Continuous Disclosure and Shareholder Communication Policy

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1. PNC's Continuous Disclosure Obligation

Pioneer must immediately disclose to the ASX any information concerning the Company that a reasonable person would expect to have a material effect on the price or value of the Company's securities unless an exception under Listing Rule 3.1A applies.

Information is Price Sensitive if it would, or would be likely to, influence investors in deciding whether to subscribe for, acquire or dispose of Pioneer securities.

a) Would this information influence my decision to buy or sell securities in the Company at their current market price?

b) Would I feel exposed to an action for insider trading if I were to buy or sell securities in the entity at their current market price, knowing this information had not been disclosed to the market?

Pioneer will be considered to have become aware of information where a director or officer of the Company has, or ought reasonably to have, come into possession of the information in the course of the performance of their duties as a director or officer of Pioneer.

"Immediately" means promptly and without delay, i.e. doing it as quickly as possible in the circumstances and not deferring, postponing or putting it off to a later time.

2. Exceptions to Listing Rule 3.1

Pioneer is not required to disclose Price Sensitive Information while all three of the following requirements are satisfied:

a) One of the exceptions in Listing Rule 3.1A applies;
b) The information remains confidential and ASX has not formed the view that confidentiality has been lost; and
c) A reasonable person would not expect the information to be disclosed.

If any of these requirements ceases to be satisfied, Pioneer must immediately consider whether disclosure is required.

3. Confidentiality

If information is not disclosed in reliance on the confidentiality exceptions as outlined above, the confidentiality requirement must be maintained at all times. If information loses its confidentiality, Pioneer will then need to consider and determine whether the information needs to be disclosed to the market.

All Personnel of Pioneer have a duty not to disclose confidential information to any person other than with the express consent of the Company or in circumstances required by the law. This obligation is set out in Pioneer’s Code of Conduct.

Where confidential information is to be provided to another party, measures must be put in place to ensure that the confidentiality of the information is maintained, such as a confidentiality agreement.

4. Is Disclosure Required?

Personnel must promptly notify the Managing Director or Company Secretary of potentially market-sensitive information

The Executive of Pioneer is expected to continuously consider potential disclosure issues and compliance with the Company’s continuous disclosure obligations.

The Managing Director and Company Secretary, will assess the information, consult other officers or advisers where appropriate and determine whether disclosure is required.

5. Approval of Announcements

Non-routine market announcements must be approved by the Board or its nominated delegate, currently Chair of Audit. If the nominated delegate is unavailable, approval may be given by the Board Chair. Where possible, the final draft of any non-routine announcement is circulated by the Company Secretary to all directors prior to its release.

Routine administrative announcements may be approved by the Company Secretary.

6. ASX-First Rule

Price Sensitive Information must be given to ASX before it is disclosed to any other persons, including the media, analysts, investors or shareholders. Information must not be provided externally, including on an embargoed basis, until ASX has confirmed its release to the market. Directors receive copies of all ASX announcements promptly after they have been made.

7. Authorised Spokespersons

The only persons authorised to speak to ASX or externally (such as analysts, investors, brokers or shareholders) in relation to the Company are the:

a) Chair;
b) Managing Director;
c) Chief Financial Officer;
d) Company Secretary; ; or
e) any other Personnel with the express approval of the Managing Director or Chair.

Authorised spokespersons must comply with this policy and any internal procedures regarding external communications about Pioneer.

Where any other person receives a request for information or comment about Pioneer from a third party, that person must advise the third party that they are not authorised to speak on behalf of the Company, and where appropriate they should refer the enquiry to an authorised spokesperson.

8. Market Speculation & Rumours

As a general policy, Pioneer does not comment on speculation or rumours unless a response is required under the ASX Listing Rules or the law. If ASX forms the view that a false market has been created and requests the Company to provide information, the Managing Director and Company Secretary will proceed as if it were a continuous disclosure matter under paragraphs 4 and 5 and prepare a response to ASX.

9. Trading Halts

The Managing Director and Company Secretary may, with the Chair's approval, request a trading halt or voluntary suspension where necessary to maintain an informed market.

10. Inadvertent Disclosure

If any Price Sensitive Information is inadvertently disclosed by Pioneer Personnel to a party outside the Company, the Managing Director or Company Secretary must be immediately notified so that the information can be considered in the context of Pioneer's continuous disclosure obligations.

11. Specific Price-Sensitive Information

During Prohibited Periods and Additional Prohibited Periods as defined in the Company's Securities Trading Policy, the Company will not hold any briefings with the investment community to discuss the Company's financial information.

Where the Company is undertaking a specific corporate transaction which constitutes Price Sensitive Information, the Company will obtain assurances from third parties to ensure that any Price Sensitive Information remains confidential, including where necessary requiring parties to enter into confidentiality agreements.

12. Briefings

Authorised spokespersons may meet with investors, analysts and other market participants, but must not disclose new substantive, material or price-sensitive information unless it has first been released to ASX.

All enquiries from the investment community regarding Pioneer should be referred to the Managing Director, or Chief Financial Officer.

13. Media and Social Media

Pioneer provides information from time to time to the media and responds to their enquiries. All media enquiries must be referred to the Managing Director or Company Secretary, in accordance with the Company's Media Referral Policy. The Company will not provide material information to the media, even on an embargo basis, before it has been disclosed to ASX.

The Company will monitor the media, including social media, to determine if there are any issues which may require the Company to make an announcement or take other action to manage its continuous disclosure obligations.

14. Overarching Principles

In accordance with ASX Corporate Governance Council Principle 6, Pioneer is committed to ensuring shareholders can effectively exercise their rights by:

- providing timely access to information about Pioneer and its governance;
- communicating openly and transparently;
- conducting open briefings when appropriate; and
- encouraging participation in shareholder meetings.

15. Corporate Governance – Website

In accordance with Recommendation 6.1, Pioneer has a Corporate Governance section on its website.

This section includes the Company's values, profile, constitution, the Board and Board Committee Charters, key policies and its most recent annual Corporate Governance Statement. The Corporate Governance Statement is lodged with ASX or contained in the annual report, together with an Appendix 4G, enabling shareholders and other stakeholders readily identify and locate the Company's governance disclosures.

16. General Meetings

The Pioneer Annual General Meeting (AGM) is usually held by 30 November each year. The date, time and location are provided in the Notice of Meeting and on the Pioneer website.

The Notice of Meeting is distributed to all shareholders in accordance with the timeframe provided in the Corporations Act. The documents are also made available on the Pioneer website.

Pioneer welcomes and encourages shareholder participation and uses a mix of virtual and in-person shareholder meetings. Shareholders unable to attend the AGM are given the opportunity to submit questions and comments ahead of the meeting, and where appropriate those questions will be answered at the meeting.

The external auditor attends each AGM and is available to answer shareholder questions about the conduct of the audit and preparation and conduct of the Independent Auditor's Report.

All resolutions at general meetings will be decided by a poll rather than a show of hands.

17. Reports

The Company's financial results for each full year ended 30 June are reported in August each year, and the financial results for each half year ended 31 December are reported in February each year. These results are released to ASX in accordance with the Listing Rules and are available in the ASX Announcements section of the Company's website.

Pioneer's Annual Reports are sent in hard copy to all shareholders who have specifically requested one. Annual and Half Yearly Financial Reports in relation to prior years are also made available in the ASX Announcements section of the Company's website.

18. Media Releases and Other Information

Pioneer's media releases (if any) are available on the Company's website and are released to the ASX in accordance with the ASX Listing Rules.

Pioneer's head office, investor relations and share registry contacts are listed on the Company's website.

Shareholders may elect to receive shareholder communications including annual report notifications, notices of meeting and dividend payment statements, electronically through the Share Registry.

Review of Continuous Disclosure and Shareholder Communications Policy

The Board will review this policy at least annually and approve any material changes.

Continuous Disclosure and Shareholder Communications Policy History

Adopted:	25 February 2014
Last reviewed:	August 2026

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