



RESOURCES

*resourcing the new economy
for a better tomorrow*

CONTINUOUS DISCLOSURE POLICY

EQ RESOURCES LIMITED

ACN 115 009 106

eqresources.com.au

1. PURPOSE

- 1.1. The aim of this policy is to:
- Establish a procedure for the collection, assessment, and (if required), release to the ASX, of material information;
 - Ensure EQR company announcements are timely, factual, complete and expressed in a clear and objective manner; and
 - Ensure EQR meets its obligations to keep the share market fully informed of information which may have a material effect on the price or value of its securities.

2. SCOPE

- 2.1. This policy applies to:
- The Board and all EQR employees, contractors, and service providers (**You, you or your**)
 - All EQR subsidiaries.
- 2.2. The Code of Conduct, Spokesperson and External Communications Policy, Shareholder Communications Policy, social media Policy and Securities Trading Policy apply in conjunction with this policy.
- 2.3. A link to this Policy is located on EQR's website under the Corporate Governance tab (<https://eqresources.com.au/corporate-governance>). You will be given information and training about this Policy as considered necessary and appropriate from time to time.

3. CONTEXT & POLICY

- 3.1. EQR is listed on the Australian Securities Exchange (**ASX**) and must comply with the Corporations Act and the ASX Listing Rules (**Listing Rules**).
- 3.2. Listing Rule 3.1 of the ASX requires listed entities to immediately notify the ASX when they become aware of any information that a reasonable person would expect to have a material effect on the listed entity's securities (upwards or downwards).
- 3.3. EQR is committed to ensuring compliance with its continuous and periodic disclosure obligations relating to market sensitive information and ensuring all investors have timely, fair and equal access to material information concerning EQR.
- 3.4. EQR will not disclose price-sensitive information in any forum unless it has been previously disclosed to the ASX.
- 3.5. The Company Secretary will act on behalf of EQR on any notification or reporting in relation to market disclosures to the ASX and coordinate with analysts, brokers, and investors on the disclosure.

4. RESPONSIBILITIES

- 4.1. If you become aware of any potentially market sensitive information that is not generally available, you must immediately bring it to the attention of the Company Secretary. **Do not make your own judgement, just tell the Company Secretary.**
- 4.2. It is not possible to establish fixed rules for the type of information that might be material under Listing Rule 3.1, but some examples are:
- New mineral resource or ore reserve estimates which materially change previous estimates;

- b) Significant and material exploration results;
 - c) Significant interruptions to production which are likely to negatively impact the market;
 - d) Major changes in financial performance or outlook other than because of changes to commodity prices;
 - e) a material acquisition or disposal;
 - f) Major environmental incidents;
 - g) Catastrophic or major accidents;
 - h) Significant and material litigation, breach of contract or breach of statutory compliance matters;
 - i) granting or withdrawal of a licence material to EQR's operations;
 - j) any negative publicity or social media that relates to EQR;
 - k) a proposed or actual change to the Company's capital structure.
- 4.3. While EQR has a responsibility to disclose sensitive market information, in certain circumstances (detailed in Listing Rule 3.1) EQR is entitled to keep information confidential until it is appropriate to release it to ASX. For example, the information concerns an incomplete proposal or negotiation; the information comprises matters of supposition/is insufficiently definite to warrant disclosure; the information is generated solely for the internal management purposes or is a trade secret.
- 4.4. If you possess confidential information, you must continue to preserve its confidentiality in accordance with the Code of Conduct and the terms of your contract with EQR including by:
- a) refraining from discussing or divulging that information to an unauthorised person; and
 - b) ensuring any documents or other written material in your possession relating to that information are properly and securely stored and are not disclosed to an unauthorised person.
- 4.5. If confidential information is market sensitive information, it is 'inside information' and as such you are restricted from trading in EQR securities outside deemed Trading Windows as detailed in the Securities Trading Policy.
- 4.6. Directors and Senior Management must:
- a) understand the continuous disclosure requirements set out in the ASX Listing Rules;
 - b) convey all potentially material information to the Company Secretary or Chair immediately after obtaining or becoming aware of such information;
 - c) convey all information that would or would likely influence people who commonly invest in securities to the Company Secretary or the Chair;
 - d) immediately report any situations where information that has been lodged with the ASX is or has become (or is likely to become) incorrect, false, misleading, or deceptive;
 - e) establish processes within their teams to ensure that potentially market sensitive information is elevated within the reporting structure immediately;
 - f) maintain and protect confidential information of EQR, including by limiting the number of people who are given access to confidential information, ensuring that anyone receiving confidential information is bound by obligations of confidentiality and establishing appropriate procedures for the protection of financial information and information relating to significant projects;

- g) not use confidential information in a way that may injure or cause loss to EQR, or to gain a personal advantage;
- h) not selectively disclose (ie to analysts or the media) material information prior to it being announced to the ASX;
- i) not make unauthorised disclosures of confidential information or use it for purposes other than those for which it was disclosed except as required by law; and
- j) not speak publicly about the affairs of EQR unless authorized under the Spokesperson and External Communications Policy.

4.7. The Company Secretary must:

- a) assess, in liaison with the Chair, whether the information received must be disclosed to the ASX;
- b) consider whether the information warrants referral to the Board and, if so, present the information to the Board for determination promptly without delay, and maintain a record of any decisions;
- c) prepare an appropriate ASX announcement in conjunction with the Chair, ensuring that the material information is reported in an objective, complete, and timely manner;
- d) report material information to the ASX following the approval of the Board, ensuring that the information reported is factual and does not omit any material information required to be disclosed under the ASX Listing Rules.
- e) coordinate all communication with the ASX, including lodgment with the ASX of announcements that have been approved by the Board, or other authorised officer promptly without delay;
- f) make a clarifying statement to the ASX if EQR becomes aware that media comment or speculation is affecting the price or volume of trading in the EQR's securities, including requesting a Trading Halt if needed.
- g) ensure the EQR website includes a copy of this Policy, and copies of ASX releases.
- h) periodically review EQR's disclosure procedures in light of changes to the ASX Listing Rules or to the Corporations Act and recommend any necessary changes to Policy or Procedures
- i) ensure that Continuous Disclosure is included as an item on the agenda for each Board meeting.

5. DISCLOSURE PROTOCOL

5.1. All material disclosures must follow this process:

- a) Identification and escalation to Company Secretary
- b) Assessment of materiality
- c) Board or authorised approval (where required)
- d) Release to ASX
- e) Subsequent publication on EQR website.

6. NON-COMPLIANCE TO THE POLICY

- 6.1. Strict compliance with this Policy is a condition of employment with EQR. Breach of the Continuous Disclosure Rules can expose EQR, and individuals involved in the breach to penalties, third party claims, and reputational damage. A breach can also undermine confidence in the market for EQR's securities.
- 6.2. If there is a breach of the Policy, the person who becomes aware of the breach must immediately notify the Company Secretary who must then take such necessary and required to remedy the breach as soon as possible.
- 6.3. Where the breach relates to a leak or a suspected leak of confidential information, the Company Secretary will investigate the leak and document the steps taken and the results of the investigation.
- 6.4. Individuals involved in breaching this Policy may be subject to disciplinary action, which may include termination of employment.

7. MANAGEMENT OF POLICY

- 7.1. EQR has nominated the **Company Secretary** as the person with primary responsibility for compliance with this Policy and making you aware of this Policy. Any questions about this Policy should be referred to them.
- 7.2. This Policy will be reviewed by our Board **every 2 years** to ensure it remains effective and meets the best practices, industry standards, and our needs.
- 7.3. This Policy will be available on the EQR's website within a reasonable time after any such updates or amendments have been approved.
- 7.4. This Policy cannot be amended without written approval from the Board of Directors.

8. DOCUMENT VERSION CONTROL

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