



ALEXIUM INTERNATIONAL GROUP LIMITED

**ABN:** 91 064 820 408

### 1 Introduction

This Policy imposes obligations and procedures on all Directors, employees and contractors of the Alexium International Group Limited (“Alexium” or “the Company”) group of companies (“Group”) to ensure, on the one hand, protection of confidential information and, on the other hand, the timely and balanced disclosure of all material matters concerning the Group.

### 2 Application

This Policy applies to all Directors, senior executives (including senior and key officers) (“Senior Executives”), employees and contractors who act on behalf of or represent the Group (“Group Personnel”).

Group Personnel must understand and comply with this policy. Compliance with this policy is critical and failure to comply could lead to civil or criminal liabilities for the Company and its employees and could have a damaging impact on the perception of the Company within the investment community.

### 3 Objectives

3.1 The objectives of this policy are to:

(1) ensure that the Company is able to meet its continuous disclosure obligations under the Australian Securities Exchange (“ASX”) Listing Rules and the Corporations Act 2001 (Cth); and

(2) establish internal procedures so that all Group Personnel understand their obligations to ensure:

- a. confidential information is protected;
- b. Price Sensitive Information (as defined in clause 4.1 and further explained in clause 8) is disclosed to the Disclosure Officer; and

(3) recognise the importance of the Company’s market announcements being accurate, balanced and expressed in a clear and objective manner that allows investors to assess the impact of the information when making decisions.

### 4 Continuous disclosure – legal considerations

4.1 Chapter 3 of the ASX Listing Rules deals with the continuous disclosure requirements that a listed company must satisfy. In particular, Listing Rule 3.1 states that once an entity is or becomes aware of any information concerning it that a reasonable person would expect to have a material effect on the price or value of the entity’s securities (“Price Sensitive Information”), the entity must immediately inform the ASX of that information.

There is, however, an exception to the disclosure of Price Sensitive Information in Listing Rule 3.1. This exception applies when:

- (1) a reasonable person would not expect the information to be disclosed;
- (2) the information is confidential and ASX has not formed a view otherwise; and
- (3) one or more of the following applies:

- a. it would be a breach of law to disclose the information;
- b. the information concerns an incomplete proposal or negotiations;
- c. the information comprises matters of supposition or is insufficiently definite to

warrant disclosure;

- d. the information is generated for the internal management purposes of the Company; or
- e. the information is a trade secret.

4.2 The Listing Rules also provide that if the ASX considers that there is or is likely to be a false market in an entity's securities and asks the entity to give information to correct or prevent a false market, the entity must give the ASX the information needed to correct or prevent the false market.

## 5 Information to be disclosed to Disclosure Officer

5.1 The Board is required to appoint a Disclosure Officer to administer this policy.

5.2 As soon as any Group Personnel become aware of information:

- (1) that is not generally available (i.e. the information in question has not been included in any annual report, ASX release or other publication of the Company); and
- (2) which may be Price Sensitive Information;

they must provide to the Disclosure Officer the following information:

- (1) a general description of the matter;
- (2) details of the parties involved;
- (3) the relevant date of the event or transaction;
- (4) the status of the matter (e.g. final/ negotiations still in progress/ preliminary negotiations only);
- (5) the estimated value of the transaction;
- (6) the estimated effect on the Company's finances or operations; and
- (7) the names of any in-house or external advisers involved in the matter.

## 6 Disclosure of information externally



Unless disclosed in accordance with this policy, potentially Price Sensitive Information should be treated as strictly confidential. In particular, information concerning an incomplete proposal or negotiation, or information which is insufficiently definite to warrant disclosure, should not be disclosed externally e.g. to analysts, professional bodies, the media, customers or any other person ("External Persons") and should only be disclosed internally to the minimum number of persons possible.

6.1 All confidentiality guidelines issued by the Disclosure Officer must be followed. Senior Executives leading a proposed transaction also must consider whether additional safeguards should be implemented to protect sensitive information, consistent with recognized governance and investor relations good practice..

6.2 Potentially Price Sensitive Information must not be selectively disclosed to External Persons prior to being announced to the ASX.

6.3 The Disclosure Officer will release a copy of any new investor or analyst presentation on the ASX market announcements platform ahead of the presentation.

6.4 If any Group Personnel is proposing to present any potentially Price Sensitive Information to External Persons (e.g. at an analyst briefing) or make any media release, they should ensure that copies of their

materials are provided to the Disclosure Officer prior to presenting that information externally or making that media release. All material to be presented at a general meeting of shareholders also must be approved by or referred through the Disclosure Officer prior to briefing.

6.5 When presenting Price Sensitive Information which has been approved by the Disclosure Officer, discussion should be limited to the scope of the approved material. Issues beyond this scope should only be discussed if the relevant information has already been announced to the ASX. If a question can only be answered by disclosing potentially Price Sensitive Information, the person should decline to answer or take the question on notice.

6.6 If potentially Price Sensitive Information is leaked or inadvertently disclosed to External Persons, that information should immediately be provided to the Disclosure Officer.

#### Role of the Disclosure Officer

6.7 The Board has appointed the Company Secretary ("Secretary") to act as the Disclosure Officer to:

- (1) monitor the Company's compliance with disclosure obligations, including the maintenance of confidentiality of information when appropriate;
- (2) be responsible for disclosure to the ASX;
- (3) ensure that a process of approval is followed regarding media releases and other material for presentation to External Persons and shareholders;
- (4) have responsibility for communications with the ASX in relation to ASX Listing Rule matters generally (in accordance with ASX Listing Rule 12.6).

6.8 The Disclosure Officer must:

- (1) periodically monitor disclosure processes and reporting and periodically review the effectiveness of disclosure and materiality guidelines;
- (2) provide guidance to the Company to assist the Company in determining what information must be disclosed to the ASX, including the information needed to correct or prevent a false market;
- (3) conduct disclosure discussions with management as required;
- (4) conduct all disclosure discussions with the ASX;
- (5) maintain a Disclosure File which must contain a record of:
  - a. material that has been disclosed to the ASX (with a copy of each announcement to the ASX); and
  - b. potentially price sensitive information that has come to the attention of the Disclosure Officer and has not been disclosed to the ASX, together with the reasons for that non-disclosure;
- (6) submit reports to each regular Board meeting, setting out the matters disclosed to the ASX and those matters of which the Disclosure Officer became aware that were not disclosed to the ASX and the reasons for that non-disclosure (if any);
- (7) put in place such confidentiality as the Disclosure Officer considers necessary or appropriate;
- (8) take such action as the Disclosure Officer considers necessary or appropriate, in conjunction with the Chair (including if considered necessary the implementation of regular training sessions for relevant Group Personnel) to ensure that the senior managers and their subordinates are aware of and adequately understand:



- a. the nature of the Company's continuous disclosure obligations;
- b. the responsibilities of the Group Personnel in ensuring compliance with the Company's continuous disclosure obligations, including the maintenance of confidentiality of information when appropriate; and
- c. the requirements of this policy.

6.9 The Disclosure Officer must, as quickly as possible in the circumstances, decide in respect of information that comes to his or her attention (either directly or from a director or Senior Executive) whether:

- (1) the information must be disclosed to the ASX;
- (2) there is an exception which allows non-disclosure to apply; or
- (3) an alternative procedure, such as whether a notice pending, trading halt or suspension of shares is appropriate in all the circumstances.

6.10 In the case of paragraphs 7.3(1) and 7.3(2), there are 3 alternatives:

(1) The Disclosure Officer believes the information is Price Sensitive Information and must be disclosed. In this case, the Disclosure Officer must:

- a. Bring the matter to the attention of the Chair followed by the Board;
- b. discuss the matter with management;
- c. discuss the matter with the Company's Managing Director (or equivalent) who may, in turn, discuss the matter with the Chair or other Directors;
- d. prepare an announcement to the ASX disclosing the Price Sensitive Information which must be considered and approved by the Board; and
- e. promptly and without delay send the announcement to ASX and a copy of the announcement to all Directors (usually by email) and place a copy of the announcement on the Disclosure File maintained by the Disclosure Officer.

(2) The Disclosure Officer believes reasonably, considering all of the circumstances, the information is not Price Sensitive Information or does not have to be disclosed because it is covered by the exceptions in ASX Listing Rule 3.1A. In this case, the Disclosure Officer must make careful notes documenting why the information has been brought to his or her attention and the reasons why the information is not price sensitive, or why the exceptions in ASX Listing Rule 3.1A apply (as applicable). These notes must be placed on the Disclosure File.

If the information is covered by an exception in ASX Listing Rule 3.1A but then is leaked or inadvertently disclosed externally, the Disclosure Officer should consider whether the protection of the ASX Listing Rule 3.1A still applies. If so, then it should make notes as above explaining the reasons but nonetheless post the information on the Company's website. If not, the Disclosure Officer should undertake steps (a) to (d) in paragraph 7.4(1).

(3) The Disclosure Officer is not certain whether the information is Price Sensitive Information or whether it falls within an exception. In this case, the Disclosure Officer must follow the appropriate procedures in paragraph 7.4(1) and seek external legal or financial advice.

6.11 The Disclosure Officer shall be responsible for ensuring that Company announcements are:

- (1) made promptly and without delay i.e. as quickly as possible in the circumstances and not deferring, postponing or putting it off to a later time;



- (2) factual;
- (3) complete i.e. do not omit Price Sensitive Information;
- (4) balanced i.e. they include not only positive Price Sensitive Information but also negative Price Sensitive Information;
- (5) are expressed in a clear and objective manner that allows investors to assess the impact of the information when making investment decisions: and
- (6) have been appropriately authorised by the Company for release as required by the ASX Listing Rules.

## 7 What is Price Sensitive Information?

7.1 The Disclosure Officer, in consultation with the Board, is responsible for assisting the Company in making decisions about what information will be disclosed. As noted in paragraph 4.1 above, whether information constitutes Price Sensitive Information depends on whether it is material (see Clause 8.2 following).

7.2 Information is material if the information would, or would be likely to, influence persons who commonly invest in securities in deciding whether to acquire or dispose of the Company's securities.

7.3 The information needs to be assessed in the context of the circumstances affecting the Company at the time, including any external information that is publicly available, and any previous information the Company has provided to the market.

7.4 Materiality is assessed against this qualitative test, considering the Company's business activities, size and place in the market.

7.5 A quantitative assessment may also be undertaken by the Disclosure Officer as part of, but not in substitution for, the materiality test.

7.6 To ensure that there is no pre-judgment of the materiality test, Group Personnel must inform the Disclosure Officer of any potentially material price or value sensitive information or proposal as soon as they become aware of it.

7.7 If an employee is in doubt about whether particular information is potentially Price Sensitive Information, they should immediately disclose the information to the Disclosure Officer.

7.8 Information regarding the financial position, performance, ownership and governance of the Company may constitute Price Sensitive Information.

7.9 There are many other types of information that could also give rise to a disclosure obligation. For example, developments in companies which are affiliated with, but not controlled by, the Company may be Price Sensitive Information when related to the Company itself. Any questions on whether particular information is Price Sensitive Information should be immediately directed to the Disclosure Officer.



## 8 Consequences of contraventions

The Company contravenes its Australian continuous disclosure obligations if it fails to notify the ASX of the information required by ASX Listing Rule 3.1 to be disclosed. If the Company contravenes this obligation by failing to notify the ASX of 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 2001 (Cth).

#### 10 Trading Halts

The Secretary may request a trading halt from the ASX to prevent trading in the Company's securities by an inefficient and uninformed market.

The Secretary will manage the process of seeking a trading halt in consultation with the Chair and the Board of Directors.

#### 11 Review and changes to this policy

The Board will review this policy and related procedures as often as the Board considers necessary to ensure this policy remains effective and relevant to the current needs of the Company.

#### 12 Public availability of materials

A copy of the Price Sensitive Information Policy will be publicly available on the Company's website in the corporate governance section at <https://www.alexiuminternational.com/investor-relations/>.

*Approved by the Board on 22 August 2025.*