

Disclosure Policy

Disclosure Requirements

1. The Company recognizes its duties pursuant to the continuous disclosure rules of the ASX Listing Rules and to keep the market fully informed of information which may have a material effect on the price or value of the Company's securities.
2. Subject to certain exceptions (in ASX Listing Rule 3.1A), the Company is required to immediately release to the market information that a reasonable person would expect to have a material effect on the price or value of the Company's securities.

Responsibilities of Directors, Officers and Employees

3. The Board as a whole has primary responsibility for ensuring that the Company complies with its disclosure obligations and for deciding what information will be disclosed. Subject to delegation, the Board is also responsible for authorizing all ASX announcements and responses of the Company to ASX queries.
4. Every director, officer and employee of the Company is to be informed of the requirements of this policy by the Chairperson (in the case of directors) and by the Chief Executive Officer ("CEO") (in the case of other officers and employees) and must advise the CEO, Chairperson or Company Secretary as soon as possible (and prior to disclosure to anyone else) of matters which they believe may be required to be disclosed.

Authorized Disclosure Officer

5. The Board has delegated its primary responsibilities to communicate with ASX to the following Authorized Officer:
 - 5.1. the Company Secretary; or
 - 5.2. in the absence of the Company Secretary, the CEO or a designated Executive Director who is authorized to act in that capacity by the Board.

Responsibilities of Authorized Disclosure Officer

6. Subject to Board intervention on a particular matter, the Authorized Officer is responsible for the following:
 - 6.1. monitoring information required to be disclosed to ASX and coordinating the Company's compliance with its disclosure obligations;
 - 6.2. ASX communication on behalf of the Company, authorizing Company announcements and lodging documents with ASX;
 - 6.3. requesting a trading halt in order to prevent or correct a false market;
 - 6.4. providing education on these disclosure policies to the Company's directors, officers, and employees; and
 - 6.5. ensuring there are vetting and authorization processes designed to ensure that Company announcements:
 - 6.5.1. are made in a timely manner;

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- 6.5.2. are factual;
 - 6.5.3. do not omit material information; and
 - 6.5.4. are expressed in a clear and objective manner that allows investors to assess the impact of the information when making investment decisions.
- 6.6. An authorized Disclosure Officer must be available to communicate with the ASX at all reasonable times and is responsible for providing contact details and other information to ASX to ensure such availability.

Measures to Avoid a False Market

7. If ASX requests information from the Company in order to correct or prevent a false market in the Company's securities, the Company will comply with that request. The extent of information to be provided by the Company will depend on the circumstances of the ASX request.
- 7.1. If the Company is unable to give sufficient information to the ASX to correct or prevent a false market, the Company will request a trading halt.
 - 7.2. If the full Board is available to consider the decision of whether to call a trading halt, only they may authorize it, but otherwise, the Authorized Disclosure Officer may do so.

Market Announcements

8. Subject to the requirements set out in the applicable disclosure rules and this Policy, the Company will as soon as possible announce to the securities exchanges on which its securities are listed (the **markets**) any information relating to the Company which:
- 8.1. a reasonable person would expect to have a material or significant effect on the price or value of its securities; or
 - 8.2. a reasonable investor is likely to use as part of the basis for making investment decisions (market sensitive information).
9. In some limited circumstances, market sensitive information may not require immediate disclosure to the markets. The applicable disclosure rules describe the circumstances in which disclosure of market sensitive information may be delayed, and any conditions which must be complied with in these circumstances.
10. Company announcements of price sensitive information are subjected to the following vetting and authorization process to ensure their clarity, timely release, factual accuracy, and inclusion of all material information:
- 10.1. The Authorized Officer must prepare market announcements when required to fulfill the Company's disclosure obligations.
 - 10.2. Proposed announcements must be approved by the Chairperson or in his or her absence, urgent announcements may be approved by the CEO or other person expressly authorized by the Board.

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- 10.3. Announcements must first be released to the Company's market platforms before being disclosed to any other private or public party (such as the media). After release of the announcement, it must be displayed on the Company's website, following which the Company can then release such information to media and other information outlets.
- 10.4. Wherever practical, all announcements must be provided to the directors, CEO and Company Secretary prior to release to the market for approval and comment.

Confidentiality and Unauthorized Disclosure

- 11. The Company must safeguard the confidentiality of information which a reasonable person would expect to have a material effect on the price or value of the Company's securities. If such information is inadvertently disclosed, the Authorized Disclosure Officer must be informed of the same and must refer it to the Chairperson and CEO (or equivalent) as soon as possible.

External Communications and Media Relations Policy

- 12. The Chairperson or CEO (or equivalent) are authorized to communicate on behalf of the Company with the media, government and regulatory authorities, stockbrokers, analysts and other interested parties or the public at large. No other person may do so unless specifically authorized by the Chairperson or CEO (or equivalent).
 - 12.1. All requests for information from the Company must be referred to the Authorized Disclosure Officer for provision to the Chairperson and CEO.
 - 12.2. The Company shares ASX Announcements on social media platforms including LinkedIn, Facebook, Instagram, and Twitter.
 - 12.3. All ASX Announcements have key Company email addresses that shareholders can email should they require further information.
 - 12.4. The Company provides a contact form on its website, and monitors email accounts and social media platforms for any security holder queries or communication.
 - 12.5. The Company promptly replies to security holder enquiries through any of the above-mentioned platforms during Western Australian business hours.
 - 12.6. Security holder participation is encouraged at meetings, including annual general meetings, with stockbrokers, analysts, shareholders, and other stakeholders, where shareholders and other attendees are invited to ask questions at regular intervals.

Breach of Disclosure Policy

- 13. Serious breaches of this disclosure policy may be treated with disciplinary action, including dismissal, at the discretion of the Board.
 - 13.1. Where the breach is alleged against a member of the Board, that director will be excluded from the Board's consideration of the breach and any disciplinary action for the Company to take.