Investment Policy

Carbon Revolution Public Limited Company

Adopted by the Board on 6th November 2023

Investment Policy

A. Purpose

The purpose of this investment policy is to establish the primary objectives with respect to the treasury function of Carbon Revolution Public Limited Company (the "Company") and the primary guidelines and restrictions in connection with that function.

B. Administration

The Company's Chief Financial Officer, with a bank, investment manager or dealer approved by the Company's Board of Directors (the "Investment Manager"), shall construct and manage a diversified portfolio that meets the investment objectives specified below.

C. Investment Objectives

The primary objectives, in order of importance, are:

- Preservation of capital (the principal value should not be put at significant risk and the market value of investment instruments should be relatively stable);
- Liquidity (the duration of investments should be consistent with the Company's anticipated need for capital);
- Diversification; and
- Income (investments should earn the highest rate of return consistent with the foregoing objectives).

The Company's Chief Financial Officer shall review the Company's anticipated cash flow and working capital needs over the next six months. Funds reserved for anticipated working capital needs shall be invested in a deposit account with an institution approved by the Chief Financial Officer. Funds not required for working capital will be invested in a managed portfolio of fixed income securities within the guidelines set forth below.

D. Investment Guidelines

1. *Approved Instruments*

All funds to be invested shall be invested only in fixed income instruments denominated and payable in U.S. dollars. The following investments are considered appropriate:

- Obligations of the U.S. government and its agencies;

- Money market funds registered according to SEC Rule 2a-7 of the Investment Company Act of 1940 (investments in the fund shall be consistent with approved instruments hereunder and assets under management shall be at least $1 billion); and
- Money market instruments: repurchase agreements, commercial paper, negotiable certificates of deposit, bankers' acceptances and certificates of deposit.

All securities must have a readily ascertainable market value, must be readily marketable and be U.S. dollar denominated. Cash in non-U.S. subsidiaries should ordinarily be kept to a minimum and may be invested in U.S. dollars or local currency fixed income securities consistent with these guidelines.

2. *Prohibited Instruments*

The following investments are prohibited:

- Collateralized mortgage obligations;
- Collateralized debt obligations;
- Collateralized loan obligations;
- Structured investment vehicles; and
- Extendable commercial paper.

3. *Credit Quality*

Repurchase agreements shall be with primary dealers only and 102% collateralized with securities issued by the U.S. government or its agencies.

Securities of issuers with a short-term credit rating must be rated A-1, P-1 or better by Standard and Poor's Corporation ("S&P") or Moody's Investor Services ("Moody's"), respectively, at the time of purchase. Securities of issuers with a long-term credit rating must be rated at least A2 by Moody's or A by S&P at the time of purchase.

If a security held in the portfolio is downgraded by S&P or Moody's below the minimum rating specified above, appropriate action should be taken to transfer securities to an approved rated security unless otherwise approved by the Company's Board of Directors.

4. *Diversification*

Securities of a single issuer valued at cost at the time of purchase, should not exceed 3% of the market value of the portfolio or $1 million, whichever is greater.

For purposes of this diversification restriction, securities of a parent company and its subsidiaries will be combined except for captive finance companies. Such captives will be included with their parent company only if their primary purpose is to finance the parent's business.

Securities issued by the U.S. Treasury and U.S. Government Agencies are specifically exempted from these restrictions.

5. *Marketability/Liquidity*

In general the Investment Manager shall purchase liquid securities that regularly trade in a secondary market under normal conditions. The Investment Manager shall also structure the portfolio so that securities mature as needed to meet anticipated liquidity demands. The basic guideline is to maintain sufficient funds in the checking account to provide a targeted 45-day working capital supply, minimum 30-day supply.

6. *Maturity*

In no event shall the final maturity or put date of any security within the portfolio exceed twenty-four months.

7. *Performance Measurement*

The Chief Financial Officer shall report regularly to the Company's Board of Directors regarding all investments and their performance.

The Investment Manager shall meet with the Chief Financial Officer or a designee no less than annually and will be available for regular telephone contact.

8. *Investment Company Act*

The portfolio shall be managed so at no time shall the Company or any subsidiary be an "investment company" for purposes of the Investment Company Act of 1940, as amended.

9. *Amendments and Waivers*

Amendments to and waivers of this Investment Policy are prohibited without the prior approval of the Company's Board of Directors.