Continuous Disclosure Policy

HomeCo Daily Needs REIT

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1. Introduction

1.1 HMC Funds Management Limited (**RE**) as responsible entity for the HomeCo Daily Needs REIT (**HDNR**) has adopted this Continuous Disclosure Policy (**Policy**) to ensure that the Group complies with its disclosure obligations under the *Corporations Act 2001* (Cth) (**Corporations Act**) and the Listing Rules of the Australian Securities Exchange (**ASX**). It is also aligned with the continuous disclosure policy of HMC Capital Limited (ASX:HMC). For the purposes of this policy, the Group means HDNR and any entities owned, either beneficially or legally, by HDNR or the RE.

1.2 This Policy applies to all executive and non-executive directors, officers, employees, consultants of the Group and of HMC Capital Limited as the manager of the Group (collectively, **Employees**) in respect of information of which they become aware in the course of their duties.

1.3 Although this Policy relates to disclosure to ASX, the information which is material to the Group could arise in any country where the Group conducts business.

2. HDNR's Disclosure Obligations

2.1 HDNR is listed on ASX and must comply with the continuous disclosure obligations in the ASX Listing Rules. These obligations have the force of law under the Corporations Act.

2.2 The main ASX disclosure requirement is set out in ASX Listing Rule 3.1, which essentially requires HDNR to **immediately** (meaning, "promptly and without delay") disclose to the market any information concerning the Group of which it is or becomes aware of and which a reasonable person would expect to have a material effect on the price or value of units of HDNR. Disclosure is made by making an announcement to the ASX.

2.3 Information will be taken to have a material effect on the price or value of HDNR's units if it would be likely to influence investors in deciding whether to buy, hold or sell HDNR's units if the information became public. This type of information is referred to as "price sensitive information".

2.4 Materiality is assessed using measures appropriate to HDNR and having regard to the examples given by ASX in ASX Listing Rule 3.1 and Guidance Note 8.

2.5 Materially price sensitive information must be immediately disclosed to ASX unless it falls within the scope of the limited confidentiality exemption contained in ASX Listing Rule 3.1A.

2.6 Materially price sensitive information to be announced to the ASX will be approved by the Board prior to release.

2.7 Furthermore, anyone who uses or communicates materially price sensitive information may breach the insider trading provisions in Part 7.10 of the Corporations Act.

3. Disclosure Committee

3.1 HDNR has established a Disclosure Committee. At the date of adoption of this Policy, the members are:

(a) the Company Secretary; and

(b) the Chairman.

4. Compliance approach

4.1 HDNR takes its disclosure obligations seriously and seeks to comply with the spirit as well as the letter of the ASX requirements.

4.2 This Policy emphasises a pro-active approach to continuous disclosure. Notwithstanding the establishment of the Disclosure Committee, all Employees are required to notify the Company Secretary or other member of the Disclosure Committee if they believe there is material information which requires disclosure and are encouraged to approach the Company Secretary or other member of the Disclosure Committee if they have any queries about what information should be disclosed to ASX. The objective is to create a culture of openness which is conducive to the fulfilment of HDNR's disclosure obligations.

5. Material information must be reported

5.1 It is imperative that all material information be reported to the Company Secretary or other member of the Disclosure Committee. However, the Disclosure Committee should also consider whether the material information could fall within the scope of the ASX Listing Rule 3.1A exemption.

6. Exceptions to disclosure of information

6.1 Under ASX Listing Rule 3.1A, certain material information does not need to be disclosed if each of the following paragraphs (a), (b) and (c) is satisfied in relation to the information:

(a) one or more of the following conditions apply:

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

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

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

(iv) the information is generated for internal management purposes of HDNR; or

(v) the information is a trade secret;

(b) the information is confidential and ASX has not formed the view that the information has ceased to be confidential; and

(c) a reasonable person would not expect the information to be disclosed.

6.2 If a member of the Disclosure Committee believes that certain material information falls within the ASX Listing Rule 3.1A exemption, they should specify exactly why they consider it meets the criteria set out in (a), (b) and (c) above.

6.3 As soon as any one of these three conditions is no longer satisfied, HDNR must immediately comply with its continuous disclosure obligation.

Maintaining confidentiality

6.4 If certain material information is being withheld from immediate disclosure on the basis that it is confidential, then it is important that all necessary steps be taken to ensure that the information remains confidential. This includes ensuring that it is not disclosed to third parties except on the basis of a written confidentiality undertaking.

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7. Disclosure Roles and Responsibilities

Disclosure Committee

7.1 The role of the Disclosure Committee is to manage HDNR's compliance with its disclosure obligations and this Policy. Subject to any direction given by the board of directors (**Board**), its responsibilities will include:

(a) seeking to ensure that HDNR complies with its disclosure obligations;

(b) assessing the possible materiality of information which is potentially price sensitive;

(c) making decisions on information to be disclosed to the market;

(d) referring any announcement which the Disclosure Committee considers to be a matter of key significance to the Board for consideration, except where the Board has delegated to the Disclosure Committee the authority to approve and release announcements;

(e) ensuring that all directors receive copies of all material market announcements promptly after they have been made;

(f) urgently seeking any advice that is needed to assist the Disclosure Committee to interpret the information (provided that disclosure of the information cannot be delayed if the information is clearly materially price sensitive on its face);

(g) seeking to ensure that announcements are made in a timely manner, are not misleading, do not omit material information and are presented in a clear, accurate, balanced and objective way that allows investors to assess the impact of the information when making investment decisions;

(h) reviewing HDNR's periodic disclosure documents and media announcements before release to the market; and

(i) periodically monitoring disclosure processes and reporting and the effectiveness of this Policy.

7.2 Without limiting the above, the Board may from time to time determine that certain disclosure matters are to be brought to it for review (for example, disclosures in relation to strategic or important initiatives).

7.3 The Company Secretary will also organise training for the relevant Employees to:

(a) assist with their understanding of HDNR's and their own legal obligations relating to disclosure of price sensitive information, materiality and confidentiality;

(b) raise awareness of the internal processes and controls; and

(c) promote compliance with this Policy.

Company Secretary

7.4 HDNR has appointed the Company Secretary as the person responsible for communication with ASX in relation to ASX Listing Rule matters and also for the general administration of this Policy.

7.5 The Company Secretary's responsibilities include:

(a) seeking to ensure that ASX is immediately notified of any information which needs to be disclosed;

(b) reviewing Board papers and other information referred to the Company Secretary for events that the Company Secretary considers may give rise to disclosure obligations;

(c) maintaining a record of discussions and decisions made about disclosure issues by the Board and a register of announcements made to ASX;

(d) being the liaison between the Disclosure Committee, the Board and the ASX in relation to matters of disclosure; and

(e) co-ordinating education within HDNR about its disclosure obligations.

7.6 The Company Secretary will also communicate significant amendments made by the Board to this Policy to the Disclosure Committee and relevant Employees.

7.7 The Disclosure Committee and other Employees should contact the Company Secretary if they have any questions about this Policy.

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8. Disclosure matters generally

Inform ASX first

8.1 HDNR will not release any information publicly that is required to be disclosed through ASX until HDNR has received formal confirmation of its release to the market by ASX.

8.2 Information must not be given to the media or others before it is given to ASX, even on an embargo basis.

Dealing with analysts and investors

8.3 HDNR must ensure that it does not give analysts or other select groups of market participants any material price sensitive non-public information at any time, for example, during analyst briefings, answering analysts' questions or reviewing draft analyst research reports. It is permissible to clarify or correct any errors of interpretation that analysts make concerning already publicly available information, but only to the extent that the clarification or correction does not itself amount to giving the analyst material non-public information (such as correcting market expectations about profit forecasts).

8.4 In order to preserve transparency and confidence in HDNR's disclosure practices, all information given to analysts at a briefing, such as presentation slides, should also be given to the Company Secretary for immediate release to ASX and posted on HDNR's website. The information must always be released to ASX before it is presented at the briefing, regardless of whether the presentation contains material new information required to be disclosed under ASX Listing Rule 3.1.

8.5 Slides from other public speeches by a director or senior manager of HDNR, such as an investor presentation (including results presentations and presentations typically given at annual general meetings, investor days and broker conferences) or at an industry seminar, which relate to HDNR or its business should also be made available in this way to the Company Secretary for immediate release to ASX and posted on HDNR's website, ahead of the presentation. This provision is not intended to apply to private meetings between HDNR and an investor or analyst, however, Employees must be careful not to disclose in the meeting any non-public information that could have a material effect on the price or value of its units.

8.6 All dealings with analysts should be carefully monitored by those Employees participating in such dealings to ensure that material non-public information is not inadvertently disclosed, and if this occurs HDNR must immediately disclose that information to ASX.

Authorised HDNR spokespersons

8.7 The only people authorised to speak publicly on behalf of or in relation to HDNR (i.e. to make public verbal statements in respect of HDNR) are:

(a) the Chair; and

(b) any person who is expressly authorised in writing by the Board.

8.8 This requirement applies in respect of all enquiries by the media, analysts and unitholders.

8.9 All enquiries by regulators should be passed on to the Company Secretary immediately.

Market speculation and rumours

8.10 In general, HDNR does not respond to market speculation and rumours except where:

(a) the speculation or rumours indicate that the subject matter is no longer confidential and therefore the exception to disclosure set out in the ASX Listing Rules no longer applies;

(b) ASX formally requests disclosure by HDNR on the matter; or

(c) the Disclosure Committee or Board considers that it is appropriate to make a disclosure in the circumstances.

8.11 Only authorised spokespersons may make any statement on behalf of HDNR in relation to market rumours or speculation. If an Employee becomes aware of any market speculation or rumours of which the Company Secretary or other member of the Disclosure Committee may not be aware, these should be reported to the Company Secretary or other member of the Disclosure Committee immediately.

False market

8.12 If ASX considers that there is, or is likely to be, a false market in HDNR’s units and asks HDNR to give it information to correct or prevent a false market, HDNR must give ASX the information needed to correct or prevent the false market.

Trading halts

8.13 In certain circumstances, HDNR may need to request a trading halt from the ASX to maintain the efficient trading of its units. The Disclosure Committee is authorised to make decisions in

relation to trading halts and, unless otherwise approved by the Board, the Company Secretary is the only person authorised to request a trading halt on behalf of HDNR.

Website

8.14 All company announcements will be posted on HDNR's website immediately after they are released to ASX.

9. Review of Policy

The Disclosure Committee may review this Policy from time to time to ensure that this Policy is operating effectively and whether any changes are required, and report to the Board any changes it considers should be made. This Policy may be amended by resolution of the Board.

10. Breaches

10.1 It is important that HDNR complies with its continuous disclosure obligations. Failure to comply with the disclosure obligations in this Policy may lead to a breach of the Corporations Act or ASX Listing Rules and to personal penalties for directors and officers. Accordingly, it is incumbent upon all Employees to comply with this Policy.

10.2 Breaches of this Policy will be viewed seriously and may lead to disciplinary action being taken against the relevant Employee. In serious cases, such action may include dismissal. Any Employee who becomes aware of a violation of this Policy should immediately report the violation to the Company Secretary.

11. Questions

11.1 For questions about the operation of this Policy or its application in any particular situation, please contact the Company Secretary.

May 2026

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Team	Legal, Compliance and Governance
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