

Challenger Limited

Summary of Continuous Disclosure Policy

1. Introduction

Challenger has adopted a policy to ensure that it complies with its continuous disclosure obligations under the ASX Listing Rules and the Corporations Act. The framework is as provided in the Listing Rules and the legislation; the formal procedures are summarised in this paper.

2. Basic requirements

2.1 Challenger immediately notifies ASX of any information that a reasonable person would expect to have a material effect on the value/price of Challenger securities. The limited exceptions set out in the Listing Rules for certain information which is confidential apply, but only if all necessary conditions are satisfied.

2.2 Challenger assesses the materiality of information on the basis of both qualitative and quantitative criteria. Matters which do not appear quantitatively material at first glance may be material if from a qualitative perspective their omission or non-disclosure has the potential to adversely affect the decision that shareholders might make regarding their investments.

3. Continuous disclosure committee and reporting channels

3.1 Challenger has established a Continuous Disclosure Committee (comprising the Chief Executive Officer, Chief Financial Officer, Head of Investor Relations, the General Counsel and Group Company Secretary) to determine which matters require disclosure and whether a trading halt or voluntary suspension is justified in any particular situation. The guiding principle for the Committee is as set out in paragraph 2, above.

3.2 Employees are required to report potentially price sensitive information to their Executive Manager, the General Counsel and Group Company Secretary and the Head of Investor Relations. The reporting lines are co-ordinated by the Challenger Management Team. Employees are required not to pre-judge reportable situations, but to report all matters appropriate for disclosure.

4. Speculation and rumours

Where media comment or speculation becomes specific and results (or is likely to result) in a movement in the market for Challenger securities, or ASX has asked for clarification, the Group Company Secretary will convene a meeting of the Continuous Disclosure Committee to consider Challenger's response. The Committee will consider and provide the most appropriate response to requests for information from ASX and/or to comments or speculation affecting the market for Challenger securities.

5. Disclosure procedures

5.1 The following procedure is followed in relation to market disclosures:

- The Company Secretary notifies ASX of all company announcements;
- All ASX releases concerning major announcements are promptly placed on the Challenger website following acknowledgment of receipt by ASX; and
- ASX releases concerning major announcements are emailed to the board of directors and to the Chief Executive Officer's direct reports after receipt by ASX is acknowledged.

5.2 Unauthorised disclosure of price sensitive material may result in disciplinary action. Only certain named individuals in senior executive positions are authorised to speak on behalf of Challenger.