

## CONTINUOUS DISCLOSURE POLICY

### Tesseract Limited ACN 605 672 928 (“Company”)

The policy is aimed at ensuring that market sensitive information is continually disclosed to the Australian Securities Exchange (**ASX**) and the market.

The purpose of this policy is to assist with the Company’s continuous disclosure obligations that arise under the ASX Listing Rules and the Corporations Act 2001(Cth) (**the Act**). It outlines the procedures to be followed for the release of information to the ASX, the investment community, the media and the public.

Serious consequences, both civil and criminal, may arise from a breach of the law relating to continuous disclosure. A breach can negatively affect both the Company and individuals.

#### **1. Continuous Disclose Obligation**

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If the Company becomes aware of any information that a reasonable person would expect to materially affect the Company’s share price, the Company will promptly and without delay disclose the information to the ASX.

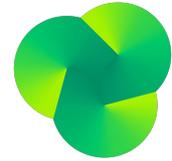
Information related to the following may be required to be disclosed:

- (a) financial results;
- (b) dividends;
- (c) profit outlooks;
- (d) resignations and appointments of Directors; and
- (e) key strategic strategies.

Information to be released to the market will be factual, will not omit any material information and will be expressed in an objective and clear manner.

The Company will not disclose market sensitive information where:

- (a) the information relates to an incomplete proposal;
- (b) the information is not definite enough to require disclosure;
- (c) the information relates to a trade secret;
- (d) the information is generated merely for internal management purpose.
- (e) the information is confidential, and the ASX does not believe that the information is no longer confidential; and/or



## CONTINUOUS DISCLOSURE POLICY

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- (f) A reasonable person would not expect the information to be disclosed.

### 2. Review and Disclosure of Information

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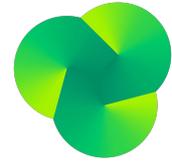
The Disclosure Team consist of, the:

- (a) Chairman,
- (b) CEO;
- (c) CFO (if any); and
- (d) Company Secretary.

#### **(Disclosure Team)**

If the Disclosure Team has received information that may be market sensitive, the following procedure will be followed:

- (a) The information will be reviewed by the Disclosure Team.
- (b) The Disclosure Team will determine whether the information requires disclosure under the ASX Listing Rules and the Act. If required, the Disclosure Team will consult with the Board of Directors.
- (c) Any information that that poses a significant financial or reputational risk to the Company must be referred to the Company's Board. The Board must then approve any disclosure of information to the ASX.
- (d) Unless the Board is otherwise aware, the Disclosure Team must tell the Board of any disclosure or non-disclosure decision as soon as possible after a decision has been made.
- (e) After it is resolved that any information requires disclosure, the Disclosure Team will promptly and without delay inform the ASX of the information.
- (f) If information is required to be disclosed to the ASX, it will not be given to anyone else until the information has been given to the ASX and the ASX has communicated to the Company that the information has been released to the market. The information will not be given to the media or analysts before the ASX.
- (g) After disclosure to the ASX, the Disclosure Team shall place the information on the Company's website. The market sensitive information will also be provided by the Disclosure Team to the media, analysts and investors. Only the Disclosure Team may convey this information to the media, analysts and investors.



## CONTINUOUS DISCLOSURE POLICY

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- (h) The Disclosure Team must give all directors a copy of any continuous disclosure announcement.

### 3. Register of Continuous Disclosure Decisions

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The Disclosure Team will maintain a register of all information referred to it as potentially market sensitive information (**the Register**). The Register will include the following information:

- (a) the information under consideration;
- (b) whether the information was disclosed to the ASX, and the justification for any reasons; and
- (c) if an announcement is made, a record of the announcement.

### 4. Communication with ASX

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Any communication with the ASX regarding disclosure obligations shall be made by [the Disclosure Team/ Company Secretary]. No other person is entitled to communicate with the ASX regarding continuous disclosure.

### 5. Presentations and Briefings

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If information is to be disclosed at a presentation or briefing, the following procedure shall be followed:

- (a) Any information that will be disclosed in a presentation or briefing will be given to the Company Secretary in advance of the briefing or presentation. The Company Secretary must be given sufficient time enough time prior to the presentation or briefing to allow for the Disclosure Team to evaluate whether disclosure to the ASX is required.
- (b) If possible, any briefings or presentations should be attended by no less than two company representatives. If this cannot be done, the person at the briefing/presentation must keep a record of the proceedings.
- (c) Questions at any briefing or presentation must be answered with due care and diligence - market sensitive information must not be disclosed, unless it has already been provided to the ASX.
- (d) Presentations, briefings, comments to the media and comments to other stakeholders that may become public must only be made by the CEO and/or Chairman, unless another person is authorised to do so by the Board.



## CONTINUOUS DISCLOSURE POLICY

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### 6. Analyst Reports and Forecasts

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The Company will only comment on information contained in an analyst's report to the extent that the information:

- (a) has been publicly disclosed to the ASX by the Company, or is otherwise in the public domain; and
- (b) contains factual inaccuracies on past matters.

The Company will not support or endorse analyst reports and their content.

The Company will not:

- (a) distribute external analyst reports;
- (b) publish an individual analyst's projections on the Company's website unless it also published all other recommendations from analysts who formally report on the Company; or
- (c) comment on an analyst's recommendations or research.

### 7. Market Rumours

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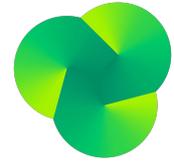
The Company will not make comment on market rumours and speculation unless they are required to do so by law.

If the ASX considers that there is or is likely to be a false market in relation to Company's shares following a specific rumour or media comments and the ASX requests information regarding the rumour or comment, the Company will give the ASX the information it requests to correct or prevent the false market.

### 8. Leaked/Accidental Disclosure

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If price sensitive information has leaked accidentally or inadvertently, the Company Secretary must be informed. The Company Secretary will then inform the Disclosure Team. The Disclosure Team will then decide whether the information must also be disclosed to the ASX.



## CONTINUOUS DISCLOSURE POLICY

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### 9. Halting Trading

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In exceptional circumstances, it may be necessary for the Company to halt trading of its securities or request suspension from the ASX. This must only be done to ensure the market is not trading in an uninformed or false market.

The Disclosure Team or the Board may decide whether trading needs to be halted or if suspension is required. If the Disclosure Team makes a decision to halt trading or suspend the Company without approval of the Board, the Chairman must also be consulted on the issue.

The Disclosure Team must tell the Board as soon as possible after a decision to halt trading or to suspend the Company from the ASX.

Any decisions regarding halting trading or the suspension of the Company from the ASX must be recorded in the Register.

### 10. Policy Breaches

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The Disclosure Team will monitor compliance with this policy, and will report any material or reoccurring breaches to the Board.

Any person who breaches this policy may be subject to disciplinary action. In serious cases, disciplinary action may include termination of employment.

Breaches of continuous disclosure obligations can have criminal and civil consequences, both for the Company and for individuals.

### 11. Policy Review

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This policy is subject to annual review by the Board.

**Document history:**

Adopted: 15 June 2015

Amended: 28 July 2017

Amended: 24 July 2020