



**POLICY AND PROCEDURES
MANUAL:**

Section 1
Corporate
Subject 2
Trading in Securities

Policy: The Company recognizes that directors, officers and employees may hold securities in the Companies and that most investors are encouraged by these holdings. It is the individual director, officer or employee's responsibility to ensure that any trading by the director, officer or employee complies with the Corporations Act 2001, the ASX Listing Rules and Company Policy.

Definition: Director, officer or employee includes a director, officer or employee of the Company, the director's, officer's or employee's immediate family (includes a person or persons under the control or influence of the director, officer or employee) and related entities controlled by the director, officer or employee or members of their immediate family.

Company Securities:

1. Directors are to advise the Chairman, or in his absence the Managing Director, at least one day prior to the sale of securities in the Company held by the director. Should the Chairman wish to sell securities he shall similarly notify the Managing Director at least one day prior to the sale.
2. Where a director wishes to buy securities in the Company the director is to advise the Chairman, or in his absence the Managing Director prior to placing the buy order. Similarly the Chairman is to advise the Managing Director in advance of the placing of a buy order.
3. A director, officer or employee shall not trade any securities in the Company five days or less prior to the release of a price sensitive report or ASX announcement by the Company or less than two days following the release of a price sensitive report or ASX announcement by the Company. For the purpose of this section an officer or employee includes only those officers and employees who are at the time aware of the price sensitive information concerning the Company.
4. A director, officer or employee shall not trade securities in the Company if the director, officer or employee is aware of any information that has not been released to the ASX and is likely to have a significant impact on the price of the Company's securities were the information to be released.
5. Price sensitive information includes the knowledge or expectation that the Company's final half year or full year financial results may be expected to be materially different to any preliminary guidance results announced to the ASX.
6. For the purposes of this Policy, trading in company securities excludes the exercise or conversion of unlisted options to ordinary shares.

Other Securities: A director, officer or employee shall not trade securities in any company where the director, officer or employee is aware of non-public information regarding investigations or negotiations being made by the Company or any of its related entities into that company.

Funding and Hedging Arrangements:

1. Directors, officers and employees are prohibited from entering into transactions or arrangements which limit the economic risk of participating in unvested entitlements.
2. Directors, officers and employees are prohibited from entering into funding arrangements relating to their interests in the Company's shares or options where the funding security would affect the equivalent of 3% or more of the Company's listed shares.