Recce Pharmaceuticals
recce.com.au
ACN 124 849 065

Continuous Disclosure Policy

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Updated and approved by the Board on 4 August 2026

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1 INTRODUCTION

1.1 Purpose and Commitment

The Company is committed to providing shareholders and the market with full and timely information about its activities in compliance with its continuous disclosure obligations arising from legislation and the ASX Listing Rules.

1.2 The Continuous Disclosure Principle

This requires the Company to immediately (meaning promptly and without delay) disclose to the market information concerning it that a reasonable person would expect to have a material effect on the price or value of ASX shares (market sensitive information) unless it falls within certain exceptions.

1.3 Scope and Policy Governance

This policy applies to all Recce Team Members, including:

(1) Directors of the Company and its subsidiaries;

(2) Employees of the Company and each of its subsidiaries (**Recce Group**) regardless of where based, whether full time, part time or casual; and

(3) contractors and consultants whose terms of engagement with Recce Group apply this policy to them.

This Policy establishes procedures to ensure all Recce Team Members understand their responsibilities regarding market-sensitive information.

Only authorised spokespersons may communicate with the media, analysts, or the public on behalf of the Company.

The Board has adopted this Policy as a guide to maintaining accountability and compliance across the Company.

2 COMPANY SECRETARY RESPONSIBILITIES

The Company Secretary is responsible for:

(1) overseeing and co-ordinating disclosure of information to the relevant stock exchanges and shareholders; and

(2) providing guidance to Directors and employees on disclosure requirements and procedures.

3 PREPARING AND RELEASING ANNOUNCEMENTS

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.

All announcements (and media releases) must be:

(1) prepared in compliance with ASX Listing Rules continuous disclosure requirements;

(2) factual and not omit material information; and

(3) expressed in a clear and objective manner to allow investors to assess the impact of the information when making investment decisions.

4 CONFIDENTIALITY OF MARKET-SENSITIVE INFORMATION

4.1 Strictly Confidential Mandate

All information concerning the Company that a reasonable person would expect to have a material effect on the price or value of its securities must be treated as strictly confidential prior to its market release. This includes but is not limited to information relating to clinical trial milestones and data, regulatory approvals, trial status changes, safety concerns, commercial partnerships and licensing, patent grants, IP challenges, pre-clinical breakthroughs, proposed transactions, funding and grants, capital raisings, and information held during a trading halt.

4.2 Restricting Access

Access to market-sensitive information before public release is strictly limited to directors, officers, and employees on a "need-to-know" basis.

4.3 Secure Handling and Data Protection

All documents, communications and data containing confidential, market-sensitive information must be stored, transmitted and discussed securely, and must not be left accessible to unauthorised persons.

4.4 Embargo Restrictions

All Recce Team Members and authorised spokespersons must not disclose any market-sensitive information under an embargo arrangement. This restriction applies until the information is officially released to the market.

4.5 Wall Crossing Procedures

Before any internal or external party is given access to confidential, market-sensitive information:

(1) The Company must conduct a formal confidentiality briefing in accordance with its wall-crossing procedure.

(2) The recipient must confirm that the information is confidential and will not be disclosed or acted upon before public release.

(3) Where appropriate, external parties (including advisers, underwriters, and consultants) must execute a confidentiality or non-disclosure agreement.

5 PROTOCOL TO RELEASE INFORMATION TO ASX

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

(1) All key announcements at the discretion of the Chairman are to be circulated to and reviewed by all members of the Board.

(2) All members of the Board should seek to provide to the Chairman (or in their absence, the Company Secretary) with verbal or written confirmation of each key announcement, prior to its release.

(3) 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.

(4) The Chairman (and in their absence, the Managing Director) is to be given the final signoff before release to the ASX of the announcement.

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 Secretary is to maintain a copy of all announcements released.

6 ANALYST AND INVESTOR BRIEFINGS AND PRESENTATIONS

6.1 Pre-Disclosure Requirement

The Company will not disclose market-sensitive information to any analyst, investor, or media representative unless that information has first been disclosed to the ASX and the Company has received an official acknowledgment of its release.

6.2 Investor Relations Meetings

The Company may hold individual or group meetings with analysts and investors as part of its investor relations program to facilitate effective two-way communication. Only publicly available or non-market-sensitive information may be discussed at these meetings.

6.3 Presentation Materials

A copy of any new and substantive analyst or investor presentation materials must be lodged on the ASX Market Announcements Platform prior to the commencement of the presentation.

6.4 Inadvertent Disclosure

If any market-sensitive information is inadvertently disclosed during a briefing, meeting, or subsequent Q&A session, the attending Company representatives must immediately notify the Chairman and Company Secretary.

7 BREACH OF THIS POLICY

Breaches of this Policy may be regarded as misconduct, which may lead to disciplinary action including termination of employment or engagement, and may result in other action taken against the individual if necessary.

8 TRAINING AND AWARENESS

The Company will provide training to all Recce Team Members on their confidentiality and continuous disclosure obligations under this policy, on induction and refreshed on a periodic basis.

9 REVIEW

The Board reviews this policy at least annually. This policy may only be amended by resolution of the Board.