure of information to the Exchange in accordance with this Continuous Disclosure Policy;
- b) providing guidance to Directors and employees on disclosure requirements and procedures; and
- c) maintaining copies of all announcements released.

The Board of the Company is responsible for overseeing the Company's continuous disclosure regime.

## 4. ANNOUNCEMENTS PROTOCOL

To ensure that market sensitive information is broadly disseminated in an efficient and equitable manner to all sections of the market, the ASX and TSX-V will be used as the central collection and dissemination point for all market sensitive announcements released by the Company as follows:

- a) Where both the ASX and the TSX-V exchanges are open and trading at the time market sensitive information is required to be released, market sensitive information will be released either simultaneously to the ASX and TSX-V (if possible) or otherwise managed through the use of trading halts in one or both of the Exchanges to ensure equitable distribution of information to investors trading through both Exchanges.
- b) Where only one or neither of the ASX or TSX-V exchanges are open and trading at the time market sensitive information is required to be released:
  - market sensitive information will be publicly released in the first instance through whichever of the Exchanges is open and trading (or will be the first to open and commence trading) at the time the price sensitive information is required to be publicly released, whether that be the ASX or the TSX-V: and
  - where market sensitive information is first released to one securities exchange, the same information will be submitted for release with the other securities exchange either immediately (where possible) or in any event, prior to the commencement of trading on the latter exchange.

Where the Company and/or Harvest One become obliged to publicly disclose market sensitive information but are not in a position to do so immediately or otherwise within the reasonable timeframes required by the ASX and the TSX-V, the Disclosure Officers are required to consider whether the Company and/or Harvest One should request a trading halt, or, in an exceptional case, a voluntary suspension to prevent trading in the securities of the Company and/or Harvest One whilst the market as a whole is not fully informed.

The Company's protocol in relation to the preparation and review of all market sensitive announcements is as follows:

a) All market sensitive announcements concerning the Company are to be circulated to and reviewed by all members of the Board of the Company.

Where an announcement concerns Harvest One and/or its wholly owned subsidiaries and requires disclosure on both the ASX and the TSX-V, the respective Boards of the Company and Harvest One will be given the opportunity to review the announcement concurrently.

All members of the Board shall be given a reasonable opportunity to provide the Managing Director (or in his/her absence, the Company Secretary) with verbal or written contribution to each key announcement prior to its release.

- b) Any relevant parties named in an announcement should also be given the opportunity to review the announcement prior to its release to confirm all information is factually correct.
- c) The final approval of both the Chairman and the Managing Director must be obtained prior to the release of each material announcement to the ASX and the TSX-V (as required) by the Company Secretary. In the event that one of the above Disclosure Officers are not available to carry out their role in the announcements protocol, any director of the Company may fulfil this role in the absence of that Disclosure Officer.
- d) Following release via the Exchange, market sensitive announcements may then be posted on the Company's website and disseminated via other mediums with the aim of making the information readily accessible to the widest audience.