

MALABAR RESOURCES LIMITED

CONTINUOUS DISCLOSURE POLICY

June 2024

1. INTRODUCTION

Malabar Resources Limited (“Malabar”) has established this Continuous Disclosure Policy (“Policy”) to ensure compliance with its disclosure obligations under section 675(2) of the *Corporations Act 2001* (Cth) (“Corporations Act”) and the regulations of the Australian Securities & Investments Commission (“ASIC”). This Policy aims to reflect Malabar’s desire to support fair markets, honest management, and full and fair disclosure. Compliance with the disclosure obligations must be done in accordance with their meaning and purpose. To achieve this, Malabar has established this Policy and it is critical that employees of Malabar understand and adhere to the objectives of this Policy and its procedures.

Malabar is committed to fulfilling its continuous disclosure obligations and ensuring that trading in its securities takes place in a market that is orderly, informed, and free of misinformation wherever practicable.

2. PURPOSE AND SCOPE

The purpose of this Policy is to:

- a) Summarise Malabar’s disclosure obligations in accordance with ASIC’s Regulatory Guide (“RG”) 198; and
- b) Establish a set of procedures that must be followed for the disclosure of information to ASIC, the investment community, the media, and the public.

This policy applies to all of Malabar, including its directors, officers, employees, subcontractors, and subsidiaries.

3. COMPANY’S CONTINUOUS DISCLOSURE OBLIGATIONS

Malabar’s main continuous disclosure obligations are set out in ASIC’s RG 198 and compliance is critical to the integrity and efficiency of timely information being made available to investors.

Under ASIC’s continuous disclosure provisions, subject to certain exceptions, if Malabar becomes aware of information:

- a) That is not generally available; and

- b) That a reasonable person would expect, if it were generally available, to have a material effect on the price or value of the Unlisted Registered Scheme’s securities,

Malabar must lodge a document containing that information with ASIC as soon as is reasonably practicable (see section 675 of the *Corporations Act*). However, in lieu of RG 198.40, ASIC will not require Malabar to lodge information under section 675(2) of the *Corporations Act* if Malabar follows ASIC’s good practice guidance for website disclosure (refer to section 4 below). This is because information that is publicly disclosed on a website and made available to investors in a timely manner is often more accessible to investors than information lodged with ASIC.

4. WEBSITE DISCLOSURE AND TIMELY OF DISCLOSURE

According to RG198, Malabar is committed to following ASIC’s good practice guidance for website disclosure of material information of:

- All material information being included onto the Malabar website;
- Investors are able to find material information easily and determine its significance for them;
- Any new material information is included on the website as soon as practicable; and
- Information is kept on the website for as long as it is relevant and appropriate records are kept.

Malabar acknowledges that it must lodge material information with ASIC as website publications do not relieve Malabar from their legal obligation to also lodge the relevant information with ASIC.

5. REVIEW OF POLICY

This Policy will be reviewed regularly by the Board having regard to the changing circumstances of the Company and any changes to this Policy will be notified to affected persons in writing.

6. QUESTIONS

For questions about the operation of this Continuous Disclosure Policy, please contact the Company Secretary via email at company.secretary@malabarresources.com.au.

7. DOCUMENT CONTROL

Version	Date	Owner	Description of changes
V1	12/6/2024	Company Secretary	