

DISCLOSURE AND COMMUNICATIONS POLICY

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INTRODUCTION

Eastern Metals Limited (**Eastern Metals** or the **Company**) is committed to complying with its disclosure obligations under the listing rules (**Listing Rules**) of the Australian Securities Exchange (**ASX**) and the Corporations Act and maintaining public confidence through timely disclosure of information which affects investment decisions.

This policy applies to all Directors, officers, employees (full time, part time, and casual) and key contractors/consultants (Eastern Metals' representatives) of the Company and its subsidiaries.

The purpose of this policy is to outline Eastern Metals' procedure for ensuring compliance with its disclosure obligations and disseminating information to third parties.

DISCLOSURE OFFICERS

The Board has authorised the Chairman, Company Secretary and Chief Executive Officer (**Disclosure Officers**) to assist in the administration of Eastern Metals' Disclosure and Communications Policy. Their responsibilities include:

- coordinating Eastern Metals' consideration of matters that may require disclosure, being matters reported to them or matters of which they themselves become aware;
- overseeing and coordinating disclosure of information to the ASX;
- coordinating all disclosure of information to analysts, brokers, shareholders, the media and the public; and
- educating staff about this Disclosure and Communications Policy and raising awareness of the principles underlying continuous disclosure.

ASX DISCLOSURE OFFICER

The Company Secretary is the ASX disclosure officer. All communications between Eastern Metals and ASX must be directed to or by the Company Secretary, or if that person is unavailable the Chairman.

AUTHORISED SPOKESPERSONS

The only Eastern Metals representatives authorised to make any public statement on behalf of the Company are the Chairman and Chief Executive Officer (**Authorised Spokespersons**) or those who have the prior approval of an Authorised Spokesperson.

COMMITMENT TO CONTINUOUS DISCLOSURE

Eastern Metals is committed to complying with its continuous disclosure obligations Listing Rules and the Corporations Act.

Eastern Metals will immediately notify the market, by announcing to the ASX, any information (**Material Information**), concerning the business of the Company that a reasonable person would expect to have a material effect on the price or value of Eastern Metals' securities.

Eastern Metals will not release Material Information to any other person until it has given the information to the ASX and received an acknowledgment that ASX has released the information.

Exceptions

The disclosure obligation under Listing Rule 3.1 does not apply to particular information while each of the following is satisfied in relation to the information:

- (i) one or more of the following applies:
 - it would be a breach of 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 internal management purposes; or
 - the information is a trade secret; and
- (ii) the information is confidential and ASX has not formed the view that the information has ceased to be confidential; and
- (iii) a reasonable person would not expect the information to be disclosed.

Eastern Metals will meet its continuous disclosure obligation as soon as any one of paragraphs (i), (ii) and (iii) is no longer satisfied.

CONFIDENTIAL INFORMATION

Eastern Metals Representatives in possession of Material Information that has not been disclosed (**Confidential Information**) must not purchase or sell, or cause or procure a third party to deal, in the securities of Eastern Metals as detailed in the company's Securities Trading and Trading Windows Policy.

Periods in which trading in Eastern Metals' securities is not permitted is detailed in the company's Securities Trading and Trading Windows Policy.

PROCESS FOR DISCLOSURE

The following sets out how Eastern Metals will comply with its disclosure obligations under the Corporations Act and Australian Securities Exchange (ASX) Listing Rules, and ensure that markets are properly informed.

Eastern Metals' representatives must immediately notify the Disclosure Officers as soon as they become aware of Material Information concerning the business of Eastern Metals that a reasonable person would expect to have a material effect on the price or value of Eastern Metals' securities. This information will be considered for release to the market by the Disclosure Officers.

Other than for disclosure that will be triggered by a major company decision or routine business reporting, when a potentially disclosable matter is identified or reported, the Disclosure Officers will discuss the significance of the matter and possible disclosure responses, and if the matter is sufficiently significant the Disclosure Officers may require the matter to be considered by the Board. Continuous Disclosure is discussed regularly by the Board to ensure compliance with Eastern Metals' disclosure obligations.

If the matter is required to be disclosed, the Disclosure Officers will:

- co-ordinate the preparation of a draft ASX announcement with the relevant Eastern Metals representatives, including obtaining any necessary verification of information from relevant Eastern Metals representatives in relation to the information in the proposed form of disclosure to the ASX; and
- circulate the draft announcement for review and approval by the Chairman.

When acknowledgement is received from ASX that information disclosed to it has been released to the market, the Disclosure Officers will arrange for it to be posted on Eastern Metals' website. The Disclosure Officers will also forward a copy of all announcements to all Directors and distribute the announcement to various third parties through the media and other channels as appropriate.

DISCLOSURE OF MAJOR COMPANY DECISIONS

In the case of information requiring disclosure to the ASX that involves a major Company decision, the content of that disclosure will be considered by the Board. Where practicable, a draft of the announcement will be considered by the Board. If due to time constraints it is not practicable to obtain the approval of all Directors prior to the making of such a release, management should consult with the Chairman prior to disclosure and circulate a copy to all Directors as soon as possible after its release. If the Board determines that finalisation of the form of the disclosure is to be delegated to management, the Board will provide guidance to management on the content of the announcement.

ROUTINE BUSINESS REPORTING

When an event occurs that is a matter of fact and which requires disclosure under the Listing Rules, the Company Secretary will disclose the information to ASX, without the need to seek approval from the Chairman.

MARKET RUMOURS OR CORRECTING A FALSE MARKET

Eastern Metals will not generally comment on market rumours or market speculation.

However, under Listing Rule 3.1B, ASX may require disclosure if ASX considers that there is or is likely to be a false market in Eastern Metals' securities.

TRADING HALTS

In order to facilitate an orderly, fair and informed market it may be necessary to request a trading halt from the ASX. Eastern Metals' Directors and Company Secretary will make all decisions relating to a trading halt. The other members of the Board will be advised of the trading halt decision as soon as practicable.

COMMUNICATING WITH SHAREHOLDERS

All significant information disclosed to the ASX is posted on the Company's website as soon as practicable after it is disclosed to the ASX.

The Company promotes its website and the electronic distribution of data to shareholders as the favoured course of communication. The Company provides information updates to investors by email.

The Company actively answers all questions and communication from shareholders, where appropriate, in a concise and timely fashion.

The Company has requested its external auditor to attend all general meetings and this has been supported by the Company's audit director at RSM. The Company's external auditor attends all annual general meetings as required by section 250RA of the *Corporations Act 2001*.

ANALYST AND INVESTOR BRIEFINGS

From time to time Eastern Metals conducts analyst and investor briefings. When analysts are briefed on aspects of the Group's operations, the material used in the presentation is (or has previously been) released to the ASX and posted on the Company's website. Where appropriate, the Company keeps a summary record of these briefings and the issues discussed. The following protocols apply to investor briefings:

- no Material Information may be disclosed unless it has been previously released to the ASX;
- if Material Information is inadvertently released during such a briefing, it will be immediately released to the ASX and placed on the Eastern Metals website;
- questions at briefings that deal with Material Information not previously disclosed will not be answered;
- if any Eastern Metals representative participating in the briefing consider that a matter has been raised that might constitute a previously undisclosed material price or value sensitive matter, then he or she must immediately notify the Disclosure Officers.

ANALYSTS' REPORTS AND ESTIMATES

Eastern Metals may be asked to review analysts' research reports. Eastern Metals will confine its comments to factual matters and material previously disclosed by it. In relation to analysts' earnings estimates Eastern Metals will confine its comments to the extent to which the estimates are within current forecasts as released to ASX, whether there are any factual errors and question analysts' assumptions or sensitivities if the estimates are significantly different from current forecasts as released to ASX.

PUBLIC RELATIONS

The Chairman and Chief Executive Officer liaise with all media, including interviews and advertising, on behalf of the Company. The Chairman and Chief Executive Officer can delegate this role as deemed appropriate on a case by case basis.

All queries from media must be referred to the Chairman or Chief Executive Officer.

No Material Information may be disclosed unless it has been previously released to the ASX. If Material Information is inadvertently released, it will be immediately released to the ASX and placed on the Eastern Metals website.

BREACHES OF THE POLICY

A breach of this policy means Eastern Metals has not complied with its disclosure obligations under the Listing Rules and the Corporations Act and will lead to a loss of public confidence in the Company.

Not complying with its disclosure obligations is an offence under the Corporations Act and could lead to court ordered penalties.

Not complying with its disclosure obligations under the Listing Rules could lead to the Company being suspended or delisted.

REVIEW

Continuous Disclosure is discussed regularly by the Board to ensure compliance with Eastern Metals' disclosure obligations.

The Board will regularly consider its continuous disclosure and communications procedures to verify compliance with the policy and to ensure continuing adequacy and appropriateness.

Date adopted: 17 May 2021