



**ENVIRONMENTAL CLEAN
TECHNOLOGIES LIMITED**

Continuous Disclosure Policy

Version 3

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1. Introduction and Purpose

Environmental Clean Technologies Limited (ECT) is a listed public company on the Australian Stock Exchange (ASX) and must meet the requirements of the Corporations Act 2001 and ASX Listing Rule 3.1 (Continuous Disclosure) to keep the market informed of material events as they occur. Consistent with these obligations as a listed entity ECT is committed to the provision of timely, full and accurate disclosure to the market such that:

- All investors have equal and timely access to material information concerning ECT – including its financial situation, performance, ownership and governance; and;
- Company announcements are factual and presented in a clear and balanced way.

This Policy establishes processes to ensure that Company announcements are made in a timely manner, are factual, do not omit material information and are expressed in a clear and objective manner, and have been appropriately authorised.

2. ASX Listing Rule 3.1 and Material information

ASX Listing Rule 3.1 provides that “Once an entity 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 entity's securities, the entity must immediately tell ASX that information”

ASX Listing Rule 3.1 does not apply to particular information while each of the following is satisfied in relation to the information:

- One or more of the following 5 situations applies:
 - It would be a breach of a law to disclose the information.
 - The information concerns an incomplete proposal or negotiation.
 - The information comprises matters of supposition or is insufficiently definite to warrant disclosure.
 - The information is generated for the internal management purposes of the entity; or
 - The information is a trade secret; and
- The information is confidential, and ASX has not formed the view that the information has ceased to be confidential; and
- A reasonable person would not expect the information to be disclosed.

Within the context of this Policy “Material Information” means any information concerning ECT, which a reasonable person would expect to have material effect on the price or value of any securities issued by ECT or must be disclosed pursuant to ASX Listing Rule 3.1.

Material Information within the context of the Policy is classified as Highly Sensitive; Moderately Sensitive or Minimally Sensitive.

- Highly Sensitive Material Information – Information that if known to the market would be expected to have significant impact upon the share price ($>\pm 10\%$) or relates to a major commercial transaction to be undertaken by the Company or contains specific representations in respect of the future financial performance of the Company.
- Moderately Sensitive Material Information – Information that if known to the market would not be expected to have a significant impact upon the share price ($<\pm 10\%$) and is not considered by its nature to be Highly Sensitive or Minimally Sensitive.
- Minimally Sensitive Material Information – Information that if known to the market would not be expected to have a significant impact upon the share price ($<\pm 10\%$) and is required to be released to fulfil a regulatory obligation (e.g., ASX Listing Rules disclosures of new issues or changes in directors’ holdings).

In the first instance the Managing Director (or equivalent) will be responsible for the classification of Material Information as Highly Sensitive; Moderately Sensitive or Minimally Sensitive, or in his absence or unavailability, either the Chairman or Company Secretary. If there is doubt in respect of the classification by

the Managing Director, it will refer to the members of the ECT Board for a determination, and the classification agreed by a simple majority of members of the ECT Board will be accepted for the purposes of this Policy.

3. The Policy

The directors of the ECT have promulgated a Continuous Disclosure Policy that seeks to ensure:

- Directors and other Company officers are fully aware of the Continuous Disclosure Policy and the Company's obligations for continuous disclosure under the ASX Listing Rules;
- Processes are in place to identify Material Information and if any Director or Officer becomes aware of any fact or circumstance which may be Material Information, they will immediately inform, in the first instance, the Managing Director or, if unavailable, either the Chairman or Company Secretary;
- All Material Information is to be fully and accurately disclosed to the market in a timely manner;
- All information, other than Material Information, required under the ASX Listing Rules is provided in a timely manner;
- Procedures for preparing and authorising the release of Material Information are to be effective; and
- Delegated authority and responsibilities for the execution of the Continuous Disclosure Policy are to be effective.

4. Roles/Responsibilities

The Directors are responsible for:

- Authorising the Continuous Disclosure Policy and the delegations for implementation of the policy;
- Ensuring the Continuous Disclosure Policy is effective in ensuring that ECT is in compliance with its obligations under the Corporations Act 2001 and the ASX Listing Rules.

The Managing Director has delegated responsibility for:

- Effective implementation of the Continuous Disclosure Policy;
- Identification of Material Information and its classification into Highly, Moderately or Minimally Sensitive Material Information; ·
- Overseeing and coordinating disclosure of Material Information to shareholders, analysts and brokers;
- Being ECT's primary point of contact with the media.
- Reporting to the ECT directors in regard to the effectiveness of the Continuous Disclosure Policy.

The Company Secretary is responsible for:

- Establishing the Continuous Disclosure Policy;
- Communicating the Continuous Disclosure Policy within ECT;
- Providing guidelines as to what is Material Information and its appropriate classification;
- Providing advice on disclosure of Material Information;
- Seeking legal advice if there is uncertainty as to whether disclosure is required
- Disclosure of Material information to the ASX.
- Ensuring timely release of the information as required by the ASX Listing Rules that may not be Material Information consistent with the requirements of the Listing Rules;
- Monitoring compliance with this Policy;

All employees of the ECT are accountable for ensuring that if they become aware of any fact or circumstance that may be Material Information then that information is communicated as soon as possible to the Managing Director and, in his absence or unavailability, to either the Chairman or Company Secretary. If the information is based on rumour or speculation that may give rise to a false market in the Company's securities, then the Managing Director will be provided with the following information:

- The detail of the rumour or speculation;
- The source of the information; and
- The effect of the information, if true, on ECT's finances and operations (if known).

No Director, Officer or any other employee is to make comment regarding ECT to any sector of the media without the express authority of the Chairman or Managing Director.

5. Approvals to Disclose

Highly Sensitive Material Information

All Directors will be promptly advised of Highly Sensitive Material Information and circulated with a draft announcement. Highly Sensitive Material Information must be approved by a majority of Directors prior to the disclosure of Highly Sensitive Material Information to the market. The approval may be granted as a result of a meeting of Directors or as received and documented by written or electronic communication to the Managing Director or the Company Secretary.

If a Director raises a concern in respect of a proposed Highly Sensitive Material Information announcement, then this concern is to be communicated to the other directors for re-assessment of the proposed announcement, however if upon re-consideration the majority of Directors agree to proceed with the announcement, then it is to be released.

Any release which includes disclosure of a profit projection or other specific financial forecast is deemed to be Highly Sensitive Material Information and must be explicitly approved by the Chairman of ECT, as well as a majority of the ECT Directors prior to its release.

Moderately Sensitive Material Information

All Directors will be promptly advised of Moderately Sensitive Material Information and circulated with a draft announcement. The Chairman or Managing Director will have the authority to approve the disclosure of Moderately Sensitive Material Information to the market.

If a Director raises a concern in respect of a proposed Moderately Sensitive Material Information announcement, then his concern is to be communicated to the Chairman or in his absence the Deputy Chairman for re-consideration of the proposed announcement, however if upon re-consideration the Chairman or in his absence the Deputy Chairman agree to proceed with the announcement, then it is to be released.

Minimally Sensitive Material Information

Directors will be circulated with copies of Minimally Sensitive Material Information. Any two of the Chairman (or his deputy if unavailable) or Managing Director or Company Secretary will have the authority to approve the disclosure of Minimally Sensitive Material Information to the market.

Disclosure

Following necessary approvals, the Company Secretary will:

- Coordinate the actual form of disclosure; and
- Make the disclosure to the ASX as required.

6. Analysts/Shareholders

All communications with market analysts shall be conducted by the Managing Director and/or the Marketing and Communications Manager. The Chairman may participate in appropriate cases.

No Director, Officer or any other employee is to make comment regarding ECT to any sector of the media without the express authority of the Chairman or Managing Director.

No other Director, Officer or employee shall communicate with analysts or shareholders on Material Information unless specifically authorised by the Chairman or Managing Director.

There shall be no communication with analysts or shareholders of any Material Information that has not been the subject of an ASX release or is not generally available.

7. Media

There shall be no communication to the media of any Material Information that has not been the subject of an ASX release or is not generally available.

All communications with media are to be authorised by the Managing Director or the Chairman.

All media enquires relating to the affairs of the Company must be dealt with by either the Managing Director or the Chairman.

No other Director, Officer or employee shall communicate with media unless specifically authorised by the Chairman or Managing Director.

8. Other External Communications

Information or presentations provided to, and discussions with, professional bodies or any other person, are also subject to this Continuous Disclosure Policy. Material information must not be selectively disclosed

(e.g., to analysts, professional bodies, the media, shareholders, customers, patients or any other person,) prior to being announced to the ASX. Only publicly available information can be used in these external communications.

If material information is provided to analysts, the media or other external parties without first being disclosed to ASX, the Company Secretary must be notified of the disclosure and he or she will either:

- arrange for disclosure in accordance with this Policy and ASX Listing Rule requirements; or
- arrange for the party to sign an Information Separation Certificate in accordance with the Information Separation Register.

Implementation of this policy

This policy was adopted and implemented by the Board of ECT 18 October 2022.

Availability of this policy

This policy is available on ECT's website.

Review of this policy

The Board will monitor and annually review the effectiveness of this policy.