



**VULCAN ENERGY**  
**ZERO CARBON LITHIUM™**

## **CONTINUOUS DISCLOSURE POLICY**

This Policy was approved by the Board of Vulcan Energy Resources Limited on 6 February 2020

## **1. Background**

The Company must comply with continuous disclosure requirements arising from legislation and 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 ASX 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 ASX.

3.3 All announcements (and media releases) must be:

- (a) prepared in compliance with ASX Listing Rules continuous disclosure requirements;
- (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) the Company's protocol in relation to the review and release of ASX announcements (and media releases) is as follows:
  - (i) all key announcements at the discretion of the Managing Director are to be circulated to and reviewed by 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; and
  - (iii) the Managing Director (and in his/her absence, the Company Secretary) is to be given the final signoff before release to the ASX of the announcement.

3.4 Information is posted on the Company's website after the ASX confirms 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 ASX 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.