Security Trading Policy

Right Resources Limited (ACN 649 632 744)

Adopted by the Board on 8 September 2025

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1. Purpose

a) *The Corporations Act 2001* (Cth) (**Corporations Act**) prohibits the trading in shares, options, debentures (including convertible notes) and other securities (**securities**) of a company by any person who is in possession of price sensitive information regarding that company that is not generally available. The Corporations Act:

   i) imposes substantial penalties on persons who breach those provisions; and

   ii) applies to the extent of any inconsistency between it and this policy.

b) This policy regulates dealings by directors and certain officers of Right Resources Limited (ACN 649 632 744) (**Right Resources** or the **Company**) and other designated persons, in securities in Right Resources about which they acquire Inside Information through their position or dealings with Right Resources.

c) This policy is not designed to prohibit Right Resources Persons from investing in Right Resources securities, but does recognise that there may be times when directors, officers or certain employees cannot or should not invest in Right Resources securities.

d) Right Resources has adopted this Securities Trading Policy in order to comply with ASX Listing Rule 12.9.

2. Definitions

For the purposes of this policy:

a) "**Blackout Period**" has the meaning given in section 4.1 of this policy;

b) "**Board**" means the board of directors of the Company from time to time;

c) "**Company Secretary**" means the secretary of the Company from time to time;

d) "**Directors and Senior Management**" means each director of Right Resources, the Managing Director or Chief Executive Officer (as applicable), the Chief Financial Officer, and Company Secretary, Key Management Personnel and persons as the Board decides from time to time;

e) "**Inside Information**" has the meaning given in section 3.2 of this policy;

f) "**Key Management Personnel**" has the meaning given in the ASX Listing Rules; and

g) "**Right Resources Person**" means:

   i) all Directors and Senior Management and any other person designated a Right Resources Person by the Board in writing; and

   ii) also includes:

      (A) a company or trust controlled by any of the persons referred to in sub-paragraph (i) above; and

      (B) for the purposes of section 4 only, a spouse (including a de facto spouse), child (including a step-child or adopted child), a close relative, a person financially dependent on or acting in concert with any of the persons referred to in sub-paragraph (i) above.

3. Insider trading

3.1. General prohibition on insider trading

a) No Right Resources Person may, while in possession of Inside Information concerning Right Resources, in breach of the Corporations Act:

   i) buy or sell any Right Resources securities at any time;

   ii) procure another person to deal in Right Resources securities in any way; or

   iii) pass on any Inside Information to another person for that person's own personal gain by dealing in Right Resources securities in any way.

b) All Right Resources Persons are prohibited from dealing in the securities of outside companies about which they acquire Inside Information through their position with Right Resources.

c) The requirements imposed by this policy are in addition to any legal prohibitions on insider trading. Trading in Right Resources securities is prohibited at any time by a director or a Right Resources Person if that person possesses Inside Information.

3.2. Inside Information

A Right Resources Person is responsible for assessing whether they possess "**Inside Information**". This occurs where:

a) the person possesses information that is not generally available to the public and, if the information were generally available, a reasonable person would expect it to have a material effect on the price or value of Right Resources' securities (or a decision whether or not to trade in them); and

b) the person knows, or ought reasonably to know, that the information is not generally available and, if it were generally available, a reasonable person would expect it to have a material effect on the price or value of Right Resources' securities.

A reasonable person would be taken to expect information to have a material effect on the price or value of securities if the information would, or would be likely to, influence a person who commonly invests in securities to either deal or not deal in securities in any way. Inside Information in relation to the securities of outside companies has the same meaning for the purposes of this policy, except that references to "Right Resources' securities" should be read as references to the securities of the outside company.

4. Restrictions on trading in Blackout Periods

4.1. Blackout Periods

a) Right Resources Persons, subject to sections 4.3 (d) and 6, may not buy or sell Right Resources securities during a Blackout Period.

b) "**Blackout Periods**" are times when Right Resources Persons must not deal in the Company's securities.

The following are mandated Blackout Periods:

i) the period two weeks prior to and 48 hours after the release of the Company's quarterly reports;

ii) the period two weeks prior to and 48 hours after the release of the Company's half-year results;

iii) the period two weeks prior to and 48 hours after the release of the Company's Annual Report; and;

iv) any other period determined by the Chairperson in consultation with the Company Secretary to be a Black-out Period from time to time.

If 31 May, 30 November or the end of each calendar quarter are not ASX trading days, then the Blackout Period begins on the preceding ASX trading day.

During Blackout Periods, Right Resources Persons must not deal in any of the Company's financial products or securities, or in any securities related to them.

4.2. Ad-hoc restrictions

The Board may impose, without notice and in its sole and absolute discretion, additional restrictions on trading in Right Resources' securities by any or all Right Resources Persons, and also by any other staff member(s) (who are not otherwise designated as "Right Resources Persons") as Right Resources considers appropriate. For the avoidance of doubt, Right Resources may impose ad-hoc restrictions under this section 4.2 even where the proposed trade would otherwise take place outside a Blackout Period provided for in this policy. Any restriction communicated by Right Resources to any or all Right Resources Persons (or other staff members) under this section 4.2 must be kept strictly confidential.

4.3. Procedure for authorisation

a) Right Resources Persons must:

i) prior to dealing in Right Resources securities outside a Blackout Period or where paragraph 5 requires the person to obtain a consent under this paragraph 4.3, notify the relevant person in paragraph 1)c) (the **Authorising Officer**) of their proposed dealing and obtain consent from the Authorising Officer; and

ii) confirm to the Authorising Officer that they are not in possession of any Inside Information; and

iii) after dealing with the Right Resources securities, provide the Authorising Officer with a transaction confirmation.

b) For the avoidance of doubt, the Right Resources Person seeking authorisation cannot be their own Authorising Officer.

c) The relevant Authorising Officer for a Right Resources Person will be as follows, unless otherwise determined by the Board from time to time:

Right Resources Person seeking authorisation	Authorising Officer
Chair of the Board	The Chair of the Audit and Risk Committee or, in his/her absence, the Managing Director or Chief Executive Officer (as applicable).
Other directors, Company Secretary and any other Key Management Personnel	The Chair of the Board or, in his/her absence, the Chair of the Audit and Risk Committee or, in his/her absence, the Managing Director or Chief Executive Officer (as applicable).
Any other Right Resources Person	The Company Secretary or, in his/her absence, the Managing Director or Chief Executive Officer (as applicable).

d) Any decision to grant or refuse consent by the Authorising Officer:

   i) may be made in the Authorising Officer's absolute discretion, without giving any reasons;

   ii) can be withdrawn (if consent has been given) if new information comes to light or there is a change in circumstances;

   iii) is final and binding on the Right Resources Person seeking consent; and

   iv) must be kept strictly confidential by the Right Resources Person and not disclosed to any other person.

e) Any form of consent, authorisation or clearance by the Authorising Officer is not an endorsement to trade. The Right Resources Person dealing with securities or doing the trading is individually responsible for their investment decisions and their compliance with insider trading laws. Before trading, each Right Resources Person must carefully consider whether they are in possession of any Inside Information that might preclude them from trading at that time. If the Right Resources Person is in any doubt, they should not trade.

f) If a Right Resources Person comes into possession of Inside Information after receiving a consent, they must not trade despite having received the consent.

4.4. Exceptional circumstances

a) In exceptional circumstances the Authorising Officer, has discretion to approve dealings in Right Resources securities during a Blackout Period, or other dealings that would otherwise be prohibited by this policy. Any approval given under this section 4.4(a), must be provided by electronic delivery via email. The notification requirements still apply.

b) What constitutes “exceptional circumstances” will be assessed on a case-by-case basis within the absolute discretion of the Board, and may include, without limitation, severe financial hardship or a requirement to comply with a court order or court enforceable undertaking.

4.5. Company secretary to maintain records

The Company Secretary will maintain a copy of:

a) all requests for an approval to deal in Right Resources' securities submitted by a Right Resources Person; and

b) details of all dealings in Right Resources' securities made by a Right Resources Person.

5. Other restrictions

5.1. No speculative trading

Under no circumstances should Right Resources Persons engage in short-term or speculative trading in Right Resources securities. This prohibition includes short term direct dealing in Right Resources securities as well as transactions in the derivative markets, involving exchange traded options, share warrants, contracts for difference, and other similar instruments, which are short term or speculative.

5.2. No protection arrangements

a) The entering into of all types of "protection arrangements" for any Right Resources securities (or Right Resources products in the derivatives markets):

   i) is prohibited at any time in respect of any Right Resources securities which are unvested or subject to a holding lock; and

   ii) otherwise, requires consent under paragraph 4.2.

b) For the avoidance of doubt and without limiting the generality of this policy, entering into protection arrangements includes entering into transactions which:

   i) amount to "short selling" of securities beyond the Right Resources Person's holding of securities;

   ii) operate to limit the economic risk of any Right Resources Person's security holding (e.g. hedging arrangements) including Right Resources' securities held beneficially (for example, in trust or under any Right Resources incentive plan) on that Right Resources Person's behalf; or

   iii) otherwise enable a Right Resources Person to profit from a decrease in the market price of securities.

5.3. No granting of security over Right Resources securities or entering into margin lending arrangements

a) Right Resources Persons may not at any time, directly or indirectly, grant any form of security (whether by way of charge, mortgage, pledge or otherwise) over any Right Resources securities which are unvested or subject to a holding lock, to secure any obligation of that Right Resources Person or any third party or enter into any margin lending arrangement involving Right Resources securities.

b) Unless paragraph a) applies, Right Resources Persons may, directly or indirectly, grant any form of security (whether by way of charge, mortgage, pledge or otherwise) over any Right Resources securities, to secure any obligation of that Right Resources Person or any third

party or enter into any margin lending arrangement involving Right Resources securities, with consent under paragraph 4.3.

6. Exemptions

a) Right Resources Persons may at any time:

i) trade Right Resources securities where the trading does not result in a change of beneficial interest in the securities;

ii) acquire securities under any director or employee security plan or through the exercise of options or performance rights under an option or performance rights plan or acquire, or agree to acquire, options or performance rights under an option or performance rights plan. However, any dealing in those securities remains subject to this policy and the provisions of the Corporations Act;

iii) transfer Right Resources securities already held into a self-managed superannuation fund or other saving scheme in which the restricted person is a beneficiary;

iv) acquire Right Resources' ordinary shares by conversion of securities giving a right of conversion to Right Resources' ordinary shares;

v) acquire Right Resources' securities under a bonus issue made to all holders of securities of the same class;

vi) undertake to accept, or accept, a takeover offer;

vii) invest in, or trade in units of, a fund or other scheme (other than a scheme only investing in the securities of Right Resources) where the assets of the fund or other scheme are invested at the discretion of a third party;

viii) a disposal of Right Resources securities that is the result of a secured lender exercising their rights under a loan or security agreement;

ix) where a restricted person is a trustee, trade in the securities managed by that trust provided the restricted person is not a beneficiary of the trust and any decision to trade during a prohibited period is taken by the other trustees or by the investment managers independently of the restricted person; or

x) trade under an offer or invitation made to all or most of the security holders, such as, a rights issue, a security purchase plan, a dividend or distribution reinvestment plan or an equal access buy-back, where the plan that determines the timing and structure of the offer has been approved by the Board. This includes deciding whether or not to take up the entitlements and the sale of entitlements required to provide for the take up of the balance of entitlements under a renounceable pro rata issue.

b) If a Right Resources Person undertakes any of the actions described in paragraph a), that Right Resources Person must advise the relevant Authorising Officer (as set out in section 4.3(c)).

7. ASX Notifications

a) Right Resources must notify ASX within 5 business days after any change to a director's relevant interest in Right Resources securities or a related body corporate of Right Resources, including whether the change occurred inside a Blackout Period and, if so, whether prior written clearance was provided.

b) To enable Right Resources to comply with the obligation set out in paragraph a), a director must immediately (and no later than 3 business days after any relevant event) notify the Company Secretary in writing of the requisite information for the Company Secretary to make the necessary notifications to the Australian Securities and Investments Commission and ASX as required under the Corporations Act and ASX Listing Rules.

c) If Right Resources makes a material change to this trading policy, the amended trading policy will be provided to the ASX for release to the market within 5 business days of the material changes taking effect.

8. General

a) A breach of this policy will be regarded seriously and may lead to disciplinary action, including dismissal.

b) This policy will be made available on the Right Resources website.

c) If you require any further information or assistance or are uncertain about the application of the law or this trading policy in any situation, please contact the Company Secretary.

9. Reviews and changes to the Securities Trading Policy

a) The Board will review this policy periodically to ensure that it is operating effectively and whether any changes are required.

b) The Board may change this policy from time to time by resolution.

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