



TERRA FIRMA EQUITY LIMITED
ACN 675 999 747

CONTINUOUS DISCLOSURE POLICY

Document type

Version

Approved by

Approval date

Corporate policy

1.0

Board of Terra Firma Equity Limited

25 February 2026

1. Purpose

This Policy establishes procedures for identifying, escalating and, where applicable, disclosing material information concerning the Company.

The Company is not presently an ASX-listed entity. Accordingly, ASX Listing Rule continuous disclosure obligations apply only if and when the Company becomes subject to them. This Policy is intended to support disciplined disclosure practices and future readiness.

2. Material information

Information may be material if it would, or could reasonably be expected to, influence an investor or shareholder in making a decision concerning the Company's securities or otherwise requires disclosure under applicable law, contract or market rules.

3. Escalation

Directors, officers and employees must promptly refer potentially material information to the Chair, company secretary or legal counsel. They should not make their own external disclosure unless authorised.

4. Disclosure decision

The Board, or a person or committee authorised by the Board, will determine whether information should be disclosed, the timing and form of disclosure, and whether legal or contractual restrictions apply.

5. External communications

Only authorised spokespersons may make public statements on behalf of the Company concerning financial performance, material transactions, capital raising, corporate strategy or other potentially material matters.

6. Rumours and market speculation

The Company generally will not comment on rumours or speculation unless the Board considers a response necessary or disclosure is required by law, contract or applicable market rules.

7. Analyst, investor and media briefings

Material non-public information must not be selectively disclosed. Briefing materials should be reviewed where appropriate to reduce the risk of inadvertent disclosure.

8. Future listed status

If the Company becomes listed or otherwise subject to a statutory or market continuous disclosure regime, this Policy must be reviewed promptly and updated to reflect the applicable requirements.

9. Breach and review

A breach of this Policy may result in disciplinary action. The Board may amend this Policy at any time.