



ABN 36 087 244 228

# Policy for Trading in Company Securities

Approved by the Board on 31 January 2008

## 1. Insider Trading

Directors, executives and employees who wish to trade in the Company's securities must have regard to the statutory provisions of the Corporations Act with respect to insider trading. Insider trading is an offence which carries severe penalties, including imprisonment.

Directors, executives and employees must not, whether in their own capacity or as an agent for another, subscribe for, purchase or sell, or enter into an agreement to subscribe for, purchase or sell, any securities (shares or options) in the Company, or procure another person to do so;

1. if that director, executive or employee possesses information that a reasonable person may expect to have a material effect on the price or value of the securities if the information was generally available; or
2. if the director, executive or employee knows or ought reasonably to know, that:
  - a. the information is not generally available; and
  - b. if it were generally available, it might have a material effect on the price or value of the securities in the Company.

Directors, executives and employees must treat all potentially price sensitive information as confidential and must not pass confidential information on to others if they know, or ought reasonably to know, that such other person is likely to deal in the securities of the Company in contravention of insider trading rules.

Any director, executive or employee who is in doubt with respect to the circumstances of a particular situation should consult either the Company Secretary, the CEO or the Chairperson.

## **2. Trading in securities of the Company generally**

Directors who trade in Company securities are bound by the disclosure provisions contained in the ASX Listing Rules.

Directors or senior executives who wish to purchase or sell shares in the Company are required to give a minimum of one clear day's advance notice of their intention, to either the CEO or the Chairman.

### **a. Trading embargoes**

Directors, executives and employees are prevented from trading the Companies securities from 1 June until close of business on the date on which the Company releases its annual results, and from 1 December until close of business on the date on which the Company releases its half year results, in each financial year.