

Continuous Disclosure Policy

Experience Co Limited

ACN 167 320 470

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1. INTRODUCTION

1.1 Company's commitment to disclosure and communication

Experience Co Limited (EXP/Company/Group) is committed to complying with the continuous disclosure obligations as required by the Corporations Act 2001 (Cth) (Corporations Act) and the ASX Listing Rules.

1.2 Purpose of this policy

This policy outlines corporate governance measures adopted by the Company aimed at fostering a culture of corporate compliance and ethical behaviour in complying with its obligations and commitments.

1.3 Application of this policy

This policy applies to all Directors, officers, employees, contractors and consultants of the Company. Failure to comply with the disclosure obligations in this policy may lead to a breach of the Corporations Act 2001 (Cth) (Corporations Act) or the ASX Listing Rules and to personal penalties. Breaches of this policy may lead to disciplinary action.

2. MATTERS THAT MUST BE DISCLOSED

The Corporations Act and the ASX Listing Rules require the Company, as a company listed on the ASX, to comply with the ASX Listing Rules continuous disclosure obligations.

2.1 ASX Listing Rule 3.1 requires that the Company immediately disclose to the market any information of which the Company becomes aware concerning the Company that a reasonable person would expect to have a material effect on the price or value of the Company's securities. Disclosure is made by making an announcement to the ASX. The Directors, Officers and employees of EXP understand the importance of keeping corporate information confidential prior to announcement to the ASX and all have a responsibility to comply with this policy.

2.2 False market

If the ASX considers that there is, or is likely to be, a false market in the Company's securities and requests the Company to provide information to correct or prevent a false market, the Company must give the ASX the information requested to correct or prevent the false market.

3. INTERNAL DISCLOSURE PROCEDURE

3.1 Internal notification

- (a) All Directors, officers and members of senior management must immediately notify the Company Secretary as soon as they become aware of any information that is not generally available, which may be price sensitive, and which should be considered for release to the market.
- (b) The Company Secretary must review any information reported in accordance with paragraph (a), in consultation with the Chief Executive Officer (CEO), the Chief Financial Officer (CFO), the Chair of the Board and / or any Directors of the

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Company, as relevant, and determine whether any of the information is required to be disclosed to the ASX.

3.2 Approval of announcements

Before the release of any announcement to the ASX:

- (a) The CEO and CFO must review any announcement to ensure the information contained in the announcement is factually correct. Any relevant parties named in the announcement should be given the opportunity to review the announcement prior to its release in order to confirm that all information contained in the announcement is factually correct; and
- (b) Any proposed announcement for release on the ASX market announcements platform must be circulated to all Directors prior to release and approved by a majority of the Directors of which one must be the Chair of the Board.

4. MARKET COMMUNICATION

4.1 Communication of information

All ASX announcements made by the Company must be timely, accurate, balanced and expressed in a clear and objective manner that allows investors to assess the impact of the information when making investment decisions.

4.2 Disclosure must be made to ASX first

The Company will not release any information publicly that is required to be disclosed through the ASX market announcements platform until the Company has received formal confirmation of its release to the market by the ASX.

4.3 Corrections and updates

If any material information disclosed to the market becomes incorrect, the Company must release an announcement correcting or updating the information.

4.4 Inadvertent disclosure or mistaken non-disclosure

If price sensitive information is inadvertently disclosed or a Director, officer or employee becomes 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 market announcements platform.

4.5 Market speculation and rumour

The Company does not, in general, comment on market speculation and rumour unless there are factual errors contained in the speculation that could materially affect the Company, or the Company receives a formal request from the ASX.

4.6 Trading halts

If necessary, the Company Secretary with approval of the Chair of the Board, has the authority to request a trading halt from the ASX to ensure orderly trading in the Company's securities and to manage disclosure issues.

5. SHAREHOLDER COMMUNICATION

The Company's policy in relation to communications with its shareholders is set out in the Company's Shareholder Communications Policy.

6. MEDIA AND ANALYSTS

6.1 Analysts and institutional investors

The Company may conduct briefings for analysts and institutional investors from time to time to discuss matters concerning the Company.

The CEO, CFO and Chair of the Board or other approved representatives of the Company are authorised to engage with analysts and institutional investors from time to time.

Any new or substantive investor or analyst presentation must be released on the ASX market announcements platform prior to the presentation being made.

The Company's policy at these briefings is that:

- (a) one-on-one and group briefings between the Company and analysts or investors must be restricted to discussions of previously disclosed information;
- (b) in responding to an analyst or investor query, only previously disclosed information may be discussed, and all responses must be factual and balanced;
- (c) any questions raised in relation to price sensitive issues not already disclosed to the market will be taken on notice; and
- (d) if a question is taken on notice and the answer would involve the release of price sensitive information, the information must be released through the ASX market announcements platform before responding.

6.2 Analyst Reports

The Company's policy in relation to analysts' reports is that it will only review these reports to clarify historical information and correct factual inaccuracies if this can be achieved using information that has been disclosed to the market generally.

Comment or feedback will only be provided on financial forecasts, including profit forecasts prepared by the analyst, in relation to incorrect assumptions or factual inaccuracies. No comment or feedback will be provided on conclusions or recommendations set out in the report. The Company will communicate this policy whenever asked to review an analyst report.

6.3 Media relations and public statements

All inquiries from the media must be referred to the CEO or Chair of the Board. The Company must not provide interviews, stories or information to the media that contain material or price sensitive information (even on an embargo basis) before that information has been disclosed to the ASX market announcements platform.

No employee may give an interview or make a presentation without the specific permission of the CEO or Chair of the Board.

7. RESPONSIBILITY FOR THIS POLICY

The Company has nominated the Company Secretary as the person responsible for the implementation, operation and monitoring of this policy, in particular:

- (a) liaising with the ASX in relation to continuous disclosure issues;
- (b) overseeing and coordinating the disclosure of information to the ASX;
- (c) ensuring that there are vetting and authorisation processes in place designed to ensure that Company announcements comply with the requirements set out in paragraph 4.1;
- (d) ensuring that all Board members are promptly provided with a copy of all announcements made to the ASX;
- (e) monitoring compliance with this policy;
- (f) periodically reviewing the Company's disclosure procedures in light of changes to the ASX Listing Rules or the Corporations Act and recommending any necessary changes to the procedures.

8. PROMOTING AN UNDERSTANDING OF COMPLIANCE

All Directors, officers and senior management of the Company should be familiar with the obligations under this policy.

All Directors, officers, employees and contractors of the company must have access to this policy and be aware of the consequences of a breach of this policy.

9. REVIEW

This policy will be regularly reviewed to ensure that it provides for and enables accurate, balanced and timely disclosure in accordance with the Corporations Act and the ASX Listing Rules.

This policy is available on the Company's website.

Updated – August 2022