

CORPORATE GOVERNANCE

CONTINUOUS DISCLOSURE POLICY

1. Introduction and Commitment to Market Disclosure

As per the requirements of ASX Continual Disclosure Chapter 3 and the Corporations Act Chapter 6CA the Board of Directors of Grand Gulf Energy Limited ("**GGE**" or "**Company**") are committed to a policy of continuous disclosure.

2. Responsible Persons

The Directors of the Company in consultation with their legal and corporate advisors are the sole determinates of "materiality" and therefore disclosure requirements.

3. Material Information

All management must inform a Director or in their absence the Company Secretary of any potentially material information or proposal as soon as practicable after the manager becomes aware of that information.

Information is material if it is likely that the information would influence investors in deciding whether to buy, hold, or sell GGE securities.

4. Non Material Information

Information is not material and need not be disclosed if:

- (a) A reasonable person would not expect the information to be disclosed or is material but due to a specific valid commercial reason is not to be disclosed; and
- (b) The information is confidential; or
- (c) One of the following applies:
 - i. It would breach a law or regulation to disclose the information;
 - ii. The information concerns an incomplete proposal or negotiation;
 - iii. The information comprises matters of supposition or is insufficiently definite to warrant disclosure;
 - iv. The information is generated for internal management purposes;
 - v. The information is a trade secret;

- vi. It would breach a material term of an agreement, to which the company is a party, to disclose the information;
- vii. It would harm the company's potential application or possible patent application; or
- viii. The information is scientific data that release of which may benefit the company's potential competitors.

5. Company Records

The Company Corporate File contains all matters of materiality and all records of disclosure to Australian Stock Exchange ("ASX") and Australian Securities & Investment Commission ("ASIC").

6. Disclosure Procedures

The Company Secretary is responsible for the disclosure of material information to the ASX and ASIC and maintains a procedural methodology for disclosure as well as for record keeping.

Refer to the Communications Strategy Policy for the method of disclosure to shareholders and the general public.

7. Approval of Disclosure

Any items of materiality that require disclosure require the approval of a minimum of 2 Directors.

8. Review of Company policy on Continual Disclosure

This policy is reviewed as required.

9. Disciplining Action

Breaches of this policy may lead to disciplinary action being taken against employees and consultants, including dismissal in serious cases.

10. Contacts

If you have any questions arising from Continuous Disclosure Policy, you may contact one of the persons listed below.

Mark Freeman
Managing Director
Grand Gulf Energy Limited
1A/ 1 Alvan Street
Subiaco WA 6008
Western Australia
Telephone: +61 (0) 8 6102 4826

CORPORATE GOVERNANCE

COMMUNICATIONS STRATEGY POLICY

1. Introduction

The Board of Directors of Grand Gulf Energy Limited ("**GGE**" or "**Company**") has established a communications strategy policy to promote effective communications with shareholders and stakeholders.

2. Responsible Persons

The Directors of the Company are responsible for implementing the communications strategy.

3. Methods of Communications

3.1 ASX Release

In the first instance, the Company will release all information to the public through an ASX release. The Company will ensure the release complies with the Company's Continuous Disclosure Policy.

3.2 Website

All information released to the ASX will be posted on the GGE website as soon as practicable following confirmation of receipt by the ASX. The company will also review the website on a regular basis to ensure the information is current. GGE's website is: www.grandgulfenergy.com

3.3 Database

GGE will maintain an email database of interested parties to allow the Company to send key information released to the ASX directly to the individual's email address. Parties interested in being added to the database can register on GGE's website or contact the company direct.

3.4 Annual Report and Annual General Meeting (AGM)

The Company will use the Annual Report to summarise and inform shareholders of the Company's previous year's operations and financial performance. Through the Notice of General Meeting, the Company will encourage all shareholders and other interested parties to attend the AGM as it will give them an opportunity to ask questions and meet key personnel. An update of the Company's activities will also be provided through a presentation at the AGM.

The Company's auditor will be requested to attend the AGM and be available to answer shareholder questions about the conduct of the audit and the preparation and content of the auditor's report.

3.5 Direct Communication and Presentations

Shareholders, stakeholders and other interested parties are welcome to contact the Directors or Company Secretary directly. The Company will also be available to provide presentations to investor groups, brokers, institutions and industry related parties on a regular basis. Where possible, the Company will accept invitations to publicly present on the Company at relevant seminars and conferences.

At all times information released to any of the parties must conform with the Continuous Disclosure Policy.

3.6 Media

Key information released to the ASX will also be forwarded to relevant media organisations. The Company will also pursue and encourage publicity on the Company through feature articles and briefings. The Company is also willing to accept invitations from the media to make comment on industry related activities unless there is good reason for not doing so. All media contact must be authorised by the Board.

4. Contacts

Contact details for the company are:

Mark Freeman
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Grand Gulf Energy Limited
1A/ 1 Alvan Street
Subiaco WA 6008
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Telephone: +61 (0) 8 6102 4826

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