

# NSX Trading Policy

*and Procedures for Dealing in Securities (“Dealing Rules”)*

NSX Limited

(ABN 33 089 447 058)

National Stock Exchange of Australia Limited

(ABN 11 000 902 063)

Issued: 2021





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# 1. Introduction

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## 1.1. Background

NSX Limited (“**NSXL**”) is committed to conducting its business in a way that is open and accountable to shareholders, its stakeholders, customers and the wider marketplace. NSXL believes that its corporate governance practices as a public company should be of a high and rigorous standard.

NSXL is the parent company of the National Stock Exchange of Australia Ltd (“**NSXA**”). NSXA holds an Australian Market Licence enabling NSXA to operate a Stock Exchange within Australia.

As a market licensee, NSXA has the statutory obligation to operate a market that is fair, orderly and transparent (“**FOT obligations**”)<sup>1</sup>. Responsibility for NSXA meeting its statutory obligations as a market licensee rests with the board of NSXA and supported by the Board of NSXL.

This requirement is enshrined in the constitutions of NSX Limited and National Stock Exchange of Australia Limited.

If you are in doubt about the standards that are set by the Policy or your obligations under the Policy, you should speak to your manager.

## 1.2. Governance Standards and Requirements

The policy is reflective of the following governance standards:

- (a) The Constitution of NSX Limited;
- (b) The Constitution of National Stock Exchange Limited;
- (c) The Corporations Act;
- (d) ASIC Regulatory Guides as varied from time to time;
- (e) While NSXL is the holding company of NSXA, reflect the requirements and conditions of the National Stock Exchange of Australia Australian Market Licence and published variations;
- (f) While NSXL is listed on ASX, the ASX Corporate Governance Council Principles and Recommendations (the fourth edition), the ASX Listing Rules and Guidance Notes particularly ASX Guidance Note 27 and ASX Listing Rules 12.9 – 12.12; and
- (g) The Policies and procedures as approved by the Board from time to time.

# 2. Purpose

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## 2.1. What is the purpose of this policy and procedures?

The purpose of this policy and procedures is to ensure that NSXL, its subsidiaries and its employees conduct its business in relation to dealing in securities listed on the National Stock Exchange of Australia (“**NSXA**”) and securities issued by NSX Limited (“**NSXL**”) in accordance with:

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<sup>1</sup> Subsection 792A of the Corporations Act (2001) Cth



- (a) The Corporations Act 2001 (the Act);
- (b) Conditions of the NSXA Australian Markets Licence.

Employees and directors may have in their possession sensitive commercial information which could materially affect the value of financial products traded on NSXA markets or on other markets (where such products are related to products traded on NSXA markets), including NSXA securities.

The suggestion of insider trading by an employee or director would do great harm to the employee/director and also to NSXL irrespective of whether insider trading actually occurs or is proven. The Corporations Act 2001 (Cth) prohibits insider trading in relation to financial products. The provisions are wide ranging and breaches are serious offences.

This document:

- (a) provides an outline of the insider trading and other relevant provisions of the Corporations Act;
- (b) sets out the rules relating to dealings by employees and directors in securities issued by NSXL;
- (c) sets out the rules relating to dealings by employees and directors in financial products issued over NSXL securities by third parties such as warrants, options and futures; and
- (d) sets out the rules relating to dealings by employees and directors in financial products traded on NSXA markets unrelated to NSXL securities and financial products traded on other markets which are related to financial products traded on NSXA markets.

The Dealing Rules are designed to assist in preventing breaches of the insider trading provisions of the Corporations Act. Ultimately, it is the responsibility of the employee or director to ensure that none of his or her dealings could constitute insider trading.

## 2.2. Who does this apply to?

- (a) Directors;
- (b) Key Management personnel;
- (c) Employees (whether full time, part time, or short term);
- (d) Listing and Admissions Committee Members; and
- (e) Compliance Committee Members; or
- (f) Others as may be declared by the Board or Disclosure Officers from time to time.

The policy and procedures may also apply to others, from time to time, such as contractors or consultants that provide services to NSX and where they could be expected to come into contact with sensitive information.

In addition, connected or associated Persons such as

- (a) Immediate family members; and
- (b) Companies, trusts and entities which are controlled by the above persons or your immediate family members.

Where those restrictions prohibited certain conduct then those restrictions also apply to the Connected or associated Persons and others as defined from time to time.



### 2.3. What are your responsibilities?

This policy and procedures are intended for all staff, officers, employees and directors of NSXL and are relevant to both permanent and temporary members of staff including consultant's, advisers and contractors.

Nothing in this policy or procedures permits you to do anything or omit to do anything that is not in accordance with Australian law, regulation or policy.

### 2.4. Failure to comply

Compliance with the rules set out in this document is mandatory. Infringement of the insider trading provisions can attract a substantial monetary penalty, imprisonment or both as per the Corporations Act 2001 (Cth). Failure to comply with the Dealing Rules could have a damaging impact on perception of NSX within the investment community and undermine the credibility of NSXA as a market supervisor.

Any employee or director who has been found not to have complied with the Dealing Rules set out in this document will be considered to have engaged in serious misconduct which may result in the termination of their engagement by NSX or other disciplinary action.

## 3. Insider trading prohibition

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### 3.1. The nature of the prohibition

Section 1043A (of Part 7.10, Division 3) of the Corporations Act makes it an offence for a person in possession of information that is not generally available but which, if generally available, might materially impact the price or value of a financial product to:

- (a) trade in (i.e. apply for, acquire or dispose of, or enter into an agreement to do any of these things); or
- (b) procure, advise or encourage another person to trade in,

financial products (collectively referred to as "deal in financial products").

It is also an offence to "tip" or communicate the information to another person with the knowledge that the person could deal in financial products. Accordingly, the effect of this section cannot be avoided by simply getting another person to deal on your behalf. A breach of this section of the Corporations Act is punishable by substantial fines, imprisonment or both. This law applies to all listed and unlisted securities.

### 3.2. How you become aware of the information is irrelevant

It is irrelevant how or in what capacity the person came into possession of the information. This means that s 1043A will apply to any employee or director who acquires "inside information" in relation to a financial product, no matter in which capacity and is prohibited from dealing in that financial product.

### 3.3. Information which might affect price value

The prohibition also refers to unpublished information which, if generally available, might materially impact the price or value of financial products.



### 3.4. What does information include?

“Information” includes matters of supposition or speculation and matters relating to the intentions or likely intentions of a person.

### 3.5. What information might materially affect price or value?

This means information that a reasonable person would expect to have a material effect on the price or value of financial products. A reasonable person would be taken to expect information to have a material effect on price or value if the information would be likely to influence persons who commonly invest in financial products whether or not to do so.

Examples of this type of information which might affect the price or value of NSXL securities and securities of listed entities on NSXA Markets include:

- (a) proposed changes in the capital structure, capital returns and buy backs of financial products;
- (b) information relating to NSXL’s financial results;
- (c) a material acquisition, divestment or realisation of assets;
- (d) proposed dividends and securities issues;
- (e) changes to the Board;
- (f) possible events which could have a material impact on profits (negatively or positively) e.g, loss of a major customer;
- (g) proposed changes in the nature of the business of NSXL;
- (h) notification to NSXL of a substantial shareholding; and
- (i) any information required to be announced to the NSX and ASX markets pursuant to the respective Listing Rules.

### 3.6. What does “Unpublished” Mean?

Unpublished for this purpose means that the information is not generally available. Information is generally available if it consists of readily observable matter, or it has been disseminated in a manner likely to bring it to the attention of investors and a reasonable period has elapsed.

### 3.7. What exclusions are there to trading?

There may be exclusions where you do not need to apply for approval to deal in the securities. Some examples are:

- (a) Participating in a performance rights plan;
- (b) Participating in a rights issue;
- (c) Participating in a dividend reinvestment plan;
- (d) Accepting a takeover offer;
- (e) With shareholder approval;
- (f) Participating in some other corporate action as announced by the Company.

If in doubt, then you are required to consult a **Notification Officer** before proceeding.



## 3.8. Performance Rights

### Issue of Performance Rights

The Employee is not required to seek approval when Performance Rights are issued by the Company to the Employee. The process of issuing Performance Rights is governed by the Performance Rights Policy and the Performance Rights Plan. The Company will make the required disclosures to the market.

### Conversion of Performance Rights

The Employee is not required to seek approval on conversion of the Performance Rights. The process of converting Performance Rights is governed by the Performance Rights Policy and the Performance Rights Plan. The Company will make the required disclosures to the market and instruct the Share Registry service to issue the converted Performance Rights into securities.

Once converted, the Employee is governed by this Trading Policy and Dealing Rules as to when the Employee may buy or sell securities.

## 4. Relevant Corporations Act provisions

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Directors, officers<sup>2</sup> and employees of NSX are subject to the duties set out in sections 182, 183 and 184 of the Corporations Act. Officers of NSX are subject to additional duties outlined in sections 180 and 181 of the Corporations Act.

### 4.1. No improper use of inside information (s183 and s184)

An officer or employee, or former officer or employee must not make improper use of information acquired by virtue of his or her position as such an officer or employee to gain, directly or indirectly, an advantage for himself or herself or for any other person, or to cause detriment to NSX.

### 4.2. No gain by improper use of position (s182 and s184)

An officer or employee must not make improper use of his or her position as such an officer or employee, to gain, directly or indirectly, an advantage for himself or herself or for any other person, or to cause detriment to NSX.

### 4.3. Care and diligence (s180)

An officer must exercise their powers and discharge their duties with the degree of care and diligence a reasonable person would exercise in the same circumstances.

### 4.4. Good faith (s181 and s184)

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<sup>2</sup> Includes a director, secretary, executive officer or Key Management Personnel (KMP) of NSXL. An executive officer is a person concerned in, or taking part in, the management of NSX. KMP has the same definition as given in AASB 124 *Related Party Disclosure*.



An officer must exercise their powers and discharge their duties in good faith in the best interests of NSX and for a proper purpose. An officer commits an offence if they are reckless or are intentionally dishonest and fail to exercise their powers and discharge their duties in good faith in the best interests of NSX and for a proper purpose.

## 5. Dealing in securities issued by NSX Limited

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### 5.1. No dealing permitted

Subject to Dealing Rules 5.2 to 5.8 below, employees and directors are permitted to deal in NSXL securities throughout the year except during the following blackout periods:

- (a) During a Black Out period (**See Section 11: Glossary**);
- (b) if he or she has information that he or she knows, or ought reasonably to know, is inside;
- (c) information in relation to Company Securities;
- (d) if he or she has not complied with paragraph 5.2 below

Each Black Out period is referred to as the Non-Trading Period. The period where dealing is permitted is called the Trading Period.

### 5.2. Requirement to Notify Before Dealing

An employee must not deal in NSXL securities without **first**:

- (a) completing and forwarding a Notification Form to Deal in NSXL Securities or Securities of NSXA Listed Entities [**Attachment A**] with [**Part A**] duly completed to the Notification Officer [refer to **Attachment B**]; and
- (b) confirming with the Notification Officer that he or she is prepared to complete [**Part B**] of the Notification Form to Deal in NSXL Securities or Securities of NSXA Listed entities.

A director must not deal in NSXL securities without **first** consulting and confirming with the Notification Officer [refer to **Attachment B**].

### 5.3. Prohibition on dealing while in possession of relevant information

Dealing in NSXL Securities is subject to the prohibition that an employee or director must not deal in NSXL Securities:

- (a) at any time when he or she is in possession of unpublished, information which, if generally available, might materially affect the price or value of those NSX Securities; and
- (b) on the day the public announcement is made in relation to that matter.

### 5.4. Prohibition on active dealing

Dealing during a Trading Period is subject to the prohibition that an employee and director must not actively deal in NSXL Securities with a view to deriving profit related income from that activity. "Actively Deal" for this purpose means to deal in NSXL Securities in a manner which involves frequent and regular trading activity.

### 5.5. The effect of notification





Notification of any dealing in NSXL Securities to the Notification Officer and the completion of **Part B** of the “Notification Form to Deal in NSXL Securities or Securities of NSXA Listed Entities” does **not** constitute approval by or on behalf of NSXL of the relevant dealing.

However, it is the responsibility of the Notification Officer on receiving a “Notification Form to Deal in NSXL Securities or Securities of NSXA Listed Entities”, to consider the circumstances of the employee concerned and either to:

- (a) complete Part B of the “Notification Form to Deal in NSXL Securities or Securities of NSXA Listed entities”; or
- (b) direct the employee that the relevant dealing ought not be undertaken.

An employee must comply with the direction given by the Notification Officer.

## 5.6. Special approval to deal during the Non Trading Period

If there are exceptional circumstances, for example a pressing financial commitment, then approval may be given by the Notification Officer:

Any such approval must be obtained in advance. It cannot be given after the event. A dealing for which such special approval is given remains subject to Rules 6.2, 6.3, 6.4 and 6.5 above.

The discretion will be applied, taking into account the hardship of the employee or director and weighing this against any perceived detriment to NSXL’s reputation.

## 5.7. Confirmation of dealing that has occurred

NSX may require an employee to provide confirmation of dealing in NSXL financial products by an employee or his/her associate(s). Complete **[Attachment D]** for this purpose.

## 5.8. Notice of change to Trading Period or Non Trading Period

The Non Trading Period, as outlined in Rule 5.1, may be extended or shortened or another Non Trading Period may be introduced at any time by direction of the Board.

Notice of such changes will be specified to employees by email and to directors by email. Changes to the Non Trading Period or Trading Period are effective immediately upon the giving of such notice. Where an employee does not have email access it is the manager’s responsibility to inform the employee.

## 5.9. Director requirement to report interests

In accordance with the Procedures and Register Director Interests and the Constitution, directors are required to provide details of all changes to their interest in NSXL Securities registered in the name of the director or held on behalf of the director, directly or indirectly where a director holds a relevant interest. The details must be provided as soon as reasonably possible after the date of the change or no later than the timeframe required by the Corporations Act. Complete **[Attachment D]** for this purpose.

## 5.10. Prohibition on Margin Loans by Directors

There is a prohibition set by the Board that Directors will not enter into margin loans if trading in NSX Limited shares of shares of companies that are listed on the NSXA market. A Director should discuss the circumstances with the Chair should they contemplate a margin loan which could potentially breach this prohibition.

## 5.11. Duration of an approval



An approval only lasts for a maximum of two weeks after the approval is given or until the transition is completed whichever is the shorter. Any part transaction not completed after the approval period expires must be withdrawn from market immediately or a new approval granted before the expiry of the previous approval.

## 6. Prohibition in dealing in financial products issued over NSX securities by third parties

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Employees and directors are **not** permitted to deal at any time in financial products such as options, warrants, futures or other financial products issued over NSXL Securities by third parties such as banks and other institutions traded on either NSXA markets or any other market. An exception may apply where NSXL Securities form a component of a listed portfolio or index product.

## 7. Dealing in listed financial products on NSXA's Market

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### 7.1. Access to unpublished information by employees and directors

During the performance of an employee's or director's duties, the employee or director may become aware of, or come into contact with, information regarding the activities or potential activities of entities listed on NSXA markets that is not publicly available.

Should an employee or director receive or possess such information they are not to make use of that information or enable any other person or party to make use of that information for the purpose of conducting dealings in the listed entity's financial products traded on NSXA markets or any other market.

### 7.2. Policies on dealing in NSXA Listed entity's Financial Products

Prior to commencing employment employees and directors must complete an "Acknowledgement of Confidentiality" in which the employee or director acknowledges that he or she will not:

- (a) disclose information in relation to listed entities which is not publicly available; or
- (b) exploit or otherwise use any information which is not publicly available in any dealings an employee or director may make in financial products of listed entities, except in the course of duties or as required by law.

### 7.3. Requirement to notify before dealing

An employee must not deal in NSXA Listed Entity Securities without **first**:

- (a) completing and forwarding a Notification Form to Deal in NSXL Securities or Securities of NSXA Listed Entities [**Attachment A**] with Part A duly completed to the Notification Officer [refer to **Attachment B**]; and
- (b) confirming with the Notification Officer that he or she is prepared to complete Part B of the Notification Form to Deal in NSXL Securities or Securities of NSXA Listed Entities.



A Director must not deal in Securities of NSXA Listed Entities without **first** consulting and confirming with the Notification Officer [refer to **Attachment B**].

#### 7.4. Prohibition in dealing while in possession of Relevant Information

Dealing in Securities of NSXA Listed Entities is subject to the prohibition that an employee or director must not deal in Securities of NSXA Listed Entities:

- (a) at any time when he or she is in possession of unpublished, information which, if generally available, might materially affect the price or value of those Securities; and
- (b) on the day the public announcement is made in relation to that matter.

#### 7.5. Prohibition on Active Dealing

Dealing is subject to the prohibition that an employee and director must not actively deal in Securities of NSXA Listed Entities with a view to deriving profit related income from that activity. “Actively Deal” for this purpose means to deal in Securities in a manner which involves frequent and regular trading activity.

#### 7.6. The effect of notification

Notification of any dealing in Securities of NSXA Listed Entities to the Notification Officer and the completion of Part B of the “Notification Form to Deal in NSXL Securities or Securities of NSXA Listed entities” does **not** constitute approval by or on behalf of NSXA of the relevant dealing.

However, it is the responsibility of the Notification Officer on receiving a “Notification Form to Deal in NSXL Securities or Securities of NSX Listed Entities”, to consider the circumstances of the employee concerned and either to:

- (a) complete Part B of the “Notification Form to Deal in NSXL Securities or Securities of NSXA Listed Entities”; or
- (b) direct the employee that the relevant dealing ought not be undertaken.

An employee must comply with the direction given by the Notification Officer.

#### 7.7. Confirmation of dealing that has occurred

NSXL requires an employee or director to provide confirmation of dealing in NSXL or NSXA Listed Financial Products by an employee or his/her associate(s). Complete [**Attachment D**] for this purpose.

#### 7.8. Director requirement to report interests

In accordance with the Procedures and Register of NSXA and NSXL Director Interests, directors are required to provide details of all changes to their interest in NSXL Securities or Securities of NSXA Listed Entities registered in the name of the director or held on behalf of the director, directly or indirectly.

The details must be provided as soon as reasonably possible after the date of the change or no later than at the next NSX Board Meeting. Complete [**Attachment D**] for this purpose.



## 8. Waiving rules

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### 8.1. Employees

If there are exceptional circumstances, the Chair and CEO/Managing Director in their discretion may waive parts of the Dealing Rules, to allow for employees to deal.

### 8.2. Directors

If there are exceptional circumstance, the Chair in consultation with the CEO/Managing Director or if absent the Company Secretary or Head of Compliance, in their discretion may waive parts of the Dealing Rules, to allow directors to deal.

### 8.3. Hardship

This discretion will be applied taking into account the hardship of the employee or director and weighing this against any perceived detriment to NSXL's reputation and compliance with the ASX Listing Rules.

## 9. Related parties and relevant interests

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The restrictions on dealings by an employee or director are equally applicable to any dealings:

- (a) An entity that controls NSXL;
- (b) Directors of NSXL or an entity that controls NSXL;
- (c) by their spouses or de facto spouses of anyone referred to in (a) and (b)
- (d) parents and children of anyone referred to in (a), (b) or (c) above;
- (e) an entity controlled by anyone referred to in (a) – (e) above;
- (f) anyone acting in concert with someone referred to in (a) – (f) above
- (g) any other dealings in which, for the purposes of the Corporations Act, he or she is or is to be treated as interested<sup>3</sup>. For example, if an employee or director is a trustee of a trust and is also a beneficiary of the trust, the employee or director must not purchase NSXL Securities on behalf of the trust.

It is the duty of the employee and director to seek to avoid any such dealing at a time when he or she is himself or herself prohibited from dealing.

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<sup>3</sup> Section 608 of the Corporations Act sets out the rules relating to relevant interests. The basic rule is a person has a relevant interest in securities if they are holding, or controlling the voting or disposal, of such securities, including through trusts, company structures and under agreements, with a number of carve outs for nominee holdings and the like. Section 609 of the Corporations Act sets out the situations not giving rise to relevant interests.



## 10. Employment and monitoring compliance

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To promote understanding of the insider trading prohibition, related Corporations Act provisions and NSX policy, a copy of this document will be distributed to all employees and directors (present and future) and will also be available on the NSX intranet site. The induction procedures for new employees and directors must require that a copy of this document be provided to each new employee and director.

All new employees will be required to provide a completed “Form of Acknowledgment” [**Attachment C**]. All new directors will be required to provide this form to the Company Secretary.

All previous versions of this document provided to employees and directors (present and past) have been replaced by this document. All references to previous versions of the rules in NSXL documents including but not limited to, letters of offer, staff codes of conduct and material on the intranet site, are replaced by references to this document.



## 11. Glossary

Term	Definition
<b>ASIC</b>	Australian Securities & Investments Commission (ABN 86 768 265 615)
<b>NSXL</b>	NSX Limited (ABN 33 089 447 058)
<b>NSXA</b>	National Stock Exchange of Australia Limited (ABN 11 000 902 063)
<b>Corporations Act</b>	the Corporations Act 2001 (Cth)
<b>Chair</b>	Chair of the NSXL Board
<b>De facto spouse</b>	A person who (although not legally married to the first person) is living with the first person on a genuine domestic basis
<b>Deal or Dealing</b>	Includes any transaction associated with buying, acquiring, selling, transferring, disposing or converting or agreeing to do, or procuring, inciting or inducing another person or entity to do any of the aforementioned.
<b>Director</b>	Means a director of any company in the NSX Group
<b>Derivatives</b>	Has the meaning given in Section 761D of the Corporations Act and includes futures, exchange-trade options, contracts for difference and warrants.
<b>Disclosure Officers</b>	Has the same meaning that described in the NSXL Continuous Disclosure Policy.
<b>Employee</b>	Means full-time, part-time, temporary, casuals, consultants, executives, contractors of NSX and its wholly owned subsidiaries. Includes Key Management Personnel as given in AASB 127 <i>Related Party Disclosures</i> .



Term	Definition
<b>Financial product</b>	Includes: <ul style="list-style-type: none"><li>(a) debentures, stocks or bonds issued or proposed to be issued by a government;</li><li>(b) shares;</li><li>(c) interests in a managed investment scheme;</li><li>(d) units;</li><li>(e) warrants;</li><li>(f) options;</li><li>(g) futures; and</li><li>(h) any other products that are able to be traded on a financial market.</li></ul>
<b>Notification Officer</b>	Means the persons set out in Attachment B.
<b>Participant</b>	Means: <ul style="list-style-type: none"><li>(a) a company that is recognised as and remains recognised as a Participating Organisation by the NSXA; or</li><li>(b) who has not ceased to be a participant; or</li><li>(c) is a participant on any other financial market or holds an Australian Financial Services Licence and is licenced to transact in the financial product.</li></ul>
<b>Black out or Non-trading period (or Closed Period)</b>	Means: The commencement of up to a 5 week period preceding the due date for: <ul style="list-style-type: none"><li>(a) the audited annual results (ASX Appendix 4E and Financial Statements);</li><li>(b) the half yearly results.</li></ul> and ending at the end of the day of the announcement; or <ul style="list-style-type: none"><li>(c) such other periods as the Company may notify from time to time, for example, where the Company was considering a major transaction (such as a business acquisition) that could have a material effect on the security's price.</li></ul>
<b>Securities</b>	Means: For NSXL purposes, the issued fully paid ordinary shares of the Company, plus any partly paid shares, issued options, Performance Rights and other instruments that may be convertible into shares of the Company that may be on issue. For NSXA purposes, any securities of Issuers that have been admitted to the Official List of the NSXA market.



# 12.Attachment A

Notification form to deal in NSX securities or securities of NSXA Listed entities <sup>4</sup>

## PART A – For completion by Employee

<b>Date of this notification:</b>	__/__/____
<b>Name of Employee / Director (Department &amp; Job Title)</b>	
<b>Description of Transaction</b> (a) Market Trading Code (b) Name of Security (c) Number of Securities (d) Price or consideration per Security (e) Transaction Type as either Sale, Purchase , Subscription or Agreement	
<b>Proposed Date of Transaction</b>	__/__/____
<b>Transacting Participant</b>	

### I confirm that:

- (a) It is not a black out or non- trading period;
- (b) I am not in possession of any unpublished information which, if generally available, might materially affect the price or value of NSXL securities or securities of NSXA Listed entities (“inside information”);
- (c) I will not deal in securities until I am notified that clearance is approved;
- (d) I may be refused permission to deal without explanation; and
- (e) the transaction in NSXL securities or securities in NSXA Listed entities above described does not contravene these Dealing Rules.

Signature: .....Dated: .....

*(continued next page)*

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<sup>4</sup> Signing of form is valid for 2 weeks unless otherwise specified





## PART B – For Completion by Notification Officer

I confirm that I am not aware of any circumstances pursuant to which the employee named above is or is likely to be in possession of unpublished information which, if generally available, might materially affect the price or value of NSXL securities or the Securities of NSXA Listed entities.

Name: .....

Title: .....

Signature: .....Dated: .....

**The completed form is to be sent to the Head of Compliance & Company Secretary for inclusion into the Securities Transactions Register.**



## 13. Attachment B – Notification Officers

<b>Division</b>	<b>Notification Officer (in their absence their authorised delegate)</b>
<b>All Committees (excluding Audit and Risk Committee)</b>	Head of Compliance & Company Secretary
<b>Chair of Board</b>	Chair of the Audit and Risk Committee & Company Secretary
<b>Chief Executive Officer / Managing Director</b>	Chair of Board & Company Secretary
<b>Chief Operating Officer</b>	CEO/Managing Director & Company Secretary
<b>Company Secretary</b>	Chair of Board & CEO/Managing Director
<b>Directors</b>	Chair of Board and CEO/Managing Director
<b>Head of Compliance</b>	CEO/Managing Director & Company Secretary
<b>Employees</b>	Head of Compliance & Company Secretary



## 14. Attachment C: Acknowledgement

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### Acknowledgement by employee or director

- (a) I have read and understood the contents of this document known as the Dealing Rules.
- (b) I agree to be bound by and to comply with the Dealing Rules as amended or replaced from time to time.
- (c) I acknowledge and agree that the Dealing Rules constitute a part of the terms of my employment agreement.

**Name:** .....

**Department:** .....

**Title:** .....

**Signature:** .....**Dated:** .....

The completed form is to be sent to the Head of Compliance & Company Secretary for inclusion into the Securities Transactions Register.



## 15. Attachment D: Confirmation of Transaction

Notification form confirming transaction has taken place in either NSXL securities or securities of NSXA listed entities

<b>Date of this notification:</b>	__/__/__
<b>Name of Employee / Director (Department &amp; Job Title)</b>	
<b>Description of Transaction</b> (a) Market Trading Code (b) Name of Security (c) Number of Securities (d) Price or consideration per Security (e) Transaction Type as either Sale, Purchase , Subscription or Agreement (at transaction completion date)	
<b>Date transaction was completed</b>	__/__/__
<b>Transacting Participant</b>	

(Please attach the relevant contract note from the transacting participant)

Signature: .....Dated: .....

**The completed form is to be sent to the Head of Compliance & Company Secretary for inclusion into the Securities Transactions Register.**