# MARKET DISCLOSURE POLICY

## 1 Purpose

1.1 MOVE Logistics is committed to providing timely, orderly, consistent and credible information, consistent with legal and regulatory requirements, to enable orderly behaviour in the market. The Board believes it is imperative that disclosure be evenly balanced during good times and bad and that all parties in the investment community have fair access to this information.

1.2 In particular, MOVE Logistics is committed to its obligation to inform shareholders (both current and prospective) and market participants of all information that might have a material effect on the price of its shares in accordance with the NZX Listing Rules and the ASX Listing Rules.

1.3 MOVE Logistics has a secondary listing on the Australian Stock Exchange (**ASX**). The Disclosure Officer will ensure that any information MOVE Logistics provides or intends to provide to NZX is also provided to ASX immediately or as otherwise required by the ASX Listing Rules and this policy.

## 2 Framework of Procedures and Guidelines

2.1 To apply this policy, a framework of procedures and guidelines relating to the disclosure of Material Information about MOVE Logistics has been developed. The key elements of the framework are summarised as follows:

2.1.1 MOVE Logistics has appointed a Disclosure Officer who is responsible for administering the policy. The Group Chief Financial Officer of MOVE Logistics holds the role of Disclosure Officer;

2.1.2 all Material Information shall be released promptly and without delay to NZX via the NZX Market Announcement Platform (**MAP**) and to ASX as required by the ASX Listing Rules. The information will also be published on the MOVE Logistics website with further dissemination through approved channels to MOVE Logistics' shareholders, news agencies and other market commentators where appropriate;

2.1.3 no Material Information will be released to any third party not bound by obligations of confidentiality until it has been released to NZX (via MAP) and to ASX;

2.1.4 MOVE Logistics will ensure that, at all times, at least three people have access and the ability to lodge announcements to NZX (via MAP) and to ASX as required by the ASX Listing Rules;

2.1.5 the authorised spokespersons of MOVE Logistics are the Chair of the Board, the Chief Executive Officer and the Disclosure Officer;

2.1.6 no undisclosed Material Information or undisclosed Material Information that clarifies previously released Material Information will be disclosed in any meeting or conference call with investors or analysts;

2.1.7 discussions with investors or analysts shall serve only as opportunities to provide background to previously disclosed information;

2.1.8 any inadvertent disclosure of Material Information during investor meetings or calls will be immediately advised to the Disclosure Officer and the information will be immediately released to NZX (via MAP) and ASX;

2.1.9 where possible, MOVE Logistics will have a minimum of two representatives at investor meetings/calls;

2.1.10 earnings forecasts will only be discussed if previously issued by MOVE Logistics by way of a public announcement or via the registration of a product disclosure statement or release of other offer documentation;

2.1.11 MOVE Logistics may make available on its website any other relevant information made available to investors/analysts, e.g. presentation briefing materials but subject to any new Material Information having been released on MAP and to ASX first;

2.1.12 to avoid inadvertent disclosure, MOVE Logistics' comments on analyst reports will be restricted to information MOVE Logistics has publicly issued and information that is in the public domain;

2.1.13 Subject to paragraph 2.1.14 below, MOVE Logistics will not endorse, or be seen to endorse, analyst reports or the information they contain. MOVE Logistics will not generally comment on analyst forecasts.;

2.1.14 MOVE Logistics will not respond to market speculation or rumours, however, it may issue a statement if it believes there is a 'false market' or it has a request from NZX or ASX or it considers it has an obligation to make a statement on a particular matter; and

2.1.15 MOVE Logistics employees or associated persons (such as secondees, contractors, and advisors) must not participate (whether using their own name or any other handle or name) in social media discussions where the subject matter relates to the financial or operational matters of MOVE Logistics. This extends to all social media platforms and share market specific platforms including ShareChat and Share Trader. Social media use may be sanctioned by MOVE Logistics for a legitimate business function such as marketing activity and a spokesperson will be authorised by the Chief Executive or the Disclosure Officer for that purpose.

## 3 Application

3.1 This policy applies to all directors, officers, employees, contractors or secondees of MOVE Logistics and any of its subsidiaries.

## 4 Policy

4.1 MOVE Logistics will comply with the continuous disclosure requirements of the NZX and ASX Listing Rules.

4.2 Any breach of this policy must be reported to the Disclosure Officer as soon as is reasonably practicable.

## 5 Material Information

5.1 MOVE Logistics must release Material Information to NZX (via MAP) and ASX promptly and without delay upon it becoming aware of that information, unless an applicable exception is satisfied. "Material Information" is any information that:

5.1.1 if it were generally available to the market, a reasonable person would expect to have a material effect on the price of MOVE Logistics' listed financial products; and

5.1.2 relates to MOVE Logistics' securities or MOVE Logistics specifically.

5.2 Material Information must not be released to any third party until the material information has been submitted to NZX (via MAP) and ASX.

5.3 Information is considered generally available to the market if it has been released to NZX (via MAP) and ASX or investors who commonly invest in MOVE Logistics' financial products can readily obtain the information (whether by observation, use of expertise, purchase from other persons or other means).

5.4 Information that is only available to a certain group of investors, or which requires substantial collation or research is not considered generally available.

5.5 MOVE Logistics 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.

## 6 Identification of Material Information

6.1 Employees or contractors who become aware of any information that is or may be Material Information must alert the member of the executive team responsible for their area. If the member of the executive team who becomes aware of the information considers that it is or may be Material Information, the member of the executive team must alert the Chief Executive Officer and/or the Disclosure Officer (Chief Financial Officer).

6.2 Directors and senior managers who become aware of any information that is or may be Material Information must alert the Chief Executive Officer or the Disclosure Officer, who will then notify the Board if he or she has a concern that the information is or may be Material Information.

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

6.4 Directors, officers, employees, contractors or secondees of MOVE Logistics and its subsidiaries who:

6.4.1 possess Material Information; and

6.4.2 intend to trade in MOVE Logistics financial products,

should be aware of their obligations under MOVE Logistics' Securities Trading Policy, particularly in relation to the prohibition on insider trading.

## 7 Exceptions to disclosure obligations

7.1 There are certain exceptions under the NZX Listing Rules to the requirement for disclosure of Material Information. This is where:

7.1.1 a reasonable person would not expect the information to be disclosed; and

7.1.2 such information is confidential and remains confidential to MOVE Logistics; and

7.1.3 one or more of the following applies:

(a) it would be a breach of law to disclose the information;

(b) the information concerns an incomplete proposal or negotiation;

(c) the information comprises matters of supposition or is insufficiently definite to warrant disclosure;

(d) the information is generated for internal management purposes; or

(e) or the information is a trade secret.

7.2 Guidance as to whether an exception applies will be provided by a director, the Chief Executive Officer, the Chief Financial Officer or the Chair of the Board.

## 8 False market

8.1 MOVE Logistics will promptly and without delay release Material Information to NZX (via MAP) and ASX to the extent necessary to prevent development or subsistence of a false market for MOVE Logistics' shares (i.e. a market which is materially influenced by false or misleading information), where required. MOVE Logistics may be required to provide this information even if an exception to the continuous disclosure rules (discussed above) applies.

## 9 Media

9.1 No employee or contractor shall communicate any Material Information to the media unless such information has been:

9.1.1 released to NZX (via MAP) and ASX; or

9.1.2 is generally available to the market and approval to release to media has been provided by the Chief Executive Officer or the Chair of the Board.

9.2 The Disclosure Officer must be immediately notified if Material Information has been inadvertently disclosed to the media and may need to be disclosed to the market.

## 10 Authorised Spokespeople

10.1 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.

10.2 Authorised spokespersons of MOVE Logistics are the Chair of the Board, the Chief Executive Officer and, in their absence, the Disclosure Officer.

## 11 Approval of disclosure

11.1 MOVE Logistics 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) and ASX. If unreleased Material Information is unintentionally communicated by MOVE Logistics or an employee, by any means, the Disclosure Officer must be advised immediately and the information must be immediately released to NZX (via MAP) and ASX.

11.2 All information which is potentially material will be disclosed to the Disclosure Officer promptly and without delay. The Disclosure Officer will determine if the matter is to be referred to the Board for consideration and/or whether it needs to be disclosed to the NZX (via MAP) and ASX. A trading halt may be requested until the Material Information can be released.

11.3 The Disclosure Officer will arrange training and educational sessions for MOVE Logistics people as appropriate in respect of MOVE Logistics' continuous disclosure obligations.

11.4 Where practicable, the full Board will be given the opportunity to review NZX and ASX 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 the Disclosure Officer, Chair of the Board or Chief Executive Officer may approve the form and content of disclosure of Material Information to the market.

11.5 To ensure timely release, where possible draft announcements will be prepared in advance of Board meetings or other planned events, such as entering into agreements.

## 12 Release of information to NZX and ASX

12.1 All NZX, ASX and media releases are subject to an agreed sign off procedure which requires approval from the Chief Executive Officer and the Disclosure Officer.

12.2 The Disclosure Officer is responsible for ensuring the release of the information to NZX, ASX and the media. Where possible, MOVE Logistics will release Material Information prior to market opening, however this does not negate the requirement to disclose all Material Information promptly and without delay.

12.3 The person responsible for the release of the announcement to NZX (via MAP) and ASX shall, at the same time as the release:

12.3.1 provide a copy of the announcement to all the directors; and

12.3.2 publish the announcement on MOVE Logistics' website.

## 13 Roles and Responsibilities

13.1 The Board is responsible for:

13.1.1 continuously monitoring MOVE Logistics' disclosure obligations under the NZX and ASX Listing Rules and the Financial Markets Conduct Act 2013 (**FMCA**);

13.1.2 reviewing MOVE Logistics' accounts for any material changes that should be disclosed to the market;

13.1.3 where practicable, making the final decision as to whether or not information requires disclosure under this Policy and the form that disclosure takes;

13.1.4 where guidance has been released to the market, monitoring performance against that guidance and advising the market immediately if such guidance will not be met;

13.1.5 monitoring banking covenants and immediately advising the market if a breach arises or upon the Board becoming aware a break is likely to arise; and

13.1.6 where information is being released by a third party, considering and preparing a response for immediate release following publication by the third party continuously monitoring MOVE Logistics' disclosure obligations under the NZX and ASX Listing Rules and the FMCA;

13.2 At any meeting of the Board:

13.2.1 staff may send recommendations to directors with board papers as to what information should be disclosed;

13.2.2 the Board may consider whether any matters should be disclosed; and

13.2.3 the minutes should record the reasons for disclosing or not disclosing specific matters.

13.3 The Disclosure Officer is responsible for:

13.3.1 consulting with employees, directors and the Board in relation to disclosure of Material Information;

13.3.2 alongside the Chair of the Board and the Chief Executive Officer, approving the form and content of Material Information to be disclosed to the NZX and ASX Market as and when required;

13.3.3 ensuring the release of Material Information to NZX (via MAP) in accordance with the applicable laws, regulations and the NZX Listing Rules;

13.3.4 ensuring that any information MOVE Logistics provides or intends to provide to NZX is also provided to ASX immediately or as otherwise required by the ASX Listing Rules;

13.3.5 managing all communications with NZX and ASX on matters relating to the NZX and ASX Listing Rules and disclosure of information;

13.3.6 authorising all financial market communications and, where possible, being present during meetings with investors/analysts;

13.3.7 monitoring disclosure practices of MOVE Logistics and periodically updating the policy and associated framework components in response to changes in internal structure, legislative and regulatory developments and technology developments; and

13.3.8 appointing an "authorised representative" to act in his or her place as required, as approved by the Chair of the Board or the Chief Executive Officer.

13.4 Any questions about this Policy should be referred to the Disclosure Officer.

## 14 MOVE Logistics Employees and Contractors

14.1 All MOVE Logistics employees and contractors are responsible for reporting Material Information in accordance with this policy.

14.2 All managers are responsible for ensuring employees and contractors are aware of their obligations under this policy and establishing appropriate lines of communication to ensure that if any employees or contracts become aware of Material Information, they will promptly notify their manager of that information.

14.3 In order to assist management in identifying information that may be material, the Disclosure Officer has circulated a list of indicative events to be used by senior managers to assess information in order to determine if it is material.

## 15 Review of the Market Disclosure Policy

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| Date approved: | May 2026 |
| Owner: | Chief Financial Officer |
| Next scheduled review: | May 2028 |