

Continuous Disclosure Policy

Approved 29 October 2009; revised 29 September 2022, 23 April 2024

1. Introduction

Techniche Limited (**the Company**) is committed to the promotion of investor confidence by ensuring that trade in its securities takes place in an efficient, competitive and informed market. The Company is an unlisted public company and disclosing entity. The Company's shares are not listed on any licensed market or exchange, including the Australian Securities Exchange (ASX). In order to provide the Company's shareholders with some liquidity for their shares the Company has received approval from the Australian Securities and Investments Commission (**ASIC**) to operate a low volume financial market under exemption provided by section 791C of the *Corporations Act 2001* (Cth) (**the Corporations Act**) and in accordance with the *Corporations (Low Volume Financial Markets) instrument 2016/888*.

As an unlisted disclosing entity the Company is subject to continuous disclosure obligations under the Corporations Act that require the Company to notify ASIC of any information that is not generally available that would reasonably be expected to have a material effect on the price or value of the Company's securities (**the Continuous Disclosure Provisions**). ASIC administers the Continuous Disclosure Provisions so that an unlisted disclosing entity can publish material information on its website in accordance with the good practice guidance issued by ASIC, rather than having to lodge the information with ASIC.

This Continuous Disclosure Policy (**Policy**) has been adopted to ensure that the Company complies with its continuous disclosure obligations. The framework is as provided in the Corporations Act; the formal procedures are summarised in this Policy.

2. Objectives

The purpose of this Policy is to:

- ensure the Company meets its continuous disclosure obligations under the Corporations Act;
- ensure that all employees are aware of the Company's continuous disclosure obligations;
- ensure that selective or inadvertent disclosure of material price sensitive information is prevented; and
- implement a procedure for:
 - the central collection of all material information;
 - the assessment of whether that material information must be disclosed to ASIC pursuant to the Corporations Act; and
 - the method of release of that material information to on the Company's website.

3. Policy

The Company will, as soon as practicable if it is or becomes aware of any information concerning it that is likely to have a material effect on the price or value of the Company's securities and that is not generally available, publish that information on the Company's website.

The Company assesses the materiality of information on the basis of both qualitative and quantitative criteria. Matters which do not appear quantitatively material may be qualitatively material if their

omission or non-disclosure has the potential to adversely affect the decision that shareholders might make regarding their investments.

4. Procedure

Directors and employees must immediately notify the Company Secretary as soon as they become aware of information that is potentially price sensitive that should be considered for publication by the Company.

Directors and employees are required to not pre-judge reportable situations and if a Director or employee is uncertain about the consequences of any such information they are to immediately contact the Company Secretary.

As soon as the Director or employee becomes aware of information that:

- is not generally available (i.e. the information in question has not been included in any Annual Report, website release or other publication of the Company); and
- which may be price sensitive (i.e. it is likely to have a financial or reputational impact upon the Company that may be considered material),

they must provide to the Company Secretary the following information (where applicable):

- a general description of the matter;
- details of the parties involved;
- the relevant date of the event or transaction;
- the status of the matter;
- the estimated value of the transaction;
- the estimated effect on the Company's finances or operations; and
- details of any external advisers involved in the matter.

The Company Secretary will review the information provided, consult the Managing Director (if any) and Chairman to determine if the matter is to be disclosed, and co-ordinate the preparation of the disclosure.

The disclosure is to be reviewed and authorised by the Company's directors.

Media Speculation and Rumours

Media speculation and rumours, whether substantiated or not, have the potential to impact the Company. The Company's general policy on responding to media speculation and rumours is that the Company does not respond to media speculation or rumours. Employees must observe this policy at all times. However, the Company may wish to provide a response that corrects speculation if it contains factual errors that could materially affect the Company.

Authorised Spokesperson

The Company will make authorised spokespersons available to shareholders, other potential investors and media representatives.

The Company's Authorised Spokespersons are the Chairman, the Managing Director (if any), the CEO and the Company Secretary on matters authorised by the Board to be released to the media. (From time to time the Chairman and Managing Director may be the same person). Employees authorised to make any public statement on behalf of, or attributable to, the Company must first have the approval of the Chairman or the Managing Director (if any).

This policy was adopted by the Techniche Limited Board on 29 October 2009 and revised on 29 September 2022 and 23 April 2024.

The policy is also publicly available on the Company's website in a clearly marked Corporate Governance section.

Any questions relating the interpretation of this policy should be forwarded to the Company Secretary.