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Media and External Communication Policy

FDC Consolidated Holdings Limited
(ACN 698 452 229)

Approved by the Board on 28 June 2026

Version 1.1

1 Purpose and Scope

FDC Consolidated Holdings Limited (ACN 698 452 229) and its related bodies corporate (together, ***FDC***) has adopted this Policy to outline how it intends to engage with media, social media, and conduct external communications.

This Policy applies to all directors, officers, employees, consultants, and contractors of FDC (referred to in this Policy as ***FDC Personnel***).

This Policy is designed to guide the external communications activities of FDC Personnel in order to create a framework for FDC, its directors, its employees, and its shareholders so that external communications may be authorised, accurate, consistent, and compliant with FDC's obligations as an ASX listed entity.

Just as FDC approaches every project and every client relationship with care and respect, FDC strives to approach media engagement the same way. FDC seeks to be helpful, courteous, and genuinely open with all stakeholders where possible.

FDC recognises that its employees are important ambassadors. The purpose of this Policy is not to prevent employees from being proud of their work or celebrating FDC's achievements. It is designed so that pride and celebration may be expressed in ways that align with FDC's values without inadvertently create legal exposure or reputational risk for the company or for individual employees.

The central principle of this Policy is simple: one voice, consistently. External communications about FDC must flow through authorised channels and authorised people.

This Policy's primary objectives are:

- To establish a process for FDC Personnel to manage media enquiries
- To provide guidance to FDC Personnel in managing their own social media accounts
- To provide guidance and structures to support FDC's various external communications activities
- To reinforce FDC's commitment to transparency and accountability in its dealings

2 Definitions

Term	Definition
ASX announcement	A formal disclosure lodged via the ASX Market Announcements platform by the Company Secretary.
Authorised spokesperson	A person specifically authorised to make public statements on behalf of FDC. See Section 4.
External communications	Any communication directed at an audience outside FDC, including media, clients, subcontractors, industry bodies, government, investors, and the general public, through any channel.
National Marketing Manager	National Marketing Manager, FDC Construction & Fitout.

Term	Definition
Material information	Information that a reasonable person would expect to have a material effect on the price or value of FDC's securities. Under ASX Listing Rule 3.1, such information must be disclosed to ASX immediately.
Media	Any journalist, reporter, editor, producer, blogger, podcaster, or content creator representing a print, digital, broadcast, or online publication or platform.
Media inquiry	Any contact from a media representative seeking comment, information, interview, or confirmation of information relating to FDC, its operations, its financial performance, its people, or any matter in which FDC has an interest.
Social media	Any online platform that enables user-generated content and social interaction, including but not limited to LinkedIn, Instagram, X (Twitter), Facebook, TikTok, YouTube, and podcast platforms.

3 Authorised Spokespersons

3.1 Primary spokesperson

The only person authorised to speak to media on behalf of FDC as a matter of course is its CEO. The CEO is FDC's sole authorised spokesperson for media communications without the requirement for pre-approval. All requests for media interviews with the Chief Executive Officer must be routed through the National Marketing Manager in the first instance.

3.2 Additional spokespersons

No FDC Personnel may speak to media about FDC without prior authorisation, regardless of seniority, role, or the subject matter of the inquiry

In specific circumstances, other FDC Personnel may be authorised to speak to media. In these circumstances:

- Prior authorisation must be obtained in advance from the National Marketing Manager
- The media opportunity should be relevant to the proposed spokesperson's specific role
- The information to be shared must comply with FDC's disclosure obligations as an ASX-listed entity
- Where possible, the spokesperson should be supported by a written media brief including key details of the engagement and approved talking points

> *Authorisation to speak to media about a specific project does not constitute authorisation to comment on FDC's financial performance, strategic direction, share price, or any matter that could constitute market-sensitive information.*

4 Media Engagement

4.1 Media engagement oversight

FDC speaks to the media with one respectful, professional and coordinated voice. The National Marketing Manager is responsible for leading all media engagement – reactive and proactive – and is FDC's primary point of contact for all media relationships. All FDC Personnel who receive a media inquiry, or who wish to initiate media contact, must involve the National Marketing Manager from the outset.

4.2 Media inquiry and response protocol

If you receive a media inquiry - by phone, email, in person, on a project site, via social media, or through any other channel - you must follow this protocol immediately and without exception.

1 Do not provide any comment, information, or opinion. This applies regardless of whether you believe the question is straightforward, whether the information appears to be publicly available, or whether you know the journalist personally.

2 Collect the journalist's details. Take their full name, the publication or outlet they represent, their contact phone number and email address, and a brief description of what they are seeking.

3 Respond with the approved holding response only:

APPROVED HOLDING RESPONSE

"Thank you for reaching out. I'm not the right person to help with this, but I'll make sure the right person contacts you shortly. Could I take your name and contact details?"

Take their details. Notify immediately. Say nothing further.

4 Notify immediately. As soon as the contact has been managed, you must simultaneously notify your direct manager, and the National Marketing Manager. Where possible, contact by phone first, then follow up in writing. This notification must happen within minutes, not hours. The notification must include the journalist's name and outlet, the nature of the inquiry, the questions asked, and the time and method of contact.

5 Do not follow up with the journalist yourself. Once you have collected their details and notified the relevant people, your role in the process is complete. The National Marketing Manager or their delegate will manage all subsequent contact.

4.3 Proactive media engagement

FDC's proactive engagement with media is to be led by the National Marketing Manager.

Any FDC Personnel who wishes to engage proactively with media - including pitching a story, agreeing to an interview, contributing to an article, writing a by-lined piece, or appearing on a podcast or broadcast program - must obtain prior written approval from the National Marketing Manager before doing so.

This applies to all media formats including trade publications, industry association newsletters, financial press, and podcasts where FDC's name, projects, clients, or performance may be referenced.

Approval will be assessed against FDC's current disclosure obligations, the subject matter of the proposed engagement, and whether the proposed spokesperson has been appropriately briefed.

4.4 On-site media

Where a journalist is approved to conduct media activities on site, FDC Personnel must follow all on-site safety rules and regulations.

Entry must not be permitted without written approval. If a journalist, photographer, or film crew attends a project site without prior arrangement, the site manager must advise that media access requires prior authorisation from the National Marketing Manager. The site manager must take the media representative's details and immediately notify the National Marketing Manager, and their state-based General Manager. No comment about the project, the client, or FDC should be made.

Unauthorised photography or filming of FDC sites, signage, or personnel should be declined. If the media representative does not comply, the matter must be escalated immediately to the National Marketing Manager.

5 Continuous Disclosure

From the date of FDC's listing, all external communications must be assessed against FDC's continuous disclosure obligations. A separate Continuous Disclosure Policy applies and should be read alongside this Policy, and all media and external communications must be made consistent with it.

All public statements must comply with FDC's disclosure obligations. No material information may be released before it has been disclosed to the ASX.

If you are unsure whether something you want to say is compliant, do not say it. Contact the National Marketing Manager immediately.

6 Prohibited Statements

The following statements are strictly prohibited for all FDC Personnel, regardless of context, audience, or channel, unless authorised in accordance with this Policy and consistent with the Continuous Disclosure Policy:

- Any comment on FDC's financial performance, revenue, profitability, or cash position that has not already been disclosed via ASX announcement
- Any forward-looking statement about FDC's pipeline, order book, expected revenue, or project wins
- Any comment on FDC's share price — past, present, or expected
- Any statement that could be construed as earnings guidance or a profit forecast
- Any comment on undisclosed contract wins, losses, or disputes
- Any comment on potential acquisitions, mergers, or strategic transactions
- Any comment on undisclosed personnel changes at senior or executive level
- Any statement that goes beyond or contradicts an existing ASX announcement

> *Making a public statement that constitutes undisclosed material information may constitute a breach of ASX Listing Rule 3.1 and the Corporations Act 2001.*

7 If You See Something — Say Something

If any FDC Personnel becomes aware of media or social media content - by any other FDC Personnel, a former employee, a subcontractor, or a third party - that may contain undisclosed material information about FDC or that could create legal or reputational risk, they must notify the National Marketing Manager immediately.

8 Crisis and Negative Commentary

If FDC or any of FDC Personnel are the subject of negative, inaccurate, or potentially defamatory media or social media commentary, FDC Personnel must not respond directly. All such matters must be referred to the National Marketing Manager immediately.

9 Social Media

FDC recognises that social media is a valuable tool for professional connection, industry engagement, and personal brand development. This Policy does not seek to prevent FDC Personnel from using social media. It seeks to create a framework so that the use of social media by FDC Personnel does not inadvertently harm FDC, its clients, or FDC Personnel.

The same rules that apply to media communications apply to social media. If you would not say it in a media interview, do not post it on social media. If in doubt, check with the National Marketing Manager — or do not post at all.

Content that is factually inaccurate, misleading, discriminatory, offensive, or inconsistent with FDC's values may result in disciplinary action in accordance with FDC's employment contracts and applicable workplace policies, regardless of whether it was posted during or outside of work hours.

9.1 Personal social media accounts

Where a member of FDC Personnel's personal social media account identifies them as an FDC Personnel — for example, through their job title, employer field, or regular references to their work — this Policy applies to the content they post.

FDC's employment contracts govern conduct on social media during and outside of work hours where that conduct could damage FDC's reputation or relationships. FDC Personnel should be aware that a breach of this Policy may result in disciplinary action including termination of employment.

9.2 Alignment with FDC values

When considering posting content on social media, FDC Personnel should give careful consideration to whether that content reflects and aligns with FDC's values.

Before posting, FDC Personnel are encouraged to ask themselves: would I be comfortable if this post was seen by a client, a colleague, or a member of the FDC leadership team? If the answer is no - or if there is any doubt - the post should not proceed without first seeking guidance from the National Marketing Manager.

FDC's values are:

- We're Personal

We are only as good as our client, subbie and team relationships, the tenure of our staff, and the wellbeing of our families and community. Content that is dismissive, disrespectful, or harmful to any of those relationships is inconsistent with this value.

- We're Defined by the Client Experience

We measure our success by our clients' metrics, not our own. Content that speaks negatively about clients, projects, or outcomes - or that discloses client information without authority - is inconsistent with this value.

- We're Humble, but Hungry

Despite our success, we don't focus on how far we have come but how well we can do today. Content that is boastful, inflammatory, or that overstates the company's position or pipeline is inconsistent with this value.

- We Are All In

We are invested in each other and driven by the collective ambition for our team to succeed. We share a collective reputation. Content that undermines confidence in FDC, disparages colleagues, or works against the collective interests of the team reflects on every person in the business and is inconsistent with this commitment.

- We're Young at Heart

In personality, not experience. Our sense of empowerment and possibility is an asset. Content that is offensive, reckless, or that trivialises matters of genuine importance to our people, clients, or community is inconsistent with the spirit this value represents.

9.3 Encouraged social media activity

FDC actively encourages FDC Personnel to use LinkedIn and other appropriate platforms to:

- Share and engage with content published on FDC's official company channels
- Celebrate completed projects using imagery and content approved by the marketing team
- Share professional insights about their work in the construction and fitout sector
- Highlight their own professional development and achievements
- Represent FDC's culture, values, and Made Personal ethos authentically

For detailed guidance on LinkedIn specifically, including profile setup, content guidelines, and best practice examples, refer to the FDC LinkedIn Guidelines document available on the company intranet.

9.4 Pre-approval requirements

The following categories of social media content require prior written approval from the National Marketing Manager before posting by FDC Personnel:

- Any post that references FDC's financial performance, pipeline, or strategic direction
- Any post that announces or refers to a project not yet published on the FDC website
- Any post that names a client relationship or discloses a contract value
- Any post or article that includes commentary on the construction sector that could be read as representing FDC's official position

- Any podcast appearance, article, or external publication where the author is identified as an FDC employee
- Any post made during the prospectus period that expressly mentions or could be associated with FDC

9.5 Prohibited social media content

The following social media content is strictly prohibited for all FDC Personnel:

- Any comment on FDC's share price - past, present, or expected
- Any comment on FDC's financial results, revenue, profit, or cash position that has not been publicly disclosed via ASX announcement
- Any opinion on whether FDC is a good or bad investment
- Any reference to an undisclosed project, contract, or client relationship
- Any statement that contradicts or goes beyond an existing ASX announcement
- Any content that is discriminatory, harassing, defamatory, or that brings FDC into disrepute

10 Other External Communications

10.1 Industry events and conferences

FDC Personnel speaking at industry events, conferences, or forums in a capacity that identifies them as FDC employees must obtain prior approval from the National Marketing Manager. Presentation content must be reviewed before delivery. No presentation may include FDC financial data, pipeline information, or forward-looking statements about the company's performance unless such information has been disclosed to the market.

10.2 Award submissions

Award submissions that reference FDC's financial performance, revenue, project values, or client relationships must be reviewed and approved by the National Marketing Manager before submission. This applies to industry awards, employer-of-choice awards, sustainability awards, and any other external recognition programs. Award submissions are public documents and must be consistent with ASX announcements.

10.3 Analyst and investor inquiries

All inquiries from equity analysts, fund managers, institutional investors, and retail investors must be referred immediately to the National Marketing Manager and dealt with under FDC's Continuous Disclosure Policy. FDC Personnel must not provide financial information to investors under any circumstances.

10.4 Regulatory inquiries

Any communication from ASIC, ASX, or any other regulatory body relating to FDC's compliance obligations must be referred immediately to the Company Secretary and the CFO. Do not respond to regulatory inquiries yourself.

10.5 Subcontractor and client communications

While routine project-related communications with clients and subcontractors are part of normal business operations and are not governed by this Policy, FDC Personnel must not share FDC's financial position, forward pipeline, or strategic plans with clients or subcontractors.

11 Breach and Consequences

FDC takes compliance with this Policy seriously.

Depending on the nature and severity of the breach, consequences for FDC Personnel may include:

- Formal warning
- Suspension with or without pay pending investigation
- Termination of employment
- Referral to ASIC or ASX for regulatory investigation
- Civil or criminal liability for the individual concerned

12 Review

The Board will review this Policy biennially or as often as it considers necessary to check that it is operating effectively and to ensure it remains relevant to the current needs of FDC. This Policy may be amended by resolution of the Board.