

CONTINUOUS DISCLOSURE POLICY

Introduction

Hastings Technology Metals Limited (the **Company or Hastings**) recognises that timely and balanced disclosure of all material information concerning the company must be made on a continuous basis, to ensure the market is informed of all material events and developments relating to the Company, as they arise.

Purpose

The purpose of this policy is to document the procedures adopted by the Company to ensure compliance with its continuous disclosure obligations under the Listing Rules (Listing Rules) of the Australian Securities Exchange (**ASX**) and the Corporations Act 2001 (Cth) (**Corporations Act**).

Scope

This policy applies to all directors, officers, employees, contractors and consultants of the Company and its subsidiaries (Staff).

Policy

ASX Listing Rule 3.1 requires Hastings to immediately disclose to the ASX any 'market sensitive' information concerning the Company of which it is aware or becomes aware. Information is considered 'market sensitive' if a reasonable person would expect that information to have a material effect on the price or value of the Company's securities.

A reasonable person is taken to expect information to have such an effect if it would, or would be likely to, influence persons who commonly invest in and hold securities for a period of time, based on their view of the inherent value of the security, in deciding whether or not to subscribe for, sell, or buy, those securities.

The Company will not release material information to any other person until it has given the information to ASX and received an acknowledgement that ASX has released the information to the market.

Obligations

All Staff must:

- a) Immediately report potentially market sensitive information in accordance with this Policy including where information that has been lodged with the ASX is, or has, become false, misleading or deceptive;
- b) Maintain and protect Hastings confidential information and ensure that anyone

- c) receiving such confidential information is bound by obligations of confidentiality; Not use Hastings confidential information in a manner that is contrary to any law or in any way that may injure or cause loss to the Company, or to gain a personal advantage; and
- d) Not speak publicly about the affairs of the Company without proper authorisation.

Procedures

Responsible Officer

The Company Secretary has primary responsibility for administration of this policy.

The Company Secretary will be responsible for all communications with the ASX.

The Company Secretary will also be responsible for:

- a) coordinating the Company's consideration of matters that may require disclosure;
- b) coordinating the actual form of disclosure and liaising with the Chairman and the Board in that regard;
- c) overseeing and coordinating disclosure of information to the ASX, shareholders, analysts, brokers, the media and the public;
- d) keeping a record of all ASX and other releases that have been made; and
- e) periodically reviewing this policy and procedure in light of changes to the Listing Rules or Corporations Act and recommending any necessary changes to the procedures to the Board.

Process for Disclosure

- a) As soon as a Staff member becomes aware of potentially material sensitive information, regardless of whether a particular exemption to the requirement to disclose may apply, that person has an obligation to provide such information to the Company Secretary.
- b) When a potentially disclosable matter is identified or reported, the Company Secretary will discuss the significance of the matter and possible disclosure obligations, or other actions required with the Board, including potential for Trading Halt Application.
- c) If the matter is required to be disclosed, the Company Secretary will:
 - coordinate the preparation of an ASX Announcement; and
 - circulate a draft announcement for review and approval by the Board.
- d) Upon acknowledgment being received from ASX of release of the information to the market, the Company Secretary will arrange for it to be posted on the Company's website and distributed via email as appropriate.

When an event occurs that is of a routine or administrative nature and which requires disclosure under the Listing Rules, the Company Secretary may disclose the information to ASX in the interest of expediency.

In the case of information requiring disclosure to ASX that involves a major Company decision or

event, the content of that disclosure will be considered by the Board and approved by the Board. If due to time constraints it is not practicable to obtain the approval of all directors, the Company Secretary will consult with the Chairman prior to disclosure and circulate a copy to all directors as soon as possible after its release.

Exceptions

Exceptions to the continuous disclosure obligations under ASX Listing Rule 3.1 apply where each of the exceptions listed in (a) to (c) below are satisfied in relation to that particular information:

- (a) one or more of the following applies:
 - (i) it would breach the law to disclose the information;
 - (ii) the information concerns an incomplete proposal or negotiation;
 - (iii) the information comprises matters of supposition or is insufficiently definite to warrant disclosure;
 - (iv) the information is generated for internal management purposes; or
 - (v) the information is a trade secret; and
- (b) the information is confidential and the ASX has not formed the view that the information has ceased to be confidential; and
- (c) a reasonable person would not expect the information to be disclosed.

The exception will cease to apply, and the Company will meet its continuous disclosure obligation as soon as any of the paragraphs (a), (b) and (c) are no longer satisfied.

Analyst, Media and Staff Briefings

Information provided to, and discussions with, analysts, investors, the media and staff are subject to this Policy. The following procedures will apply:

- a) no material information may be disclosed unless it has been previously released to ASX;
- b) all briefings should be approved by the Chairman;
- c) presentation material must be reviewed by the Company Secretary prior to disclosure;
- d) presentation material will be made available on the Company's website;
- e) responses to questions should be confined to clarifying any publicly available information;
- f) questions that deal with material information not previously disclosed will not be answered;
- g) if material information is inadvertently released during such a briefing, it will be immediately released to ASX and placed on the Company's website; and
- h) all inquiries from analysts, brokers, the media and staff must be referred to the Chairman.

Trading Halts

In order to facilitate an orderly, fair and informed market, it may be necessary to request a trading halt from ASX. The Chairman and Company Secretary will make all decisions relating to

a trading halt, in consultation with the Board, where practicable. Any request to ASX for the Company to be placed into voluntary suspension must be approved the Board.

Market Speculation and Rumours

Market speculation and rumours, whether substantiated or not, have a potential to impact the Company's share price. Speculation may also contain factual errors that could materially affect the Company. In general, the Company will not respond to market speculation and rumours.

The ASX may, under Listing Rule 3.1B, require disclosure if ASX considers that there is or likely to be a false market in the Company's securities.

Questions

If you have any questions arising from this Policy, then please contact the Company Secretary.

This Policy will be reviewed every two years or as required.



Charles Lew
Executive Chairman

Approved by the Board (20 September 2023)