

## Securities Trading Policy

Adopted by the Kangaroo Island Plantation Timbers Ltd (KPT or “the Company”) Board on 25 June 2013 and reviewed annually, last reviewed in September 2020.

The purpose of this Policy is to:

- assist those persons covered by the Policy to comply with their obligations under the insider trading provisions of the *Corporations Act 2001* (Cth) (**Corporations Act**);
- aim to ensure that the reputation of the Company is not adversely impacted by perceptions of trading in the Company’s securities at certain times, and to ensure a proper market for the Company’s securities is maintained which supports shareholder and investor confidence; and
- establish a procedure for trading in the Company’s securities by persons covered by the Policy including setting out: the periods when trading is prohibited; the restrictions on trading; the exceptional circumstances when trading may be permitted during a prohibited period with prior written clearance; the procedure to obtain written clearance to trade during a prohibited period; and the trading that is excluded from the Policy.

The Company’s securities trading policy regulates dealings by directors, officers and employees in securities issued by the Company. In certain circumstances this policy also applies to contractors and consultants.

This Policy is for the protection of the Company and each of the persons covered by the Policy. This policy imposes basic trading restrictions on all employees of the Company and its related companies who possess inside information and additional trading restrictions on:

- all directors;
- all executive officers;
- any other employees and consultants of the Company considered appropriate by the Chief Executive Officer and Company Secretary from time to time;

Collectively referred as “designated persons”.

If any Designated persons do not understand any part of this Policy, or the summary of the law relating to insider trading, or how it applies they should contact the Company Secretary before trading in any securities covered by this Policy. It is the responsibility of Designated persons to ensure that trading does not constitute insider trading.

### **General Restrictions When in Possession of Inside Information**

#### **Insider Trading Laws**

Insider trading laws cover all directors, senior management and employees of the Company. If a person is in possession of any unpublished price-sensitive information, it is a criminal offence to take advantage for personal gain or that of an associate.

Price-sensitive information is any information which if it were generally available, a reasonable person would expect it to have a material effect on the price or value of the Company’s securities, or would be likely to influence a person in deciding whether to buy or sell the Company’s securities.

#### **Confidential Information**

Designated persons also have a duty of confidentiality to the Company. A person must not reveal any confidential information concerning the Company; use that information in any way that may cause loss to the Company, or use that information to gain an advantage for himself or herself or anyone else.



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The long-term holding of the Company's securities by designated persons is encouraged however, under the Company's Securities Trading Policy, a designated person must not trade in any securities of the Company at any time when they are in possession of unpublished, price-sensitive information in relation to those securities.

Also, they must not give such information to any other person who is likely to:

- use this information with which to trade in the company's securities; and/or
- pass this information on to another person who may use this information with which to trade in the Company's securities.

Before commencing to trade in the Company's securities a designated person must first obtain the written approval of the Chairman or the Company Secretary.

In the instance that the Chair wishes to trade in the Company's securities, the Chair must obtain the written approval of all other members of the board.

### Closed Period

Designated persons are prohibited from trading in the Company's securities during the following periods:

- From 1 July to one day after the release of the Company's final results;
- From 1 January to one day after the release of the Company's half-year results; and
- Any other periods as may be determined by the Board and communicated to designated persons.

### Exemptions

Only in exceptional circumstances will approval for the disposal of the Company's securities during this closed period be forthcoming. Examples of such circumstances are:

- Where severe financial difficulty or hardship can be demonstrated.
- By Order of a Court of Australia.

At no time will approval for the purchase of the Company's securities be granted to designated employees during the closed period.

### Notification of Dealings by Directors

As required by the ASX Listing Rules, the Company is required to report any transaction conducted by Directors in the securities of the Company to the ASX within 5 business days after the date of the transaction.

Directors are required to report these transactions to the Company Secretary the day following the transaction so the appropriate disclosure can be made and to ensure the Company's compliance with the ASX listing rules.

### Breaches of Policy

Strict compliance with this policy is a condition of employment with the Company. Insider trading is a criminal offence, which attracts potential fines and imprisonment and will not be tolerated by the Company. Designated persons who fail to comply with this policy may face disciplinary action including suspension or termination of employment.

### Review

This policy is reviewed annually and updated as required, to reflect regulatory changes and/or community and investor requirements.