

## EAST 72 HOLDINGS LIMITED: SECURITIES TRADING POLICY

### 1. Preamble

East 72 Holdings Limited (“E72” or “the Company”) encourages Directors and future employees to be meaningful security holders in E72 by means of making a personal financial commitment to acquiring shares in the Company.

As a consequence of this philosophy, Directors and employees of E72 are able to build such shareholdings by means of:

- a: the conversion of remuneration into shares of E72, subject to shareholder approval where relevant; and/or
- b: acquisition of shares via participation in new issues of securities by E72, subject to shareholder approval where relevant; and/or
- c: issuance of options (subject to shareholder approval and vesting provisions) convertible into shares of E72; and/or
- d: acquisition of E72 securities in a secondary market such as that operated by NSX Limited.

Since new issues of securities by the Company will require relevant notification that E72 is in compliance with continuous disclosure legislation embedded within the Corporations Act and NSX Listing Rules, this Securities Trading Policy seeks to ensure that Directors and employees of the Company are similarly compliant when acquiring E72 shares in a secondary market.

### 2. Secondary market trading – requirement to be in compliance with Corporations Act

The Corporations Act states that it is an offence for a person who possesses information that is not generally available and knows or ought reasonably to know that it is not generally available and that if it were it would have a material impact on the price or value of a security (including an option) issued by the Company, to:

- A. trade in (i.e. apply for, acquire or dispose of, or enter into an agreement to do any of these things) securities issued by the Company;
- B. procure another person (e.g. a family member, friend, or family company, superannuation fund or trust) to trade in securities issued by the Company; or
- C. communicate the information to another person if you know or ought reasonably to know that the person may use the information to trade in or procure another person to trade in securities issued by the Company.

It is the responsibility of each Director, employee or contractors (hereafter “**Representatives**”) of the Company to ensure that they do not breach the insider trading prohibition. Breaches of the insider trading prohibition are considered serious and will result in disciplinary action being taken by the Company.

### 3. Precluded Periods

Representatives are permitted to trade in the Company’s securities throughout the year except during the following periods:

- A. the period from 30 June each year and the announcement of the full year’s results to NSX or until definitive guidance, such as an NTA per share announcement, on such results is publicly released;

- B. the period from 31 December each year and the announcement of the half yearly results to NSX or until definitive guidance on such results, such as an NTA per share announcement, is publicly released;
- C. The period between the end of the calendar month and the release of the Company's month unaudited NTA/share statement is released to NSX;
- D. The remainder of the trading day upon which an announcement deemed as material by the Board of Directors is released; this will generally include announcements of interim and final results but not generally NTA/share disclosures; or
- E. they are aware of information at any time which would have a material impact on the price of E72 securities which is not generally known to the market; or
- F. The Chairman of the Company, at his or her sole discretion, precludes trading in the Company's securities.

#### **4. Consent**

Representatives other than the Chairman must obtain written, email or Board Meeting consent from the Chairman prior to trading in the Company's securities.

The Chairman must obtain written or email consent from the Company Secretary, who will obtain agreement from other Directors, prior to trading in the Company's securities.

#### **5. Changes in Directors' Shareholdings**

Directors must advise the Company Secretary of changes to their shareholdings in the Company and any of its related bodies corporate within two business days of the change.

#### **6. Waivers**

In exceptional circumstances, where the Chairman agrees, at their discretion, the Chairman may waive a part of this Securities Trading Policy to allow Representatives to trade in the securities of the Company where to do so would not be unlawful or illegal.