



RESOURCES

*resourcing the new economy
for a better tomorrow*

COMMUNICATION AND DISCLOSURE POLICY

EQ RESOURCES LIMITED

ACN 115 009 106

eqresources.com.au

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1. INTRODUCTION

- 1.1 Listing Rule 3.1 of the Australian Stock Exchange (“**ASX**”) requires listed entities to immediately notify the ASX when it becomes aware of any information that a reasonable person would expect to have a material effect on the listed entity’s securities.
- 1.2 EQ Resources Limited (referred to as the “**Company**”) is committed to ensuring compliance with the continuous and periodic disclosure obligations contained in the Listing Rules of the ASX and the Corporations Act 2001 (Cth) relating to market sensitive information and providing Company security holders and the market with timely, fair and equal access information about Company’s activities.
- 1.3 The Company Secretary will act on behalf of the Company on any notification or reporting in relation to market disclosures to the ASX and coordinate with analysts, brokers, and investors on the disclosure.

2. PURPOSE

- 2.1 This Policy sets out the Company’s policies and procedures which are aimed at ensuring the Company complies with Listing Rule 3.1.
- 2.2 This Policy also serves as a tool to eliminate any regulatory, financial, and/or reputational impact for the Company.

3. APPLICATION

- 3.1. This Policy applies to the Board and employees of the Company, including temporary employees, interns, and contractors/ consultants.
- 3.2. It also applied to any of the Company subsidiaries.

4. RESPONSIBILITIES

- 4.1 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 persons 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 the Company, 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 the Company, or to gain a personal advantage;
- (h) 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
- (i) not speak publicly about the affairs of the Company unless authorised.

4.2 The Company Secretary must:

- (a) determine, in liaison with the Chair, whether the information received must be disclosed to the ASX;
- (b) considering whether the information warrants referral to the Board and, if so, presenting the information to the Board for determination promptly and without delay, and maintaining a record of any decisions
- (c) prepare an appropriate 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) coordinating all communication with the ASX, including lodgment with the ASX of announcements that have been approved by the Board, the Board, or other authorised officer promptly and without delay; and
- (f) ensuring that the Company website includes a copy of this Policy, and copies of ASX releases.

5. POLICY

5.1 The Company is committed to ensuring all investors have equal and timely access to material information concerning the Company.

5.2 The Company will not disclose price-sensitive information in any forum unless it has been previously disclosed to the ASX.

5.3 The Company is committed to:

- (a) communicating effectively with its shareholders;
- (b) providing shareholders with timely access to balanced information concerning the Company; and
- (c) maintain and protect confidential information of the Company, including 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.

5.4 The Company will communicate with its shareholders by:

- (a) market releases via the ASX;

(b) information provided directly at meetings of shareholders; and

(c) information provided directly on the Company's website.

5.5 The Company will also seek feedback from its shareholders to facilitate effective two-way communication. The Company will also give its shareholders the option of receiving communications from the Company electronically.

6. NON-COMPLIANCE TO THE POLICY

6.1 Strict compliance with this Policy is a condition of employment with the Company. Breach of the Continuous Disclosure Rules can expose the Company and individuals involved in the breach to penalties, third party claims, and reputational damage. A breach can also undermine confidence in the market for the Company's securities.

6.2 Individuals involved in breaching this Policy may be subject to disciplinary action, which may include termination of employment.

7. POLICY REVIEW AND AMENDMENTS

7.1 This Policy will be reviewed by the Audit and Risk Committee and approved by the Board **at least once every two years**. This Policy must reflect the Company's current practice and will be updated from time to time to ensure that it remains effective and meets the ASX Listing Rules and the Corporations Act 2001 (Cth).

7.2 The Audit and Risk Committee also reviews the compliance with this Policy and reports to the Board in relation to that review.

7.3 This Policy cannot be amended without written approval from the Board. Any questions about the Company's continuous disclosure obligations or this Policy should be referred to the Company Secretary.

8. DOCUMENT INFORMATION

Policy Status:	Adoption	26 January 2019
	Version	V1.0 Approved on 26 January 2019 V1.2 Updated on 1 March 2021 V.2.0 Updated on 24 July 2024
Endorsement Body:	EQ Resources Board	
Approval Body:	EQ Resources Board	
Maintained by:	Company Secretary	