

A close-up, low-angle shot of the front left corner of a red car. The car's headlight and grille are visible, reflecting light. The background is dark and out of focus.

AMA GROUP

Continuous Disclosure Policy

September 2025

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1. INTRODUCTION

- 1.1. In accordance with the continuous disclosure obligation imposed on AMA Group Limited ("AMA Group" or the "Company") by the Corporations Act 2001 (Cth) ("Corporations Act"), Australian Securities Exchange ("ASX") Listing Rules and good corporate governance, AMA Group has adopted this Continuous Disclosure Policy (the "Policy").
- 1.2. The Policy is designed to ensure that procedures are in place so that the stock market in which the Company's securities are listed is properly informed of matters which may have a material impact on the price at which the securities are traded.

2. PURPOSE

- 2.1. This Policy describes the internal processes designed to ensure that the AMA Group complies with its continuous disclosure obligations on the stock exchanges on which its securities are listed.
- 2.2. The Company is committed to:
 - a) complying with the general and continuous disclosure principles contained in the Corporations Act and the ASX Listing Rules;
 - b) preventing the selective or inadvertent disclosure of material price sensitive information;
 - c) ensuring shareholders and the market are provided with full and timely information about the Company's activities; and
 - d) ensuring that all market participants have equal opportunity to receive externally available information issued by the Company.

3. APPLICATION

- 3.1. This Policy applies to all Board of Directors, senior executives, employees, officers, contractors, consultants, and their associates of AMA Group and its controlled entities (collectively, "Employees").

4. NON-COMPLIANCE WITH THE POLICY

- 4.1. Strict compliance with this Policy is a condition of employment with the Company. Breach of the general law relating to continuous disclosure rules can expose the Company and individuals involved in the breach to penalties, third party claims, and reputational damage. A breach can also undermine confidence in the market for the Company's securities.
- 4.2. Individuals involved in breaching this Policy may be subject to disciplinary action, which may include termination of employment, and, where relevant, referral to regulatory authorities.

5. RESPONSIBILITY FOR AMA GROUP'S CONTINUOUS DISCLOSURE OBLIGATIONS

- 5.1. The Managing Director and the Company Secretary have been appointed as the Company's Disclosure Officers (the "Disclosure Officers") responsible for implementing and administering this Policy.
- 5.2. The Disclosure Officers are responsible for:
 - a) all communication with the ASX;

- b) making decisions on what information must be disclosed publicly under this Policy; and
 - c) ensuring that appropriate systems are in place to capture and disclose all relevant information
- 5.3. Ultimate management responsibility for compliance with AMA Group's continuous disclosure obligations rests with the Managing Director and the Chief Financial Officer.
- 5.4. For material matters requiring continuous disclosure, the Disclosure Officers will consult with the Board to ensure alignment with legal and regulatory obligations. The Board retains ultimate decision-making authority on significant disclosures, in accordance with **Sections 9 and 10** of this Policy.
- 5.5. In the absence of both the Managing Director and the Company Secretary, any material matters regarding disclosure issues are to be referred to the Chair of the Board.

6. MATERIAL INFORMATION

- 6.1. In accordance with the ASX Listing Rules, the Company is required to immediately notify the market (via an announcement to the ASX) of any information that a reasonable person would expect to have a material effect on the price or value of the Company's securities.
- 6.2. Material information is defined as information that is likely to influence persons who commonly buy and hold securities in deciding whether to buy, hold, or sell the Company's securities.
- 6.3. The Company is also required to disclose information if asked to do so by the ASX, to correct or prevent a false or misleading market.
- 6.4. If an employee or officer of the Company becomes aware of any information that may be price sensitive, it must be reported immediately to the Disclosure Officers.
- 6.5. The Company is deemed to have become aware of information where a Director or Executive Officer has, or ought to have, come into possession of the information in the course of the performance of their duties as a Director or Executive Officer.
- 6.6. The Company must take preventive measures to limit or control potentially market sensitive information. These measures shall include (but are not limited to):
 - a) Non-disclosure agreements ("NDA") must be signed with third parties before disclosing any confidential information;
 - b) Line managers must identify Employees in possession of material price sensitive information and notify the Disclosure Officers;
 - c) Line managers must restrict access to material price sensitive information on a "need to know" basis;
 - d) material price sensitive information must be kept secure, protected by firewalls or through access controls.
- 6.7. Where there is any doubt as to whether an issue might materially affect the price or value of the Company's securities, the Disclosure Officers will assess the circumstances with appropriate Senior Executives and/or the Board and if necessary, seek external professional advice.

7. REVIEW OF COMMUNICATIONS FOR DISCLOSURE

- 7.1. The Disclosure Officers will review all communications to the market to ensure that they are full and accurate and comply with the Company's obligations. Such communications may include:
- a) media releases;
 - b) analyst, investor or other presentations;
 - c) prospectuses; and
 - d) other corporate publications.
- 7.2. All presentations to analysts and investors will be released to the ASX, prior to or simultaneously with their delivery, and then included on the Company's website.

8. AUTHORISED SPOKESPERSON

- 8.1. The Company may from time to time receive inquiries from the press, investors or others regarding affairs of the Company, rumours, or unpublished information. Unless otherwise authorised under this Policy, all employees are strictly prohibited from providing any comment in such instances, including, without limitation, rumours concerning additional securities offerings, acquisitions, dispositions, restructuring, or similar matters. Only the persons authorised under this Policy may respond to such inquiries.
- 8.2. The Company's authorised spokespersons are the Managing Director, the Chair, and the Company Secretary. In appropriate circumstances, the Managing Director or the Chair may from time to time authorise other spokespeople on particular issues and those within their area of expertise.
- 8.3. No Employees or consultants are permitted to comment publicly on matters confidential to the AMA Group. Any information which is not public must be treated by employees and consultants as confidential until publicly released in accordance with the ASX Listing Rules.
- 8.4. Employees are prohibited from discussing any potentially material price sensitive information on social networks, forums chat rooms, or other online platforms.

9. CONTINUOUS DISCLOSURE OBLIGATIONS

- 9.1. The Group must, subject to the disclosure exceptions set out in the applicable Listing Rules, immediately notify the market of any information or development related to its business that a reasonable person would expect to have a material effect on the price or value of its securities.
- 9.2. The term "immediately" in this context means "promptly" (that is, as quickly as possible in the circumstances) and "without delay" (that is, without deferring, postponing or putting it off to a later time). Disclosure is made by making an announcement to the ASX.

Exceptions to disclosure of information

- 9.3. Certain material information does not need to be disclosed if each of the following paragraphs (a), (b) and (c) is satisfied in relation to the information:
- a) one or more of the following conditions apply:
 - i. it would be a breach of the law to disclose the information; or
 - ii. the information concerns an incomplete proposal or negotiation; or

- iii. the information comprises matters of supposition or is insufficiently definite to warrant disclosure; or
 - iv. the information is generated for internal management purposes of the Group; or
 - v. the information is a trade secret; and
 - b) the information is confidential and the 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.
- 9.4. If certain material information is withheld from disclosure on the basis that it is confidential, then it is important that all necessary steps are taken to ensure that the information remains confidential. This may include ensuring that it is not disclosed to third parties except on the basis of a written confidentiality undertaking.
- 9.5. As soon as any of these elements are no longer satisfied (for example, the information is reported in the media and is therefore no longer confidential), disclosure will generally be required.

Material effect on the price or value of AMA Group's securities

- 9.6. A reasonable person would be taken to expect information to have material effect on the price or value of AMA Group's securities if it would, or would be likely to, influence persons who commonly invest in securities in deciding whether to subscribe for, buy or sell AMA Group securities.
- 9.7. In forming a view as to whether a reasonable person would consider information to be material, regard should be had to the external information that is publicly available and previous disclosures to the market (for example, commentary of likely results). Materiality is assessed using both quantitative and qualitative factors appropriate to the Group and having regard to the examples given by the ASX in ASX Listing Rule 3.1 and accompanying ASX Guidance Note 8.

False markets

- 9.8. If the ASX considers that there is, or is likely to be, a false market in AMA Group's securities and requests the Group to provide information to correct or prevent a false market, AMA Group must give the ASX the information requested to correct or prevent the false market.
- 9.9. The obligation to give information arises even if the exceptions detailed in Section 9.3 apply.

10. CONTINUOUS DISCLOSURE PROCEDURE

Internal notification

- 10.1. All Employees should notify the Company Secretary if they consider there is material information which requires disclosure. Personnel should also notify the Company Secretary if they believe any prior disclosure to the ASX is inaccurate or incomplete.
- 10.2. The Company Secretary will:
- a) review any information reported in accordance with the paragraph above, in consultation with the Managing Director, the CFO, and any other relevant executives and Chair of the Board, as relevant;
 - b) determine whether any of the information is required to be disclosed to the ASX; and

- c) co-ordinate the form of disclosure to ensure that any information disclosed is accurate, balanced and expressed in a clear and objective manner that allows investors to assess the impact of their investment when making investment decisions.

Approval of announcements

- 10.3. Except as set out in the paragraphs below, the Managing Director or CFO, in conjunction with the Company Secretary, have the authority to approve the following announcements to the market:
 - a) substantial shareholder notices (approved by the relevant holder);
 - b) director interest notices (approved by the relevant Director);
 - c) company administration notices (such as Appendix 3Bs and 2As); and
 - d) announcements pre-approved by the Board in substantially the form approved.
- 10.4. Proposed announcements to the market which:
 - a) are to include disclosure of a forecast or other forward-looking information; or
 - b) relate to a matter that is material and strategically important to the Group (including announcements relating to the full-year or half-year reports),
- 10.5. Announcements under 10.4 must be circulated and approved in writing (this includes email or other electronic means) by a majority of the Directors of the Board in advance of being released to the market. Where a matter must be urgently disclosed to the ASX, the Chair of the Board (or in the Chair's absence, the Managing Director) may approve the announcement on behalf of the AMA Group Board. In this instance, the full Board must be informed of the disclosure at the first available opportunity following the release of the announcement.
- 10.6. The Managing Director, Group CFO, or Company Secretary will generally circulate drafts of announcements to the Directors before they are released to the market.
- 10.7. All announcements will be posted on the Group's website after they are released to the market. The Board will also be provided with copies of all information disclosed to the ASX promptly after it has been disclosed.

11. REPORTING OF DISCLOSABLE INFORMATION

- 11.1. AMA Group must not release or disclose information publicly or to any other person (for example, the media or analysts) or post it on its website until AMA Group has given the information to ASX and has received an acknowledgement that the ASX has released the information to the market.

Corrections and updates

- 11.2. If any material information disclosed to the market becomes incorrect, AMA Group must release an announcement correcting or updating the information, immediately.

Inadvertent disclosure or mistaken non-disclosure

- 11.3. If price-sensitive information is inadvertently disclosed or Personnel become aware of information which should be disclosed, the Company Secretary must immediately be contacted so that appropriate action can be taken including, if required, releasing the information on the ASX.

12. MARKET SPECULATION AND RUMOURS

- 12.1. In general, AMA Group does not respond to market speculation and rumours except where:
- a) the speculation or rumours indicate that the subject matter is no longer confidential and therefore an exception to Listing Rule 3.1 no longer applies;
 - b) ASX formally requests disclosure by the Group on the matter; or
 - c) the Group considers that it is appropriate to make a disclosure in the circumstances (for example, if there are factual errors contained in the speculation or rumours that could materially affect the Group).
- 12.2. If Personnel become aware of any market speculation or rumours, these should be reported to the Company Secretary immediately.

Media relations and public statements

- 12.3. All enquiries from the media must be referred to the Managing Director or Group Chief Financial Officer ("CFO").
- 12.4. The following persons are authorised to make public statements on behalf of the AMA Group:
- a) the Chair of the Board;
 - b) the Managing Director, and
 - c) the CFO.
- 12.5. The Managing Director may delegate this authority to another Employee.
- 12.6. Those persons may only clarify information that the Group has publicly released and must not comment on price-sensitive information that has not been released to the market.

13. ANALYST AND INVESTOR BRIEFINGS AND FORECAST

- 13.1. AMA Group may conduct briefings with analysts and investors from time to time to provide background information and publicly released materials. In these cases, the following protocols will apply:
- a) no price-sensitive information will be disclosed at these briefings (including in response to any questions asked at the briefing) unless it has been previously or is simultaneously released to the market.
 - b) if price-sensitive information is inadvertently disclosed, it will immediately be released to the market.
 - c) any new or substantive investor or analyst presentation materials to be given to analysts and investors at a briefing will be released to the market and posted on the Group's website. This should occur before the information is presented at the briefing.
 - d) a record of all meetings and briefings with analysts or investors will be kept, including confirmation that no price-sensitive information was disclosed beyond that which has already been released to the market.
 - e) unless approved by the Chair of the Board (or in their absence, the Managing Director), briefings, engagements or interviews with analysts, investors or media, are not permitted to be conducted during trading black-out periods or any other closed trading period as determined by the Board from time to time.

- 13.2. The Chair of the Board, Managing Director and Group CFO are authorised to engage with analysts and investors.
- 13.3. The Managing Director may delegate this authority to another Employee.

14. ANALYST REPORTS

- 14.1. AMA Group is not responsible for, and does not endorse, reports by analysts commenting on the Group.
- 14.2. The Group does not incorporate reports of analysts in its corporate information, including its website (this also extends to hyperlinks to websites of analysts).
- 14.3. Where requested to do so, the Group may review research reports by analysts but will confine its comments to factual matters and material previously disclosed to the market. Comment or feedback will only be provided on financial forecasts, including profit forecasts prepared by analysts, in relation to incorrect assumptions or factual inaccuracies. No comment or feedback will be provided on the conclusions or recommendations set out in the report. The Group will communicate this policy whenever asked to review an analyst report.

15. TRADING HALTS

- 15.1. In order to facilitate an orderly, fair and informed market it may be necessary to request a trading halt from the ASX.
- 15.2. The circumstances in which it may be appropriate to request a trading halt may include:
 - a) if, during ASX trading hours, AMA Group becomes aware of disclosable information, but it is not in a position to issue an announcement straight away;
 - b) where information has been leaked ahead of an announcement being made, and the information is having, or is likely to have, a material effect on the price or value of AMA Group securities; or
 - c) if ASX has formally requested for AMA Group to release information to correct or prevent a false market and it is not able to lodge an immediate announcement.
- 15.3. Employees are not authorised to initiate a request for a trading halt other than through the Company Secretary, who must obtain approval from the Managing Director before making the request.
- 15.4. If the Managing Director is unavailable, the Company Secretary must obtain the approval of the Chair of the Board, or if the Chair is unavailable, another Non-Executive Director.
- 15.5. The Company Secretary is responsible for liaising with the ASX in relation to the lodgement of a trading halt request. If the Company Secretary is unavailable, the Managing Director is responsible for coordinating the trading halt request.
- 15.6. Where a trading halt request is made, the Company Secretary must promptly notify the AMA Group Board.

16. MANAGEMENT OF THIS POLICY

- 16.1. The AMA Group Board has nominated the Company Secretary as the person responsible for general administration of this Policy.
- 16.2. The Company Secretary's responsibilities include:

- a) ensuring that announcements are communicated to the ASX in accordance with applicable regulatory requirements and this Policy;
 - b) ensuring that all Directors are promptly provided with a copy of all announcements made to the ASX;
 - c) maintaining a register of announcements made to the market;
 - d) reviewing Board papers and other information referred to the Company Secretary for events that the Company Secretary considers may give rise to disclosure obligations;
 - e) communicating with ASX about general matters concerning the ASX Listing Rules including in relation to matters of disclosure, and co-ordinating communications with the ASX in relation to matters of disclosure;
 - f) ensuring (using reasonable endeavours) announcements are factual and are expressed in a clear and objective manner that allows investors to assess the impact of the information when making investment decisions; and
 - g) periodically monitoring compliance with this Policy and the Group's disclosure processes and the effectiveness of this Policy.
- 16.3. The Company Secretary will also arrange (in conjunction with the Group's Human Resources function) for any significant amendments to this Policy to be notified to relevant Personnel.

17. CONFIDENTIALITY

- 17.1. All Personnel must maintain and protect the confidentiality of AMA Group information as set out in the Code of Conduct. It is important that no one inadvertently or improperly discloses confidential information as this could put AMA Group in breach of its obligations under the Corporations Act and the Listing Rules of the ASX.

18. WEB-BASED COMMUNICATION

- 18.1. The Company's website features discrete sections for shareholders and investors to ensure that such information can be accessed by interested parties. Such information will include:
- a) annual reports and results announcements;
 - b) all other company announcements made to the ASX;
 - c) company profile and company contact details; and
 - d) written information provided to investors or stockbroking analysts.
- 18.2. Announcements lodged with ASX will be placed on the Company's website as soon as practicable after ASX confirms receipt of that information.
- 18.3. Shareholders may be offered the option of receiving information via e-mail instead of posting.

19. BREACH OF THIS POLICY

- 19.1. Breaches of this Policy will be viewed seriously and may lead to disciplinary action being taken against the relevant Personnel. Any breach of this Policy will be reported to AMA Group's Audit & Risk Committee.

20. POLICY ACCESS AND TRAINING

- 20.1. This Policy will be made available to all Personnel via the following channels:

- a) posting the Policy on the staff intranet or other communication platform;
 - b) posting the Policy on staff noticeboards, as appropriate;
 - c) referencing the Policy in the Code of Conduct; and
 - d) incorporating the Policy in any induction information packs and training for new starters.
- 20.2. To the extent applicable to their roles, training may be provided periodically to enable Managers or designated contacts to provide guidance to other Personnel.
- 20.3. This Policy is also available on AMA Group's website.

21. FURTHER ASSISTANCE

- 21.1. Any questions about AMA Group's continuous disclosure obligations or this Policy should be referred to the Company Secretary.

22. POLICY REVIEW

- 22.1. This Policy will be reviewed at least once every two years (or earlier if required) to ensure that it remains effective and meets the requirements of the Listing Rules and Corporations Act.
- 22.2. The Policy will be available on the Company's website within a reasonable time after any such updates or amendments have been approved, and in such other ways as to ensure the Policy is available to employees and Personnel wishing to use it.

Version	V3 - 2025	Effective Date	September 2025
Approved By	AMA Group Board	Maintained By	AMA Group Board