Continuous Disclosure and Shareholder Reporting Policy

Version: 2
Last review: 30 June 2026

1. Introduction and purpose

K2 Asset Management Holdings Ltd (the Company) is admitted to the official list of ASX Limited (ASX) and its ordinary shares are quoted under the code KAM. As a listed entity, the Company is subject to continuous disclosure obligations under the Corporations Act 2001 (Cth) and the ASX Listing Rules.

This policy sets out how the Company complies with those obligations, ensures that all investors have equal and timely access to material information about the Company, and communicates with shareholders and the market. It applies to all directors, officers and employees of the Company and its controlled entities (the Group).

This policy is to be read in conjunction with the guidelines and procedures set out at the end of this policy.

2. The continuous disclosure obligation

Under ASX Listing Rule 3.1 (as elaborated in ASX Guidance Note 8) and sections 674 and 674A of the Corporations Act, once the Company is or becomes aware of any information concerning it that a reasonable person would expect to have a material effect on the price or value of the Company's securities (market sensitive information), the Company must immediately tell ASX that information, unless an exception in Listing Rule 3.1A applies.

Consistent with ASX guidance, the Company treats “immediately” as meaning promptly and without delay. Information is material if it would, or would be likely to, influence persons who commonly invest in securities in deciding whether to acquire or dispose of the Company's securities.

3. Exceptions to immediate disclosure

Disclosure is not required under Listing Rule 3.1A for so long as all of the following are satisfied: a reasonable person would not expect the information to be disclosed; the information is confidential and ASX has not formed the view that it has ceased to be confidential; and the information concerns an incomplete proposal, is insufficiently definite, was generated for internal management purposes, is a trade secret, or could not lawfully be disclosed.

Reliance on the exception is kept under continuous review. If any condition ceases to be satisfied — for example, if confidentiality is lost — the information is disclosed immediately.

4. False markets

If ASX considers that there is, or is likely to be, a false market in the Company's securities and asks the Company for information to correct or prevent it, the Company will immediately give ASX that information (Listing Rule 3.1B). The Company will also release information needed to prevent or correct a false market whether or not ASX has asked.

5. Disclosure governance

The Board oversees the Company's compliance with its continuous disclosure obligations and approves material announcements before release. Day-to-day disclosure compliance is administered by the Company's Disclosure Officers — the Managing Director and Chief Executive Officer, the Chief Financial Officer and the Company Secretary — who assess potentially market sensitive information, determine whether disclosure is required or an exception applies, and authorise announcements to ASX. All personnel must escalate potentially market sensitive information to a Disclosure Officer immediately. The Board receives copies of all material market announcements promptly after they are made.

6. Authorised spokespersons and equal access

Only the Managing Director and Chief Executive Officer (or their authorised delegates) may comment publicly on the affairs of the Company. Market sensitive information is not released to any person — including analysts, investors or the media — before it has been given to ASX and released to the market, and no external party is given information that provides a beneficial insight into the Company's affairs beyond what is publicly available.

7. Analyst and investor briefings

The Company does not disclose market sensitive information at analyst or investor briefings unless it has previously been, or is simultaneously, released to ASX. New and substantive presentation materials are released to ASX ahead of the presentation, records of briefings are kept, and if market sensitive information is inadvertently disclosed it is immediately given to ASX. The Company may correct factual errors in analysts' reports but does not comment on analysts' conclusions, assumptions or earnings estimates.

8. Market rumours and speculation

The Company does not generally comment on market speculation or rumours. It may respond where speculation contains factual errors that could materially affect the Company, where there is a movement in the price of the Company's securities reasonably referable to the speculation, or where ASX or another regulator requests a response. Any response is authorised by a Disclosure Officer and is limited to correcting factual matters.

9. Trading halts

To maintain a fair, orderly and informed market, the Company may request a trading halt or voluntary suspension from ASX where it is not in a position to make an immediate announcement of market sensitive information. A trading halt may be requested by the Managing Director and Chief Executive Officer or, in their absence, by directors or the Company Secretary in accordance with the Company's internal authorities.

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10. Closed periods

The Company observes closed periods ahead of its half-year and full-year results announcements (i.e. from 1 December to early February and from 1 June to early August), during which briefings with the investment community and the media are restricted and the Company's financial performance is not discussed. Restrictions on dealing in the Company's securities during closed periods are set out in the Company's Securities Trading Policy.

11. Shareholder communications

The Company places its ASX announcements, annual reports, results materials and substantive investor presentations on its website, and uses general meetings to communicate with shareholders and allow reasonable opportunity for informed participation. Shareholders may elect to receive communications from, and send communications to, the Company and its share registry electronically. The Company's external auditor attends each annual general meeting and is available to answer shareholder questions about the conduct of the audit and the preparation and content of the auditor's report.

12. Compliance and review

Suspected breaches of this policy must be reported and are remedied as soon as possible, including by announcement to ASX where required. A breach may also engage the breach reporting obligations of Group entities that hold an Australian financial services licence. A contravention of the continuous disclosure obligations may give rise to criminal, civil penalty or administrative consequences for the Company and personal liability for directors and officers under the Corporations Act. The Board monitors compliance with this policy and reviews it periodically to keep it current with the Corporations Act, the ASX Listing Rules and ASX guidance. The Company provides training to relevant personnel on their continuous disclosure obligations under this policy. This policy is available on the Company's website.