

CONTINUOUS DISCLOSURE POLICY

1 Purpose

Lotus Resources Limited (**Lotus Resources**) as a listed entity must make accurate, timely and balanced disclosure of all matters concerning it that a reasonable person would expect to have a material effect on the price or value of its securities. This policy sets the requirements for complying with Lotus Resources' continuous disclosure requirements contained in the ASX Listing Rules and the *Corporations Act 2001* (Cth).

The purpose of this policy is to:

- (a) Raise awareness of Lotus Resources' continuous disclosure requirements;
- (b) Establish a process to ensure that information about Lotus Resources which may be market sensitive and which may require disclosure is brought to the attention of the relevant person in a timely manner and is kept confidential; and
- (c) Sets out obligations of Directors, officers, and employees of Lotus Resources and its subsidiaries to ensure Lotus Resources complies with its continuous disclosure obligations.

2 Responsibilities and Review

Directors and Executive Management are responsible for:

- Understanding the continuous disclosure requirements of Lotus Resources; and
- Reporting potentially material information immediately to either the Company Secretary, Managing Director or the Chair of the Board.

The Company Secretary is responsible for:

- Liaising with the Managing Director and/or Chair of the Board on information supplied to determine if it needs to be disclosed under Lotus Resources' continuous disclosure requirements;
- overseeing and co-ordinating disclosure of information to the relevant stock exchanges and shareholders; and
- providing guidance to Directors and employees on disclosure requirements and procedures.

3 Legal Requirements

In accordance with the ASX Listing Rules, Lotus Resources will immediately notify the ASX of information:

- (a) Concerning Lotus Resources that a reasonable person would expect to have a material effect on the price or value of Lotus Resources' securities; and
- (b) that would, or would be likely to, influence persons who commonly invest in securities in deciding whether to acquire or dispose of Lotus Resources' securities.

(Market Sensitive Information)

The only exception to this is where the ASX Listing Rules do not require such information to be disclosed, which includes:

- (a) One of more of the following 5 situations applies:
 - (i) it would be a breach of law to disclose the information;
 - (ii) the information concerns an incomplete proposal or negotiation;
 - (iii) the information concern matters of supposition or is insufficiently definite to warrant disclosure;
 - (iv) the information is generated for internal management purposes;
 - (v) the information is a trade secret;

- (b) The information is confidential and the ASX has not formed the view that the information has ceased to be confidential; or
- (c) A reasonable person would not expect the information to be disclosed.

Additionally, if the ASX considers that there is or is likely to be a false market in an entity's securities and asks the entity to give it information to correct or prevent a false market, the entity must immediately give ASX that information.

Market Sensitive Information must be publicly released through the ASX before it is disclosed separately to any other person, including shareholders and market participants. Distribution of other information to shareholders and market participants is also managed through disclosure to the ASX. The importance of safeguarding the confidentiality of corporate information to avoid premature disclosure is paramount.

All announcements (and media releases) must be:

- (a) prepared in compliance with ASX Listing Rules continuous disclosure requirements;
- (b) factual and not omit material information; and
- (c) expressed in a clear and objective manner to allow investors to assess the impact of the information when making investment decisions.

4 Lotus Resources' Disclosure Protocol

Lotus Resources' disclosure protocol in relation to the review and release of ASX announcements (and media releases) is as follows:

- (a) In the event any member of the Board or Executive Management become aware of any fact or circumstance which may give rise to a requirement to disclose such information under the ASX Listing Rules, they will immediately inform either the Company Secretary, Managing Director or the Chair of the Board;
- (b) The Company Secretary and the Chair of the Board and/or Managing Director will review the information to determine whether the information is required to be disclosed and the appropriate disclosure to be made. If there is any uncertainty, the Company Secretary will seek external legal advice;
- (c) The Company Secretary will determine whether a trading halt is required if the market is trading and announcement cannot be issued straight away or an announcement cannot be issued before trading recommences;
- (d) All key announcements are to be circulated to and reviewed by all members of the Board (where practicable).
- (e) Where practicable, all members of the Board are required to provide the Managing Director (or in their absence, the Company Secretary) with verbal or written confirmation of each key announcement, or their approval to the announcement, prior to its release. Where the urgency of the subject matter precludes reference to the full Board, an announcement within this category may be approved by the Directors who are available. It is specifically acknowledged that where a continuous disclosure obligation arises, disclosure cannot be delayed to accommodate the availability of Board members.
- (f) Where practicable, any relevant parties named in the announcement should also be given the opportunity to review the announcement prior to its release, to confirm all information is factually correct.
- (g) All members of the Board will receive copies of all material market announcements promptly after they have been made.

Information is posted on Lotus Resources' website after the ASX confirms an announcement has been made, with the aim of making the information readily accessible to the widest audience.

5 Measures to Avoid a False Market in Lotus Resources' Securities

Lotus Resources recognises that a false market in Lotus Resources' securities may occur if Lotus Resources provides incomplete information to the ASX or if Lotus Resources fails to respond to market and media speculation that may, or may be likely to, have an impact on the price of Lotus Resources' securities.

While Lotus Resources does not, in general, respond to market speculation or rumours unless required to do so by law or the ASX, Lotus Resources is committed to disclosing as much information as possible, without harming Lotus Resources, to a wide audience of investors through media releases of important milestones, including information that may not strictly be required under continuous disclosure requirements. Information given to the ASX for market release will also be provided to investors through media releases. Such media releases will be posted on Lotus Resources' website. Where appropriate, Lotus Resources will request a trading halt from the ASX to prevent trading in Lotus Resources' securities by an inefficient and uninformed market until Lotus Resources can make an announcement to the market.

5.1 MEDIA CONTACT AND COMMENT

The Board has designated the Managing Director and CEO, or the Chair of the Board (where appropriate) to speak to the media on matters associated with Lotus Resources. In speaking to the press, the Managing Director and CEO, or the Chair of the Board will not comment on Market Sensitive Information that has not been disclosed to the ASX; however, they may clarify previously released information.

There will be times when Directors and employees will be approached by the media for public comment. On such occasions, the Director(s) or employee(s) should comply with the following:

- (a) refer the person to the Managing Director and CEO, or Chair of the Board as appropriate for comment;
- (b) refrain from disclosing any information, documents or other forms of data to the person without the prior consent of the Managing Director and CEO, or the Chair of the Board;
- (c) report the person who contacted the Director/employee, the reason (explicit or inferred) for the contact and a summary of any other relevant information as soon as possible to the Managing Director and CEO, or the Chair of the Board.

5.2 EXTERNAL COMMUNICATIONS AND INVESTOR/ANALYST BRIEFINGS

Lotus Resources discloses its financial and operational results to the market each half year/quarter as well as informing the market of other events throughout the year as they occur. Quarterly financial reports, media releases and Annual General Meeting scripts are all lodged with the ASX and subsequently posted to Lotus Resources' website. As all financial information is disclosed through the ASX, Lotus Resources will only comment on factual errors in information and underlying assumptions when commenting on market analysts' financial projections, rather than commenting on the projections themselves.

In addition to the above disclosures, Lotus Resources does conduct briefings and discussions with the investing community. However, price sensitive information will not be discussed unless that particular information has been formally disclosed to the market via an ASX announcement. Prior to the commencement of any briefings, discussions, investor roadshows or investor presentations, a copy of the presentation or briefing materials will be disclosed to the market via an ASX announcement, unless:

- (a) no substantive changes have been made to an investor presentation and there is no material new information; or
- (b) the material is incomplete and the ASX Market Platform is closed, in which case the presentation will be disclosed when the ASX Market Platform re-opens.

The materials will also be posted to Lotus Resources' website as soon as the ASX confirms that this information has been released to the market.

Similarly, when answering shareholder questions, price sensitive information will not be discussed unless that particular information has been formally disclosed to the market via an ASX announcement.

Where a question can only be answered by disclosing price sensitive information, Lotus Resources will decline to answer it or take it on notice and announce the information to ASX prior to responding.

5.3 TRAINING

Everyone working for or engaged by Lotus Resources is trained on this policy as part of their induction process.

All Board and Executive Management will receive regular updates on this policy as part of their ongoing continuous disclosure education and awareness training and to assist with their understanding of the legal obligations relating to disclosure of Market Sensitive Information, materiality and confidentiality.

5.4 BREACHES OF THIS POLICY

The Board will monitor the content, effectiveness and implementation of this Policy on a regular basis. Any updates or improvements identified will be addressed as soon as possible.

Breaches of continuous disclosure laws have serious consequences for the Company and its Directors. Breaches of this policy may lead to disciplinary action being taken against any employee involved in the breach, including termination of employment in serious cases. All reports of any breaches or suspected breaches, whether material or not, are dealt with under Lotus Resources' Whistleblower Policy.

5.5 POLICY REVIEW

This policy is to be reviewed on a biennial basis by the Company Secretary in consultation with the Managing Director and CEO, and presented to the Audit and Risk Committee for review and recommendation to the Board to ensure that it continues to be effective in managing Lotus Resources' continuous disclosure obligations and to confirm whether any changes are required to the policy.

Significant amendments made to this policy will be communicated to employees by the Company Secretary.

6 Reference Documents

- Corporate Code of Conduct
- Whistleblower Policy

7 Document Control

Version Number	Revision Date	Document Owner	Document Approver
Version 2.0	13 May 2025	Company Secretary	Board of Directors