



CONTINUOUS DISCLOSURE POLICY

Acusensus Limited ACN 625 231 941 (Company)

1. Application

This Continuous Disclosure Policy (**Policy**) applies to the Company and its subsidiaries (and a reference to the 'Company' in this Policy will include a reference to any subsidiary), the board of directors of the Company (**Board**) and all Personnel.

In this Policy, '**Personnel**' includes an officer, employee, authorised representative, contractor or consultant of the Company, or anyone who provides services for or on behalf of the Company.

2. Purpose

ASX Listing Rule 3.1 sets out the Company's primary disclosure obligations. The Company must immediately notify ASX of information that a reasonable person would expect to have a material effect on the price or value of the Company's securities when the Company becomes aware of the information, unless the material price sensitive information falls within the exemptions set out in ASX Listing Rule 3.1A. In this context, ASX has confirmed in Guidance Note 8 that "immediately" means "promptly and without delay". Although the length of time required to make an announcement will depend on the circumstances, the information must be disclosed to ASX as quickly as possible in the circumstances and must not be deferred, postponed or put off to a later time.

The Company is committed to taking a proactive approach to continuous disclosure and creating a culture within the Company that promotes and facilitates compliance with the Company's continuous disclosure obligations.

The Company recognises the importance of its market announcements and notes that this Policy is aimed at ensuring the Company's announcements 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.

3. Responsibilities of the Board

The Board bears the primary responsibility for the Company's compliance with its disclosure obligations and is therefore responsible for overseeing and implementing this Policy.

The Board makes the ultimate decision on whether potentially material price sensitive information to be disclosed to the ASX or otherwise. It is a standing agenda item at all Board meetings to consider

any information reported or discussed at a Board meeting that may need to be disclosed in accordance with the Company's continuous disclosure obligations.

If an announcement that would ordinarily require Board approval must immediately be disclosed to the ASX in order for the Company to comply with its continuous disclosure obligations, all reasonable effort must be made to have the announcement urgently considered and approved by the Board prior to release. However, if such approval cannot be obtained then:

- 3.1 the Chair may authorise the disclosure to ensure compliance with continuous disclosure laws;
- 3.2 if the Chair is unavailable, then the Chair of the Audit and Risk Management Committee may authorise the disclosure;
- 3.3 if the Chair of the Audit and Risk Management Committee is unavailable, then the Chief Executive Officer may authorise the disclosure; and
- 3.4 if the Chief Executive Officer is unavailable, then any member of the Board may authorise the disclosure.

The announcement must then be considered by the Board at the first possible opportunity following its release to determine what, if any, further steps need to be taken by the Company.

The Company has appointed the Company Secretary or another person nominated by the Board from time to time as the Reporting Officer (**Reporting Officer**) in order to streamline the day-to-day compliance with its continuous disclosure obligations. All directors are required to notify the Reporting Officer if they believe there is material price sensitive information which requires disclosure. All directors are encouraged to approach the Reporting Officer if they have any queries about what information should be disclosed to the ASX.

4. Responsibilities of the Company Secretary

The Company has appointed the Company Secretary (and in their absence the Managing Director) as its ASX liaison officer, being the person responsible for communicating with ASX with respect to all Listing Rule matters. The Company Secretary plays an important role in the Company's disclosure compliance program and is responsible for:

- 4.1 maintaining, and monitoring compliance with this Policy;
- 4.2 liaising between themselves, the Board and the ASX;
- 4.3 overseeing and coordinating disclosure of information to the ASX (including any required verification testing of content and review / sign off by management), analysts, brokers, shareholders, the media, and the public; and
- 4.4 coordinating education within the Company about its disclosure obligations and disclosure compliance program.

5. Responsibilities of the Authorised Company Spokesperson

The Company has appointed the Chair of the Board or Chief Executive Officer, or in their absence their delegate nominated for a specific purpose, as authorised spokespersons. Authorised spokespersons

are the only people authorised to make any public statement on behalf of or in relation to the Company to the media, analysts or shareholders. All enquiries by regulators should be passed on to the Chief Executive Officer.

The spokesperson must not disclose any material price sensitive information which has not already been released to the market through the ASX, nor make comment on anything that may have a material effect on the price or value of the Company's securities. In particular, no guidance on actual or forecast financial performance will be provided to any external party that has not already been provided to the market generally. Authorised spokespersons may, however, clarify information which has already been disclosed to the ASX. Prior to making any public statement, the spokesperson should liaise with the Reporting Officer regarding the Company's disclosure history and outline what information is proposed to be disclosed to minimise the risk of inadvertent release of material price sensitive information.

In the event of potential inadvertent selective disclosure of previously undisclosed material price sensitive information, the person or persons involved should immediately contact the Reporting Officer. The Board will determine as soon as practicable whether there is a need to disclose the information to ASX.

6. Responsibilities of Personnel

All Personnel are required to comply with this Policy and the Company's continuous disclosure obligations.

In particular, all Personnel are required to escalate potentially material price sensitive information to the Reporting Officer promptly and without delay.

All Personnel are encouraged to approach the Reporting Officer if they have any queries about what information should be disclosed to the ASX.

7. Reporting Obligations

7.1 Information to be reported

Subject to the exemption set out in the ASX Listing Rules, the Company will notify the ASX as soon as it becomes aware of any information that a reasonable person would expect to have a material effect on the price or value of the Company's securities and make all required securities exchange filings.

Materiality must be assessed having regard to all the relevant background information, including past announcements that have been made by the Company and other generally available information.

A reasonable person is taken to expect information to have a material effect on the price or value of securities if it would, or would be likely to, influence persons who commonly invest in securities on deciding whether or not to subscribe for, buy or sell the securities.

Strategic or reputational matters clearly have the potential to present significant issues for the Company. They can be equally (or even more) important than financial and other 'quantifiable' matters.

Examples of potentially material price sensitive information includes, but is not limited to:

- 7.1.1 an issue of equity securities or entry into an agreement to issue equity securities;
- 7.1.2 restructurings;

- 7.1.3 major acquisitions, divestitures or joint ventures;
- 7.1.4 changes in the Board, relevant senior management or company secretary;
- 7.1.5 significant developments affecting the Company's business operations or products;
- 7.1.6 a material change in the Company's published financial forecast or expected results;
- 7.1.7 declaration of a dividend;
- 7.1.8 entry into, variation or termination of material agreements, including financing arrangements;
- 7.1.9 events triggering material accelerations of, or increases in, financial obligations;
- 7.1.10 a material change in accounting policy adopted by the Company;
- 7.1.11 a rating applied by a rating agency to the Company or its securities, and any change in such a rating;
- 7.1.12 a significant change in market or regulatory conditions which is likely to have a material effect on the Company's results;
- 7.1.13 information that may have an adverse effect on the reputation of the Company;
- 7.1.14 major litigation (brought by or brought against the Company);
- 7.1.15 a proposed change to the Company's auditor; and
- 7.1.16 the Company experiencing a data breach that results in the exfiltration of unencrypted personal information provided by a large number of customers in the ordinary course of the Company's business.

The above examples are indicative only, and are not exhaustive. Where the Reporting Officer is unsure whether information is material price sensitive information, it should take a conservative view and report it to, or discuss it with, the Board. The Company's legal advisers should be consulted where the materiality of information or the obligation to disclose is unclear.

The Company must not release information that is for release to the market to any person until it has given the information to the ASX and has received acknowledgement that the ASX has released the information to the market.

7.2 Confidential information

Certain material price sensitive information does not need to be disclosed if it falls within the scope of the confidentiality exemption set out in ASX Listing Rule 3.1A. To fall within the exemption, all of the following conditions must be satisfied:

7.2.1 the information falls within one or more the following categories:

- (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 to warrant disclosure;

- (d) the information is generated for internal management purposes of the Company;¹ or
 - (e) the information is a trade secret; and
- 7.2.2 the information is confidential and ASX has not formed the view that the information has ceased to be confidential; and
- 7.2.3 a reasonable person would not expect the information to be disclosed.

Once the Reporting Officer determines that a matter is material, the Board will consider the confidentiality of the matter and bears the sole authority to determine whether a matter should not be disclosed on the basis of the confidentiality exemption.

The Reporting Officer should disclose all material information to the Board and must not make a final assessment whether material information should not be disclosed on the basis of the confidentiality exemption. However, to assist the Board in making these decisions, the Reporting Officer should provide details as to why they consider the information may be confidential.

The Reporting Officer, directors and Personnel must take all necessary steps to ensure that all potentially confidential information remains confidential. For example, potentially confidential information should not be disclosed to external parties except on the basis of a written confidentiality undertaking.

A false market is where material misinformation or materially incomplete information exists in the market, which compromises the proper valuation of securities. ASX Listing Rule 3.1B provides that if the ASX considers that there is, or is likely to be a false market in the Company's securities, and requests information from the Company to correct or prevent the false market, the Company must give the ASX the information needed to correct or prevent the false market (i.e. a false market may cause the confidentiality exemption to be lost).

7.3 Reporting obligations of the Reporting Officer

The Reporting Officer has the following reporting obligations in relation to information that potentially requires disclosure:

- 7.3.1 review reports of potentially material price sensitive information received from directors or Personnel or otherwise obtained from the Company's reporting systems;
- 7.3.2 immediately report all potentially material price sensitive information to the Board, either in writing or verbally;
- 7.3.3 provide sufficient details of all potentially material price sensitive information to allow the Board to form a view as to whether the information is material price sensitive information and to prepare the appropriate form of disclosure, if necessary; and
- 7.3.4 state whether the Reporting Officer considers that the information is confidential and the reasons for forming that view.

The Reporting Person will consider each announcement to be lodged by the Company on ASX's market announcement platform to determine whether each such announcement should be tagged as 'market sensitive' or 'non-sensitive' when the Company uploads the announcement on the ASX announcement platform.

¹ ASX has confirmed in its Guidance Note 8, that information in relation to internal budgets or earnings projections which are generated for internal management purposes and, provided they remain confidential, are not required to be disclosed to the market.

7.4 Dealing with analysts and investors

The Company must take care to ensure that it does not give analysts or other select groups of market participants any material price sensitive non-public information at any time, such as during analyst briefings, when responding to analysts' questions or when reviewing draft analyst research reports. The Company may clarify or correct any errors of fact or interpretation that analysts make concerning already publicly available information, but only to the extent that the clarification or correction does not itself amount to giving the analyst material price sensitive non-public information (such as correcting market expectations about profit forecasts). Wherever possible, at least two representatives of the Company will be present at all analyst or market participant briefings. Where either representative believes that information that may have a material effect on the price or value of the Company's securities has been inadvertently disclosed, the representative must immediately report the matter to the Reporting Officer for review by the Board for immediate disclosure to the ASX.

Any new and substantive investor or analyst presentation should be given to the Reporting Officer for release to the ASX before it is presented at an analyst or investor briefing.

7.5 Review of analyst reports

The Company is not responsible for, and does not endorse, reports by analysts commenting on the Company.

The Company does not incorporate reports of analysts in its corporate information, including on its website (this also extends to hyperlinks to websites of analysts).

If an analyst sends a draft report to the Company for comment:

- 7.5.1 Personnel and directors must immediately send it to the Chief Executive Officer or the Chief Financial Officer (if the Chief Executive Officer is unavailable);
- 7.5.2 any response to it will not include material price sensitive information that has not been disclosed to the market;
- 7.5.3 it will only be reviewed to correct factual inaccuracies on historical matters; and
- 7.5.4 no comment will be made on any profit forecasts contained in it.

Any correction of a factual inaccuracy does not imply that the Company endorses an analyst research report.

A standard disclaimer will be made in any response to an analyst.

7.6 Market speculation and rumours

In general, the Company does not respond to market speculation and rumours except where:

- 7.6.1 the speculation or rumours indicate that the subject matter is no longer confidential and therefore the exception to disclosure set out in the ASX Listing Rules no longer applies;
- 7.6.2 the ASX formally requests disclosure by the Company on the matter (under ASX Listing Rule 3.1B); or
- 7.6.3 the Board considers that it is appropriate to make a disclosure in the circumstances.

Only authorised spokespersons may make statements on behalf of the Company in relation to market rumours or speculation. Any person within the Company should report market speculation or rumours to the Reporting Officer immediately.

7.7 Trading halts

It may be necessary to request a trading halt from the ASX to ensure that orderly trading in the Company's securities is maintained and to manage disclosure issues. The Company's Chief Executive Officer will make all decisions in relation to trading halts. If the Chief Executive Officer is unavailable, then:

- the Chair may authorise the trading halt to ensure compliance with continuous disclosure laws; and
- if the Chair is unavailable, then the Chair of the Audit & Risk Management Committee may authorise the trading halt to ensure compliance with continuous disclosure laws.

No other Personnel is authorised to seek a trading halt except with the approval of the Chief Executive Officer.

7.8 Website

All Company announcements will be posted on the Company's website immediately after the ASX has released it to the market to ensure accessibility to the widest audience.

8. Compliance

Breaches of this Policy or disclosure laws will be viewed seriously and may lead to disciplinary action being taken against the relevant Personnel. In serious cases, such action may include dismissal or termination of employment or engagement with the Company. Directors and Personnel should report all breaches of this Policy by any person to the Reporting Officer.

A breach of applicable laws may expose a director, Personnel and/or the Company to criminal and/or civil penalties, the consequences of which may be severe, such as heavy fines.

9. Review of the Policy

This Policy will be reviewed periodically by the Company Secretary to check that it is operating effectively having regard to the changing circumstances of the Company. The Company Secretary will recommend to the Board any changes to this Policy for approval.

10. Questions

For questions about the operation of this Policy, please contact the Reporting Officer.

11. Definitions

In this Policy, the following definitions apply:

ASX means ASX Limited or the Australian Securities Exchange as the context requires;

Policy means this Continuous Disclosure Policy; and

Reporting Officer means the Company Secretary or other person appointed to this role by the Board from time to time.

Last updated: January 2025.