



## Energy Technologies Limited Securities Trading Policy

### Introduction and Definitions

This document sets out the current policy of Energy Technologies Limited (EGY) for trading in securities of EGY.

The policy summarises the law relating to insider trading, which applies to everyone connected with the company. Directors and executives must also adhere to additional requirements when trading in the company's shares or related financial instruments.

Definitions:

For the purposes of this policy:

- a) **Director** means an executive or non-executive director of EGY.
- b) **Executive** means
  - i. a member of the EGY corporate executive team; or
  - ii. a member of the global management team; or
  - iii. a person designated as such by the Managing Director of EGY or the Company Secretary
- c) **Associate** means a person acting in concert with a Director or Executive or a person over whom they have, or can be regarded as having, investment control or influence. This includes:
  - i. spouses or partners;
  - ii. family members;
  - iii. nominees, including investment managers;
  - iv. persons in partnership with them;
  - v. a company which they or their family controls
  - vi. a trust of which they, or any member of their family, or a family controlled company, are trustee or a beneficiary
- d) **Securities** means shares, other instruments considered to be securities under the Corporations Act, and any derivatives of shares or other instruments;
- e) **Trading** includes the subscribing for, selling, buying, or otherwise transferring the beneficial or legal interest in Securities of EGY.

If you are in any doubt about how this policy may affect you or whether it applies, seek clarification from the Managing Director or Company Secretary.

## Insider Trading

### Legal Issues

The Corporations Act 2001 specifically deals with prohibited conduct by persons in possession of inside information. The following is a **summary only** of those provisions.

*Inside information* is information that is not generally available and which a reasonable person would expect to have a material effect on the price or value of shares, if it were generally available,

If a person (“the insider”) possesses *inside information* and the insider knows, or ought reasonably to know, that it is *inside information*, then the insider must not, and must not procure another person to, subscribe for, buy or sell the shares, or agree to do so, and the insider must not communicate any information to another person who the insider knows or ought to know might do this.

In simple terms, the insider must not trade, and must not give information to someone who might.

### Policy

No one may buy, sell or otherwise trade in the Company’s shares if they possess material price sensitive information which is not in the public domain.

### Consequences of a Breach of the Insider Trading Rules

Breach of the insider trading prohibition could result in exposure to criminal and civil liability. Breach of the insider trading laws or this policy will also be regarded by EGY as serious misconduct which may lead to disciplinary action or dismissal.

### Additional restrictions on trading by Directors and Executives

In addition to the general trading restrictions set out in this policy, additional restrictions on trading in EGY Securities apply to Directors, Executives and their Associates.

#### *Blackout Periods*

Directors and Executives of EGY may not trade in EGY Securities during the Blackout Periods, which are the periods in each year:

- between July 1 and one trading day following the announcement of the full year results; and
- between January 1 and one trading day following the announcement of the half year results.

Trading within Blackout Periods may be permitted only with prior written approval of the Chairman where there are exceptional circumstances, such as severe financial hardship, and the Director or Executive is not prohibited from trading by the insider trading rules. Trading approved in this manner must occur within 7 days of approval.

### *Clearance on trading outside Blackout Periods*

In any of the circumstances where trading is permitted under this policy, a Director or an Executive must notify the Company Secretary of an intention to deal in the Company's securities either by themselves or by their Associates and confirm that they do not hold insider information. The trading must occur within seven days after the Company Secretary acknowledges receipt of the notice.

Details of the trade must be promptly notified to the Company Secretary afterwards.

### **Other legal requirements**

Directors must also comply with the EGY Constitution and Board Charter, as well as all requirements of the Corporations Act 2001 (Cth) and the Listing Rules of the Australian Securities Exchange.

Trading not prohibited by this policy

This policy does not apply where a person:

1. acquires EGY securities by conversion of existing securities;
2. acquires securities under a bonus issue or dividend reinvestment, rights issue or top-up plan that is available to all security holders of the same class;
3. acquires or agrees to acquire securities under a company's sponsored share or option plan; or
4. acquires or agrees to acquire securities pursuant to a prospectus until the last day for acceptance of securities issued pursuant to that prospectus.