

Continuous Disclosure Policy

Introduction and Purpose

- 1.1 The Company is committed to complying with the continuous disclosure obligations under the Corporations Act 2001 (Cth) and the ASX listing rules.
- 1.2 This purpose of this policy is to:
 - provide shareholders and the market with equal access to timely, balanced and effective information issued by the Company and expressed in a clear and objective manner; and
 - promote investor confidence in the markets for its shares.
- 1.3 This policy applies to all Directors, Executives, employees, advisors, contractors and consultants of the Company.

ASX Listing Rules and Continuous Disclosure

- 2.1 ASX Listing Rule 3.1 sets out the continuous disclosure requirements that the Company must satisfy as a listed entity:

“Once an entity is or becomes aware of any information concerning it that a reasonable person would expect to have a material effect on the price or value of the entity’s securities, the entity must immediately tell ASX that information.”

Information described above is referred to in this Policy as “Price Sensitive Information”.

- 2.2 Material information is not required to be disclosed where the following three criteria are met:
 - the information is confidential; and
 - one or more of the following situations applies:
 - it would be a breach of a law to disclose the information;
 - the information concerns an incomplete proposal or negotiation;

- the information comprises matters of supposition or is insufficiently definite to warrant disclosure;
 - the information is generated for the internal management purposes of the Company; or
 - the information is a trade secret; and
- A reasonable person would not expect the information to be disclosed.

False market

- 3.1 A false market in the Company’s shares refers to a situation where there is material misinformation or materially incomplete information in the market. This may arise due to market rumours, leaks or inadvertent disclosures. If the ASX considers there is or is likely to be a false market and asks the Company to provide information to correct or prevent that false information, the Company must do so.

Disclosure of Price Sensitive Information

- 4.1 Ultimate responsibility for the disclosure of Price Sensitive Information rests with the Board. The Board has appointed the Company Secretary as the person responsible for compliance with the continuous disclosure requirements. This includes overseeing and coordinating disclosure of information to the ASX, analysts, brokers, shareholders, the media and the public. In addition, the Company Secretary is responsible for educating directors and staff on the Company’s disclosure policies and procedures and raising awareness of the principles underlying continuous disclosure.
- 4.2 The Company Secretary is responsible for ensuring that all announcements made by the Company to the ASX are accurate, balanced, factual, do not omit material information, and are expressed in a clear and objective manner.

- 4.3 All Directors, Executives, employees, advisors, contractors and consultants are to immediately inform the Company Secretary and the CEO of any information to be disclosed, or information that may be considered to be Price Sensitive Information. If the Company Secretary or CEO determines that there may be a requirement to disclose, the disclosure process set out below is to be initiated immediately. If there is doubt about the need to disclose, the matter should be discussed with relevant members of management, the Chairman and/or the Board as appropriate in order to form a view regarding the Company's disclosure obligations. Board meetings and Executive Management meetings are also used as an opportunity to consider potential disclosure issues and to ensure compliance with this Policy.

Disclosure Process

- 5.1 The Company Secretary will co-ordinate the actual form of disclosure with relevant members of management and/or the Board as appropriate and seek the approval of the Board before making or arranging for the relevant announcement to be made to the ASX.
- 5.2 The disclosure process is not complete until the ASX has confirmed receipt of the announcement. The Company Secretary will advise the Board when confirmation has been received from the ASX and provide a copy of all material market announcements to the Board.
- 5.3 The Company Secretary will arrange for all ASX announcements to be posted on the Company's website as soon as practicable after release to the ASX.
- 5.4 Price sensitive information is publicly released through the ASX before disclosure on other communication platforms such as the Company website, social media or directly to analysts or others outside the Company.

Analyst and Investor Meetings

- 6.1 When appropriate, the Company will conduct analyst and investor briefings. presentations to be used at such briefings will be reviewed by the CEO and/or the Company Secretary and, where appropriate, the CFO. If the presentation contains new and substantive information, a copy will be released to the ASX prior to the meeting.

Company Spokespersons

- 7.1 The Chairman, CEO, CFO, and Company Secretary ("Senior Management") or their authorised delegates are the only persons authorised to speak and comment to the media, analysts, brokers, shareholders, the public or other stakeholders in relation to the affairs of the Company.
- 7.2 As part of their role, other employees may be authorised to speak at public forums such as industry or scientific conferences provided that their presentations have been reviewed by Senior Management to ensure that there is no Price Sensitive Information disclosed.

Promoting Compliance

- 8.1 The Company Secretary is authorised by the Board to take such action as the Company Secretary considers necessary or appropriate to ensure that the Directors, Executives and their subordinates are aware of and adequately understand the nature of the Company's continuous disclosure obligations, the responsibility of the Company's Directors, Executives and employees in ensuring compliance with these obligations, and the requirements of this Policy.
- 8.2 Non-compliance with continuous disclosure obligations may constitute a breach of the Corporations Act or ASX listing rules. Breaches of this policy are to be reported to the Company Secretary or a member of Senior Management. Breaches of this policy may result in disciplinary action against the individual.



Review

- 9.1 This Policy will be reviewed periodically to ensure it continues to comply with applicable laws and regulations and remains relevant and effective.
- 9.2 The Board may change this Policy by resolution.
- 9.3 This policy was last reviewed by the Board on 28 October 2021.