
The Australian Wealth Advisors Group Limited

ACN 653 634 292

Continuous Disclosure Policy

(As adopted by the board of directors on 31 October 2023)

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1. General

- 1.1 The Company must keep the market informed of any information that a reasonable person would expect to have a material impact on the price or value of the Company's securities (**Market Sensitive Information**) by advising the Australian Securities Exchange (**ASX**) of events and developments that amount to Market Sensitive Information relating to the Company immediately as they occur. If not, significant criminal and civil penalties may be imposed on the Company and its officers.
- 1.2 This Policy sets out the rules for disclosing information to ASX, the obligations on the Company and its people and the procedures put in place by the Company to comply with these rules. This Policy is in addition to the rules the Company must comply with for routine disclosures to ASX, such as quarterly and annual reporting. This Policy should be reviewed in conjunction with the Company's Securities Trading Policy.

2. Disclosure Obligations

- 2.1 If the Company becomes aware of any Market Sensitive Information, it will notify ASX promptly and without delay, unless an exemption set out below or in the ASX Listing Rules applies.
- 2.2 Subject to the overriding disclosure obligations in ASX Listing Rules, information will not need to be disclosed to ASX if each of the following are satisfied in relation to that information:
- (a) one or more of the following five situations applies:
 - (1) disclosing the information would be a breach of a law;
 - (2) the information concerns an incomplete proposal or negotiation;
 - (3) the information comprises matters of supposition or is insufficiently definite to warrant disclosure;
 - (4) the information is generated for the internal management purposes of the Company; or
 - (5) the information is a trade secret;
 - (b) the information is confidential and ASX has not formed a view that the information has ceased to be confidential; and
 - (c) a reasonable person would not expect the information to be disclosed.
- 2.3 If ASX considers there is, or is likely to be, a false market in the Company's securities, ASX may ask the Company to disclose information or make a statement to correct or prevent the false market. This may occur where there is market speculation or media reports arising from a leakage of confidential information concerning a proposal or negotiations that have not been disclosed by the Company because the exception to Listing Rule 3.1 applies. The Company must immediately give ASX that information. Information must not be selectively disclosed to others, such as prospective shareholders, the media or analysts, before it is disclosed to ASX.

3. Obligations on the Company Officers and Employees

- 3.1 It is the responsibility of each director, officer and employee to advise any of the chairperson of the board of directors (**Board**), (**Chairperson**), chief executive officer or chief financial officer (**Company Contacts**) immediately in relation to any information about the Company of which the person is aware that may be Market Sensitive Information.
- 3.2 That is, the information might influence someone to buy or sell the Company's securities. It is also their responsibility to immediately advise one of the Company Contacts of any circumstances that may make, or have made, any publicly released price sensitive information potentially, or actually, inaccurate (such as a forward looking statement), so that a correcting statement may be released as soon as possible.
- 3.3 If a person is unsure about the importance or relevance of the information which has become known, the information should be reported to one of the Company Contacts so that a decision may be made about whether or not to disclose the information to ASX.
- 3.4 Company directors, officers, employees, consultants and contractors who possess information that may be Market Sensitive Information must preserve the confidentiality of that information until it is disclosed in accordance with this Policy.

4. Materiality

- 4.1 A reasonable person will be taken to expect information to be Material Sensitive Information if the information would, or would be likely to, influence persons who commonly invest in such securities in deciding whether or not to subscribe for, buy or sell, the securities.
- 4.2 Determining if a matter is material involves quantitative and/or qualitative considerations. A matter may have low relative financial value but still be considered material due to its potential to significantly impact the Company's reputation or strategy.
- 4.3 If a director, officer or employee is in doubt as to whether a matter is material, they should ask a Company Contact.
- 4.4 If in any doubt, the Company Contact must refer the matter to the Board to make a determination. The Company Contact or the Board will, if necessary, seek external legal or financial advice.

5. Preparation of ASX releases

- 5.1 Upon receipt of any Market Sensitive Information, it is the responsibility of the Chairperson (or such other person determined by the Board), in consultation with the Board, the Company's company secretary (**Company Secretary**) and, if necessary any external legal or financial advisors to determine if the information is required to be disclosed to ASX. If it is deemed that a release should be made to ASX, arrangements to draft the release must be made between these parties.
- 5.2 The public release of Market Sensitive Information must be accurate, balanced and expressed in a clear and objective manner that allows investors to assess the impact of the information when making investment decisions.

6. Approval of ASX releases

Once the release has been drafted, the final form of the release is to be approved for release to ASX by the Chairperson and, where requested to do so by the Chairperson because the information involves a material decision or event with the potential to have significant consequences for the Company's stakeholders, the Board of the Company.

7. Lodgement of ASX releases

Once approved for release to ASX, the Company Secretary will then register the release in the Company's records and arrange for its immediate release by online distribution to ASX via the Company's online website lodgement service. Where the Company is required to release its information to another securities exchange, the same procedure as set out in this Policy for approval and release to ASX is to be followed.

8. Media Releases

A media release that is prepared potentially in conjunction with an ASX release, or as an ASX release, must be approved for release by the same person who would approve an ASX release as listed above.

9. Responding to questions from analysts and shareholders

The Chairperson and any other person authorised to speak at a briefing or respond to shareholder questions, must only discuss information that has been publicly released through ASX. If a question can only be answered by disclosing Market Sensitive Information, the Chairperson or authorised person must decline to answer it or take it on notice, then ensure that the information is announced through ASX before responding.

10. Management of this Policy

The Company Secretary is responsible for:

- (a) liaising with ASX in relation to continuous disclosure matters;
- (b) ensuring timely disclosure of material information to ASX and other relevant securities exchanges;
- (c) liaising with any of the Company Contacts in relation to the form of disclosure by the Company;
- (d) keeping records of releases to ASX and other relevant securities exchanges; and
- (e) reviewing this Policy annually and otherwise as reasonably necessary in light of any changes to the laws and rules governing continuous disclosure and recommending changes to the Board for its approval.

11. Review

The Board will regularly review this Policy periodically to check that it is operating effectively and to consider whether any changes are required.