



POLICY ON CONTINUOUS DISCLOSURE

Introduction

Australian Carbon Vault Ltd ("Company") is listed on the Australian Securities Exchange ("ASX"). The ASX has advised the Company that it is an *oil and gas exploration entity* for the purposes of the Listing Rules. As such the Company is obliged to disclose certain information under Chapter 5 of the Listing Rules, where applicable.

In addition the Company has adopted the continuous disclosure policy set out in herein to keep the market properly informed of events and developments as they occur.

Further to these obligations the Company commits to ensuring that any statement made in relation to the storage capacity of any asset operated or managed by the Company is recognised by a qualified, independent professional and is in line with the process of reporting reserves and resources as outlined below.

The Company commits to timely and balanced disclosure of all material matters concerning the Company. All investors should have equal and timely access to material information. The Company has adopted certain procedures to ensure that it complies with its continuous disclosure obligations and has appointed a Responsible Officer who is responsible for ensuring the procedures are complied with. The Responsible Officer is the Managing Director, and in that person's absence, the Company Secretary.

This Policy sets out the obligations of directors, officers and employees to ensure that the Company satisfies its continuous disclosure obligations.

General Rule

The general rule is 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, the entity must immediately tell ASX that information¹."

According to the Corporations Act, a reasonable person would be taken to expect information to have a "material effect" on the price or value of securities if the information would be likely to influence persons who commonly invest in securities in deciding whether or not to subscribe for or buy or sell the first mentioned securities.

Directors, officers and employees of the Company, have an obligation to bring to the attention of the Responsible Officer any information of which they become aware which could have a material effect on the Company's securities.

The Responsible Officer is then responsible for determining whether or not that information needs to be disclosed to the market.

Process Under Which Material Market Announcements are Made

All Board members are consulted with prior to the release of any material announcement to the ASX. All Board members will also receive a copy of the announcement after it has been released.

Investor presentations must always be released to the market prior to the commencement of the actual delivery of the presentation by a member of the Company's personnel.

Talking with Brokers, Analysts, Shareholders and the Media

Only the Responsible Officer and the Company's Chairman is authorised to speak with the Media.

¹ Chapter 3, ASX Listing Rule.



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When talking with brokers, analysts and shareholders, only information which has been released to the market can be discussed. Further, it is only the Responsible Officer who is authorised to make Company announcements.

The Responsible Officer should be aware of all information disclosures in advance, including information to be presented at private briefings, to analysts and others, including answers to shareholders questions.

Process of reporting exploration results, resources and reserves

The ASX has advised the Company that it is an *oil and gas exploration entity* under ASX Listing Rule 5.1. As a result, the Company will classify and report its gas storage exploration results, resources and reserves in accordance with Listing Rule 5 (when relevant) and at all times under the *Storage Resource Management System* (SRMS) guidelines, as developed (and amended from time to time) by the Society of Petroleum Engineers (SPE).

In addition to the obligations under Listing Rule 5.1, the Company is committed to ensuring that any public statements regarding the gas storage resource or reserve potential of its assets adhere to the following principles:

- **Use of a Competent Person:** All market announcements containing exploration results, resource or reserve data will be reviewed and signed off by a Competent Person. This individual will be a current member of the Society of Petroleum Engineers and possess the necessary qualifications and experience. A formal statement by the Competent Person will accompany each announcement.
- **SRMS-Compliant Reporting:** The Company will adopt the *Storage Resource Management System* (SRMS) guidelines for all carbon storage capacity resource and reserve statements and classifications. The SRMS is derived from the *Petroleum Resource Management System* (PRMS) and as such aligns closely with oil and gas industry standards and the reporting thereof required under Listing Rule 5.1. The SRMS provides a consistent, project-based framework for evaluating technically supported storage capacities and resource potential.
- **Independence and Transparency:** The Company will ensure that any Competent Person engaged for reporting purposes maintains adequate independence from the Company, with no financial or personal interest, other than standard professional compensation for work undertaken, that could reasonably be perceived to impair their objectivity.

Forward-Looking Statements and Production Targets

In accordance with the Company's obligations under the ASX Listing Rules and its commitment to transparent and responsible disclosure, any forward-looking statements, including, but not limited to, storage injection targets, forecast financial outcomes, indicative timelines, and project development scenarios, will be clearly identified as such in public disclosures.

Such statements will be accompanied by appropriate cautionary language and supporting information, including:

- A clear statement of the underlying assumptions, such as the existence of binding agreements (e.g., sales contracts), regulatory approvals, financing arrangements, or other material dependencies;
- Any relevant qualifications or limitations applicable to the forward-looking nature of the information; and



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- A summary of known risks, uncertainties, or variables that may cause actual results to differ materially from those anticipated.

The Company will ensure that forward-looking disclosures are based on reasonable grounds, are not misleading, and are updated promptly in the event of any material change in circumstances or new information that affects the validity of previously disclosed statements.

Examples of Disclosure Material

Examples of the types of information that need to be brought to the attention of the Responsible Officer include the following:

- (a) change in the Company's financial forecast or expectation;
- (b) the appointment of a receiver, manager, liquidator or administrator in respect of any loan, trade credit, trade debt, borrowing or securities held by it or any of its child entities;
- (c) a transaction for which the consideration payable or receivable is a significant proportion of the written down value of the Company's consolidated assets (normally an amount of 5% or more would be significant, but a smaller amount may be significant in a particular case);
- (d) a change of control of the Company;
- (e) a recommendation or declaration of a dividend or distribution;
- (f) a recommendation or decision that a dividend or distribution will not be declared;
- (g) under subscriptions or over subscriptions to an issue;
- (h) an agreement or option to acquire a substantial asset;
- (i) information about the beneficial ownership of shares obtained by the Company or under the Corporations Act;
- (j) giving or receiving a notice of intention to make a takeover;
- (k) an agreement between the Company (or a related party or subsidiary) and a Director (or a related party of the Director);
- (l) execution of any formal contract for a material business venture;
- (m) entry by the Company into a binding heads of agreement or memorandum of understanding;

Consequences of Non-Compliance

A person involved in a company's contravention of the continuous disclosure provisions can be held **personally liable** for the contravention. In addition, other penalties as prescribed under the Corporations Act may be incurred to the Company.

Confidentiality Obligations

Whilst the Company has a responsibility to disclose the information as described above, the Company is entitled to keep information confidential in some circumstances until it is appropriate to release it to the ASX such as where the information concerns a transaction that is incomplete or a trade secret.