



CONTINUOUS DISCLOSURE POLICY

This Policy was approved by the Board of Vulcan Energy Resources Limited on 25 March 2025

1. Background

The Company must comply with continuous disclosure requirements arising from applicable legislation and relevant stock exchange laws, including but not limited to the ASX Listing Rules.

The general rule, in accordance with ASX Listing Rule 3.1, is that once the Company becomes aware of any information concerning it that a reasonable person would expect to have a material effect on the price of value or the Company's securities, the Company must immediately disclose that information to the ASX.

2. General Purpose

The Company has in place a written policy on information disclosure and relevant procedures.

The focus of these procedures is on continuous disclosure compliance and improving access to information for investors.

3. Policy and Process

3.1 The Company Secretary is responsible for:

- (a) overseeing and co-ordinating disclosure of information to the relevant stock exchanges and shareholders; and
- (b) providing guidance to Directors and employees on disclosure requirements and procedures.

3.2 Price sensitive information is publicly released through the relevant stock exchanges before it is disclosed to shareholders and market participants. Distribution of other information to shareholders and market participants is also managed through disclosure to the relevant stock exchanges.

3.3 All announcements (and media releases) must be:

- (a) prepared in compliance with ASX Listing Rules continuous disclosure requirements and the rules of other relevant stock exchanges;
- (b) factual and not omit material information; and
- (c) expressed in a clear and objective manner to allow investors to assess the impact of the information when making investment decisions.
- (d) subject to the rules of the relevant stock exchanges, the Company's protocol in relation to the review and release of announcements (and media releases) is as follows:
 - (i) at the discretion of the Managing Director, all key announcements will be drafted by and are the responsibility of the executive team, and are to be circulated to all members of the Board;
 - (ii) any relevant parties named in the announcement should also be given the opportunity to review the announcement prior to its release, to confirm all information is factually correct;
 - (iii) a sub-committee consisting of one of the Managing Director/CEO, Group CFO, Executive Chair (**Executive Directors**), AND one Non-Executive Director is to give the final signoff before release of the announcement to the relevant stock exchanges. The sub committee's focus should be on the factual accuracy of the announcement;

- (iv) under exceptional circumstances where an announcement is material and time-critical, AND none of the Non-Executive Directors can be reached prior to release despite best efforts to be contacted by the Executive Team, two Executive Directors may on behalf of the sub-committee, authorise the announcement for release.
- 3.4 Information is posted on the Company's website after confirmation that an announcement has been made, with the aim of making the information readily accessible to the widest audience.
- 3.5 The Company Secretary is to maintain a register and copy of all announcements released.
- 3.6 The Company holds briefing sessions with analysts and investors. Only authorised Company spokespersons may conduct such sessions and all sessions will be conducted in accordance with the Company's continuous disclosure obligations.
- 3.7 Any new and substantive investor or analyst presentation will be released on the relevant stock exchanges Market Announcements Platform ahead of the presentation. Where practicable, the Company should consider providing shareholders the opportunity to participate in such presentations.
- 3.8 All employees must ensure that they comply with the Company's Code of Conduct and any other policies in respect of media contact and comment.
- 3.9 The Board will monitor the content, effectiveness and implementation of this Policy on a regular basis. Any updates or improvements identified will be addressed as soon as possible.