



Acumentis®

Continuous Disclosure Policy



Approved by Acumentis Board 22 Oct 2025

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1. Summary

By following this policy and the procedures detailed in section 4, Acumentis Group Limited will meet its continuous disclosure obligations thereby ensuring that the market is fully informed and all investors have equal access to price sensitive information.

2. Purpose

Acumentis Group Limited is listed on the Australian Stock Exchange (“ASX”) and is required to abide by ASX Listing Rules 3.1 and 3.1A.

This policy ensures compliance with the ASX Listing Rule requirements in order that:

- All investors have equal and timely access to material information concerning Acumentis including its financial position, performance, ownership & governance.
- Company announcements are factual & presented in a clear and balanced way.
- Balance requires disclosure of both positive and negative information.

The policy is primarily directed at the Board of Directors and Group Executive Directors, however all employees of Acumentis should be aware of the ASX requirements in order to alert the Board of Directors to any circumstances they may become aware of that might require disclosure to the ASX.

3. ASX Listing Rules

3.1 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, the entity must immediately tell ASX that information.

3.1A Listing rule 3.1 does not apply to particular information while each of the following requirements is satisfied in relation to the information:

3.1A.1 One or more of the following 5 situations applies:

- It would be a breach of a law to disclose the information;
- The information concerns an incomplete proposal or negotiation;
- The information comprises matters of supposition or is insufficiently definite to warrant disclosure;
- The information is generated for the internal management purposes of the entity; or
- The information is a trade secret; and

3.1A.2 The information is confidential and ASX has not formed the view that the information has ceased to be confidential; and

3.1A.3 A reasonable person would not expect the information to be disclosed.

Further details can be found here: [ASX CONTINUOUS DISCLOSURE](#)

4. Procedures to Ensure Compliance

- All matters covered by the ASX Listing Rule disclosure requirements are to be disclosed immediately.
- At each meeting the Board will determine whether there are any matters requiring disclosure.
- In between Board meetings all matters which the CEO or CFO consider require disclosure should be immediately discussed with the Chair and a decision made whether disclosure is required.

Should the Chair not be available then reliance on an alternative non-executive director for approval of the release is acceptable.

- Specific authority for the Company Secretary to request a trading halt should he/she be aware of very material information requiring disclosure to the ASX but is unable to contact the Chair, CEO or other NED's to seek guidance.
- All Group, National and State Directors are to be made aware of the need for compliance with the ASX Listing Rule and to report any such matters to the CEO.
- The Board is responsible for monitoring compliance and avoiding the emergence of a false market in the company's securities.
- The Board, CEO, Group Executive, National & State Directors are responsible for safeguarding the confidentiality of corporate information to avoid premature disclosure.
- All media contact and comment and all shareholder contact regarding confidential information will be by the CEO or Chair.
- Analysts, shareholders attending annual meetings and any other third parties are not to be given information which is not available to all shareholders.
- All announcements are immediately lodged on the Acumentis website and shared with the Board.

5. Breach of Policy

- Compliance with this policy is mandatory.
- A breach of the policy may lead to the ASX suspending trading of Acumentis Group Limited shares as well as fines and opening the company to investor legal action.
- Any breach of this policy by an employee will result in disciplinary action and may lead to their termination.

6. Policy Approval & Revisions

Date	Action	Changes	Sign off
22 September 2022	Acumentis Board Approval	-	Acumentis Board
22 October 2024	Acumentis Board Approval	-	Acumentis Board
22 October 2025	Acumentis Board Approval	Link to ASX fixed and minor wording changed	Acumentis Board

7. Further Information and Advice

This policy was endorsed by the Acumentis Board and reissued in October 2025 and is due for review and endorsement annually by the Acumentis Board. The next review will take place in October 2026. For further information, contact People & Culture at people@acumentis.com.au.