Continuous Disclosure Policy

19 November 2026 | Version 4

Policy Owner	Company Secretary, with Chief Financial Officer support
Approval Body	Board, following recommendation from the Risk Committee
Review Cycle	Once every two years/As required
Next Review Date	November 2028
Audience	Shareholders Directors, officers, employees and contractors of the Group

1. Purpose

1.1. The purpose of this Policy is to support NobleOak Life Limited's compliance with its continuous disclosure obligations as an ASX-listed entity and to promote timely, accurate and balanced disclosure to the market.

1.2. This Policy is intended to:

(a) ensure that the Company immediately (meaning, 'promptly and without delay') discloses all Market Sensitive Information to ASX in accordance with the ASX Listing Rules and the Corporations Act;

(b) ensure that the Company's officers and employees are aware of the Company's continuous disclosure obligations;

(c) ensure that communications with the ASX, investors, analysts, the media and other external parties are managed consistently and lawfully; and

(d) establish procedures for:

(i) the collection of all Potentially Market Sensitive information;

(ii) assessing whether information must be disclosed to ASX under the ASX Listing Rules or under the Corporations Act and, if it is to be disclosed, that its announcement is factual, complete, balanced and expressed in a clear and objective manner that allows an investor to assess the impact of the information when making an investment decision;

(iii) releasing to ASX information determined to be Market Sensitive Information and required to be disclosed so that all investors have equal and timely access to this information; and

(iv) responding to any queries from ASX (particularly queries under ASX Listing Rule 3.1B).

2. Scope

2.1. This policy is owned by the Company Secretary, with support from the Chief Financial Officer. Business owners are responsible for implementing and maintaining controls within their respective areas, while the Risk function provides independent second-line oversight, monitoring and reporting.

2.2. This policy applies to all directors, officers, employees and relevant contractors of the Group who may become aware of information relevant to the Company's disclosure obligations.

3. Legal framework

3.1. As an ASX-listed entity, the Company is subject to the continuous disclosure regime under the ASX Listing Rules, including the obligation in Listing Rule 3.1 to disclose Market-Sensitive Information immediately once the company becomes aware of it.

3.2. In some circumstances, the Company may be entitled to withhold disclosure under the exception framework in Listing Rule 3.1A. Whether that exception is available must be assessed carefully and on a continuing basis.

3.3. Information that is initially non-disclosable may become disclosable because circumstances change, confidentiality is lost, the matter becomes sufficiently definite, or a reasonable person would no longer expect the information to remain undisclosed.

3.4. In addition to specific continuous disclosure obligations, inaccurate, incomplete, unbalanced or delayed market communications may create broader legal, regulatory and governance risk, including risk associated with misleading or deceptive conduct and the creation or maintenance of a false market.

3.5. This Policy is to be interpreted and administered consistently with those obligations and risks.

4. Definitions

Term (Abbreviation/Acronym)	Definition
ASIC	means the Australian Securities and Investments Commission.
ASX	means ASX Limited and, where the context requires it, the ASX market operated by it.
ASX Listing Rules	means the listing rules of ASX, as amended or waived from time –to time.
Awareness	Means information possessed by, or which ought reasonably to have come into the possession of, a director or officer in performing their duties.
Board	means the directors of the Company from time to time, acting as a board.
CEO	means the Chief Executive Officer of the Company or any person performing that function.
CFO	means the Chief Financial Officer of the Company or any person performing that function.
Chair	means the Chair of the Board.

Term (Abbreviation/Acronym)	Definition
Confidential Information	means information that is not generally available and is being kept confidential by the Company through reasonable and effective confidentiality controls.
Company	means NobleOak Life Limited.
Company Secretary	means the company secretary of the Company or any duly authorised delegate acting in that capacity.
Company Securities	includes securities in the Company, options over those securities and any other financial products of the Company traded on the ASX.
Corporations Act	means the *Corporations Act 2001* (Cth), as amended or modified from time to time.
CRO	means the Chief Risk Officer of the Company or any person performing that function.
Disclosure Officers	means the CFO and the Company Secretary of the Company, and any other senior officer formally designated by the Board for the purposes of this Policy.
Group	means the Company and its controlled entities.
Market-Sensitive Information	means information that a reasonable person would expect to have a material effect on the price or value of Company Securities.
Media Adviser	means any media, investor relations or investment relations adviser appointed by the Board and authorised to speak on behalf of the Company.
Trading Halt	means a request to ASX for a trading halt in the company's securities and includes, where the context requires, consideration of a voluntary suspension.
Potentially Market Sensitive Information	means information that may be Market Sensitive Information.

Unless the contrary intention appears, references in this Policy to the Company include any relevant controlled entity to the extent information relating to that entity may be material to the market in the Company's securities.

5. Roles and responsibilities

5.1. The Board is responsible for:

(a) overseeing the Company's compliance with its continuous disclosure obligations;

(b) approving this Policy and material amendments to it;

(c) considering and approving announcements that are of fundamental strategic significance, relate to matters reserved to the Board, or are otherwise referred to the Board under this Policy;

(d) being informed promptly of material disclosure issues, significant ASX interactions and any Trading Halt or voluntary suspension request; and

(e) reviewing management's operation of disclosure governance and controls.

5.2. The Chair is responsible for:

(a) supporting effective Board oversight of disclosure matters;

(b) being available for urgent consultation where Board input is required between meetings;

(c) approving, jointly with another authorised approver where required under this Policy, urgent announcements or Trading Halt requests when it is not practicable to convene the full Board; and

(d) ensuring the Board is informed promptly of significant disclosure developments.

5.3. The CEO is responsible for:

(a) promoting a culture of prompt internal escalation of Potentially Market-Sensitive Information;

(b) ensuring business units and senior executives identify and escalate relevant matters promptly;

(c) participating in disclosure assessments and approval decisions in accordance with this Policy; and

(d) ensuring operational resources are available to support timely market disclosure.

5.4. The CFO is responsible for:

(a) participating in assessment of financial, commercial and transaction-related disclosure matters;

(b) assisting in verification of factual and financial content of announcements;

(c) supporting disclosure decisions relating to forecasts, results, capital management and other financially sensitive matters; and

(d) participating in urgent disclosure and Trading Halt decisions in accordance with this Policy.

5.5. The Chief Risk Officer is responsible for:

(a) identifying, assessing and escalating to the Disclosure Officer, and where relevant the Disclosure Committee, any risk, compliance, operational, prudential, cyber, conduct or regulatory matter that may constitute or give rise to Market Sensitive Information; and

(b) where required, may provide input on the nature, seriousness and likely impact of the matter.

5.6. The Company Secretary is responsible for:

(a) coordinating the practical administration of this Policy;

(b) receiving and coordinating escalation of potential disclosure matters;

(c) maintaining the disclosure log and related records;

(d) coordinating preparation, review, lodgement and release of ASX announcements;

(e) serving as a principal contact with ASX on disclosure administration;

(f) coordinating Board and Chair approvals where required; and

(g) facilitating disclosure training and periodic policy review.

5.7. The Disclosure Officers are collectively responsible for:

(a) assessing Potentially Market-Sensitive Information as it arises;

(b) determining whether further fact gathering, external advice or Board involvement is required;

(c) determining whether an exception may apply and ensuring ongoing reassessment of that position;

(d) coordinating the preparation and verification of proposed announcements; and

(e) making or escalating disclosure recommendations under this Policy.

5.8. Senior executives and business leaders are responsible for:

(a) monitoring matters within their areas of responsibility for potential disclosure significance;

(b) ensuring prompt escalation to a Disclosure Officer or the Company Secretary of information that may be market-sensitive;

(c) assisting with factual verification of announcements relevant to their areas; and

(d) maintaining confidentiality controls over sensitive matters.

5.9. Employees, contractors and consultants within scope of this Policy must:

(a) escalate immediately any information of which they become aware that may be market-sensitive;

(b) maintain confidentiality of sensitive information in accordance with this Policy and the confidentiality obligations in their employment, engagement or other applicable agreement;

(c) comply with communication restrictions under this Policy; and

(d) cooperate with any disclosure assessment, investigation or record-keeping requirement.

5.10. Unless the Board determines otherwise:

(a) routine announcements may be approved by the CEO and the Company Secretary, or by the CFO and the Company Secretary, provided the matter is not one required to be referred to the Board;

(b) announcements relating to matters reserved to the Board, matters of fundamental strategic significance, half-year or full-year results, capital raisings of significance, material transactions, matters materially affecting guidance, or matters the Chair or CEO considers appropriate, must be referred to the Board unless urgency makes that impracticable;

(c) in urgent circumstances where immediate disclosure is required and it is not practicable to convene the full Board, an announcement may be approved by

the Chair and one of the CEO, CFO or Company Secretary, with the Board to be notified as soon as practicable; and

(d) the Company Secretary is responsible for ensuring the applicable approval path is documented in the disclosure log.

5.11. Announcements must be approved in accordance with the authority matrix above. Nothing in this Policy permits disclosure to be delayed to obtain an approval where immediate disclosure is required.

5.12. The CEO or a Disclosure Officer may authorise a Trading Halt or voluntary suspension where urgent action is required, with the Chair and Board informed as soon as practicable.

5.13. Routine administrative announcements, such as a disclosure to the market concerning a change in a director's notifiable interest in Company Securities, may be made by a Disclosure Officer following consultation with the CEO or his or hertheir delegate.

6. Disclosure Officers

6.1 The Board has appointed the CFO and the Company Secretary to act as the Disclosure Officers.

6.2 The Disclosure Officers are the primary point of contact with ASX in relation to continuous disclosure matters and will perform the functions allocated to them under this Policy, including:

(a) ensuring officers and employees of the Company are aware of and adequately understand:

(i) the Company's continuous disclosure obligations;

(ii) their responsibilities in relation to the Company's continuous disclosure obligations and to protect the confidentiality of information (including, when instructing advisers or conducting negotiations in relation to any matter that may give rise to Market Sensitive Information); and

(iii) this policy;

if the Disclosure Officers think it necessary, implementing training sessions for officers and employees in relation to the Company's continuous disclosure obligations, their responsibilities in relation to those obligations and the protection of confidential information and this policy;

(b) implementing and supervising procedures for reporting potentially Market Sensitive Information;

(c) ensuring (by using all reasonable endeavours) that all announcements:

(i) are factual, objective and free from the use of any emotive or argumentative language;

(ii) are balanced and free from any misleading or deceptive statements (including by omission);

(iii) do not omit material information;

(iv) are expressed in a clear, concise and effective manner; and

(v) to the extent that they contain financial information, compliant with the requirements of *ASIC Regulatory Guide 230 Disclosing non-IFRS financial information*,

in each case, so that investors can make fully informed investment decisions in response to that information; and

(d) ensuring that the Board receives a copy of all announcements released by the Company on ASX promptly after release of such announcements.

6.3 The Disclosure Officers must maintain a file (Disclosure File) of:

(a) material disclosed to ASX;

(b) communications with ASX under ASX Listing Rule 3.19B;

(c) potentially Market Sensitive Information that has come to a Disclosure Officer's attention and that has not been disclosed to ASX; and

(d) reasons why any potentially Market Sensitive Information was not disclosed (and especially if the Company is seeking to rely on the exceptions to ASX Listing Rule 3.1 (contained in ASX Listing Rule 3.1A) in deciding not to disclose that potentially material information).

6.4 The Disclosure Officers must report material matters recorded in the Disclosure File to the CEO and provide the Board with periodic reporting on material disclosure decisions, ASX interactions and any suspected breach of this Policy.

7. Deciding if information should be disclosed

7.1 Any director, officer, employee or relevant contractor who becomes aware of Potentially Market Sensitive Information must report it immediately to a Disclosure Officer or the Company Secretary. Escalation is required even if the person is uncertain whether the information is material or must be disclosed.

7.2 The Disclosure Officers must promptly assess the information and determine the appropriate approval pathway under clause 5.

7.3 If disclosure is required, the Disclosure Officers must prepare and verify an ASX announcement and obtain the approval required under clause 5. Nothing in this clause permits required disclosure to be delayed.

7.4 The Disclosure Officers may refer a material or uncertain matter to the CEO, Chair or Board and may obtain external legal or financial advice.

Matters requiring Board approval under clause 5 must be referred to the Board where practicable without delaying disclosure required under the ASX Listing Rules. Such matters will include:

(a) significant profit upgrades or downgrades;

(b) dividend policy guidance or declarations;

(c) Company-transforming transactions or events; and

(d) any other matters that are determined by the Disclosure Officers, CEO or the Chair of the Company to be of fundamental significance to the Company.

Where an announcement is to be considered and approved by the Board, the Disclosure Officers must ensure that the Board is provided with all relevant information necessary to ensure that it is able to appreciate fully the matters dealt with in the announcement.

7.5 If the Company is unable to make a disclosure to ASX immediately (meaning, 'promptly and without delay') upon becoming aware of that Market Sensitive Information, or there is a risk of a false or disorderly market, the CEO or a Disclosure Officer must immediately consider whether to request a Trading Halt or voluntary suspension.

7.6 Where any information is reported as referred to in paragraph 7.1, and the Disclosure Officers or CEO determine that the circumstances are developing but the information is not presently disclosable, the Disclosure Officers must oversee the preparation of an appropriate draft announcement to facilitate immediate disclosure of the information if it later becomes disclosable (for example, as a result of confidentiality being lost through a 'leak').

7.7 If the Disclosure Officers determine that information is not Market-Sensitive Information or is not otherwise required to be disclosed, the Disclosure Officers must document the material reasons for that decision in the Disclosure File.

7.8 If an officer or employee is in doubt about whether information is Potentially Market-Sensitive Information, they must immediately give that information to a Disclosure Officer or the Company Secretary for consideration.

8. Assessing whether information is Market-Sensitive

8.1 The guiding principle is that the Company must immediately disclose to ASX any information concerning the Group that a reasonable person would expect to have a material effect on the price or value of Company Securities.

8.2 If information would, or would be likely to, influence persons who commonly invest in securities in deciding whether to acquire or dispose of Company Securities, it is material. However, information could be material in other ways and materiality must be assessed having regard to all the relevant background information, including past announcements that have been made by the Company and other generally available information. If there is any doubt, the information should be disclosed to the CEO or the Disclosure Officers for consideration.

8.3 Examples of the types of information that may need to be disclosed include:

(a) a transaction that will lead to a significant change in the nature or scale of the Group's activities;

(b) a change in revenue or profit or loss forecasts that is materially different from market expectations;

(c) a change in asset values or liabilities;

(d) a change in tax or accounting policy;

(e) a decision of a regulatory authority in relation to the Group's business;

(f) a relationship with a new or existing significant customer or supplier;

(g) a formation or termination of a joint venture, partnership arrangement or strategic alliance;

(h) the granting or withdrawal of a material licence;

(i) an entry into, variation or termination of a major contract;

(j) a significant transaction, such as an acquisition or disposal, involving the Group;

(k) giving or receiving a notice of intention to make a takeover;

(l) a labour dispute;

(m) a threat, commencement or settlement of any material litigation or claim;

(n) the appointment of a liquidator, administrator or receiver;

(o) the commission of an event of default under, or other event entitling a financier to terminate, a material financing facility;

(p) undersubscriptions or oversubscriptions to an issue of securities (a proposed issue of securities is separately notifiable to ASX under the ASX Listing Rules);

(q) the lodging of a document containing Market Sensitive Information with an overseas exchange or other regulator so that it is public in that country; or

(r) an agreement between the Company and one of its directors or one of their related parties.

8.4 There are many other types of information that could give rise to a disclosure obligation. For example, a development in a company affiliated with, but not controlled by, the Company may be price-sensitive when related to the Company itself.

9. Exception to disclosure and confidentiality

9.1 Under ASX Listing Rule 3.1A, the Company does not have to give ASX information if:

(a) one or more of the following applies:

(i) it would be a breach of 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 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.

9.2 When the Company relies, or may need to rely, on ASX Listing Rule 3.1A, appropriate confidentiality protocols must be maintained. A leak of confidential information, reasonably specific market rumour or media report may indicate that confidentiality has been lost and must be escalated immediately so that the continued availability of the exception can be reassessed.

9.3 ASX may form the view that information about a matter involving the Company ceases to be confidential if there is a reasonably specific and reasonably accurate media, analyst report, or rumour known to be circulating the market, about the matter, or if there is a sudden and significant movement in market price or traded volumes of the Company's securities that cannot be explained by other events or circumstances. If ASX forms such a view, the Company must release that information to the market even if an exception to ASX Listing Rule 3.1 is relied upon.

10. False markets, market speculation and rumours

10.1 Market speculation and rumours, whether substantiated or not, have the potential to impact Company Securities. Speculation may also contain factual errors that could materially affect Company Securities.

10.2 The CFO will monitor movements in the price or trading activity of Company Securities to identify circumstances in which a false market may have emerged in Company Securities.

10.3 If ASX asks the Company to give it information to correct or prevent a false market, the request must be escalated immediately to the Disclosure Officers, who must coordinate the Company's response. Information may be required even where Listing Rule 3.1A would otherwise apply.

10.4 The Company's general policy on responding to market speculation and rumours is that it does not respond to market speculation or rumours. However, the CEO, a Disclosure Officer or the Board (as applicable) may decide to make a statement in response to market speculation or rumours if:

(a) they consider that the Company is obliged at that time to make a statement to the market about a particular matter;

(b) they consider it prudent in order to prevent or correct a false market occurring in Company Securities; or

(c) ASX asks for information.

11. Public release of disclosed information

11.1 The Company will publicly release all information disclosed to ASX under this policy by placing it on its website (under the 'Investors' section of www.nobleoak.com.au).

11.2 The Disclosure Officers must be provided with confirmation from ASX that the information has been released to the market, before publicly discussing or otherwise publishing the information.

12. Trading Halts

12.1 The Company may ask ASX to halt trading in Company Securities to:

(a) maintain orderly trading in Company Securities; and

(b) manage its continuous disclosure obligations.

12.2 Authority to request a Trading Halt or voluntary suspension is set out in clause 5.4.

12.3 A Trading Halt or voluntary suspension should be considered where the Company cannot give an announcement promptly, confidentiality may have been lost, ASX raises a false market concern or additional time is reasonably required to verify and prepare an announcement.

13. Authorised spokespersons

13.1 Only the Chair, CEO, CFO and Media Adviser may speak on behalf of the Company to institutional investors, stockbroking analysts or the media about the Company, its business, operations, financial position or prospects. This restriction does not prevent other employees from participating in industry conferences or providing general industry commentary in the ordinary course of their role, provided they do not speak on behalf of the Company or disclose or comment on Market Sensitive Information or other confidential information.

13.2 The Chair, CEO, CFO and Media Adviser may only clarify information that the Company has publicly released and must not comment on Market Sensitive Information that has not been released to the market.

13.3 The Company will not expressly or implicitly give institutional investors or stockbroking analysts earnings forecast guidance that has not already been released to the market.

13.4 If other employees are asked to comment by an external investor, stockbroking analyst or the media in relation to any matter concerning the Group they must:

(a) say that they are not authorised to speak on behalf of the Company; and

(b) refer the investor, stockbroking analyst or media to the Disclosure Officers.

13.5 Before any media release can be issued, the Disclosure Officers must:

(a) review it;

(b) disclose it to ASX (if it contains Market Sensitive Information); and

(c) if applicable, be provided with confirmation from ASX that the information in the media release has been released to the market before publicly discussing or otherwise publishing it.

14. Open briefings to institutional investors and stockbroking analysts

14.1 The Company may hold open briefings with institutional investors or stockbroking analysts to discuss information that has been released to the market.

14.2 For the purposes of this policy:

(a) public speeches and presentations by the Chair, CEO or CFO are open briefings; and

(b) any meeting that is not an open meeting is a one-on-one briefing.

14.3 Market Sensitive Information that has not been released to the market must not be disclosed at open briefings.

14.4 If a question raised in a briefing can only be answered by disclosing Market Sensitive Information, employees must:

(a) decline to answer the question; or

(b) take the question on notice and wait until the Company releases the information to the market through ASX.

14.5 If an employee participating in a briefing thinks that something has been raised that might be Market Sensitive Information that has not been publicly released, he or she must immediately inform the CEO or, if the CEO is unavailable, the Disclosure Officers.

14.6 Any new and substantive investor or analyst presentation must be released to ASX before it is given.

15. One-on-one briefings with institutional investors and stockbroking analysts

15.1 It is in the interests of shareholders that institutional investors and stockbroking analysts have a thorough understanding of the Group's business, operations and activities.

15.2 The Company may hold one-on-one briefings with institutional investors and stockbroking analysts. At these briefings, the Company may give background and technical information to help institutional investors and stockbroking analysts better understand its business operations and activities.

15.3 For the purposes of this policy, a one-on-one briefing includes any communication between the Company and an institutional investor or a stockbroking analyst.

15.4 Market Sensitive Information that has not been released to the market must not be disclosed at one-on-one briefings.

15.5 Any inadvertent disclosure of Market Sensitive Information that has not previously been disclosed to ASX must immediately be reported to the Disclosure Officers, who must assess whether disclosure to ASX is required and take any necessary action promptly.

15.6 File notes must be made of all one-on-one briefings and kept for a reasonable period.

15.7 If an employee participating in a one-on-one briefing thinks that something has been raised that might be Market Sensitive Information that has not been publicly released, he or she must immediately inform the CEO or, if the CEO is unavailable, the Disclosure Officers.

15.8 Any new and substantive investor or analyst presentation used for one-on-one briefings must be released to ASX before it is given.

16. Presentation and briefing materials

16.1 Any presentation or briefing materials for open or one-on-one briefings must be given to the CEO or the Disclosure Officers before the briefing to determine if they contain any Market Sensitive Information that has not been released to the market.

16.2 The Disclosure Officers must ensure that any new and substantive investor or analyst presentation is released to ASX before it is given.

17. 'Blackout' periods

The Company will ordinarily avoid investor and analyst briefings between the end of a financial reporting period and announcement of the relevant results. The CEO or a Disclosure Officer may approve a briefing during that period where there is a legitimate business reason and discussion is confined to publicly available information.

18. Review of reports by analysts

18.1 The Company is not responsible for, and does not endorse, reports by analysts commenting on the Company.

18.2 The Company does not incorporate reports of analysts in its corporate information, including on its website (this also extends to hyperlinks to websites of analysts).

18.3 If an analyst sends a draft report to the Company for comment:

(a) employees must immediately send it to the CEO or, if the CEO is unavailable, the Disclosure Officers;

(b) any response to it will not include Market Sensitive Information that has not been disclosed to the market;

(c) it will only be reviewed to correct factual inaccuracies on historical matters and errors in underlying assumptions; and

(d) no comment will be made on any profit forecasts contained in it.

18.4 Any correction of a factual inaccuracy does not imply that the Company endorses an analyst research report.

18.5 A standard disclaimer will be made in any response to an analyst.

19. Informing employees

19.1 This policy or a summary of it will be distributed to employees to help them understand the Company's continuous disclosure obligations, their individual reporting responsibilities and the need to keep the Company's information confidential.

19.2 The Company's securities trading policy will also be distributed to employees. That policy also relates to the treatment of Market Sensitive Information.

20. Policy breaches

A breach of this Policy may result in disciplinary or other appropriate action. For employees, this may include dismissal in serious cases.

21. Questions

Any questions about the Company's continuous disclosure obligations or this policy should be referred to the Disclosure Officers.

22. Review of, and amendments to, this policy

This policy will be reviewed at least every two years, and earlier if required due to legislative, ASX or regulatory change.

23. Approved and adopted

This policy was approved by the Board on 19 November 2026.