



Templeton Global Growth Fund Ltd (“Company”) Compliance with ASX Listing Rules Disclosure Requirements

The following is a summary of the policies and procedures that guide the Company’s compliance with the ASX Listing Rules disclosure requirements.

CONTINUOUS DISCLOSURE OBLIGATIONS:

The policy of the Board is to comply with the ASX Listing Rules requirements about timely and balanced disclosure of all material matters concerning the Company including information that would be likely to have a material effect on the price or value of the Company shares (other than material falling within the exceptions to the disclosure requirements that are contained in the ASX Listing Rules).

It is the policy of the Board to ensure that all disclosures should be:

- made in a timely manner;
- factual;
- balanced and without omission of material matters;
- in terms that will allow investors to assess the relevance of the matters disclosed.

The principal method of disclosure is by lodging announcements with the ASX.

AUTHORISED OFFICERS:

The General Manager and Secretary have primary responsibility for identifying and bringing to the attention of the Chairman and the Board all matters that are or may be required to be disclosed.

Each individual Director also has the responsibility of bringing to the attention of the General Manager or the Chairman any matters which the Director considers are or may be disclosable.

The Board has authorised the automatic release by the Secretary without reference to the Directors of certain standard forms of documents that are lodged with the ASX eg Corporations Act filings:

- substantial Shareholder Notices,
- announcements in relation to share capital (Buy-Back Notices, Dividend Reinvestment etc);
- NTA Reports,
- Changes in directors and officers (in consultation with the Chairman),
- General Meeting dates,
- results of General Meetings, and
- Notices of Change in Directors Interests.

To ensure that Board members receive a copy of material market announcements after they are made, copies of material market announcements will be provided to the next Board or Committee Meeting.

In the case of frequent announcements, such as the Appendix 3E, only the most recent announcement will be provided to the next Board or Committee Meeting.

As a general rule the contents of all other announcements by the Company to the ASX, together with all media releases and other public statements by or on behalf of the Company are required to be reviewed by the Board or a Board Committee before release.

However, the Chairman or when the Chairman is not available, any two Directors, can at his or her discretion authorise releases that have not been reviewed by Board. For the avoidance of doubt, it is within the discretion of the Chairman to require sign-off by all Directors, if he or she considers it necessary.

In the exercise of this discretion it is the practice of the Chairman to consult with such other Directors as he or she considers to be practical and appropriate. This may include arranging a conference call for available Directors to attend.

The Secretary or in the Secretary's absence the General Manager is responsible for prompt lodging of authorised announcements and for communication with the ASX concerning such announcements and also for arranging for announcements which have been made to the ASX to be posted to the Company's website.

All other external communication on behalf of the Company, such as analyst briefings and responses to shareholder questions, is reserved to:

- the General Manager, any Director and the Chairman;
- in relation to investment management only, the Investment Manager;
- the Secretary, with the scope of any authority delegated by the General Manager, Board or Chairman with respect to particular kinds of external communication; and
- a representative of Franklin Templeton Investments Australia Limited in its capacity as services provider to the Company as authorised by the Board, Chairman or General Manager.

Substantive analyst presentations, including results and AGM presentations will be lodged with ASX prior to the presentation, unless the same content has been disclosed previously.

The Board may grant additional delegations from time to time.

RESPONSIBILITIES OF OFFICERS AND AGENTS:

The Company or its agents, including authorised representatives of Franklin Templeton Investments Australia Limited as services provider to the Company, must not release information that is not generally available that a reasonable person would expect to have a material effect on the price or value of the Company's securities to any other person (including the media, even if under embargo) until the Company has first given the information to the ASX and received an acknowledgement from the ASX that the information has been released to the market.

Each director, agent, representative, advisor or consultant of the Company must protect the confidential nature of any information that is material about the Company and has not been disclosed to the ASX.

If disclosure of non-public information is made, it must be immediately reported to the Company Secretary and General Manager to enable an appropriate announcement to be made to ASX if required.

QUERIES:

For any queries about this policy or whether information is disclosable, please contact the Company Secretary or General Manager.

Approved by the Templeton Global Growth Fund Ltd Board on 27 June 2019.