

CONTINUOUS DISCLOSURE POLICY

SCOPE

This policy applies to all directors, officers, employees, contractors and consultants (Personnel) of PYC Therapeutics Limited ("Company").

POLICY STATEMENT

The Company must comply with continuous disclosure requirements arising from legislation and the ASX Listing Rules. The Company is committed to complying with its continuous disclosure obligations and providing the market with accurate, balanced and timely information that allows investors to access the impact of the information when making investment decisions.

The purpose of this policy is to:

- (a) raise awareness of the Company's continuous disclosure obligations;
- (b) set out the obligations of all Personnel to ensure that the Company complies with its continuous disclosure obligations.

The focus of this policy is on continuous disclosure compliance and improving access to information for investors.

CONTINUOUS DISCLOSURE OBLIGATIONS

The Company operates in compliance with the Corporations Act and the ASX Listing Rules which are in place to ensure an informed market.

The general rule, in accordance with ASX Listing Rule 3.1, is that once the Company 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, the Company must immediately disclose that information to the ASX.

A reasonable person would expect information to have a material effect on the price or value of the Company's securities if the information would, or would be likely to, influence an investor in deciding whether to buy, hold or sell the Company's securities.

RESPONSIBILITIES

The Company Secretary is responsible for:

- (a) overseeing and co-ordinating disclosure of information to the relevant stock exchanges and shareholders; and
- (b) providing guidance to Directors and employees on disclosure requirements and procedures.

The Executive Director and Company Secretary will be responsible for ensuring that Company announcements are lodged in a timely manner.

MEASURES TO AVOID A FALSE MARKET

Price sensitive information is publicly released through ASX before it is disclosed to 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.

The Company's general practice, which must be observed by all Personnel, is not to comment on market speculation or rumours, unless required to do so by law or ASX. If the speculation is considered to be materially misleading or potentially damaging to the Company's share price or reputation, the Board will determine if a response is required to correct the potentially damaging rumour/speculation. Any Company Personnel who receive a request for comment on the Company's affairs from an external third party must refer the enquiry to the Executive Director.

If the ASX considers that there is, or is likely to be, a false market in the Company's securities and asks the Company to give the ASX information to correct or prevent a false market, the Company Secretary will discuss the matter with the ASX. If an announcement is required, and the Company needs time to prepare an announcement, the Company may request a trading halt.

LODGEMENT OF DOCUMENTS WITH ASX

The Company's protocol in relation to the review and release of ASX announcements (and media releases) is as follows:

- (a) All key announcements at the discretion of the Executive Director are to be circulated to and reviewed by all members of the Board.
- (b) All members of the Board are required to seek to provide the Executive Director (or in his/her absence, the Company Secretary) with verbal or written contribution of each key 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.
- (c) 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.
- (d) All members of the Board will receive copies of all material market announcements promptly after they have been made.

Where a lodgement is of a routine or administrative nature which is required to be made under the ASX Listing Rules, the Company Secretary may disclose the information to the ASX in the interest of expediency.

TRADING HALTS

In order to facilitate an orderly, fair and informed market, it may be necessary to request a trading halt from the ASX. The Executive Director and Company Secretary, in consultation with the Chairperson and where time permits approval from the Board, are responsible for all decisions relating to a trading halt. Any request to the ASX for the Company to be placed into voluntary suspension must be approved by the Board.

COMMUNICATIONS

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

The Company may hold briefing sessions with analysts and investors. Only authorised Company

spokespersons may conduct such sessions and all sessions will be conducted in accordance with the Company's continuous disclosure obligations.

Any new and substantive investor or analyst presentation will be released on the ASX Market Announcements Platform ahead of the presentation. Where practicable, the Company should consider providing shareholders the opportunity to participate in such presentations.

All Personnel must ensure that they comply with the Company's Code of Conduct and any other policies in respect of media contact and comment.

CONFIDENTIALITY

All Personnel must ensure that they comply with the Company's Code of Conduct and any other policies in respect of confidentiality of Company information.

This includes keeping confidential all information about the Company and its related companies to which Personnel have access to and which is not already public. This includes, for example, any undisclosed exploration results, resource calculations, financial information and any potential material transactions or negotiations the Company is involved in.

Personnel are not to leave unattended or read confidential documents about the Company or its related companies in public places or have confidential discussions about the Company or its related companies in places that you could be overheard by others.

Any instances where confidentiality of information has been or may be lost for any reason whatsoever should be reported to the Executive Director or Company Secretary.

POLICY REVIEW

The Board will monitor the scope and currency of this Policy every two years or as required. Any updates or improvements identified will be addressed as soon as possible.

Approved by the Board of Directors on 28 October 2024