



## Centrepont Alliance Limited

ABN: 72 052 507 507

# EMPLOYEE SHARE TRADING POLICY

## 1. BACKGROUND

Although employees are encouraged to become shareholders of Centrepont Alliance Limited ('CAF'), it is a criminal offence for a person in possession of *inside information* to trade, or assist another person to trade, in the Company's shares. This is referred to as *Insider Trading*.

## 2. AIM

Accordingly, this document sets out the Company's policy in relation to the trading of securities in CAF by its employees and directors and their close associates.

## 3. POLICY

### 3.1 All Employees

The Company has established a policy that imposes certain restrictions on directors, senior management and other employees trading in the Company's securities. In general Company policy prohibits directors and employees from dealing in Company securities (other than exercising options already held) during the following periods:

- Two weeks before and 48 hours after the release of the Company's annual and half yearly trading results to the ASX in the form of the Appendix 4E, Appendix 4D or any preceding profit announcements; and;
- Two weeks before lodgement and during the period that a disclosure document pertaining to the issue of securities (including a prospectus but excluding reinvestment of dividends) is open for applications

except to the extent a director or employee is applying for securities pursuant to that disclosure statement.

At no time may any director or employee deal in securities in the Company when they are in possession of inside information.

In addition, when in possession of inside information, it is not permissible to:

- communicate the information to any other person; or
- encourage or induce any other person to deal in those securities.

Furthermore, employees and their associates must not deal in the securities of any other company, which they are aware is the subject of an unannounced commercial transaction with CAF or its subsidiaries.

### **3.2 Directors**

In addition, the Directors of the Company must comply with the requirements of the Company's Constitution and the notification requirements of the Corporations Act 2001 and the Listing Rules of the Australian Stock Exchange.

*Prepared: 1 July 2002*

*Revised: 20 April 2005*

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