AnteoTech

Continuous Disclosure & Market Communications Policy

Purpose

AnteoTech is committed to ensuring that all investors have equal and timely access to material information and that market communications are accurate, balanced and not misleading.

This Policy establishes AnteoTech Ltd (the Company)'s framework for the timely, accurate and balanced disclosure of material information to the ASX and the financial markets. It ensures that all personnel understand their obligations, that material information is assessed and disclosed promptly, and that no person obtains an informational advantage over the market.

The Policy also seeks to minimise the risk of inadvertent selective disclosure and insider trading.

Scope

This Policy applies to all AnteoTech personnel, including directors, officers, employees, contractors and consultants. Any person who becomes aware of potentially material information must escalate it without delay to a member of the Reporting Group (defined below). Material cybersecurity incidents, ransomware attacks, significant data breaches or operational disruptions must immediately be referred to the Reporting Group for assessment under this Policy.This Policy is publicly available on AnteoTech's website and is to be read alongside the Code of Conduct, the Securities Trading Policy and the Company's Corporate Governance framework.

Policy Statement

This Policy outlines AnteoTech's position on continuous disclosure and market communications. The Company shall:

- disclose to the ASX immediately and without delay any information that a reasonable person would expect to have a material effect on the price or value of AnteoTech's securities, subject only to the limited exceptions in ASX Listing Rule 3.1A;
- ensure all market communications – including ASX announcements, investor presentations, media releases and analyst briefings – are accurate, complete, not misleading and consistent with prior disclosures;
- prevent selective disclosure of material information to any person or group before it has been released to the market through the ASX;
- prohibit all personnel from trading in AnteoTech securities while in possession of material non-public information, in accordance with the Securities Trading Policy; and
- comply with the ASX Listing Rules, the Corporations Act 2001 (Cth) – including the continuous disclosure provisions in Chapter 6CA (sections 674 and 674A) and the insider trading provisions in Part 7.10 – ASX Guidance Note 8, and applicable ASIC regulatory guidance.

The Company's Disclosure Obligation

ASX Listing Rules and the Corporations Act

As a listed entity, the Company must comply with the continuous disclosure obligations in Chapter 3 of the ASX Listing Rules and Chapter 6CA of the Corporations Act. In summary:

- Listing Rule 3.1 requires that, once the Company is, or becomes aware of, information concerning it that a reasonable person would expect to have a **material effect** on the price or value of its securities, the Company must **immediately** tell the ASX that information;
- Listing Rule 3.1A provides a limited carve-out from Listing Rule 3.1 where each of the requirements in that rule is satisfied (see "Exceptions to Disclosure" below);
- Listing Rule 3.1B requires the Company, if asked by the ASX to correct or prevent a false market, to immediately give the ASX the information the ASX asks for; and

- under the Corporations Act, section 674(2) makes a failure to disclose a criminal offence and the basis for ASIC infringement notices (an objective "reasonable person" test, with no fault element), while section 674A is a civil penalty provision under which the Company (and its officers) are liable only where the Company knew, or was reckless or negligent, as to whether the information would, if generally available, have a material effect on the price or value of its securities. Materiality is assessed under section 677.

Because civil liability now turns on that fault element (introduced permanently in 2021), the Reporting Group should carefully document the Company's materiality assessments and the reasons for any decision to rely on the Listing Rule 3.1A carve-out. Directors and officers should also be aware of their duties under the Corporations Act, including the duty of care and diligence under section 180.

When the Company is "aware" of information

The Company is aware of information if a director or executive officer has, or ought reasonably to have, come into possession of the information in the course of performing their duties. An "executive officer" is a person concerned in, or taking part in, the management of the Company, regardless of their title and whether or not they are a director.

What is meant by "immediately"

Consistent with ASX Guidance Note 8, "**immediately**" does not mean instantaneously; it means "**promptly and without delay**" – doing something as quickly as it can be done in the circumstances, and not deferring or postponing it. In assessing whether disclosure was made immediately, the ASX may take into account where and when the information originated, any forewarning, the amount and complexity of the information, the need to verify its accuracy, the need for the announcement to be accurate, complete and not misleading, the need to comply with specific legal or Listing Rule requirements, and the need in some cases for board or Disclosure-Committee approval.

What is meant by "material effect on the price or value of securities"

The effect of information on price or value is judged by reference to a **reasonable person**: information is material if it would, or would be likely to, influence persons who commonly invest in securities in deciding whether to deal in the Company's securities. ASX Guidance Note 8 suggests two practical questions: would this information influence my decision to buy or sell the securities at their current market price; and would I feel exposed to an insider-trading action if I dealt in the securities knowing this information had not been disclosed? If the answer to either is "yes", the information may be market sensitive and, unless the Listing Rule 3.1A carve-out applies, may need to be disclosed.

As a guide to how the ASX reviews disclosure after the event, if an announcement is made later than the ASX considers it should have been, and trading around the announcement moved the Company's security price (relative to comparable securities) by 10% or more, the ASX will generally treat that as confirmation the information was market sensitive; a movement of 5% or less will generally be treated as confirmation it was not.

Exceptions to Continuous Disclosure Obligation – Listing Rule 3.1A

The Company does not need to disclose information under Listing Rule 3.1 while ALL of the following are satisfied:

1. **one or more** of the following conditions applies (Listing Rule 3.1A.1):
   - it would breach 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**
2. the information is confidential and the ASX has not formed the view that it has ceased to be confidential (Listing Rule 3.1A.2); and
3. a reasonable person would not expect the information to be disclosed (Listing Rule 3.1A.3).

The carve-out operates only while all three limbs are satisfied. If any limb ceases to be satisfied – for example, if confidentiality is lost, however that occurs – the Company must disclose the information immediately. "Confidential" means, in effect, secret: the information is known to only a limited number of people, who understand it is to be kept in confidence and used only for permitted purposes, and who abide by that understanding. A confidentiality agreement alone does not make information confidential for this purpose. When a potentially market-sensitive matter is under negotiation, the Company will monitor its security price, trading activity, media and social media for signs that confidentiality may have been lost, and will keep a draft trading-halt request and a draft announcement ready.

Examples of information that may fall within the carve-out include proposed acquisitions, disposals or other commercial arrangements under negotiation, internal budgets and forecasts, management accounts, business plans, internal market intelligence, information prepared for lenders, and dispute-settlement negotiations. However, some commercially sensitive matters may still require disclosure because they do not fall within the carve-out – for example, a serious claim before proceedings commence, an undisputed regulatory investigation or allegation, information about a complete proposal, confidential settlement terms not protected by a court order, or the material terms of a trading agreement with a major supplier. Whether an exception applies depends on the particular facts.

Trading Halts

Where the Company will be, or may be, trading after it first becomes obliged to give market-sensitive information to the ASX but before it can release that information, the Company should consider requesting a trading halt so that its securities are not traded on an uninformed basis. The Chairperson and the Chief Executive Officer are each authorised to decide to request a trading halt; in their absence, the Chief Financial Officer, the Company Secretary or any Director may do so. The authorised person will endeavour to consult the Chairperson and as many Board members as practicable. No other employee is authorised to request a trading halt or suspension on the Company's behalf. The Company will keep a template trading-halt request ready for use at all times and will ensure the ASX can always contact someone who can speak for the Company.

Specific Disclosure Matters

Financing arrangements

Where the Company enters into, or alters, material financing arrangements that include terms capable of being triggered by certain events (particularly events beyond the Company's control), disclosure may be required under Listing Rule 3.1 at the time of entry or alteration, or when such a term is activated or becomes likely to be activated. Any disclosure may need to cover the nature and terms of the arrangement, the trigger event, and any material impact on the Company's banking relationships, financial position or performance. A trading halt may be appropriate if the Company cannot immediately release the information.

Changes to key people and their agreements

Listing Rule 3.16.1 requires the Company to immediately tell the ASX of a change of Chairperson, Director, Chief Executive Officer (or equivalent) or Company Secretary. Listing Rule 3.16.4 requires immediate disclosure of the material terms of any employment, service or consultancy agreement (or any variation) entered into with the Chief Executive Officer, a Director, or a related party of the Chief Executive Officer or any Director.

Directors' interests and margin loans

Listing Rules 3.19A and 3.19B require the Company to disclose the notifiable interests of a Director, and any change to them, within five business days. A Director must not enter into any margin loan or similar funding arrangement over securities they hold in AnteoTech. Where any such arrangement nonetheless exists, its key terms may need to be disclosed, and in some circumstances a funding arrangement may require immediate disclosure under Listing Rule 3.1 – a matter to be assessed having regard to the Company's circumstances.

Consequences of Non-Compliance

The consequences of failing to comply with the continuous disclosure obligations are serious and may include:

1. removal of the Company from the Official List of the ASX for a breach of the Listing Rules;
2. criminal liability under section 674(2) of the Corporations Act – a fine of up to 6,000 penalty units for a body corporate, and for individuals "involved" in the contravention up to 600 penalty units, or imprisonment for five years, or both;
3. civil penalty liability under section 674A – for a body corporate, the greatest of 50,000 penalty units, three times the benefit derived or detriment avoided, or 10% of annual turnover (capped at 2.5 million penalty units); and for involved individuals, the greater of 5,000 penalty units or three times the benefit/detriment;

4. ASIC infringement notices (up to $100,000 for a listed company) as an alternative to court action; and
5. compensation claims – including shareholder class actions – by any person who suffers loss or damage, recoverable from the Company or any person involved in the contravention, which may include directors or executive officers.

Disclosure System and Responsibilities

The Reporting Group

The following personnel form the Reporting Group, because information in their possession must be considered in order to comply with the continuous disclosure obligation: the Directors; the Chief Executive Officer; and the Chief Financial Officer and Company Secretary. Each member of the Reporting Group must keep notifiable information confidential within the group, collect and forward all information that is or may be disclosable to the Directors, Chief Executive Officer and Company Secretary (and consult them if in doubt), and make senior personnel in their area aware of the Company's disclosure obligations.

The Role of the Board

The Board of Directors, or its Authorised Representatives, are responsible for:

- preparation of announcements for release to the market;
- preparation of other public releases as necessary;
- reviewing information to be provided to analysts, brokers, the media and the public to ensure any market sensitive material has first been released to the ASX;
- overseeing and co-ordinating any trading halt request; and
- authorisation of the final form of announcement to the market. Routine announcements may be approved by delegated authority approved by the Board.

The Company Secretary will be responsible for:

- communications with the ASX in relation to Listing Rule matters;
- providing approved announcements to the ASX;
- regular monitoring of the press and share price;
- consultation with the Board regarding matters for announcement to the market; and
- ensuring the Board considers whether there are any matters requiring disclosure in respect of every item of business that it considers an notes all matters which were disclosed since the last meeting.

Releasing market sensitive information to the ASX

The process for releasing market sensitive information is as follows:

1. as soon as an employee becomes aware of information that may need to be disclosed, they must immediately notify a member of the Reporting Group;
2. when a member of the Reporting Group becomes aware of such information, they must immediately give full details to the Chairperson, Chief Executive Officer and Company Secretary;
3. those officers will assess whether disclosure is required (including whether a trading halt is needed), consult the Chairperson and, as necessary, other directors and advisers (including the ASX), and inform the Chief Executive Officer;
4. a market release will be prepared and reviewed and approved by the Board before being lodged with the ASX;
5. once the ASX confirms release to the market, the release will be posted on the Company's website; and
6. a copy of all material market releases will be provided promptly to the Board.

Board reporting

Before each Board meeting, the Chairperson, Chief Executive Officer and Company Secretary will confirm with the executive members of the Reporting Group that there is no material requiring disclosure. Board papers for each meeting will include a standing "Continuous Disclosure" agenda item, under which those officers will either confirm that no material requiring disclosure was brought to their attention in the preceding period, or outline the material that has been disclosed.

Communications With the Market

Authorised spokespersons

Only the following may speak on the Company's behalf to analysts, brokers, institutional investors and shareholders generally: the Chairperson or the Chief Executive Officer.

Analyst and investor briefings

Market-sensitive information that has not been announced to the ASX must not be disclosed at briefings, verbally or in writing. The Company will not selectively release information to any investor, analyst or journalist. If a question can only be answered by disclosing undisclosed market-sensitive information, the person must decline and take it on notice. A review will be undertaken promptly after each briefing to check whether any undisclosed material information may have been inadvertently disclosed; if so, a member of the Reporting Group must be notified immediately and the information released to the ASX. A copy of all presentation materials will be released through the ASX before the briefing and placed on the Company's website afterwards. Under Listing Rule 15.7, the Company must not release market information to any person (including the media, even on an embargoed basis) until it has given the information to the ASX and received confirmation of its release.

Draft analyst reports

Where an analyst seeks a review of a draft report, it is permissible to correct errors of fact and underlying assumptions, but comment on price-sensitive information must be avoided, and any response must avoid suggesting that the Company's or the market's projections are incorrect.

Authorising external presentations in advance

Materials to be presented, and issues to be discussed, at any external presentation must be reviewed with the Chairperson, Chief Executive Officer and/or Company Secretary beforehand to confirm that no undisclosed material information will be disclosed.

Market Speculation, Rumours and Leaks

The Company does not expect to respond to all media comment or market speculation. However, where comment or speculation appears to be based on credible market-sensitive information (whether accurate or not) and the market moves in a way that appears to reference it, the Company will make a statement so the market remains properly informed, consistent with Listing Rule 3.1B. Once information becomes known to any part of the market, it should be released to the whole market.

If the Company is asked to clarify a market rumour, the enquiry must be referred to the Chairperson, Chief Executive Officer and Company Secretary; the standard response is that "the Company does not respond to market rumours", following which those officers will consider whether an announcement is required. Any unauthorised disclosure or leak of information (even if not thought to be price sensitive) must be notified to those officers, who will consider whether disclosure to the ASX is required. An unauthorised leak may place the Company in breach of the Listing Rules and expose individuals to insider-trading risk.

Company Website and Social Media

Information released to the ASX will also be published on the Company's website once the ASX confirms release. Any information or materials to be placed on the website must first be approved by the Chief Executive Officer (or, in their absence, the Chairperson and Company Secretary).

Any comments, information or materials to be posted on the Company's social media platforms must be approved by the Chief Executive Officer (or, in their absence, the Chairperson and Company Secretary) beforehand. If any director, manager or employee identifies information or commentary on social media that is factually incorrect or otherwise concerning, they must immediately inform the Chief Executive Officer or the communications focal point (or, if unavailable, a nominated spokesperson), who will consider what response, if any, is appropriate. Directors, management and employees who are not nominated spokespersons must not comment on or engage in relation to AnteoTech on social media without prior written approval. For this Policy, social media platforms include (but are not limited to) X (formerly Twitter), Instagram, Facebook, LinkedIn, HotCopper and similar platforms.

Periodic Disclosure

In addition to its Corporations Act obligations, Chapter 4 of the ASX Listing Rules requires the Company to prepare and disclose periodic financial information, including a half-year report (Appendix 4D) and a preliminary final (annual) report (Appendix 4E), together with the associated financial statements, and – while the Company remains subject to the requirement – quarterly cash flow reports (Appendix 4C). This Policy applies equally to periodic disclosure.

Register of Disclosures

The Company Secretary will maintain a register of information disclosed to the ASX, together with the Company's materiality assessments and any Listing Rule 3.1A determinations. The register is reviewed by the Audit & Risk Committee at least annually.

Training and Attestation

The Company will provide training on this Policy at induction and at least annually, covering disclosure obligations, escalation responsibilities and the prohibition on insider trading, supported by written annual attestations from all personnel. A trading blackout calendar is communicated to all personnel under the Securities Trading Policy, with ad hoc blackouts declared as needed.

Review of This Policy

The Board will review this Policy at least annually to ensure it remains effective and consistent with the ASX Listing Rules, the Corporations Act, ASX Guidance Note 8 and current ASIC guidance.

Our Outcomes

This Policy aims to maintain market integrity, protect AnteoTech and its personnel from regulatory and legal risk, and ensure all investors have equal and timely access to material information. Through consistent application, AnteoTech will uphold its obligations as an ASX-listed entity and sustain the confidence of its shareholders and the broader market.

Endorsement

This Policy is endorsed by the Board of Directors and reviewed annually.

Approval

MGray

Merrill Gray

Chief Executive Officer (CEO)

27th August 2026