

## RADIUS RESIDENTIAL CARE LIMITED MARKET DISCLOSURE POLICY

### POLICY STATEMENT

Radius Residential Care Limited (**Radius**) is committed to providing timely, orderly, consistent, accurate, and credible information in accordance with legal and regulatory requirements to enable orderly behaviour in the market. Radius believes objective disclosure is fundamental to building shareholder value and earning the confidence of the investment community.

This Market Disclosure Policy assists the Board with fulfilling its obligation to keep investors and the market informed through a timely, clear, and balanced approach that communicates all information which may have a material effect on the price of Radius' shares, whether it is positive or negative, in accordance with the NZX Listing Rules (**Listing Rules**).

### DISCLOSURE POLICIES

Market disclosure requires the approval of the Board.

The CEO is responsible for:

- Administering compliance with the Market Disclosure Policy;
- Communicating with the NZX;
- Continuously monitoring Radius' disclosure obligations under the Listing Rules and ensuring timely disclosure of all material information to NZX via the NZX Market Announcement Platform (**MAP**);
- Safeguarding the confidentiality of corporate information to avoid premature disclosure;
- Releasing material information to NZX via MAP upon receipt of appropriate approvals from the Board; and
- Managing all communications with NZX prior to and following release of material information and including any potential trading halt.

The Chairperson of the Audit and Risk Committee and CEO may approve the delegation of aspects of administering this Policy to Radius employees other than the CEO.

The Policy applies to all Directors and employees of Radius. In addition, the Policy applies to certain contractors of Radius.

### CONTINUOUS DISCLOSURE

Radius will comply with the continuous disclosure requirements of the Listing Rules. These are summarised as follows:

Once Radius becomes aware of any "Material Information" relating to it, Radius must:

- Promptly and without delay release that Material Information to NZX via MAP; and
- Not disclose the Material Information to any other party without first releasing it to NZX via MAP.

"Material Information" means information that relates specifically to Radius or its shares and that a reasonable person would expect, if it were generally available to the market, to have a material effect on the Radius share price.

Radius will be deemed to become aware of Material Information if, and as soon as, one of its Directors or senior managers has, or ought reasonably to have, come into possession of the information in the course of the performance of their duties.

Under the Listing Rules, Material Information does not have to be disclosed if:

- A reasonable person would not expect the information to be disclosed;
- Such information is confidential and remains confidential to Radius; and
- Any of the following circumstances apply:
  - The release of the information would be a breach of law;
  - 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 internal management purposes; or
  - The information is a trade secret.

If any of these circumstances apply, the information is “Excluded Information.” Guidance as to whether these circumstances apply will be provided by a Director, the CEO or the Chair of the Board. Employees should not decide that an exception may apply and should therefore always make the internal disclosure as required under this policy.

Radius must promptly and without delay release Material Information through MAP to prevent development or subsistence of a market for its shares, which is materially influenced by false or misleading information from either Radius or another party, that gives the information substantial credibility.

#### **ESCALATION PROCEDURES**

Employees who become aware of any information that is or may be Material Information that is not generally available to the market must alert the member of the management team responsible for their area. If the member of the management team who becomes aware of the information considers that it is or may be Material Information that is not generally available to the market, the member of the executive team must alert the CEO.

Directors and senior managers who become aware of any information that is or may be Material Information that is not generally available to the market must alert the CEO, or in his or her absence, the Chair of the Board, who will then call a meeting of the Board if he or she has a concern that the information is or may be Material Information that is not generally available to the market.

The Board will be responsible for making the final decision as to whether or not this information requires disclosure to NZX, taking into account the exceptions to the disclosure obligations set out above (if applicable). If necessary, the Board may consider it appropriate to seek a trading halt from NZX.

#### **ANALYST REPORTS AND COMMUNICATIONS**

Radius’ comments on analyst reports will be restricted to information publicly issued and information that is in the public domain. Radius will not generally endorse or comment on analyst forecasts. However, if Radius becomes aware that, in general, the market’s earnings projections materially differ from its own estimates, Radius may consider it appropriate to issue an earnings statement. All communications with market analysts shall be conducted by the Chair of the Board and / or the CEO unless specifically authorised by the Chair of the Board or the CEO.

**FINANCIAL CALENDAR**

Radius follows a calendar of regular disclosure to the market of its financial results. The calendar includes dates for the release of half-year and full-year results, shareholder meetings, and investor briefings.

Half-yearly results are announced within 60 days of 30 September, and full-year results are announced within 60 days of 31 March.

**INVESTOR COMMUNICATION**

Radius recognises the importance of its relationship with investors and is committed to fostering constructive relationships with investors. Investors who have elected to receive documents electronically and have provided an email address will receive electronic communications unless they expressly request hard copy reports. Investors can elect to receive documents electronically at any time.

**MEDIA**

No employee shall communicate any Material Information to the media unless such information has been released to NZX or is generally available to the market and approval to release to media has been provided by the Chair of the Board or the CEO.

**APPROVAL OF DISCLOSURE AND RELEASE**

Radius must not, under any circumstances, disclose Material Information to any person not bound by obligations of confidentiality prior to releasing the information to NZX via MAP. If unreleased Material Information is unintentionally communicated by Radius or an employee, by any means, the CEO must be advised immediately and the information must be immediately released to NZX via MAP.

To the greatest extent practicable in the circumstances, the full Board will be given the opportunity to review NZX announcements disclosing Material Information to the market. However, the Directors accept that, given the time critical nature of the announcement of Material Information to the market, obtaining unanimous Director approval to the announcements may not always be achievable. In any event, either of the Chair of the Board or CEO shall approve the form and content of disclosure of Material Information to the market.

All NZX and media releases are subject to an agreed sign off procedure which requires approval from the Chair of the Board or CEO.

**AUTHORISED SPOKESPEOPLE**

Authorised spokespeople are responsible for ensuring that all proposed public comments are within the bounds of information that is either already in the public domain, or is not material.

Authorised spokespersons of Radius are the Chair of the Board and the CEO.

Other executives may be designated by the Chair of the Board from time to time as spokespersons for specific areas under their control or supervision; however, any comments made should be limited to their area of control or supervision.

**ANNUAL REPORT**

Radius will make available to investors a copy of the annual report at no charge whether they choose to receive these documents electronically or in printed form.

**WEBSITE**

Radius will make available to investors on its website investor-related information including media releases, NZX disclosures, annual reports, investor presentations and webcasts, share price information, dividend details and notices of shareholder meetings. The website will also contain governance-related material, including governance policies and charters.

**SHAREHOLDER MEETINGS**

Meetings for shareholders will be held by Radius at a time and location designed to encourage participation by investors. Shareholder meetings will include the opportunity for investors to raise appropriate questions. Members of the Board and senior management team will be present at shareholder meetings to assist in answering questions.

A notice of meeting will be distributed prior to a shareholder meeting within appropriate timeframes.

**INVESTOR BRIEFINGS**

From time to time, Radius may conduct investor briefings or meetings. Radius will also ensure that investor briefings and the materials used in those briefings comply with the “Fair Dealing” provisions of the Financial Markets Conduct Act 2013. Where appropriate, all investors will be provided with the opportunity to attend scheduled investor briefings or meetings.

In all cases, the following protocols will apply to investor briefings or meetings:

- No Material Information will be disclosed unless it has been previously released to NZX via MAP ;
- If Material Information is inadvertently released or subsequently ceases to be Excluded Information (for example, because it loses its confidentiality), it will immediately be released to NZX via MAP; and
- Questions involving Material Information not previously disclosed will not be answered.

**REVIEW**

This policy was reviewed and approved by the Radius Board in December 2022 and will be reviewed every 24 months or earlier if determined by the Board.