

# Healius Limited

## Disclosure & Communication Policy

### 1. Introduction

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#### 1.1 Purpose of this Policy

Healius Limited (**Healius**) recognises the role it plays in safeguarding the integrity of the market for its securities and in particular, the importance of providing investors with announcements which are accurate, balanced, and expressed in a clear and objective manner that allows investors to assess the impact of the information when making investment decisions.

This Policy sets out:

- the roles and responsibilities of directors, officers and employees in complying with Healius' continuous disclosure obligations;
- Healius' processes to identify, escalate and assess information for continuous disclosure and the authorisation of any market announcements;
- training provided to Healius Personnel to ensure all personnel understand the nature, and importance, of Healius' continuous disclosure obligations; and
- Healius' authorised spokespersons.

All Healius personnel are expected to be familiar with the requirements of this Policy and Healius' continuous disclosure obligations.

#### 1.2 Who does this Policy apply to?

This Policy applies to:

- all officers and employees of Healius and its related bodies corporate (together, the **Healius Group**); and
- contractors and consultants to the Healius Group with access to sensitive information,

collectively "**Healius Personnel**".

### 1.3 Non-compliance with this Policy

Conduct that does not comply with this Policy may breach applicable laws (including the ASX Listing Rules or the *Corporations Act 2001* (Cth) (**Corporations Act**)). For example, a failure to comply may result in trading in Healius securities being halted or suspended. It may also result in a criminal offence for Healius and its officers, which may result in significant pecuniary penalties as well as reputational damage.

Accordingly, a failure to comply with this Policy is a serious matter and may result in disciplinary action for any relevant individual involved in the non-compliance, including termination of employment or service relationship with Healius.

### 1.4 Relationship of this Policy to other Healius Policies

This Policy should be read in conjunction with Healius' Standards of Behaviour and Conduct Policy and Policy on Trading in Healius Securities which are available on the Healius website at <https://www.healius.com.au/corporate-governance>.

The Standards of Behaviour and Conduct Policy sets out the principles by which Healius Directors and employees are to conduct business. The Policy on Trading in Healius Securities sets out specific restrictions applicable to all employees of Healius in relation to dealing in any type of Healius securities as well as additional trading restrictions applicable to Directors and Key Management Personnel of Healius.

## 2. Healius' continuous disclosure obligations

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### Price sensitive information

Healius is an Australian public company, shares in which are traded on the Australian Securities Exchange (**ASX**). Under ASX Listing Rule 3.1, Healius must immediately disclose to the market any information it is aware of that a reasonable person would expect to have a material effect on the price or value of Healius shares (**price sensitive information**) unless an exception to disclosure applies (**Healius' disclosure obligations**).

It is not possible to establish fixed rules regarding the sort of information which may constitute price sensitive information.

For the purposes of Healius' identify and escalate procedure, Healius Personnel should adopt an "if in doubt, escalate" approach.

## 3. Roles and Responsibilities

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### 3.1 All Healius Personnel must escalate information which may be price sensitive

All Healius Personnel are encouraged to inform a member of the Executive Leadership Team (**ELT**) if they become aware of any event, matter or circumstance that is, or may be, price sensitive information.

### **3.2 Role of the Executive Leadership Committee**

Healius requires each member of the ELT to actively monitor business performance and developments, within their respective areas of management or functional accountability, to identify information that may be price sensitive information.

### **3.3 Role of the Disclosure Committee**

Healius has established a Disclosure Committee to assess information, determine if the information requires disclosure to the market under Healius' disclosure obligations and if disclosure is required, to authorise the release of information to the market. Refer to section 4 below, for further details regarding the Disclosure Committee.

### **3.4 Role of the Board and the CEO**

The Board has delegated to the CEO responsibility for approving all market releases other than for market releases relating to:

- Material corporate transactions
- Half year and full year results
- Dividends
- Guidance and outlook statements
- Material regulatory matters
- Changes to the Board or to the CEO, CFO or Company Secretary
- Recommendations to shareholders made by the Board
- Any other matters the Board determines are to be approved by the Board.

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

### **3.5 Act promptly**

As noted above, the ASX Listing Rules, require price sensitive information to be disclosed to ASX "immediately" once Healius becomes aware of it. "Immediately" should be read as "promptly and without delay" meaning doing it as quickly as can be done in the circumstances and not deferring, postponing or putting it off to a later time.

Accordingly, reporting information that is or may be price sensitive information to a member of the ELT is an urgent matter and similarly, members of the ELT must act promptly and without delay in reporting price sensitive information to Healius' Disclosure Committee (refer 4 below).

It is not the responsibility of the ELT to determine if information is price sensitive but simply to promptly report the information to a member of the Disclosure Committee.

### **3.6 Safeguard confidentiality**

It is critical to maintain the confidentiality of any information which may be price sensitive information. Loss of confidentiality could result in Healius being required to disclosure information prematurely which may cause significant damage to Healius and/or third parties.

## 4. Disclosure Committee

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### 4.1 Purpose of Committee

The purpose of the Disclosure Committee is to assess information, determine if the information requires disclosure to the market under Healius' disclosure obligations and if disclosure is required, ensure that the information is promptly given to the market in a clear and objective manner that allows investors to assess the impact of the information when making investment decisions.

### 4.2 Disclosure, not form or procedure, takes priority

In carrying out its function, the Disclosure Committee is not limited by the terms of this Policy. The Disclosure Committee's objective when assessing information is to determine if disclosure is required to comply with its obligations under the ASX Listing Rules and the Corporations Act

### 4.3 Committee Structure and members

The Disclosure Committee is comprised of the following members:

- Chief Executive Officer (CEO);
- Chief Financial Officer (CFO);
- Group General Counsel; and
- Group Company Secretary.

Each Committee member may nominate a delegate to act in their place in relation to the Committee, including attendance at meetings and exchange of communications.

### 4.4 Disclosure Committee Procedures

A quorum of the Disclosure Committee is two members.

The Disclosure Committee may determine its own procedure(s) as necessary from time to time. Meetings may take place with the assistance of technology and not all attendees need to be physically present.

The Committee may determine matters through the exchange of communications without a meeting being held (for example, by e-mail).

### 4.5 Referring matters to Healius' Board

The Disclosure Committee may refer a matter to the Chair of Healius to determine whether or not the full Board should be contacted to determine a disclosure issue.

The Disclosure Committee may resolve to recommend that the CEO authorise the Group Company Secretary to request a trading halt while this process occurs. See section 6 below for more detail.

## 5. Trading halts

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Trading halts and voluntary suspensions are important mechanisms that ASX listed entities can use to manage their disclosure obligations. Requests for trading halts and voluntary suspensions are not automatically granted. They have to be agreed to and operational steps implemented by ASX before they can take effect.

Healius may request a trading halt or a voluntary suspension where:

- trading in Healius securities might occur while the market as a whole is not reasonably informed;
- there could be a false or disorderly market in Healius securities; or
- it is required to manage Healius continuous disclosure obligations.

Only the Board, or the CEO who must act in consultation with the Chair of the Board or in the absence of the Chair of the Board, the Chair of the Audit Committee, has authority to approve the making of a request for a trading halt or voluntary suspension.

## 6. Authorised spokespersons

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

- the Chair is the authorised spokesperson for the Board;
- the CEO is the authorised spokesperson for Healius in respect of any communications with third parties including investors, analysts, media, and regulators;
- the CEO is the authorised spokesperson in respect of communications with government organisations ;
- the CFO is an authorised spokesperson to communicate with investors, analysts, and other market participants;
- the Company Secretary is an authorised spokesperson for communications with ASX and ASIC;
- the CEO and CFO are the authorised spokespersons to meet with institutional investors on roadshows, both domestically and offshore;
- other persons may be authorised to make public statements on behalf of Healius from time to time with the prior approval of the CEO or the Board or where expressly permitted within the scope of their role.

## 7. Investor Communications

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### 7.1 Types of investor communication used by the Healius Group

Healius communicates information to shareholders and the investment community through:

- half year and full year financial reports;
- the annual report;
- release of details of important strategic and financial initiatives;
- the Annual General Meeting;

- live webcasts of results briefings and Annual General Meetings;
- Healius' website ([www.healius.com.au](http://www.healius.com.au)) which has a dedicated investor relations page;
- investor briefings, principally in conjunction with the communication of the half year and full year financial results;
- roadshows, both domestic and international;
- media interviews;
- specialist industry forums; and
- meetings with analysts and investors (although material non publicly available information should not be discussed at such meetings or, if inadvertently disclosed must be released to the market immediately).

## **7.2 Market speculation and rumours**

Market speculation and rumours, whether substantiated or not, have the potential to negatively impact Healius. Under ASX Listing Rule 3.1B, if ASX considers there is or likely to be a false market in Healius' securities, it may require Healius to give ASX any information it asks for to correct or prevent the false market.

Healius' general policy on responding to market speculation and rumours is that "Healius does not comment on market speculation or rumour".

In circumstances where Healius determines that it is appropriate to comment on market speculation or rumours, or it is required to respond pursuant to a request from the ASX or another regulator, a release will be lodged with the ASX.

## **7.3 Roadshows, substantive investor or analyst presentations**

Members of the Healius Executive Leadership Team or other Healius Personnel may from time to time meet institutional investors on roadshows, both domestically and offshore, or conduct substantive investor or analyst presentations. Presentations will be lodged with the ASX prior to the start of the roadshow or presentation and posted on Healius' website.

## **7.4 Analyst reports**

Stockbroking analysts frequently prepare reports on Healius, which typically detail strategies, performance and financial forecasts. Healius does not endorse stockbroking analyst reports or the information they contain.

Accordingly, Healius does not:

- externally distribute stockbroking analyst projections or reports, but may do so for internal Board or management purposes;
- post stockbroking analyst research on Healius' website, nor refer to stockbroking analyst recommendations on its website;
- selectively refer to specific stockbroking analysts, or as a general rule publicly comment on stockbroking analyst's research or recommendations; or
- provide comment or feedback to analysts on draft or final versions of forecasts.

## 7.5 Earnings guidance provided by Healius to the market

If Healius has not issued external guidance and becomes aware that the market's consensus earnings projection materially differs from Healius' internal forecast, whether or not this is due to incorrect facts in stockbroking analyst reports, Healius will act in line with the relevant Guidance Note to the ASX Listing Rules (currently Guidance Note 8) relating to whether or not it should issue a statement on the ASX.

## 7.6 Communications in periods before half-year and full-year results

Generally, the following periods should be regarded as "blackout periods", during which no investment community communications should occur unless expressly authorised by the CEO:

- the period commencing on 1 January and ending at the time of the communication to the market of Healius' half-year results (typically around 15 February); and
- the period commencing on 1 July and ending at the time of the communication to the market of Healius' full-year results (typically around 15 August).

## 8. Inadvertent disclosure

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If price sensitive information which is not publicly available is inadvertently disclosed, this must be promptly reported to a member of the Disclosure Committee so that appropriate action can be taken including, if required, announcing the information via a market release.

## 9. No embargo of information

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As price sensitive information must be released to the market via the ASX before it becomes known to any party outside the Healius Group, Healius does not disclose information publicly, for example to stockbroking analysts or journalists, under an embargo arrangement.

## 10. Training

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Training in relation to this Policy will be included as part of the standard Healius induction program. Ongoing training will also be provided as part of Healius' ongoing compliance programs.

## 11. Review and updates

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This Policy will be reviewed and approved by the Board at least every two years unless required earlier to ensure it is operating effectively. Immaterial changes including role titles may be approved by the CEO as needed from time to time.

Approved 20 August 2025

Paul Anderson  
Chief Executive Officer

Healius Limited  
ACN 064 530 516

## Version Information

Version	Date	Comment	Approver	Publication
1.0	26 June 2015	Original	-	-
1.1	5 April 2016	Minor amendments to accommodate Group Director, Corporate Affairs and updates to Securities Trading Policy	-	-
1.2	12 December 2016	Minor amendments to accommodate updates to position titles and organisational structure	-	-
1.3	4 September 2017	Minor amendments to accommodate updates to position titles and organisational structure	-	-
1.4	25 January 2019	Amended to reflect company name change	-	-
2.0	20 August 2025	Currency Review	Board	Internally and Externally