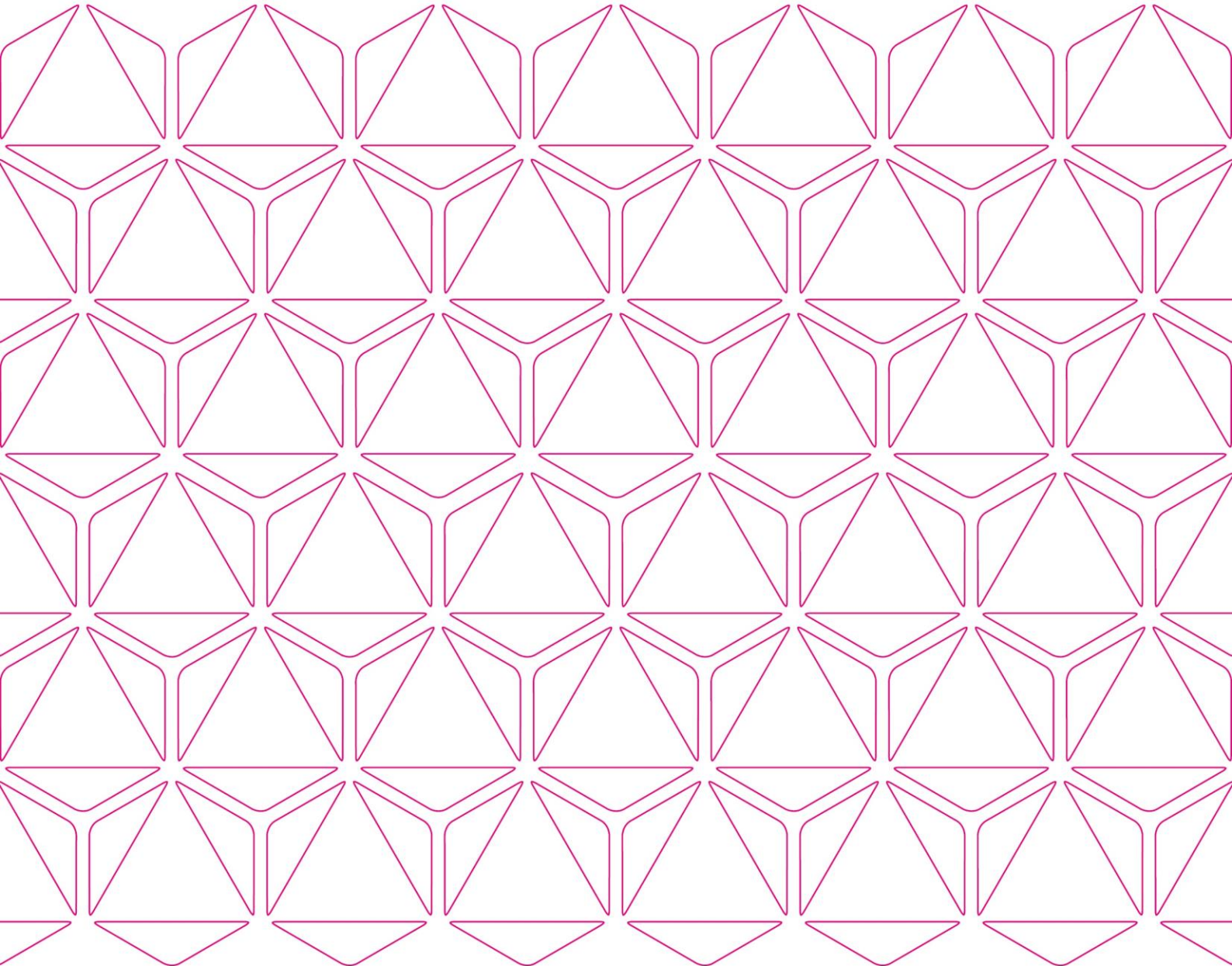


Continuous Market Disclosure Policy



Group Corporate



1. Introduction

Praemium Limited (ASX: PPS) and each of its incorporated subsidiaries ("Praemium" or "the Company") is required to comply with the continuous disclosure requirements of the Corporations Act, the Australian Securities Exchange (ASX) and other relevant exchanges on which the Company's securities are listed. The Company is committed to ensuring full and timely disclosure of price sensitive information to accommodate an efficient and informed securities market.

This policy applies to all directors and staff of the Praemium Group.

2. Continuous Disclosure Practices

Chapter 3 of the ASX Listing Rules requires that a company immediately notify the ASX and other relevant exchanges, of any information, which a reasonable person would expect to have a material effect on the price or value of the company's securities.

Exceptions to this rule are outlined in Chapter 3 of the ASX Listing Rules.

Praemium Limited's Board ("the Board") is responsible for supervising and ensuring that the Company complies with its disclosure obligations. In order for the Company to meet its continuous disclosure obligations, the following practices are adhered to:

- a. Information that is potentially market sensitive is discussed and considered by the Executive Management team in the first instance;
- b. Information considered to be market sensitive is communicated immediately to the CEO and Company Secretary. Upon approval by CEO or in his/her absence the Company Secretary, in consultation with the Board where applicable, continuous disclosure is immediately made to the relevant exchanges;
- c. In the event that circumstances occur that severely impact the business activities and the outcome is not immediately identifiable or quantifiable, the CEO together with the Board and the Company Secretary has the discretion to request a trading halt from the relevant exchanges;
- d. Periodic disclosures require the approval of the Board prior to release;
- e. Following appropriate approval, all continuous and periodic disclosure announcements are released on a timely basis to the relevant exchanges by the Company Secretary (ASX Disclosing Officer); and
- f. Upon acknowledgement of receipt from the relevant exchanges the information, where appropriate, is released to the Company website, staff and where applicable, media contacts.

Any requests for information from the ASX must be immediately forwarded to the Company Secretary who will consider the request and respond in the manner set out above concerning releases of price sensitive information.

3. Potential False Market

It may also be necessary to make an announcement in certain circumstances or where the ASX or other relevant exchange considers there is, or is likely to be, a false market in the Company's securities.

Prior to contact with any external parties, including media, results briefings and presentations to investors and analysts, any information which is price sensitive in nature will not be discussed, unless that particular information has been formally disclosed to the market. In this regard, any new and substantive written materials used are lodged with the ASX and other relevant exchanges prior to commencement of the briefing.

4. Shareholder and External Communication Policy

Praemium has adopted a disclosure policy that is designed to ensure timely and full disclosure of price sensitive information to shareholders and the market.

All releases, including relevant external briefing and presentation materials, will be made available on Praemium's website.

It is Praemium policy that, in general, Praemium will not respond to market speculation or rumours unless required to do so by law or the Australian Securities Exchange.

The Company has a formal Shareholder Communications policy which is available under the "Corporate Governance" section on the Company's website.

5. Media Communications Policy

Authorised Officers can speak on behalf of Praemium to the media, analysts and investors. These are the Chairman, CEO (or a person authorised by the CEO to speak on behalf of the Company), or any of their delegates as nominated from time to time.

Under no circumstances, other than those stated above, may a Praemium staff member make contact with the media, or when approached, discuss company related matters. If a Praemium staff member is approached by the media, they are required to refer the matter in the first instance to the Company Secretary or CEO.

6. Confidential Information

On an annual basis, the Company Secretary reviews the Market Disclosure Policy to ensure continued compliance with the Corporations Act, the ASX and other relevant exchange listing rules, and best practice recommendations. Any changes to the policy are approved by the Board, then released on the Company's website.