

INFINITY MINING LIMITED
(THE “COMPANY” OR “INFINITY MINING”)
Continuous Disclosure Policy and Communications Strategy

(Adopted 27 September 2021)

1. Introduction

- 1.1 The Board recognises its duty to ensure that its shareholders are informed of all major developments affecting the Company’s state of affairs.
- 1.2 Furthermore, the Company respects the rights of its shareholders and to facilitate the effective exercise of those rights, the Company is committed to:
- (a) communicating effectively with shareholders;
 - (b) providing shareholders with ready access to balanced and understandable information about the Company and corporate proposals; and
 - (c) making it easier for shareholders to participate in general meetings of the Company.

2. Definitions

General terms and abbreviations used in this policy statement have the following meaning set out below.

ASX	ASX Limited.
Board	the board of Directors of the Company
CEO	Chief Executive Officer
Chairman	the Chairman of the Board.
Company Secretary	the Company Secretary of the Company.
Corporations Act	the <i>Corporations Act 2001</i> (Cth).
Director	a Director of the Company

Infinity Mining or the Company

Infinity Mining Limited ACN 609 482 180

Employee

reference to an Employee include the companies or trusts substantially owned or controlled by an employee of the Company or direct relatives, executive Directors and, where the context permits, non-executive Directors, managers and all other employees or staff engaged by the Company either on a contract of employment or a salaried basis.

Listing Rules

the Listing Rules of the ASX Limited.

Officer

a senior executive of the Company.

Policy

this continuous disclosure policy and communication strategy.

3. Communication to stakeholders

This Policy provides that information will be communicated to shareholders and the market through:

- (a) the Annual Report which is distributed to shareholders (usually with the Notice of Annual General Meeting);
- (b) the Annual General Meeting and other general meetings called to obtain shareholder approvals as appropriate;
- (c) the Half-Yearly Directors' and Financial Reports;
- (d) Quarterly Activities and Cash Flow Reports; and
- (e) other announcements released to ASX as required under the continuous disclosure requirements of the Listing Rules and other information that may be mailed to shareholders.

4. Communication channels

- 4.1 The Company will actively promote communication with shareholders through a variety of measures, including the use of the Company's website and email. The Company's reports and, if and when listed on ASX Limited, ASX announcements will be available for viewing and downloading from its website: www.infinitymining.com.au or the ASX website: www.asx.com.au. The Board encourages full participation of shareholders at Annual General

Meetings and general meetings and uses these meetings to assist shareholders in understanding the Company's objectives and strategies in relation to its business activities. In accordance with section 250S of the Corporations Act 2001 (Cth), at the Company's annual general meetings the Chairman of the meeting will allow a reasonable opportunity for members to ask questions about or make comments on the management of the Company.

4.2 The Company's Annual Report is the main vehicle for communicating with shareholders on the activities and performance of the Company in the previous 12 months. The Annual Report shall be posted on the Company's website and be downloadable.

4.3 In accordance with the Listing Rules, the Company shall notify the ASX immediately of information:

(a) concerning the Company that a **reasonable person** would expect to have a **material effect** on the price or value of the Company's securities; and

(b) that would, or would be likely to, influence persons who commonly invest in securities in deciding whether to acquire or dispose of the Company's securities.

4.4 This also applies to information that the market requires to correct or prevent a false market where trading in the Company's securities occurs in the absence of material price-sensitive information; or on the basis of information that is inaccurate or misleading. In such a circumstance, and in compliance with the Listing Rules, the Company shall give the ASX the information needed to correct or prevent the false market.

5. Determining 'disclosable' information

5.1 In accordance with legal, statutory and ASX listing requirements (particularly Listing Rule 3.1), the Company shall disclose all information concerning it, of which it is or becomes aware, that a reasonable person would expect to have a material effect on the price or value of its securities.

5.2 Information shall be taken to have a material effect on the price or value the Company's securities if a reasonable person would expect the information to, or be likely to, influence persons who commonly invest in securities in deciding whether or not to trade the securities.

5.3 The Company Secretary, in consultation with the CEO or the Chairman has responsibility for determining whether a particular piece of information is material or falls within the exception, otherwise the information should be provided to the ASX for a determination.

5.4 In restricted circumstances, information is to be kept confidential for a limited period of time if the early disclosure of material Information would be unduly detrimental to the Company.

5.5 If disclosure of material information is delayed, complete confidentiality must be maintained. That is, the material information should not be disclosed to anybody, except in the necessary course of business, and precautions should be taken to assure that there is no selective disclosure to third parties. In the event that such confidential information, or rumours respecting the same, are divulged in any manner (other than in the necessary course of business), the Company would be required to make an immediate announcement on the matter.

5.6 Accordingly, to maintain confidentiality, the Company will:

- (i) not disclose the information to anyone (including others within the Company) except in the necessary course of business;
- (ii) make sure that if the information has been disclosed in the necessary course of business that everyone understands that it is to be kept confidential;
- (iii) if necessary, share in a locked cabinet any confidential documents and refer to confidential information using code names;
- (iv) ensure that confidential documents cannot be accessed through shared servers; and
- (v) make sure that there is no selective disclosure of confidential information to third parties, e.g. during the course of a meeting with an analyst. This would be considered tipping, prohibited under securities law.

6. Continuous disclosure compliance

The Company Secretary has responsibility for:

- (a) ensuring Employees (including Directors and Officers) and any third parties (indicatively such as consultants, agents, sales representatives, distributors and independent contractors when representing the Company), where necessary, receive a copy of this Policy statement as well as a copy of Guidance Note 8 of the Listing Rules, which highlights the general principles and obligations set out in Chapter 3 of the Listing Rules pertaining to Continuous Disclosure;
- (b) conducting education sessions for new Employees;
- (c) ensuring that the Company has an effective reminder system regarding the obligations of Employees and the third parties, where necessary, to notify the Company Secretary of matters that may be disclosable under this Policy, and to otherwise comply with this Policy. This may be via email, in staff meetings or by refresher courses conducted annually;
- (d) including in the reminder system a requirement that all Employees report potential breaches of this Policy directly to the Company Secretary; and
- (e) ensuring that Directors and Officers are briefed in detail regarding the continuous disclosure regime.

7. Disclosure agreements

All Directors have, and new Directors shall enter into a Director Disclosure Agreement with the Company (as set out in Guidance Note 22 of the Listing Rules). The Company Secretary is to maintain records of signed copies of these agreements.

8. Release of ASX announcements

- 8.1 The Company recognises that non-public, material information (which may include positive as well as negative information affecting the prospects for the Company), must be released in a timely, clear and objective manner, that allows investors to assess the impact of the information when making investment decisions and when released, must be made broadly available to the market. Accordingly, all new material information in the first instance will be released to the ASX.
- 8.2 The procedure for the release of ASX announcements is as follows:
- (a) the Board shall review and provide written approval to the Company Secretary in respect of all key announcements prior to release to the market;
 - (b) any relevant parties named in the announcement shall review for factual accuracies in respect of information attributable to them and provide written consent for inclusion of the names in the announcement to the Company Secretary;
 - (c) the CEO or the Chairman (and in his or her absence the Company Secretary) is to give the final sign-off before release to the ASX;
 - (d) all announcements are to be released electronically by the Company Secretary;
 - (e) after confirmation of the release has been obtained from ASX, the Company Secretary will circulate the release to all Directors and Officers the Company;
 - (f) all announcements released are to be posted on the Company website as soon as practicable; and
 - (g) the Company Secretary is to maintain a register and copy of all announcements released.
- 8.3 As a policy matter, the Company shall not comment on rumours unless, in the circumstances, this would amount to a breach of Listing Rule 3.1B or other applicable laws.

9. Dealing with the media and analysts

- 9.1 All media enquiries relating to the Company are to be coordinated by the Company Secretary, in consultation, with the CEO and Chairman. Media comment will be made only by the Chairman, the CEO or other authorised Company spokesperson.
- 9.2 The CEO in consultation with the Chairman shall approve all press releases referring to material issues prior to release.
- 9.3 The Company shall actively seek to provide private briefings to analysts, institutions and stockbrokers to enhance their understanding of the Company. However, these private briefings must not involve the disclosure of price-sensitive information. If any new information is provided in the presentation, a copy must be lodged with the ASX prior to that meeting. If price-sensitive information is inadvertently disclosed at a private briefing, then the information must be announced to the ASX as soon as practicable.

9.4 If an analyst asks a question at a private briefing which touches on a price-sensitive area, then the Company spokesperson can only use publicly available information in the answer the question. Where this is not possible, then the Company spokesperson should decline to answer the question or take it on notice and answer it after a general disclosure to the ASX has been made. As such, at any private briefing at least two Employees should be present and a detailed record of the meeting be taken.

9.5 In respect of telephone conversations with investors, analysts and the media, a record should be made of the conversation.

10. Dealing with shareholders

10.1 The Company shall use annual general and other general meetings to communicate with shareholders about its financial performance and business strategy. At all shareholder meetings, the Company shall actively encourage and allow a reasonable opportunity for shareholder participation.

10.2 In all other cases, depending on the nature of the enquiry, the CEO or the Chairman and the Company Secretary will deal with private shareholder enquiries.

11. Publication & Review

11.1 The Board has approved the adoption of this Policy. A copy of this Policy is available at www.infinitymining.com.au.

11.2 This Policy should be read in conjunction with the Company's Communication Policy.

11.3 This Policy shall be reviewed and updated as necessary by the Company Secretary. Each new Employee will be provided with a copy of this policy and taken through it by their manager. The policy will be brought to the attention of each other employee on at least an annual basis and more frequently if changes are made in the interim.