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## 1. INTRODUCTION

- 1.1. At Aurelia Metals Limited (the **Company**) we are committed to providing timely and accurate information to the market in accordance with our continuous disclosure obligations.
- 1.2. This Policy sets out the policy and procedures adopted by the Board in order to comply with the Company's continuous disclosure obligations under the Corporations Act and ASX Listing Rules.
- 1.3. This Policy applies to all Directors, Employees, contractors and consultants of the Company (**Company Personnel**).

## 2. GUIDING PRINCIPLE – IMMEDIATE DISCLOSURE OF MATERIAL INFORMATION

- 2.1. The Company's key disclosure requirement is set out in ASX Listing Rule 3.1.
- 2.2. The Company must immediately notify the market via an announcement to ASX of "information" concerning the Company that a reasonable person would expect to have a material effect on the price or value of the Company's Securities (**material information**).

## 3. MATERIALITY DEFINITION

- 3.1. Whether "information" is considered material, and therefore required to be disclosed, will vary according to the circumstances and is therefore a matter of qualitative and quantitative judgment.
- 3.2. Materiality is assessed qualitatively by assessing the "information" relative to the Company's business activities, size and market capitalisation. Quantitative assessment is guided by AASB 1031 which presumes that a transaction is deemed or presumed to be material if it is equal to or greater than 10% of the relevant base amount and deemed to be immaterial if less than 5% of the base amount. The base amount can be any relevant number such as market capitalisation, share price, annual revenue or expenditure. Where information is equal to 5% or more but less than 10% of the relevant base amount, materiality is to be assessed qualitatively having regard to the nature and significance of the information relative to the Company's business activities, size and market capitalisation.
- 3.3. Section 677 of the Corporations Act provides that information is material if a reasonable person expects the information would, (or would be likely to), influence investors in deciding whether to buy, hold or sell the Company's Securities.
- 3.4. Examples of types of information which could be material information include (this list is not exhaustive and must be assessed on a case-by-case basis):
  - the Company receives or makes a takeover or merger proposal;
  - 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 (for example) a proposed issue or buyback of Company securities;
  - government/regulatory decisions that could significantly affect the business;
  - major safety or environmental incidents that could significantly impact the business;
  - a significant difference between the Company's published earnings, cost or production guidance information and actual/forecast business performance;
  - significant exploration results;

- 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 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;
- litigation being commenced by or against 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;
- an event of default under the Company's finance arrangements.

## 4. EXCEPTION TO THE GUIDING PRINCIPLE

4.1. Disclosure is not required where each of the following three requirements is satisfied:

- (1) a reasonable person would not expect the information to be disclosed; **and**
- (2) the information is confidential and ASX has not formed the view that the information has ceased to be confidential; **and**
- (3) one or more of the following applies:
  - (a) it would be a breach of the law to disclose the information;
  - (b) the information concerns an incomplete proposal or negotiation;
  - (c) the information comprises matters of supposition or is insufficiently definite;
  - (d) the information is a trade secret; or
  - (e) the information is generated for internal management purposes.

As soon as any one of the above three elements ceases to be satisfied, for example, information ceases to be confidential, the Company must disclose the information to ASX immediately.

4.2. All Company Personnel must preserve the confidentiality of any material information concerning the Company they possess. Disclosure of material information must occur only in accordance with this Policy. If Company Personnel becomes aware that information has ceased to be confidential (e.g. if it is reported or referred to in the media or appears on any information agency screens or is discussed on social media platforms), they must inform the Company Secretary immediately so as to allow the Company to comply with its continuous disclosure obligations.

## 5. CONSEQUENCES OF FAILURE TO COMPLY WITH CONTINUOUS DISCLOSURE OBLIGATIONS

5.1. If the Company contravenes its continuous disclosure obligations by failing to notify ASX of material information:

- (1) that is not generally available; and
- (2) that a reasonable person would expect, if it were generally available, to have a material effect on the price or value of Securities issued by the Company,

it, and its officers, may be guilty of an offence under the Corporations Act.

The Company may face criminal or civil liability, de-listing from ASX and proceedings by ASIC. The Company's officers (including its Directors), Employees or advisers who are involved in a contravention by the Company, may also face criminal penalties and civil liability.

- 5.2. Contravention of the Company's continuous disclosure obligations may also lead to unwanted publicity and may cause damage to the Company's reputation which may adversely impact the market value of the Company's Securities.

## 6. INTERNAL REPORTING PROCESS

- 6.1. Employees, contractors or consultants must immediately inform Management of:
- 6.1.1. any potentially material price or value sensitive information or proposal; or
  - 6.1.2. a matter that meets the criteria in the materiality guidelines set out above (section 3).
- 6.2. Employees, contractors or consultants must consult Management if they are unsure whether a matter should, or needs to, be disclosed.
- 6.3. Management is to coordinate the provision of material or potential material information from their business unit to the Company Secretary.
- 6.4. Directors and Management must immediately inform the Company Secretary if they become aware of information that:
- 6.4.1. is not generally available (i.e. the information has not been included in any Annual Report, ASX Announcement or other publication from the Company); and
  - 6.4.2. which may be price sensitive (i.e. it is likely to have a financial or reputational impact upon the Company that may be considered material).

## 7. EXTERNAL REPORTING PROCESS (“MARKET DISCLOSURE”)

The Company's Managing Director/CEO, Chief Financial Officer and Company Secretary (herein referred to as the “**Executive**”), may receive material information from the internal reporting process (detailed in section 6). All material information is to be made available to the Board for review and agreement on what must be disclosed to the market in accordance with the Listing Rule requirements. The Company must not publicly release information before confirmation of its release by ASX has been received.

### 7.1. Nature of the information

The disclosure process undergoes differing levels of internal control and approval prior to release to ASX depending on the nature and materiality of the ‘information’. The range of information that the Company releases to ASX has been defined from extreme priority “Material Price Sensitive Information”, to high priority “Periodic Releases” to lower priority “Routine/Non-market sensitive Releases” to administrative in nature “Administrative Releases”.

#### 7.1.1. *Material Price Sensitive Information*

The Company must immediately notify ASX once it becomes aware of any **Material Price Sensitive Information** which does not fall within the exception to the guiding principle.

The proposed ASX disclosure regarding a matter of material significance to the Company must be approved by the Board prior to disclosure to ASX.

#### 7.1.2. *Periodic Releases*

The Company is obliged to make periodic disclosures, such as quarterly operating reports, financial results, (**Periodic Releases**) pursuant to the ASX Listing Rules and Corporations Act. All Periodic Releases must be approved by the Board before disclosure to ASX.

#### 7.1.3. *Routine/Non-market sensitive Releases*

Non-market sensitive ASX announcements, such as conference presentations or other announcements which do not contain market sensitive information, can be approved by the Managing Director/CEO and released to ASX.

#### 7.1.4. *Administrative Releases*

ASX announcements of a purely administrative nature such as updates to Director's Interests, Appendix 3H (Notification of cessation of securities), Appendix 3G (Notification regarding unquoted securities), Appendix 2A (Application for quotation of securities), can be approved by the Company Secretary and released to ASX.

### 7.2. **Delivering Material Information**

When the Company releases 'information' to ASX, it must:

- (1) be made in a timely manner;
- (2) be factual;
- (3) be balanced and not omit material information; and
- (4) be expressed in a clear and objective manner that allows investors to assess the impact of the information when making investment decisions.

The Executive may, where appropriate, approve additional methods for the dissemination of an announcement to the market, but only after the announcement has been released to ASX. This may include issuing a press release, sending emails to media outlets or organising a mail-out to Company security holders.

### 7.3. **Correcting and Updating Information**

If the Company discovers that information disclosed to the market is, or has become, materially incorrect due to subsequent information, the Company must release an announcement to ASX correcting or updating the relevant statement immediately following the discovery of the inaccuracy, in accordance with the processes detailed in this Policy.

### 7.4. **Board Notification of market announcements**

The Board must receive copies of all material market announcements promptly after they have been made to ASX. This can be done via ASX automated notifications.

## 8. MARKET SPECULATION AND RUMOURS

The Company generally does not respond to market speculation or rumours unless required to do so by law. Whether a comment is to be made in response to market speculation or a rumour is a decision for the Board in consultation with the Executive.

A statement in relation to market speculation or a rumour must be issued where:

- (1) the Executive and Board considers that the Company has an obligation at that time to make a statement to the market about a particular matter; or
- (2) the Company is required to respond to a formal request for information from ASX.

For example, a statement may be required to correct or prevent a false market (see section 9.5).

Statements in relation to market speculation or rumour are to be prepared by the Executive, and referred to the Chair, (or any other Director in the Chair's absence), who will determine whether the statement should be considered by the Board or relevant Committee.

## 9. COMMUNICATION WITH MARKETS

### 9.1. Guiding principles for market communications

In addition to ASX announcements, the Company may communicate with the market via group or one on-one briefings with investors and analysts and giving presentations at conferences. At all times, the following guiding principles for market communications are to be observed:

- (1) the Company must not disclose price sensitive information to an external party unless it has been previously disclosed to the market; and
- (2) timely and accurate information must be provided equally to all shareholders and market participants.

Any information to be presented to a third party must be provided to the Managing Director/CEO for approval prior to the presentation.

### 9.2. Authorised spokespersons

The only persons authorised to make public statements on behalf of the Company are the Chair of the Board and the Managing Director/CEO or a person expressly authorised by the Chair or Managing Director/CEO from time to time. If any other Company Personnel receives a request for comment from an investor, analyst or the media in relation to a matter relating to the Company, they must advise the third party that they are not authorised to speak on behalf of the Company and if appropriate, refer the inquiry to the Managing Director/CEO.

Further, no Company Personnel or associated party of the Company (such as advisers, lawyers, accountants, auditors, etc) is permitted to comment publicly on matters confidential to the Company. All Company Personnel and associated parties must be aware of their obligation to keep non-public Company information confidential.

The Company Secretary is responsible for communication with ASX in relation to Listing Rule matters. If the Company Secretary is contacted by ASX in relation to a material disclosure matter, the Company Secretary must promptly inform the Chair and the Managing Director/CEO of the substance of the communication. The Company Secretary is authorised to communicate with ASX on routine matters but must obtain prior approval from the Chair before initiating any material or significant communication with ASX.

### 9.3. No embargo of information

Company Personnel must not disclose information publicly (e.g. to analysts or journalists), under an embargo arrangement in relation to any matter that is potentially the subject of this Policy.

#### 9.4. **Analyst / Media Briefings**

Information provided to, and discussions with, analysts, media or other external parties are subject to this Policy.

Material information must not be selectively disclosed (e.g. to analysts or the media) prior to being announced to ASX.

The Company will release to ASX a copy of any new and substantive investor or analyst presentation ahead of the presentation.

All media releases must be approved by the Managing Director/CEO prior to release.

Periods in which interviews may not be given or in which presentations may not be made without the specific permission of the Managing Director/CEO may be imposed. Relevant persons will be notified of any such interview/briefing black-out period.

Company Personnel are not permitted to discuss the Company on social media including stock market forums. The Company will monitor social media when a market sensitive announcement is imminent.

#### 9.5. **False market**

If ASX considers that there is or is likely to be a false market in the Company's Securities and asks the Company to give it information to correct or prevent a false market, the Company must give ASX the information needed to correct or prevent the false market.

The obligation to give information under this rule arises even if the exception to the Guiding Principle applies (the available exceptions no longer apply). There is no formal definition of "false market" however ASX provides the following guidance on its meaning:

*"Reasonably specific rumour or media comment in relation to the entity that has not been confirmed or clarified by an announcement by the entity to the market and there is evidence that the rumour or comment is having an impact on, or ASX forms the view is likely to impact, the price of the entity's securities."*

## 10. **TRADING HALTS AND SUSPENSION OF QUOTATION**

10.1. It may be necessary to request a trading halt or suspension of quotation of the Company's Securities from ASX (or ASX may initiate the suspension) to ensure that orderly trading in the Company's Securities is maintained and to manage disclosure obligations.

10.2. The Managing Director/CEO, in consultation with the Board, is authorised to seek a trading halt or suspension of quotation.

10.3. The process for seeking a trading halt or suspension of quotation is as follows:

10.3.1. upon the Executive determining that there is a need to request a trading halt or suspension of quotation, the Managing Director/CEO shall then brief the Board and seek approval for the trading halt or suspension of quotation; and

10.3.2. if the Managing Director/CEO is unavailable, the Chair is authorised to seek a trading halt or suspension of quotation after receiving a recommendation to do so from the Company Secretary and the Chair shall then advise the Board of the trading halt or suspension of quotation.

## 11. TRAINING AND IMPROVEMENT

- 11.1. As part of the Company's commitment to its continuous disclosure obligations, Company Personnel must:
- (1) read and be aware of this Policy, which is made available to them on the Company's website or intranet;
  - (2) accept the terms of this Policy, including the obligation imposed upon them to keep non-public Company information confidential; and
  - (3) attend training programs (both as part of their general induction training and as part of the Company's continuous training programs) to ensure that they are aware of Company's continuous disclosure obligations and the terms of this Policy.
- 11.2. The Company encourages all Company Personnel to actively consider the Company's disclosure obligations and offer suggestions as to how to improve this Policy to the Company Secretary.

## 12. COMPLIANCE

- 12.1. All Company Personnel must comply with this Policy.
- 12.2. Any known or suspected instances of non-compliance should be reported to the Company Secretary for full investigation and appropriate disciplinary action. Employees should be aware that breaches of this Policy may result in summary dismissal and may also attract civil penalties under the Corporations Act.

## 13. DEFINITIONS

<b>ASIC</b>	the Australian Securities and Investments Commission.
<b>ASX</b>	the ASX Limited ABN 98 008 624 691 and the securities exchange operated by it.
<b>ASX Listing Rules or Listing Rules</b>	the Official Listing Rules of ASX as amended or replaced from time to time.
<b>Board</b>	board of directors of the Company.
<b>Company</b>	Aurelia Metals Limited ACN 108 476 384 and includes its related bodies corporate as applicable in the context.
<b>Company Personnel</b>	Directors, Employees, contractors and consultants of the Company.
<b>Company Secretary</b>	the company secretary (or secretaries) of the Company from time to time.
<b>Corporations Act</b>	the <i>Corporations Act</i> 2001 (Cth) as amended or replaced from time to time.
<b>Director</b>	a director of the Company from time to time.
<b>Employee</b>	an employee of the Company from time to time, irrespective of their employment status (i.e. whether they are employed on a full time, part time, maximum, fixed term or casual or temporary basis).
<b>Executive</b>	the Managing Director and/or Chief Executive Officer ( <b>CEO</b> ), Chief Financial Officer and Company Secretary.
<b>Management</b>	the executive leadership team of the Company, including the Managing Director and/or Chief Executive Officer, the Company Secretary, the Chief Financial Officer and any other direct reports at General Manager level or above to the Managing Director and/or Chief Executive Officer.
<b>material information</b>	information concerning the Company that a reasonable person would expect to have a material effect on the price or value of the Company's Securities.

**Securities**

include, but are not limited to shares, hybrids, debt securities, options, derivatives, interests in managed investment schemes, or any other financial products that are able to be traded on a financial market.

## 14. POLICY STATUS AND REVIEW

- 14.1. This Policy is current as at 24 April 2026 and has been updated as per the table below.
- 14.2. The Board will review this Policy regularly having regard to the changing circumstances of the Company.

TABLE 1: DOCUMENT REVISION

Revision	Date	Change Details	Change Approved By
1.0	29/07/2019	New Policy	Board
2.0	21/04/2021	Review and update to existing Policy	Board
3.0	24/04/2026	Review and update to existing Policy	Board