

## Policy

# Disclosure & Communications

28 July 2025

29Metals Limited<sup>1</sup> ('**29Metals**', or the '**Company**') recognises the importance of providing investors, other market participants and stakeholders with equal access to timely, accurate, balanced and clear information regarding the Company. In so doing, 29Metals recognises the role it plays in safeguarding the integrity of the market for the Company's securities.

This document sets out:

- the procedures and processes that 29Metals has in place to identify, escalate and assess information for disclosure;
- 29Metals' approach to communication of Company information to the market and others, including authorised spokespersons; and
- 29Metals' processes for ensuring 29Metals personnel understand the nature and importance of the Company's disclosure obligations.

### Document Control

Document Owner	Company Secretary
Review Committee	Board of Directors
Approval Authority	Board of Directors

<sup>1</sup> In this document, a reference to 29Metals includes each of its subsidiaries (from time to time), unless the context requires otherwise.

## 1. To whom does this policy apply?

This Policy applies to all 29Metals Directors and employees, as well as contractors and consultants to 29Metals with access to sensitive information ('**29Metals Personnel**'). All 29Metals Personnel are expected to be familiar with the requirements of this Policy.

## 2. Non-compliance with this Policy

A failure to comply with this Policy is a serious matter and may result in disciplinary action, including termination of the employment or service relationship with 29Metals.

In addition, conduct that does not comply with this Policy may breach applicable laws (including the ASX Listing Rules). As such, a failure to comply with this Policy may expose the Company and relevant individuals to prosecution which may result in significant pecuniary penalties, as well as reputational damage.

## 3. Continuous disclosure

As an Australian company listed on the Australian Securities Exchange ('**ASX**'), 29Metals is required to immediately disclose to the ASX information which a reasonable person would expect to have a material effect on the price or value of the Company's securities ('**sensitive information**'), unless an exception under the ASX Listing Rules applies.

### What is sensitive information?

It is not possible to establish fixed rules for what sort of information may constitute sensitive information. As a guide, the Appendix to this Policy includes examples of the type of information that may constitute sensitive information.

For the purposes of the Company's identify and escalate procedure (refer to Section 3, below), 29Metals Personnel should adopt the 'if in doubt, escalate' approach.

### When must market sensitive information be disclosed?

Unless an exception applies, market sensitive information must be disclosed *immediately* once the Company becomes aware of it – meaning promptly and without delay.<sup>2</sup>

### What are the exceptions to disclosure?

There are circumstances where disclosure is not mandatory under the ASX Listing Rules, where:

- a reasonable person would not expect the Company to disclose the relevant information; and
- the relevant information is confidential *and* falls within one of the specific exceptions in the ASX Listing Rules.

### Exceptions to disclosure may not apply

The exceptions for disclosure are not absolute. Even if the requirements for an exception applies, 29Metals may still have an obligation to disclose the information under the ASX Listing Rules. This is why the Company's processes for identifying, escalating and assessing sensitive information, as set out in this Policy, are important.

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<sup>2</sup> The standard of *promptness* expected by market participants, the ASX and Australian Securities and Investments Commission ('ASIC') is very high; "promptly and without delay" means doing something as quickly as it can be done in the circumstances and not deferring, postponing or putting it off to a later time.

## Importance of confidentiality

In order to avoid premature disclosure of potentially market sensitive information, it is critical that the Company maintain confidentiality of relevant information. All 29Metals Personnel (including contractors) are required to maintain confidentiality of the Company's information.

## Identifying and escalating relevant information

The Company requires nominated personnel (each a '**Responsible Officer**') to actively monitor business performance and developments, within their respective areas of management or functional accountability, to identify information that may be sensitive information.

Persons in the following roles are designated as Responsible Officers:

- the Executive Leadership Team;
- each person in a 'General Manager', 'Group Manager' or 'Head of' role; and
- each other person nominated by the Chief Executive Officer ('CEO'), from time to time.

All 29Metals Personnel are encouraged to contact a Responsible Officer if they become aware of any event, matter or circumstance that is, or may be, sensitive information.

Each Responsible Officer must report information that may be sensitive information to, or otherwise ensure that the relevant information is promptly brought to the attention of, the Executive Leadership Team.

As noted above, the ASX Listing Rules require sensitive information to be disclosed to ASX *immediately* once the Company becomes aware of it. Accordingly, Responsible Officers must treat all information that is, or may be, sensitive information as an urgent matter to be reported to the CEO, CFO, COO and the Company Secretary.

The CEO, CFO, COO and the Company Secretary is responsible for assessing information to determine if disclosure is required or desirable.

## 4. Market releases

29Metals discloses sensitive information to the ASX. Other than market releases the subject matter of which is reserved to the Board (unless disclosure is required immediately and the Board is unavailable), the Board has delegated responsibility for approving market releases to the CEO. Disclosure matters reserved to the Board include: guidance and outlook statements; and releases relating to material corporate transactions (including financing).

For good governance, other than administrative reporting, the Board is provided with drafts of all market releases and reports for review prior to release, regardless of whether or not the subject matter of the release has been reserved to the Board.

In all cases, market releases (other than administrative releases) are provided to the Board immediately following release.

## 5. Market activity and rumours

29Metals will generally not comment on market rumour or speculation. However, the Company will monitor unusual market activity. Unusual market activity will be reported to the Executive Leadership Team to assess whether there may be a false market in the Company's securities and associated disclosure considerations.

## 6. Trading halts

29Metals may request a trading halt in circumstances where the Company is concerned that the market is trading on an uninformed basis, or to prevent or correct a false market, or to enable the Company to manage its

disclosure obligations. The CEO, in consultation with the Company Secretary, is authorised to request a trading halt from the ASX.

The CEO shall use best efforts to engage with the Board regarding circumstances that may give rise to a potential trading halt and, in all cases, the CEO will advise the Board immediately following a request for a trading halt.

## 7. Authorised spokespersons

Only the persons expressly nominated in this Policy are authorised to make public statements on behalf of the Company:

- the Chair, as authorised spokesperson for the Board;
- where appropriate, the Lead Independent Director;
- the CEO;
- the Chief Financial Officer ('CFO'), authorised to communicate with investors and other market participants in relation to the Company's published results;
- the Company Secretary, with primary responsibility for all communications with the ASX and the ASIC; and
- the Group Executive, Corporate Development, authorised to communicate with investors and other market participants for the purposes of approved investor relations activities.

Other persons may be authorised to make public statements on behalf of the Company, from time to time, with the prior approval of the CEO or the Board.

The Company Secretary is designated as the Company's Disclosure Officer.

## 8. Investor relations

29Metals has an investor relations function which is authorised to engage with investors and other market participants (including equity analysts). In communications with the investors and other market participants, only publicly available information and information which is not sensitive information may be referred to or provided.

The Company's investor relations team will not proactively contact, nor provide commentary in response to inbound enquiries, during designated blackout periods<sup>3</sup>.

Presentation materials for investor events will be disclosed to the ASX prior to presentation to relevant investors or other market participants.

The Company may conduct briefings for analysts and institutional investors from time to time to discuss matters concerning the Company. Only the CEO and CFO or approved investor relations representatives are authorised to speak with analysts and institutional investors.

The Company's policy at these briefings is that:

- the Company will not comment on price sensitive issues not already disclosed to the market; and
- any questions raised in relation to price sensitive issues not already disclosed to the market will not be answered or will be taken on notice.

If a question is taken on notice and the answer would involve the release of price sensitive information, the information must be released through ASX before responding.

A 29Metals representative in attendance may make notes of meetings and briefings with investors or analysts. Alternatively, an event may be webcast or teleconferenced or a recording or transcript added to the Company's website.

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<sup>3</sup> Refer to Securities Dealings Policy, a copy of which is available on the Company's website at <https://www.29metals.com/about/corporate-governance>.

After briefings, the Company's representatives present at the briefing will consider the matters discussed at the briefings to ascertain whether any price sensitive information was inadvertently disclosed. If so, the information must be communicated to the market as set out in Section 10 of this Policy.

## 9. Inadvertent disclosure or mistaken non-disclosure

If sensitive information is inadvertently disclosed, or a 29Metals Personnel becomes aware of information which should be disclosed, this must be referred to a Responsible Officer so that appropriate action can be taken including, if required, announcing the information via a market release.

## 10. Investor page

Market releases, periodic reports (such as quarterly reports and half and full year financial reports) and Company presentations will be available on a dedicated investor page on the Company's website as soon as reasonably practicable following release to the ASX, and will be retained on the investor relations page for a period of three years.

The investor page on the Company's website will also identify upcoming important dates, such as expected periodic reporting dates, the date of the Company's annual general meeting and investor events.

## 11. Training

All 29Metals Personnel will be required to undertake training in relation to this Policy at induction and at least biennially thereafter.

Responsible Officers and the Board will undertake training in relation to this Policy, continuous disclosure laws and their respective duties and responsibilities at least annually.

A copy of this Policy will be made available to all 29Metals Personnel as part of the Company's normal induction procedures and is available on the Company's website.

## 12. Review of this Policy

This Policy will be reviewed at least annually to assess whether it continues to meet its purpose and objectives in the context of (among other things):

- guidance published by the ASX and the ASIC;
- governance expectations of shareholders and other market participants; and
- community expectations.

Any amendment to this Policy requires the approval of the 29Metals Board.

Material changes to this Policy will be promptly notified to the ASX and a copy of the updated Policy will be made available on the Company's website.

## APPENDIX

### Examples of 'sensitive information'

Each of the following is an example of information that may be market sensitive information:

- the Company receives or makes a takeover or merger proposal, or the Company proposes to undertake a material acquisition or disposal;
- the Company proposes to undertake, or is involved in, any other transaction that is likely to lead to significant change in the nature or scale of the Company's business;
- changes or proposed changes in the issued capital of the Company including under or over subscriptions to an issue;
- the Company receives, or is notified that it has failed to obtain, a critical approval to undertake a significant development project;
- a significant difference between the Company's published guidance information and actual/forecast business performance;
- a significant mineral discovery at an asset in respect of which the Company has a material interest;
- there is, or there is expected to be, a significant increase or decrease in the Company's published estimates of Ore Reserves and Mineral Resources;
- a possible change in the capital structure of the Company, including (for example) a proposed issue or buy-back of Company securities;
- a proposed dividend (including a decision to not pay a dividend) by the Company;
- entry into, termination or variation of a material contract;
- changes to the Board or senior management of the Company, including changes to material terms of employment and/or service;
- actual or threatened litigation involving the Company which involves claims of a substantial quantum, or which claims relate to a material asset of the Company;
- a material unexpected liability accruing to the Company; and
- an event of default under the Company's finance arrangements.