

# Policy for trading in Company securities

## Introduction

- 1 The Company recognises and enforces legal and ethical restrictions on trading in its securities by relevant persons within and external to the Company. The terms of this securities dealing policy apply to all trading by the Company's directors, senior executives, employees and consultants (**Relevant Persons**) in the Company's securities.

## Communication

- 2 This policy will be communicated to all Relevant Persons and will be placed on the Company website.

## Trading Restrictions

- 3 Trading by Relevant Persons in the Company's securities is subject to the following limitations:
  - 3.1 No trading in Company securities shall take place during the two (2) business days preceding release of each quarterly report, half-yearly financial report, and annual financial report of the Company or for a period of one (1) business day after the release of such report.
  - 3.2 No trading in the Company's securities shall take place directly or indirectly where it is known, or ought reasonably to have been known by the person intending to trade, that information exists that has not been released to the ASX and where that information is of a type that reasonably could be expected to encourage buying or selling were that information known by others, or for a period of one (1) business day after the release of such information.
  - 3.3 No trading shall take place in Company securities unless prior notice is given to the Chairperson and approval is obtained from the Chairperson.

## Hardship

- 4 During a period specified in paragraph 3.1, Relevant Persons may, after obtaining the Chairperson's prior written consent, trade the Company's securities to the extent reasonably necessary to avoid or ameliorate documented hardship and suffering or as required by other extenuating circumstances.
- 5 The Chairperson will determine, from time to time, the procedures for obtaining prior written consent in accordance with paragraph 4, having regard to the circumstances of the Company and its Relevant Persons.

## Directors' trading and disclosures

- 6 Within 3 business days of a director being appointed to the Board, resigning or being removed from the Board, or trading in the Company's securities, full details of the director's notifiable interests in the Company's securities and changes in such interest must be advised to the Company Secretary so that a record is kept within the Company and so that necessary ASX notifications will occur.
- 7 All directors must notify the Company Secretary of any margin loan or similar funding arrangement entered into in relation to the Company's securities and any variations to such arrangements, including the number of securities involved, the circumstances in which the lender can make margin calls, and the right of the lender to dispose of securities
- 8 The Company prohibits Relevant Persons from entering into transactions in associated products which limit the economic risk of participating in invested entitlements under any equity-based remuneration schemes.