

## BRADBURY CAPITAL INC. REGULATION FD POLICY

Adopted: October 6, 2026

### Policy Statement

Bradbury Capital Inc. (the “**Company**”) is committed to the full, fair, accurate, timely and understandable disclosure of information about the Company on a non-selective basis and in compliance with Regulation FD, as promulgated by the U.S. Securities and Exchange Commission (“**SEC**”), and other applicable laws and regulations. For purposes of this policy, “**public disclosure**” means filing or furnishing a current report on Form 6-K with the SEC or disseminating information through another method of disclosure that is reasonably designed to provide broad, non-exclusionary distribution of the information to the public.

### Compliance

It is the Company’s policy to comply with all periodic reporting and disclosure requirements, including Regulation FD. It has been, and continues to be, our practice to disclose material information about the Company in a public, timely and non-selective manner. As a general rule, Company employees are not authorized to disclose material, nonpublic information about the Company. Any inadvertent disclosure of material, nonpublic information on a selective basis should be reported to the General Counsel. Within 24 hours of the discovery of the inadvertent breach or on the commencement of the next day’s trading on Nasdaq, whichever is later, the Company shall (a) broadly disseminate the information via a press release or by filing the information on Form 6-K or “furnishing” the information on Form 6-K or (b) “cure” such breach by other appropriate and prompt subsequent disclosure.

“**Material**” information is any information concerning the Company or its securities if there is a substantial likelihood that a reasonable shareholder would consider the information to be important in making an investment decision or to have altered the “total mix” of available information. This includes a range of subjects, including, but not limited to:

- changes in share ownership that may affect control of the Company;
- changes in corporate structure;
- take-over bids in respect of the Company’s securities or bids by the Company for its own securities;
- major corporate acquisitions or dispositions;
- changes in the capital structure of the Company, stock splits and dividend declarations;
- borrowing of a significant amount of funds;
- public or private sale of additional securities of the Company;
- developments affecting the Company’s resources, technology, products or markets;
- commencement or termination of significant licenses or contracts;
- firm evidence of significant increases or decreases in near-term earnings prospects;
- changes in capital investment plans or corporate objectives;
- significant changes in management;
- significant litigation;
- significant disputes with major contractors, suppliers or customers;
- events of default under financing or other agreements;
- significant cybersecurity incidents, such as a data breach, or any other significant disruption in the Company’s operations or loss, potential loss, breach or unauthorized access of its property or assets, whether at its facilities or through its information technology infrastructure; and

- any other developments relating to the business and affairs of the Company that would likely affect the market price or value of any of the Company's securities or that would likely influence a reasonable investor's investment decision.

## **Compliance Guidelines**

The Company has established the following practices and procedures to ensure compliance with Regulation FD.

### **I. Authorized Representatives of the Company**

- A. The Chief Executive Officer and the Chief Financial Officer shall have authority to communicate on behalf of the Company to the following persons ("Securities Market Participants"):
  - securities market professionals, which includes brokers, dealers, analysts, investment advisors, institutional investment managers, mutual funds, hedge funds and other investment companies;
  - shareholders of the Company who may reasonably be expected to purchase or sell the Company's securities based upon the communication; and
  - persons associated with any of the above-mentioned persons.
- B. In addition, the Company's officers and such members of each of their respective staffs shall have authority to communicate with shareholders and beneficial owners in response to inquiries regarding shareholder accounts and other administrative matters.
- C. At the request of the Chief Executive Officer, other officers of the Company may communicate, from time to time, with Securities Market Participants as part of the Company's investor relations efforts; provided, however, that such officers shall not have authority to communicate business, financial or other material, nonpublic information about the Company.

### **II. Disclosure of Material Information**

If the Company determines that disclosure of material, nonpublic information will be made, it will endeavor to disclose such information in accordance with Regulation FD and other applicable legal and regulatory requirements. When the Company discloses material, nonpublic information, it will do so by one or more of the following methods:

- A. filing a current report on Form 6-K with the SEC or, if appropriate, including the disclosure in an annual report on Form 20-F;
- B. distributing a press release through a widely disseminated news or wire service;
- C. any other non-exclusionary method of disclosure that is reasonably designed to provide broad public access, such as broadcasting through the Company website after public notice of the broadcast; or
- D. a combination of the above methods.

### **III. Financial Projections and Other Forward-Looking Statements**

At the Company's sole discretion, it may publicly disclose guidance on estimates or projections relating to the Company's future earnings, performance or operations. To the extent that the Company provides guidance relative to its financial goals, any such guidance, and changes to or affirmations of the guidance, will be done through methods designed to ensure broad disclosure. If and when provided, the guidance shall constitute forward-looking statements within the meaning of the Private Securities Litigation Reform Act of 1995 and shall be subject to its "safe harbor" provisions. As such, any guidance is subject to risks and uncertainties that could cause actual results to differ materially from those as described in guidance provided by the Company. Information regarding certain risks and uncertainties is available in the Company's filings with the SEC, including the annual report on Form 20-F and current reports on Form 6-K, and may be provided in a press release. Any guidance provided by the Company will be as of the date made, and the Company shall undertake no obligation to update the guidance. Any guidance shall contain a legend to the foregoing effect.

### **IV. Analyst Models and Reports**

It is the Company's policy to refrain from commenting on analyst reports or models, except that the Chief Executive Officer and the Chief Financial Officer may, if requested, review such materials for the purpose of ensuring accuracy of publicly disclosed factual information.

### **V. Presentations**

- A. The Company will use safe harbor guidelines for forward-looking information as part of individual, group and investor conference communications formats.
- B. The Company will participate in securities firm-sponsored and other investor conferences from time to time. Should the Company decide to disclose material, nonpublic information at any securities firm-sponsored or other investor conferences, it shall do so only to the extent it simultaneously publicly discloses the information in the presentation. The Company shall issue media releases in conjunction with its major presentations scheduled during the year and post those presentations on the Company website.
- C. The Company may participate in other forums at which Securities Market Participants could be present, including industry seminars, trade shows and annual shareholder meetings. The Company does not intend to disclose any material, nonpublic information during these meetings.

### **VI. Media Communications**

- A. Although the Company recognizes that Regulation FD does not apply to communications with the media, it is the Company's policy not to disclose material information to the media unless it has been previously disclosed in accordance with Regulation FD.
- B. Senior managers are encouraged to make appropriate announcements and to conduct interviews with media regarding non-material developments in their markets.