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## PRODIGY GOLD NL – CONTINUOUS DISCLOSURE POLICY

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### 1. PURPOSE

The Company must comply with continuous disclosure requirements arising from legislation and the Listing Rules.

A listed entity, in accordance with Listing Rule 3.1, is required to disclose to the ASX immediately any information concerning it, that a reasonable person would expect to have a material effect on the price or value of its securities unless Listing Rule 3.1A applies.

The Company's Continuous Disclosure Policy ensures that it complies with its obligation under Listing Rule 3.1, so that all investors have equal and timely access to material information concerning the Company, including its financial position, performance, ownership and governance. The focus of these procedures is on continuous disclosure compliance and improving access to information for investors.

The Company Secretary has been appointed (in accordance with Listing Rules 12.6), to be the person responsible for communication with the ASX in relation to listing rule matter. The Company Secretary holds the ASX required qualifications.

Price sensitive information is publicly released through the ASX before it is disclosed to individual Shareholders and market participants. Distribution of other information to Shareholders and market participants is also managed through disclosure to the ASX.

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.

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### 2. PROCESS

The disclosure process includes:

- ensuring Company market announcements are accurate, balanced and expressed in a clear and objective manner that allows investors to assess the impact of the information when making investment decisions. Any person involved in the preparation of such an announcement is required to comply with this;
- Directors, officers and employees are prohibited to divulge price sensitive information to external parties, unless these parties are involved in the preparation, part of negotiations or are advising on the matter, in which case those external parties are required to keep the information confidential until released to the ASX,
- Directors, officers, employees and relevant external parties are required to safeguard the confidentiality of corporate information to avoid premature disclosure;
- the release of disclosures is approved by the CEO in the case of administrative announcements. The Board has authorised the Chair to approve other announcements, except where the Chair decides that the announcement is of such materiality that approval of all Directors is required;
- this Policy is to be read in conjunction with the Company's Corporate Code of Conduct and in particular the media section of that policy;
- potential disclosure issues associated with analyst briefings and responses to Shareholder questions, need to be avoided and only already disclosed or non-sensitive information should be provided;
- new and substantive investor or analyst presentations, unless part of a series of presentations containing materially the same information, will be released on the ASX market announcements platform ahead of the presentation;

- the Company strategy for responding to or avoiding the emergence of a false market in its securities includes:
  - Management monitors the market for unusual share price and volume movement and takes note of rumours about the Company;
  - in general, unless price and volume action demand it, the Company does not respond to media speculation or market rumours;
  - if required, any immediate actions can be undertaken by any two of Chair, CEO and Company Secretary, in a situation where Board members are not available within the required immediate timeframe;
  - The first response will include:
    - cessation of communications with media and investors until full assessment has been made;
    - Company Secretary and CEO to alert Chair if they become aware of a situation;
    - Chair, CEO and Company Secretary to review and assess the situation;
    - all discussions with media and investors to be channelled through the Chair unless another person is specifically authorised;
    - contact legal counsel if appropriate; and
    - contact ASX listing adviser immediately to discuss the situation and, where appropriate request a trading halt.

The Board will receive copies of all material market announcements promptly after they have been made.

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### **3. BOARD APPROVAL**

This Policy will periodically updated and amended by the Board to ensure it is operating effectively and required changes are made.