9 July 2026

Continuous Disclosure Policy

1. Introduction

1.1 Sunrise Energy Metals Limited (**Company**), has adopted this Continuous Disclosure Policy, which describes the internal processes designed to ensure that it complies with all applicable laws and continuous disclosure obligations of the stock exchanges on which its securities are listed.

1.2 This policy applies to all executive and non-executive directors, officers, employees and contractors of the Company and its controlled entities (**Group**) (collectively, **Employees**).

2. Company's Disclosure Obligations

2.1 The Company has listings on the Australian Securities Exchange (**ASX**) and OTCQX Market (**OTCQX**) (together, the **Relevant Exchanges**). The Company's securities are quoted as ordinary shares on the Relevant Exchanges.

2.2 The Company must, subject to the disclosure exceptions set out in the applicable listing rules, immediately notify the Relevant Exchanges of any information or development related to its business that a reasonable person would expect to have a material effect on the price or value of its securities.

2.3 The term "immediately" in this context means "promptly and without delay". Disclosure is made by making an announcement to the Relevant Exchanges.

2.4 Information will be taken to have a material effect on the price or value of the Company's securities if it would be likely to influence investors in deciding whether to buy or sell the Company's securities. This type of information is referred to as "price-sensitive information".

2.5 Materiality is assessed using measures appropriate to the Company and having regard to the examples given by ASX in ASX Listing Rule 3.1.

2.6 All Employees should notify the Company Secretary if they consider there is material information which may require disclosure and are encouraged to approach the Company Secretary if they have any queries about what information should be disclosed to the Relevant Exchanges.

3. Exceptions to Disclosure of Information

3.1 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; or

ii. the information concerns an incomplete proposal or negotiation; or

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

iv. the information is generated for internal management purposes of the Company; or

v. the information is a trade secret; and

(b) the information is confidential and the Relevant Exchange 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.

3.2 If certain material information is being withheld from disclosure on the basis that it is confidential, then it is important that all necessary steps are taken to ensure that the information remains confidential. This may include ensuring that it is not disclosed to third parties unless it is disclosed pursuant to a written confidentiality undertaking.

4. Company Secretary

4.1 The board of directors of the Company (**Board**) has appointed the Company Secretary as the person responsible for general administration of this policy.

4.2 The Company Secretary's responsibilities include:

(a) ensuring that announcements are communicated to the Relevant Exchanges in accordance with applicable regulatory requirements and this policy;

(b) maintaining a register of announcements made to the Relevant Exchanges;

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

(d) communicating with ASX about general matters concerning the ASX Listing Rules (in accordance with Listing Rule 12.6) including in relation to matters of disclosure, and co-ordinating communications with the OTCQX in relation to matters of disclosure;

(e) ensuring (using reasonable endeavours) announcements are factual and are expressed in a clear and objective manner that allows investors to assess the impact of the information when making investment decisions;

(f) co-ordinating education and training within the Company about its disclosure obligations and this policy as required from time to time; and

(g) periodically monitoring the Company's disclosure processes and reporting and the effectiveness of this policy.

4.3 The Company Secretary will also arrange (in conjunction with the Company's human resources function) for any significant amendments to this policy to be notified to relevant Employees.

5. Authority to Authorise Announcements

5.1 Except as set out in the paragraphs below, the Managing Director (MD) / Chief Executive Officer (CEO), or the Chief Financial Officer, in conjunction with the Company Secretary, or a Non-Executive Director, have the authority to approve for release to the Relevant Exchanges announcements which are administrative in nature including the following:

(a) substantial shareholder notices (approved by the relevant holder);

(b) director interest notices (approved by the relevant Director);

(c) company administration notices (such as Appendix 3Bs); and

(d) announcements pre-approved by the Board in substantially the form approved.

To the extent reasonably practicable, the Chief Financial Officer or Company Secretary should circulate these announcements to the Directors before they are released to the Relevant Exchanges.

5.2 Proposed announcements which:

(a) include disclosure of a forecast or other forward-looking information; or

(b) relate to a matter that is material or strategically important to the Company (including announcements relating to the quarterly, full-year or half-year reports),

must be reviewed and approved for release to the Relevant Exchanges by a majority of Directors in advance of being released to the market.

5.3 All announcements must be released to the Relevant Exchanges effectively simultaneously. Where information is to be released in Australia and simultaneously in another jurisdiction, the Company Secretary must be consulted to determine how the applicable disclosure requirements may impact timing of the disclosure.

6. Market Speculation and Rumours

6.1 In general, the Company 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 relevant exception to disclosure no longer applies;

(b) a Relevant Exchange formally requests disclosure by the Company on the matter; or

(c) the Company considers that it is appropriate to make a disclosure in the circumstances.

6.2 If an Employee becomes aware of any market speculation or rumours of which the Company Secretary may not be aware, these should be reported to the Company Secretary immediately.

7. Trading Halts

7.1 In order to facilitate an orderly, fair and informed market it may be necessary to request a trading halt from a Relevant Exchange.

7.2 No Employee is authorised to initiate a request for a trading halt other than through the Company Secretary, who must obtain approval from the Managing Director (MD / Chief Executive Officer (CEO) before making the request. If the MD / CEO is unavailable, the Company Secretary must obtain the approval of the Lead Independent Non-Executive Director, or if the Lead Independent Non-Executive Director is unavailable, another Non-Executive Director.

8. Authorised spokespersons

8.1 The only persons authorised to make public statements on behalf of the Group are:

(a) the Managing Director (MD) / Chief Executive Officer (CEO);

(b) the Chairman;

(c) the Chief Financial Officer; or

(d) any person who has the prior approval of the MD / CEO.

8.2 Those persons may only clarify information that the Company has publicly released and must not comment on price-sensitive information that has not been released to the market.

9. Analyst and Investor Briefings

9.1 The Company may conduct briefings with analysts and investors from time to time to discuss matters concerning the Group. In such circumstances the following protocols will apply:

(a) No price-sensitive information will be disclosed at these briefings (including in response to any questions asked at the briefing) unless it has been previously or is simultaneously released to the market.

(b) If price-sensitive information is inadvertently disclosed, it will immediately be released to the Relevant Exchanges.

(c) Any presentation materials to be given to investors and analysts at a briefing will be released to the Relevant Exchanges and posted on the Company's website. This should occur before the information is presented at the briefing.

(d) A record of all meetings and briefings with analysts or investors will be kept, including confirmation that no price-sensitive information was disclosed.

10. Review of Reports by Analysts

10.1 The Group is not responsible for, and does not endorse, reports by analysts commenting on the Company. The Group does not incorporate reports of analysts in its corporate information, including its website (this also extends to hyperlinks to websites of analysts).

10.2 Where requested to do so, the Company may review research reports by analysts but will confine its comments to factual matters and material previously disclosed to the market.

11. Website

11.1 All company announcements will be posted on the Company's website immediately after they are released to the Relevant Exchanges.

12. Breaches

12.1 Breaches of this policy will be viewed seriously and may lead to disciplinary action being taken against the relevant Employee. Any breach of this policy will be reported to the Chair of the Audit, Finance and Risk Committee (AFRC).

13. Questions

13.1 Any questions about the Company's continuous disclosure obligations or this policy should be referred to the Company Secretary

14. Amendments

14.1 The Company Secretary may review this policy from time to time and report to the Board any changes they consider should be made.

14.2 This policy may be amended from time to time by resolution of the Board.

15. Approved and Adopted

15.1 This policy was approved and adopted by the Board on 9 July 2026.