



CONTINUOUS DISCLOSURE POLICY

1. Overview

As a company listed on the Australian Stock Exchange CAR Group Limited (“CAR Group” or the “Company”) understands that its compliance with its obligations under the ASX Listing Rules is crucial to the efficacy of the market.

The purpose of this continuous disclosure policy (this Policy) is to ensure that market announcements made by the Company are accurate, balanced and expressed in a clear and objective manner to support the functioning of an informed market.

The Company has adopted this policy to outline how the Company complies with its obligations under the ASX Listing Rules relating to continuous disclosure.

2. The Company’s obligations of continuous disclosure

ASX Listing Rule 3.1 provides that once the Company 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 its securities, it must immediately notify the ASX of that information. The information required to be disclosed under Listing Rule 3.1 is commonly referred to as ‘market sensitive information’.

Sections 674 and 674A of the Corporations Act give Listing Rule 3.1 statutory force. An entity which breaches Listing Rule 3.1 may also breach sections 674 and 674A of the Corporations Act, which may subject the entity and its officers to serious legal consequences, including both civil and criminal penalties.

3. Exceptions to the Company’s obligations of continuous disclosure

Listing Rule 3.1 does not apply to information if, and only if, each of the following three conditions is, and remains, satisfied:



- a reasonable person would not expect the information to be disclosed; and
- the information is confidential; and
- one or more of the following conditions apply:
 - it would be a breach of a law to disclose the information; or
 - the information concerns an incomplete proposal or negotiation; or
 - the information comprises matters of supposition or is insufficiently definite to warrant disclosure; or
 - the information is generated for the internal management purposes of the Company; or
 - the information is a trade secret.

Although information may not be required to be disclosed under Listing Rule 3.1, if ASX considers that there is or is likely to be a false market in the Company's securities, it may ask the Company to disclose the information to prevent a false market in the Company's securities.

4. Determining whether information is market sensitive

The Company must assess whether particular information is market sensitive, and therefore whether that information requires disclosure.

Under the Corporations Act, a reasonable person would expect information to have a material effect on the price or value of the Company's shares if the information would or would be likely to influence persons who commonly invest in securities in deciding whether to acquire or dispose of the Company's shares.

5. When the company is deemed to have become aware of the information

The Company will be deemed to have become aware of information where a Director or executive officer has, or ought reasonably to have, come into possession of the



information in the course of performance of their duties as a Director or executive officer of the Company.

An executive officer is a person concerned in, or taking part in, the management of the Company.

6. Procedures adopted by the Board to ensure compliance

The Board oversees the Company's continuous disclosure obligations, including approving this Policy.

Pursuant to the Company's Board Charter, the Board has reserved for itself certain matters, including approving communication to shareholders and to the public of the half-year and full-year results and generally any public statements which reflect issues of the Company's policy or strategy that the Board deems material.

Accordingly, certain communications to the ASX must be approved by the Board before release. For other matters, the Board entrusts the Company's Managing Director, assisted by the Company's CFO and General Counsel and Company Secretary to determine matters requiring disclosure to the ASX.

The Board has appointed the Company Secretary as the Company's Compliance Officer to ensure that the Company complies with its obligations of continuous disclosure.

7. The Compliance Officer

7.1 Appointment of Compliance Officer

The Compliance Officer is primarily responsible for ensuring that the Company complies with its disclosure obligations under the Corporations Act and the ASX Listing Rules, and, along with the Managing Director and CFO is responsible for deciding what information will be disclosed.



7.2 Responsibilities of the Compliance Officer

The responsibilities of the Compliance Officer include:

- in consultation with the Managing Director and CFO, deciding what information must be disclosed to the ASX and, if required, consulting with the Company's legal advisors;
- overseeing and coordinating the preparation of market announcements with other executives as appropriate;
- conducting all disclosure discussions with the ASX, including lodging market announcements in the appropriate form;
- approving and lodging non-material administrative ASX releases;
- maintaining a record of market announcements by the Company to the ASX;
- circulating copies of material market announcements to the Board after they have been submitted to the ASX; and
- instituting such procedures as the Compliance Officer considers necessary and expedient to ensure that the Company's staff are aware of and understand the Company's Continuous Disclosure requirements and responsibilities under this Policy.

8. Reporting and disclosure procedure

8.1 Reporting to Compliance Officer

Where any information comes to light about the Company which may need to be disclosed, all Directors, executive officers and employees are obliged to bring that information to the attention of the Compliance Officer with all possible expediency.

In the case of an emergency, or where any delay would prejudice the Company, initial verbal notification should be given directly to the Compliance Officer, to be followed by a written report.



8.2 Determining whether the information must be disclosed

Upon receipt of a report from a Director or any other person, the Compliance Officer shall determine whether the information contained in that report may have a material effect on the price of the Company's securities and whether it should be disclosed to the ASX.

8.3 If the information must be disclosed

If the information is market sensitive and must be disclosed, the Compliance Officer shall, immediately:

- discuss the matter with the Managing Director or, in their absence, the Chair;
- prepare, together with the relevant senior executive, an appropriate release, to be reviewed by the Managing Director or, in their absence, the Chair prior to it being sent to the ASX;
- submit the release to the ASX's Company Announcements Office; and
- send a copy of the release to all Directors.

If the Compliance Officer and the Managing Director or the Chair (as the case may be) are unable to agree on whether the information must be disclosed, whether in whole or in part, or as to the terms of the disclosure, the Company's legal advisors should be consulted immediately.

8.4 Release of Information

The Company must not disclose the information in any way until disclosure has been made to the ASX and the Company has received acknowledgement from the ASX that the information has been released to the market.

After receipt of the ASX's acknowledgement, the Compliance Officer may arrange for a copy of the announcement to be posted on the Company's website.



All announcements must be kept separate from any promotional material found on the Company's website.

9. Confidential information

It is vital that the Company safeguards its confidential information. Accidental or inadvertent disclosure may result in the information losing its confidentiality, and lead to the Company being required to disclose the information to the market prematurely.

If a determination is made that the information which comes to light is confidential, the Compliance Officer will ensure that anyone who has a copy of, or knows about, the information is aware that it is confidential.

10. Financial market communications

Care must be taken not to make comments to the media or others which could result in rumours or speculation about the Company. Such speculation may put the Company at risk of a false market or likely false market, and may result in the ASX requesting disclosure of information from the Company under Listing Rule 3.1B.

As a general rule, the Company will not respond to or correct speculation or rumours unless requested to do so by the ASX. However, where information has become reasonably specific or accurate, or it is in the Company's best interest to do so, the Company may consider releasing a statement responding to the speculation.

10.1 Authorised spokespersons

This policy limits media contact on the Company's financial or strategic matters to the Chair, the Managing Director, and the Compliance Officer. Other Directors and executives may only speak with the media in relation to a particular matter concerning the Company if they have obtained the prior express approval of the Managing Director.



10.2 Presentations to investors and analysts

Presentations to investors and analysts will usually be held in conjunction with the release of the Company's full year and half year results to the market. The material used in the presentations will be released to the ASX prior to the meetings being held.

The Company may also engage in one-on-one and other briefings. During any briefings and discussions with analysts, Directors and executives must only disclose information that has been publicly released through the ASX. If a question arises which can only be answered by disclosing price sensitive information, the Director or executive must decline to answer the question or take it on notice and then announce the information through the ASX before responding.

10.3 Approval of external addresses

It is important to ensure that any speeches, or external addresses given, do not result in rumours or speculation about the Company or unauthorised disclosure. The text of all speeches and external addresses must obtain prior endorsement of the Managing Director before being delivered.

10.4 Blackout periods

As set out in the Company's Securities Trading Policy, there are certain periods during which Company employees are prohibited from trading in the Company's shares, these are:

- the period commencing 6 weeks prior to the Company's half year results to the ASX and ending 24 hours after such release;
- the period commencing 6 weeks prior to the release of the Company's year end results to the ASX and ending 24 hours after such release; and



- the period commencing 2 weeks prior to the Company's annual general meeting and ending 24 hours after the annual general meeting.

During these 'blackout periods', the Company will also exercise a communication blackout, during which it will not conduct media interviews or hold one-on-one briefings with analysts and investors which relate to Company performance.

11. Maintenance of continuous disclosure policy

This policy will be periodically reviewed by the Compliance Officer to ensure that the Company complies with its continuous disclosure obligations under the Corporations Act and the ASX Listing Rules. Where appropriate, the Company's legal advisors will be consulted to ensure that this policy complies with all relevant legislation.

Any queries about this policy should be referred to the Compliance Officer.

12. Breaches of this Policy

Due to the severe consequences of the Company not complying with its continuous disclosure obligations under the ASX Listing Rules and Corporations Act, it is vital each employee, Director and other relevant parties understand and comply with this Policy.

Non-compliance with this Policy will be regarded as a serious matter and may result in disciplinary action, including termination of employment or engagement with the Company.

Document and Version Control

Version	Date	Approval
3.1	June 2025	CAR Group Board of Directors