

9. DISCLOSURE POLICY

1. INTRODUCTION

Goldminex is committed to:

- Ensuring that shareholders and the market are provided with full and timely information about its activities;
- Complying with the continuous disclosure obligations contained in the ASX Listing Rules and the applicable sections of the Corporations Act 2001 in Australia;
- Providing equal opportunity for all stakeholders to receive externally available information issued by Goldminex in a timely manner.

Goldminex's Disclosure Policy covers financial markets communication, media contact and continuous disclosure issues. It forms part of the Company's corporate policies and procedures and is available to all staff.

The Company Secretary manages the policy. This policy will develop over time as best practice and regulations change and the Company Secretary will be responsible for communicating any amendments.

2. GUIDING PRINCIPLE

Goldminex will immediately notify the market via an announcement to the ASX of any information concerning Goldminex that a reasonable person would expect to have a "material" effect on the price of Goldminex shares or securities or influence an investment decision on those securities.

Goldminex will ensure it does not communicate material price sensitive information to an external party except where that information has previously been disclosed to the ASX.

2.1. ASX Carve-Outs to the Guiding Principle

Disclosure is not required, where all of the three following requirements are met:

- A reasonable person would not expect the information to be disclosed;
- The information is confidential; and
- One or more of certain conditions contained in ASX Listing Rule 3.1A.3 are satisfied.

2.2. What is "Material" Information?

Information is considered material if there is a substantial probability that the information would influence investors in deciding whether to invest in or divest Goldminex securities. In particular, results of drilling and sampling programs, economic studies and earnings forecast guidance will not be provided to the market where this has not been released to the market in general.

3. COMMUNICATION PROTOCOLS

3.1. Reporting of Material Information

Any information that may be required to be disclosed is to be reported to the Chief Executive Officer or Company Secretary as soon as it is known.

The Chief Executive Officer in conjunction with the Chairman will determine whether any item of information is to be disclosed to the ASX.

3.2. Authorised Spokespersons

Goldminex staff and contractors are not authorised to comment to external parties on rumours or discuss announcements released to the ASX. Only staff duly authorised by the Board are permitted speak to shareholders, investors, stockbrokers, analysts or the media in relation to the matters subject to this policy. Currently, those persons duly authorised are:

- The Chairman;
- The Chief Executive Officer;
- Company Secretary; or
- Their delegates nominated for that purpose.

Those authorised employees may clarify information that Goldminex has publicly released, but will not comment on material price sensitive issues that have not been disclosed to the market generally.

Any staff member who receives a request for comment from an external third party is to refer the enquiry to the Chief Executive Officer or Company Secretary.

3.3. Distribution of Information

All information released to the ASX, after clearance from the ASX, will be promptly placed on the Company's website within 24 hours.

Any substantive written material or presentations made to institutions, stockbrokers or shareholders will be placed on the company web site prior to such presentations and be sent to the ASX.

3.4. Communication 'Blackout' Periods

There is no blackout period before interim and full year reports.

3.5. Management Responsibilities

Goldminex employees and contractors must be made aware of the disclosure policy. Employees or contractors must disclose any potentially material information that comes to their attention to the Chief Executive Officer or Company Secretary.

Employees and contractors must be made aware of the "no comment policy" to external parties on any matters that may be material to the Company.

3.6. Trading Halts

The Company may request a trading halt to maintain orderly trading in the Company's shares or securities.

The Company Secretary will manage the process in consultation with the Chairman, Chief Executive Officer and Directors as required.

4. CONTACT WITH THE MARKET

Goldminex senior management interacts regularly with the market with respect to its exploration results and development program in a variety of ways, including briefings, market announcements, regular updates on industry issues, one-on-one briefings, meetings and educational sessions.

In addition, Goldminex provides background and technical information to institutional investors and stock broking analysts to support announcements made to the ASX about Goldminex's ongoing business activities.

At all times when interacting with external individuals, investors, stock broking analysts and market participants, Goldminex adheres to the guiding principle set out in this policy.

4.1. Open Briefings to Institutional Investors and Stockbroking Analysts

Goldminex may hold open briefings (i.e. where all members of a relevant group are invited) with shareholders, investors and/or stock broking analysts to discuss information that has been released to the market.

Goldminex's policy for conducting open briefings is not to disclose any material price or value sensitive information that has not been announced to the market generally.

For open briefings, Goldminex will place any written briefing and presentation materials on Goldminex's website at the conclusion of the briefing.

For the purposes of this policy, public speeches and presentations by Goldminex's Chairman or Chief Executive Officer will be classed as 'open briefings'.

4.2. One-On-One Briefings with Stockbroking Analysts, Institutional Investors and Shareholders

It is in the interests of Goldminex shareholders that stock broking analysts have a thorough understanding of Goldminex business operations and activities. In addition, other professional investors seek to better understand certain aspects of the Company's strategy.

From time to time, Goldminex participates in one-on-one briefings with various investment professionals. At these briefings, Goldminex may provide background and technical information to assist these people in their understanding of Goldminex's business activities. Goldminex policy is that no previously undisclosed material price or value sensitive information will be disclosed at these briefings. For the purposes of this policy, a one-on-one briefing includes any communication between Goldminex and a stock broking analyst including, for example, phone calls or e-mails made to Goldminex's Chief Executive Officer.

Any written materials to be used at open or one-on-one briefings with institutional investors or stock broking analysts will be reviewed by the Company Secretary to ensure that all information has previously been disclosed to the market. Where this is not the case, the information will be disclosed in the manner outlined above.

4.3. Review of Analyst Reports

Goldminex recognises the important role performed by analysts in assisting to establish an efficient market with respect to Goldminex's securities. However, Goldminex is not responsible for, and does not endorse, analyst reports that contain commentary on Goldminex.

Goldminex will not provide non-disclosed material price sensitive information in response to such reports. The information may be reviewed only to correct factual inaccuracies. Any correction of factual inaccuracies by Goldminex does not imply endorsement of the content of these reports.

Goldminex will only comment on results of exploration and sampling programs, and financial outcomes and other forecasts that may be contained in this type of information, in line with previously publicly released comment.

4.4. Managing Market Speculation and Rumours

Market speculation and rumours, whether substantiated or not, have the potential to impact Goldminex's share price. Speculation may also contain factual errors that could materially affect the company.

Goldminex's general policy on responding to market speculation and rumours is that "the Company does not respond to market speculation or rumours". However, Goldminex may issue a statement in relation to market speculation or rumour where and when it considers it necessary.

Speculation may result in the ASX formally requesting disclosure by Goldminex on the matter, in which case, Goldminex will respond to the request.

5. ASX COMMUNICATIONS OFFICER

Under ASX Listing Rule 12.6, the Company Secretary has been made responsible for communications with the ASX.

ASX announcements may only be made through the Company Secretary. All ASX announcements are sent by the Company Secretary, or his nominee, using the ASX's electronic platform. The Company Secretary maintains appropriate files on ASX releases.