

Domino's Pizza Enterprises Limited

Board Policy 05/05: Continuous Disclosure and External Communications

Adopted by the Board on 11 April 2005 and revised on 23 June 2009 and 10 August 2015

(ASX Corporate Governance Principles and Recommendations: Recommendation 5.1)

1 Policy objectives

- 1.1 The objective of this Policy is to ensure the market is fully informed of its strategy, ownership, governance and financial performance.
- 1.2 The Company will seek to achieve this by seeking to provide equal and timely access to information for all investors and avoiding the disclosure of material information to any person on a selective basis.

2 Policy

Equal access to information

- 2.1 Disclosable price sensitive information must be disclosed to ASX prior to disclosure to analysts, the media or others outside the company.
- 2.2 Following confirmation of receipt of lodgement, all information released to ASX will be available on or through the Company's website.

Continuous disclosure

- 2.3 Except for certain confidential, market-sensitive information (**Confidential Information**) that no reasonable person would expect to be disclosed, once the Company becomes aware of any information concerning it that a reasonable person would expect to have a material affect on the price or value of the Company's securities it will immediately tell ASX that information.
- 2.4 Continuous disclosure obligations are reviewed as a standing item on the agenda for each regular meeting of the Board and all Directors are required to confirm details of any matter within their knowledge that might require disclosure to the market.
- 2.5 Every director, officer and employee (**Employee**) of the Company has an obligation and responsibility to comply with the Company's disclosure obligations. If an Employee becomes aware of information which they believe could be material, the Employee must advise the Company Secretary or the CEO of the information.

Preventing premature disclosure

- 2.6 Each Employee must treat all information, which becomes known to them in the course of the performance of duties for the Company, as Confidential Information of the Company, and keep that information confidential except for the purpose of reporting in accordance with this policy to a director or other executive.

Handling Confidential Information

- 2.7 In order to maximise the protection of Confidential Information the Company has put in place the following measures:
 - 2.7.1 an internal system to protect Confidential Information by:
 - (a) limiting the number of people who have access to the Confidential Information;

- (b) ensuring physical documents are securely stored;
 - (c) ensuring that the security for the Company's information technology systems are up to date;
 - (d) procedures in place in the event of suspected leaks of Confidential Information; and
 - (e) regular training for Company Employees regarding Confidential Information and the Company's continuous disclosure obligations,
- 2.7.2 the Company maintains an insider list (of both internal and external people) when conducting a confidential, market-sensitive transaction;
- 2.7.3 the Company ensures that its Employees are aware of their confidentiality obligations through:
- (a) staff training;
 - (b) conducting exit interviews with leaving staff members; and
 - (c) enforcement of its Securities Trading Policy (please see Board Policy 06/05),
- 2.7.4 before passing on Confidential Information the Company requires its advisors and other services providers to enter into confidentiality agreements (unless an umbrella agreement or some other engagement arrangement fully sets out the confidentiality arrangements applicable to the transaction or a fiduciary obligation applies); and
- 2.7.5 where appropriate, limiting any market sounding to as few investors as reasonably necessary to gain the relevant level of comfort or commitment.

Periodic reporting

- 2.8 The Company will communicate regularly with shareholders through the following means:
- 2.8.1 Its full annual report, which the Company will send to shareholders in hard copy unless they elect to receive it by electronic copy;
 - 2.8.2 Its annual general meeting, at which shareholders will be updated as to the Company's performance and outlook. Shareholders will be given the opportunity to ask questions of the Board and of the auditor about the audit who will be invited to the meeting;
 - 2.8.3 Release of the annual results in August each year and the interim results in February;

Market briefings

- 2.9 The Company will brief the market as required:
- 2.9.1 If unexpected material events occur during the year; and
 - 2.9.2 To ensure that the market is clear about the Company's strategy, business and outlook.
- 2.10 No new materially price sensitive information will be provided at these briefings. Questions at briefings that deal with material information not previously disclosed will

not be answered. All inadvertent disclosure of material information during market briefings should be immediately released to ASX.

- 2.11 Slides and presentations used in briefings are to be released to ASX.
- 2.12 The Company may review analysts' research reports but will limit its comments to factual matters and material previously disclosed.

Public Announcements - authorised spokespersons and releases

- 2.13 Only the Chairman or CEO or a person authorised by the Chairman or CEO is authorised to make any public statement on behalf of the Company.
- 2.14 All ASX and media releases are to be approved by the Board except for:
 - 2.14.1 Urgent releases which must be approved by the Chairman or CEO and advised to all directors prior to release; and
 - 2.14.2 administrative releases such as disclosure of directors interests and substantial holder notices.
- 2.15 Subject to the continuous disclosure obligations, the Company will not comment on rumours or market speculation in order to avoid the emergence of a false market in the Company's securities.

Role of Company secretary

- 2.16 The Company Secretary has been nominated to have responsibility to ensure that the Company complies with continuous disclosure requirements by educating Employees on the Company's disclosure policies and procedures and raising awareness of the principles underlying continuous disclosure.
- 2.17 All proposed media releases and external presentations must be reviewed by the Company Secretary in advance in order to minimise the risk of breaching the continuous disclosure requirements. The Company Secretary is responsible for all communications with ASX. The Company Secretary should be involved in all discussions and meetings with analysts and investors, if possible or be fully briefed about those meetings. A record should be kept of all meetings and briefings with investors/analysts.
- 2.18 The Company Secretary will review briefings and discussions with analysts afterwards to check whether any price sensitive information has been inadvertently disclosed.

Trading halts

- 2.19 If a trading halt is necessary to ensure an orderly, fair and informed market, it must be approved by the Board unless it is urgent in which case it must be approved by the Chairman (or a person authorised by the Chairman) and advised to all directors prior to release.

ENDS