

CLINUVEL

Dividend Policy

Clinuvel Pharmaceuticals Limited

ACN 089 644 119

1. Purpose

The Dividend Policy (Policy) sets out the position of Clinuvel Pharmaceuticals Limited ACN 089 644 119 and its subsidiaries (collectively referred to as the Company) in relation to the payment of dividends.

2. Definitions

“**Dividend(s)**” refers to either an interim or final Dividend.

“**Share Register**” means a company specifically appointed by the Company to undertake share register and related services for the Company.

3. Declaration and Payment of Dividends

- a) The payment of dividend by the Company is at the discretion of the Board.
- b) The Dividend Policy of the Company is to distribute to its shareholders available funds from its distributable profits and/or general reserves, as may be determined by the Board of Directors, subject to:
 - i. the recognition of profit and availability of cash for distribution;
 - ii. any banking or other funding requirements by which the Company is bound from time to time;
 - iii. the operating and investment needs of the Company;
 - iv. the anticipated future growth and earnings of the Company;
 - v. provisions of the Company’s Constitution;
 - vi. working capital requirements for growth; and
 - vii. any relevant applicable laws.
- c) The Company will use its discretion in relation to the proposed dividend payout ratio between of net profit after tax, subject to the above considerations.
- d) The Company may prior to declaration of any Dividend, transfer such percentage of its profit for that financial year as it may consider appropriate, to the reserves of the Company.
- e) The Company’s Board of Directors shall be responsible for generating all proposed resolutions on the declaration and payment of dividends.
- f) The Company’s Board of Directors can provide no guarantee as to:
 - i. The extent of future dividends; and
 - ii. The level of franking or imputation of such dividends.
- g) The Company will not declare any Dividends where the law prevents such payment and if there are reasonable grounds for believing that the Company is or would be, after a Dividend payment, unable to pay its liabilities or discharge its obligations as and when they become due.
- h) The Board of Directors may in its discretion declare an interim Dividend.

- i) The list of persons entitled to receive Dividends at the closure date shall be prepared by the Share Register according to the Company's instructions and prevailing legislation.
- j) The Company must comply with the provisions of its Constitution, the requirements of the Corporations Act 2001 (Cth) and the ASX Listing Rules in relation to the payment of dividends.

4. Policy Context

This Dividend Policy is formulated in accordance with The Corporation Act; tax legislation and recognised best practices and principles of ASX listed entities.

5. Amendment

This Policy cannot be amended without approval from the Company's Board of Directors. This Policy will be reviewed from time to time to ensure that it remains effective and meets the best practice standards and needs of the Company.

6. Disclaimer

The Policy does not represent a commitment on the future Dividends of the Company but represents a general guidance on the Dividend Policy.

7. Further Assistance

Any questions about this Policy should be referred to the Managing Director or the Chief Financial Officer of the Company.

8. Approved and Adopted

This policy was approved and adopted by the Board on 28 August 2024.

Document version control:

Custodian	Company Secretary
Date of next scheduled review	August 2025
Legislative Framework and regulatory compliance	ASX Corporate Governance Principles and Recommendations (4 th edition)
Regulators	ASX