	Continuous Disclosure Policy	Version: 3 Date: 21 August 2026 Page 1 of 12
Next review due by: August 2029		
Developed by: Company Secretary		
Authorised by: Regis Board of Directors		Issued To: All Employees

PURPOSE

Regis Healthcare Limited (the **Company**) has significant obligations under the *Corporations Act 2001* (Cth) (**Corporations Act**) and the ASX Listing Rules to keep the market fully informed of information which may have a material effect on the price or value of the Company's securities.

The purpose of this policy is to reinforce the Company's commitment to its continuous disclosure obligations, and to describe the processes in place that enable the Company to provide shareholders with timely disclosure in accordance with those obligations.

PEOPLE THIS POLICY APPLIES TO

This policy applies to all people performing work for a Regis group entity who are employed via an employment contract with a Regis Group entity (**Employee**).

POLICY

1. Continuous disclosure obligations

ASX Listing Rule 3.1 requires that, subject to the exceptions set out in Attachment 1, the Company must immediately notify the ASX of:

> **any information the Company becomes aware of concerning itself that a reasonable person would expect to have a material effect on the price or value of the Company's securities**.

See Attachment 1 for information about the continuous disclosure rule, including:

- what is meant by 'immediate' disclosure;
- what is meant by 'material effect' on the price or value of the securities;
- the exceptions that apply to ASX Listing Rule 3.1; and
- consequences for the Company and individuals involved in any contravention.

2. Reporting disclosable events

2.1 Obligations on all personnel

a) If management or a non-executive director becomes aware of any potentially material information, the information must be reported immediately to the CEO, CFO or General Counsel and Company Secretary (or their formally appointed delegates) (each a **Disclosure Officer**).

b) Operating divisional heads and group functional heads must ensure they have appropriate procedures in place within their areas of responsibility to ensure that all potentially materially price sensitive information is reported to them immediately for onforwarding in accordance with this policy. This includes ensuring that appropriate delegations are in place if they are unavailable at any time.

c) All **potentially material** information must be reported to a Disclosure Officer even where the reporting officer or division is of the view that it is not in fact 'material'. The officer's or division's view on materiality can (and should) be shared with the Disclosure Officer but will not be determinative. The Disclosure Officer will determine whether information is material and requires disclosure.

d) Continuous disclosure is also a standing agenda item at senior management meetings for the purpose of monitoring compliance with the Company's obligations.

2.2 Role of the Disclosure Officers

a) Where any information is reported under this policy to a Disclosure Officer, the Disclosure Officer will report the information to the Chair or in their absence the Chair of the Audit Risk and Compliance Committee (ARCC), whereupon (as either of them shall deem appropriate) the Board shall:

- review the information in question;
- urgently seek any advice that is needed to assist the Board to interpret the information (provided that disclosure of the information cannot be delayed if the information is clearly materially price sensitive on its face);
- determine whether any of the information is required to be disclosed to the ASX;
- consider whether it is necessary to seek a trading halt to facilitate an orderly, fair and informed market in the Company's securities; and
- coordinate the actual form of disclosure with the relevant members of management and the Company Secretary.

b) Where the Chair or the Chair of the ARCC determines that the circumstances are developing but the information is not presently disclosable, the General Counsel and Company Secretary or CFO (or their delegate) must oversee the preparation of an appropriate draft announcement to facilitate immediate disclosure of the information if it later becomes disclosable (for example, as a result of confidentiality being lost through a 'leak').

2.3 Role of the Board

a) The Board is responsible for overseeing compliance with the Company's continuous disclosure obligations.
b) All announcements under Listing Rules 3.1 (continuous disclosure) or 3.1B (false market) must be approved by the Board before the announcement is made or disclosure released through the General Counsel and Company Secretary.
c) Where an announcement is to be considered and approved by the Board, the General Counsel and Company Secretary (or their delegate) must ensure that the Board is provided with all relevant information necessary to ensure that it is able to fully appreciate the matters dealt with in the announcement.
d) **Rapid Response Process:** If the Board is unavailable to determine whether to make or approve an ASX announcement in a timely manner, the following individuals may authorise the disclosure:

- the Chair of the Board; or
- if the Chair of the Board is unavailable, the Chair of the ARCC; or
- if the Chair of the ARCC is unavailable, the CEO.

The announcement must then be considered by the Board at the first possible opportunity following its release to determine what, if any, further steps need to be taken.

e) Where open briefings or public speeches are to be made and, in accordance with this policy, relevant presentation materials and speeches are to be lodged with the ASX, prior approval will be obtained from the Board.

f) The Board will be provided with copies of all information disclosed to the ASX.

g) It is a standing agenda item at all of the Company's Board meetings to consider whether any matters reported to or discussed at a Board meeting should be disclosed to the market pursuant to the Company's continuous disclosure obligation.

3. Trading Halts

The Company may request a trading halt or, in exceptional circumstances, a voluntary suspension, to prevent trading in the Company's shares taking place on an uninformed basis, to correct or prevent a false market, or to otherwise manage the Company's disclosure obligations.

The Board is authorised to call a trading halt or voluntary suspension.

Rapid Response Process: If the Board is unavailable to request a trading halt or voluntary suspension, Rapid Response Process set out in 2 d) above shall apply.

4. Public comment / statements

The Company limits who are authorised to issue statements or make verbal comment to the media and in this regard, the Company has established a Corporate Communication Policy which must be read in conjunction with this Disclosure Policy.

The Company Secretariat will ensure all announcements to the ASX made under this Disclosure Policy are placed promptly on the Company's website following receipt of acknowledgement from the ASX that it has released the information to the market.

5. External communications

5.1 The Company's contact with the market

Throughout the year the Company has scheduled times for disclosing information to the financial market on its performance. The financial results announcements, and the supporting information, must be lodged with the ASX.

If "outlook statements" or forecasts are included in the Company's annual report or results announcements for a previous period, any material change in earnings expectations (either upwards or downwards) must be announced to the ASX before being communicated to anyone outside the Company.

In addition, the Company interacts with the market in a number of ways which can include one-on-one briefings, speeches etc. At all times when interacting with the community, the Company must adhere to its continuous disclosure obligation and must not selectively disclose material price sensitive information to an external party unless that information has first been released to the ASX.

5.2 Authorised spokespersons

The only Company representatives authorised to speak on behalf of the Company to the media, major investors and stockbroking analysts are:

- Chair of the Board;
- CEO;
- CFO; or
- their delegates nominated for a specific purpose.

Authorised spokespersons must not provide any material price sensitive information that has not already been announced to the market nor make comment on anything that may have a material effect on the price or value of the Company's securities.

No guidance on actual or forecast financial performance will be provided to any external party that has not already been provided to the market generally.

Any questions or enquiries from the financial community (whether received in writing, verbally or electronically including via the website) should be referred in the first instance to CFO or their delegate.

5.3 Communication blackout periods

Between the end of a reporting period (i.e. the end of the half-year and full-year) and the announcement of the financial results for that reporting period, the Company imposes a blackout period in order to avoid the risk of creating a false market by inadvertently disclosing information that is incomplete or uncertain. The Company may also announce that other periods are to be treated as "blackout periods" for the purposes of this policy.

The Company's policy is that during blackout periods it will not hold one-on-one briefings with institutional investors, individual investors or stockbroking analysts to discuss financial information concerning the Company and will not hold any open briefings to discuss anything other than information which has been announced to the ASX.

Any proposal to deviate from this policy must be subject to approval in advance from the Board and, if any briefings or meetings are held during a blackout period, there must be no discussion or provision of financial or other information in breach of the Company's continuous disclosure obligation.

5.4 Open briefings to institutional investors and stockbroking analysts

The Company holds open briefing sessions, often at times when the Company has posted results or made other significant announcements. The Company:

a) will not disclose any information in these sessions which may have a material effect on the price or value of the Company's securities unless such information has already been announced to the ASX;

b) will advise the market in advance of open briefings and public speeches via the ASX and the Company's website, lodge all presentation materials with the ASX prior to the presentation commencing and place such information on the Company's website promptly following completion of the briefing; and

c) may web cast its open briefings at the time they occur and if so, will keep a clearly dated historical archive record of the web cast for at least a 6-month period. This information will be retained by the CFO or their delegate.

The CFO (or their delegate) will be present at all open briefings. Where the representative believes that information which may have a material effect on the price or value of the Company's securities has been disclosed inadvertently, the representative must immediately report the matter to a Disclosure Officer for consideration.

The CFO or their delegate is responsible, including by liaising with Company Secretariat as appropriate, for ensuring the policy requirements in relation to open briefings are met.

5.5 One-on-one briefings with the financial community / institutional investors

From time to time the Company may conduct one-on-one briefings with the financial community or institutional investors. Where such briefings occur, no information will be provided which may have a material effect on the price or value of the Company's securities unless it has been announced previously to the ASX.

The CFO or their delegate will be involved in all discussions and meetings with analysts and investors.

The CFO or their delegate will ensure a record or note of all one-on-one briefings is kept for compliance purposes.

5.6 Site Visits

The Company may conduct visits to its sites from time to time which involve the presence of members of the financial community.

Nothing will be disclosed during these site visits which may have a material effect on the price or value of the Company's securities unless it has already been announced to the ASX.

The CFO or their delegate should be in attendance at such site visits.

5.7 Broker sponsored investor and general conferences

Where the Company's executives give speeches or presentations to, or participate in, conferences or forums, it is important that the same protocols are maintained as for presentations to investors or analysts.

Public speeches will often be categorised as open briefings and these will be lodged first with the ASX if they contain material price sensitive information and will also be posted on the Company's website.

5.8 Review of briefings, meetings, visits and presentations

Immediately following any briefings, meetings, visits or presentations referred to in this section 5, the CFO or their delegate (or, in their absence, the senior executive involved) will review the matters discussed and presented (including any questions and answers provided). Where they believe any information has been disclosed inadvertently which may have a material effect on the price or value of the Company's securities, they must immediately report the matter to a Disclosure Officer for consideration.

5.9 Review of analyst reports and forecasts

The Company recognises the importance placed on reports by stockbroking analysts. Any comment by the Company to an analyst in relation to an analyst's report or financial projections should be confined to errors in factual information and underlying assumptions provided such comment of itself does not involve a breach of the Company's continuous disclosure obligation or amount to a selective briefing.

The CFO (or their delegate) will maintain a record of analysts' earnings forecasts and provide a summary report of these forecasts to the CFO on a regular basis.

The CFO will monitor a range of analysts' forecast earnings relative to the Company's own internal forecasts and any financial forecasts previously published by the Company. If the CFO becomes aware of a divergence between the 'consensus' of the analysts' forecasts and management's own expectations, which may have a material effect on the price or value of the Company's securities, the CFO will promptly escalate the matter to the Board to consider the necessity for an ASX announcement or trading halt.

If the Company is concerned that the analysts' consensus forecast diverges from the Company's internal expectations, then there is a risk that even a carefully scripted communication limited to previously disclosed information may be interpreted by the analyst as an upgrade or downgrade and thus amounts to 'selective disclosure'. Accordingly, analyst briefings should not be used to manage analyst's expectations.

5.10 Monitor media and share price movements

The CFO or their delegate will monitor:

- media reports about the Company;
- media reports about significant drivers of the Company's business;
- the Company's share price movements; and
- significant investor blogs, chat-sites or other social media it is aware of that regularly posts comments about the Company.

If the CFO (or their delegate) identifies unusual or unexpected price movements or unexpected media coverage (for example, media coverage in relation to price sensitive matters that have not yet been disclosed by the Company to the market) or the circumstances suggest that a false market may have emerged in the Company's securities, they will report the matter to a Disclosure Officer to determine whether the circumstances should be reviewed by the Board.

6. Role of the Company Secretary

The Company Secretary has primary responsibility for all communication with the ASX in relation to ASX Listing Rule matters. In particular, the Company Secretary is responsible for:

- liaising with the ASX in relation to continuous disclosure issues;
- assisting with the preparation of all announcements to be released on the ASX in accordance with the process described in section 2 and the Company's procedure for lodgement of documents with ASX;
- lodging announcements with the ASX in relation to continuous disclosure matters and ensuring announcements are placed promptly on the Company's website following receipt of acknowledgement from ASX that it has released the information to the market;
- implementing procedures to ensure that the Company's PIN and individual passwords are secure;
- ensuring senior management are aware of the Company's Disclosure Policy and related procedures, and of the principles underlying continuous disclosure;
- ensuring this Disclosure Policy is reviewed and updated periodically as necessary;

- developing template ASX announcements and trading halt requests; and
- maintaining an accurate record of all announcements sent to the ASX and all correspondence with ASIC in relation to the Company's continuous disclosure obligations.

The Company Secretary is responsible for ensuring that the responsibilities assigned to the Company Secretary under this policy are satisfied, including by ensuring that appropriate delegations are in place if the Company Secretary is unavailable at any time.

7. <u>Other disclosure obligations</u>

The Company has numerous other disclosure obligations under Chapter 3 and Chapter 4 of the Listing Rules, including disclosure obligations in relation to:

- periodic disclosure;
- making a takeover bid;
- making a buy-back;
- agreements between the Company (or a related party or subsidiary) and its directors (or a related party of the director);
- recommendations or decisions in relation to the declaration or payment of dividends;
- changes to the Company's share capital;
- changes to the beneficial ownership of the Company's share capital;
- options and rights over shares;
- general meetings of the Company;
- the Company's registered office and share register;
- changes in officeholders or key management personnel;
- documents sent to shareholders;
- loan assets;
- ownership limits;
- directors' interests; and
- record dates and timetables.

The Company Secretary is responsible for ensuring that necessary disclosures are made as and when required.

8. <u>Policy breaches</u>

The Company regards its continuous disclosure obligation very seriously. Breach of this policy may lead to disciplinary action being taken against the employee, including dismissal in serious cases.

ATTACHMENT 1

1. Overview of continuous disclosure obligations, contraventions and penalties

ASX Listing Rule 3.1 requires that the Company must immediately notify the ASX of any information the Company becomes aware of concerning itself that a reasonable person would expect to have a material effect on the price or value of the Company's securities.

Some of these concepts are described in further detail below.

1.1 Materiality

A reasonable person is taken to expect information to have a **material effect** on the price or value of securities if it would, or would be likely to, influence persons who commonly invest in securities in deciding whether or not to subscribe for, buy or sell the securities.

Whether information may have a material effect on the price or value of securities must be assessed having regard to all the relevant background information, including past announcements that have been made by the Company and other generally available information.

Strategic or reputational matters clearly have the potential to be very significant issues for the Company. They can be just as important as (or even more important than) financial and other 'quantifiable' matters.

Some examples of information that may require disclosure include:

- material changes in actual financial performance or projected financial performance from the previously disclosed actual or projected information;
- events likely to have a material effect on financial performance – either for the current period, or over a longer term;
- mergers, acquisitions, divestments, joint ventures or material changes in assets;
- significant new contracts or projects;
- changes in strategy, including entry into or exit from sectors and markets;
- material changes to capital structure or funding;
- industry issues which have, or which may have, a material impact on the Company;
- decisions on significant issues affecting the Company by regulatory bodies;
- information that may have an adverse effect on the reputation of the Company;
- new contracts, orders or changes in suppliers that are material to the Company's business;
- proposed changes in regulations or laws that could materially affect the Company's business;
- major litigation (brought by or brought against the Company);
- significant changes in the Company's accounting policies; and
- any rating applied by a rating agency to the Company, or securities of the Company and any change to such a rating.

1.2 What does 'immediately' mean?
'Immediate' disclosure under ASX Listing Rule 3.1 requires disclosure to be made '**promptly and without delay**'. The information must be disclosed to the ASX as quickly as possible in the circumstances and must not be deferred, postponed or put off to a later time.

1.3 Information that is generally available
The Company will not breach ASX Listing Rule 3.1 if the information is already generally available. Information is generally available if it:

a) consists of readily observable matter;

b) has been made known in a manner that would, or would be likely to, bring it to the attention of persons who commonly invest in any of the classes of securities issued by the Company and since it was made known, a reasonable period for it to be disseminated among those persons has elapsed (i.e. the information has been released to the ASX or published in an annual report or similar document and a reasonable time has elapsed after the information has been released); or

c) consists of deductions, conclusions or inferences made or drawn from information referred to in 1.3(a) or information made known as mentioned in 1.3(b), or both.

1.4 Exceptions to the continuous disclosure rule
Disclosure to the market is not required under ASX Listing Rule 3.1 where each of the following conditions is and remains satisfied:

a) **one or more** of the following apply:

- 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 Company; or
- 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.

As soon as any one of these 3 conditions is no longer satisfied (eg. the information is reported in the media and is therefore no longer confidential), the Company must immediately comply with its continuous disclosure obligation.

1.5 Confidentiality
When the Company is relying on an exception to Listing Rule 3.1 or is involved in a development that may eventually require reliance on an exception, appropriate confidentiality protocols must be adhered to. A leak of confidential information will immediately deny the Company the ability to withhold the information from the ASX and force the Company to make a 'premature' announcement, regardless of where the leak comes from.

Information about a matter involving the Company may cease to be confidential if there is:

- a reasonably specific and reasonably accurate media or analyst report about the matter;
- a reasonably specific and reasonably accurate rumour known to be circulating the market about the matter; or
- a sudden and significant movement in the market price or traded volumes of the Company's securities that cannot be explained by other events or circumstances.

If the ASX forms the view that the information has ceased to be confidential, then such information will no longer be regarded as confidential and must be released to the market.

1.6 False market

If the ASX considers that there is or is likely to be a false market in the Company's securities and asks the Company to give it information to correct or prevent a false market, the Company must immediately give the ASX that information. The obligation to give this information arises even if an exception described in paragraph 1.1 would apply but for the ASX's request.

1.7 Contraventions

The Company contravenes its continuous disclosure obligation if it fails to notify the ASX of information required by ASX Listing Rule 3.1.

Either the ASX or ASIC, as co regulators, may take action upon a suspected contravention.

The consequences of contravention include:

a) suspending trading in the Company's shares or, in extreme cases, delisting the Company from the ASX;

b) criminal liability which attracts substantial monetary fines;

c) civil liability for any loss or damage suffered by any person as a result of the failure to disclose relevant information to the ASX; and

d) risk of class action being brought against the Company.

1.8 Persons involved in a contravention

The Company's officers (including its directors), employees or advisers who are involved in any contravention of the Company's continuous disclosure obligation may also face criminal penalties and civil liability. Substantial penalties or imprisonment, or both, may apply.

DEFINITIONS

Term	Definition
Employee	Interchangeable term with worker and staff and defined as anyone employed or engaged by a registered provider to deliver aged care services.

KEY LEGISLATION, ACTS AND REFERENCES

Corporations Act 2001 (Cth)
Australian Securities and Investments Commission Act 2001 (Cth)
ASX Listing Rules (including Listing Rule 3.1 and Listing Rule 3.1B)

LINK TO STANDARDS

Standard 1	The Individual	☐
Standard 2	The Organisation	☒
Standard 3	The Care and Services	☐
Standard 4	The Environment	☐
Standard 5	Clinical Care	☐
Standard 6	Food and Nutrition	☐
Standard 7	The Residential Community	☐

NDIS	Core Module - Rights and Responsibilities	☐
NDIS	Core Module - Provider Governance and Operational Management	☒
NDIS	Core Module - Provision of Supports	☐

LINK TO RELATED POLICIES, PROCESSES AND DOCUMENTS

Corporate Communication Policy
Verification of Unaudited Periodic Corporate Reporting Policy

KEYWORDS

Nil

VERSION HISTORY / AUTHOR / CONTRIBUTORS

Version	Date Created	Sections Changed	Created/ Amended by
3	07/2026	• New policy template adopted. • Comprehensive review to align the policy more closely with current ASX guidance, contemporary drafting, and clearer internal governance processes. (previous version (June 2017) sections 1, 2.1-2.6, 4-6,7.1-7.5,7.7-7.10 and 9-11).	Legal

Version	Date Created	Sections Changed	Created/ Amended by
		• Revised to incorporate ARCC feedback (May 2026).	