Securities Trading Policy

Purpose

These guidelines set out the Securities Trading Policy ("Policy") on the sale and purchase of securities in Danakali Limited by the Personnel of Danakali Limited and any of its subsidiaries (collectively defined in this Policy as Danakali or the Company).

Personnel are encouraged to be long-term holders of the Company's securities. However, it is important that care is taken in the timing of any purchase or sale of such securities.

The purpose of the Policy is to:

- ensure that directors, officers, employees and contractors comply with the insider trading provisions of the Corporations Act 2001 (Cth);
- maintain investor confidence in the integrity of the Company's market disclosures and trading practices;
- establish procedures governing dealings in the Company's securities; and
- minimise the risk of actual or perceived insider trading.
- This Policy applies in addition to any legal obligations imposed by applicable laws and regulations.

Scope

This Policy applies to:

- all directors of the Company;
- the Chief Executive Officer;
- senior executives;
- employees;
- contractors and consultants who may have access to confidential information; and
- any associates, family members, trusts, companies or entities over which such persons have influence or control.

Persons covered by this Policy are referred to as "Restricted Persons".

Definitions

In this policy:

Key Management Personnel are those persons having authority and responsibility for planning, directing and controlling the activities of the entity, directly or indirectly, including any Director (whether executive or otherwise) of that entity.

Personnel includes officers, employees, contractors or agents of the Company.

What Types of Transactions are Covered by this Policy?

This policy applies to both the sale and purchase of any securities of the Company and its subsidiaries on issue from time to time.

What is Insider Trading?

Prohibition

Insider trading is a criminal offence. It may also result in civil liability. In broad terms, a person will be guilty of insider trading if:

- that person possesses information which is not generally available to the market and, if it were generally available to the market, would be likely to have a material effect on the price or value of the Company's securities (i.e. information that is 'price sensitive'); and
- that person:
  - buys or sells securities in the Company; or
  - procures someone else to buy or sell securities in the Company; or
  - passes on that information to a third party where that person knows, or ought reasonably to know, that the third party would be likely to buy or sell the securities or procure someone else to buy or sell the securities of the Company.

Dealing through third parties

The insider trading prohibition extends to dealings by individuals through nominees, agents or other associates, such as family members, family trusts and family companies (referred to as "Associates" in these guidelines).

Information however obtained

It does not matter how or where the person obtains the information – it does not have to be obtained from the Company to constitute inside information.

Confidential Information

Employees and directors also have a duty of confidentiality to the Company. A person must not reveal any confidential information concerning the Company, use that information in any way which may cause loss to the Company, or use that information to gain an advantage for themselves or anyone else.

Limiting Risk

Employees, directors and officers must not enter into transactions or arrangements which operate to limit the economic risk of their security holding in the company without first seeking and obtaining written acknowledgement from the Chairman.

Employee share schemes

The prohibition does not apply to acquisitions of shares or options by employees made under employee share or option schemes, nor does it apply to the acquisition of shares as a result of the exercise of options under an employee option scheme. However, the prohibition does apply to the sale of shares acquired under an employee share scheme and also to the sale of shares acquired following the exercise of an option granted under an employee option scheme.

Guidelines for Trading in the Company's Securities

General rule

Personnel must not, except in exceptional circumstances deal in securities of the Company during the following periods:

- In the seven (7) days prior to, and 48 hours after the release of the Company's Annual Financial Report;
- In the seven (7) days prior to, and 48 hours after the release of the Consolidated Interim Financial Report of the Company; and

- In the seven (7) days prior to, and 48 hours after the release of the Company's quarterly reports, (together the Closed Periods).

The Company may at its discretion vary this rule in relation to a particular Closed Periods by general announcement to all Personnel either before or during the Closed Periods.

Permission Required

Personnel must not, except in exceptional circumstances, deal in securities of the Company without receiving prior written approval in accordance with the process detailed below.

Price Sensitive Information

However, if any Personnel is in possession of price sensitive information which is not generally available to the market, then he or she must not deal in the Company's securities at any time.

No short-term trading in the Company's securities

Key Management Personnel should never engage in short-term trading of the Company's securities except for the exercise of options where the shares will be sold shortly thereafter.

Securities in other companies

Buying and selling securities of other companies with which the Company may be dealing is prohibited where an individual possesses information which is not generally available to the market and is 'price sensitive'. For example, where an individual is aware that the Company is about to sign a major agreement with another company, they should not buy securities in either the Company or the other company.

Exceptions

- Personnel may at any time:
  - acquire ordinary shares in the Company by conversion of securities giving a right of conversion to ordinary shares;
  - acquire Company securities under a bonus issue made to all holders of securities of the same class;
  - acquire Company securities under a dividend reinvestment, or top-up plan that is available to all holders or securities of the same class;
  - acquire, or agree to acquire or exercise options under an employee incentive scheme (as that term is defined in the NSX Listing Rules), such as a Company Share Option Plan;
  - withdraw ordinary shares in the Company held on behalf of the Personnel in an employee incentive scheme (as that term is defined in the NSX Listing Rules) where the withdrawal is permitted by the rules of that scheme;
  - acquire ordinary shares in the Company as a result of the exercise of options held under an employee option scheme;
  - transfer securities of the Company already held into a superannuation fund or other saving scheme in which the restricted person is a beneficiary;
  - make an investment in, or trade in units of, a fund or other scheme (other than a scheme only investing in the securities of the Company) where the assets of the fund or other scheme are invested at the discretion of a third party;

- where a restricted person is a trustee, trade in the securities of the Company 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;
- undertake to accept, or accept, a takeover offer;
- 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 and 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 decisions relating to 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;
- dispose of securities of the Company resulting from a secured lender exercising their rights, for example, under a margin lending arrangement;
- exercise (but not sell securities following exercise) an option or a right under an employee incentive scheme, or convert a convertible security, where the final date for the exercise of the option or right, or the conversion of the security, falls during a prohibited period or the Company has had a number of consecutive prohibited periods and the restricted person could not reasonably have been expected to exercise it at a time when free to do so; or
- trade under a non-discretionary trading plan for which prior written clearance has been provided in accordance with procedures set out in this Policy.

- In respect of any share or option plans adopted by the Company, it should be noted that it is not permissible to provide the exercise price of options by selling the shares acquired on the exercise of these options unless the sale of those shares occurs outside the Closed Periods.

Were this is to occur at a time when the person possessed inside information, then the sale of Company securities would be a breach of insider trading laws, even though the person's decision to sell was not influenced by the inside information that the person possessed and the person may not have made a profit on the sale.

Where Company securities are provided to a lender as security by way of mortgage or charge, a sale that occurs under that mortgage or charge as a consequence of default would not breach insider trading laws.

Notification of periods when Personnel are not permitted to trade

The Company Secretary will endeavour to notify all Personnel of the times when they are not permitted to buy or sell the Company's securities.

Approval and Notification Requirements

Approval requirements

- Any Key Management Personnel wishing to buy, sell or exercise rights in relation to the Company's securities must obtain the prior written approval of the Chairman before doing so.
- If the Chairman wishes to buy, sell or exercise rights in relation to the Company's securities, the Chairman must obtain the prior approval of the Chair of the Audit and Risk Committee before doing so.
- Any Personnel (other than Key Management Personnel) wishing to buy, sell or exercise rights in relation to the Company's securities must obtain the prior written approval of the Chairman before doing so.

Approvals to buy or sell securities

- All requests to buy or sell securities must include the intended volume of securities to be purchased or sold and an estimated time frame for the sale or purchase.
- Copies of written approvals must be forwarded to the Company Secretary prior to the approved purchase or sale transaction.

Notification

Subsequent to approval obtained in accordance with this policy, any Personnel who (or through his or her Associates) buys, sells, or exercises rights in relation to Company securities must notify the Company Secretary in writing of the details of the transaction within two (2) business days of the transaction occurring. This notification obligation operates at all times but does not apply to acquisitions of shares or options by employees made under employee share or option schemes, nor does it apply to the acquisition of shares as a result of the exercise of options under an employee option scheme.

Key Management Personnel sales of securities

Key Management Personnel need to be mindful of the market perception associated with any sale of Company securities and possibly the ability of the market to absorb the volume of shares being sold. With this in mind, the management of the sale of any significant volume of Company securities (i.e. a volume that would represent a volume in excess of 10% of the total securities held by the seller prior to the sale, or a volume to be sold that would be in excess of 10% of the average daily traded volume of the shares of the Company on the NSX for the preceding 20 trading days) by a Key Management Personnel needs to be discussed with the Board and the Company's legal advisers (if considered appropriate) prior to the execution of such a sale. These discussions need to be documented in the form of a file note, to be retained by the Company Secretary.

Exemption from Closed Periods restrictions due to exceptional circumstance

Personnel who are not in possession of inside information in relation to the Company, may be given prior written clearance by the Chairman (or in the case of the Chairman by the Chair of the Audit and Risk Committee) to sell or otherwise dispose of Company securities in a Closed Period where the person is in severe financial hardship or where there are exceptional circumstances as set out in this policy.

Severe financial hardship or exceptional circumstances

The determination of whether a Personnel is in severe financial hardship will be made by the Chairman (or in the case of the Chairman by the Chair of the Audit and Risk Committee).

A financial hardship or exceptional circumstances determination can only be made by examining all of the facts and if necessary obtaining independent verification of the facts from banks, accountants or other like institutions.

Financial hardship

Personnel may be in severe financial hardship if they have a pressing financial commitment that cannot be satisfied other than by selling the securities of the Company.

In the interests of an expedient and informed determination by the Managing Director or Chairman (or all other members of the Board as the context requires), any application for an exemption allowing the sale of Company securities in a Closed Period based on financial hardship must be made in writing stating all of the facts and be

accompanied by copies of relevant supporting documentation, including contact details of the person's accountant, bank and other such independent institutions (where applicable).

Any exemption, if issued, will be in writing and shall contain a specified time period during which the sale of securities can be made.

Exceptional circumstances

Exceptional circumstances may apply to the disposal of Company securities by a Personnel if the person is required by a court order, a court enforceable undertaking for example in a bona fide family settlement, to transfer or sell securities of the Company, or there is some other overriding legal or regulatory requirement to do so.

Any application for an exemption allowing the sale of Company securities in a Closed Period based on exceptional circumstances must be made in writing and be accompanied by relevant court and/or supporting legal documentation (where applicable).

Any exemption, if issued, will be in writing and shall contain a specified time period during which the sale of securities can be made.

NSX Notification for Directors

The NSX Listing Rules require the Company to notify the NSX within 5 business days after any dealing in securities of the Company (either personally or through an Associate) which results in a change in the relevant interests of a Director in the securities of the Company. The Company has made arrangements with each Director to ensure that the Director promptly discloses to the Company Secretary all the information required by the NSX.

Effect of Compliance with this Policy

Compliance with these guidelines for trading in the Company's securities does not absolve that individual from complying with the law, which must be the overriding consideration when trading in the Company's securities.

Review of the Policy

The Company will periodically review this policy and its implementation to ensure continued effectiveness and alignment with legal requirements, stakeholder expectations and emerging best practices.

Approval and Adoption

This Policy was approved by the Board on 2 October 2026 and takes effect from that date.