



OAKAJEE

CORPORATION

Oakajee Corporation Ltd

Share Trading Policy

The Company's share 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 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 executives reporting directly to the Managing Director; and
- any other employees of the Company considered appropriate by the Managing Director from time to time.

In this policy directors, officers and employees extends to include their spouses, partners, children (to the extent they can be influenced), family trusts, family companies and associates.

1 General Policy

- 1.1 Directors and officers of the Company are encouraged to follow a long term investment policy with respect to their holdings (including derivatives) in the Company's securities and any trading of a short term or speculative nature is generally to be discouraged.
- 1.2 Participants in the Company's long term incentive plans, which may give rise to the exercise of share options or the award of shares, are prohibited from entering into any scheme or arrangement to protect the value or lock in a price of those options or shares before the exercise or award date.

2 General Restrictions when in Possession of Inside Information

2.1 Insider trading laws

- 2.1.1 Insider trading by directors and all employees is illegal and is prohibited. If a person is in possession of any unpublished price-sensitive information, it is a criminal offence to take advantage for personal gain or that of an associate.

- 2.1.2 Price-sensitive information is any information which if it were generally available, a reasonable person would expect 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.

2.2 Confidential information

- 2.2.1 Employees and directors 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 which may cause loss to the Company, or use that information to gain an advantage for themselves or anyone else.

3 Additional Trading Restrictions for Directors and Some Employees

Additional restrictions on trading in the Company's securities apply to directors of the Company, all executives reporting directly to the Managing Director and any other employees of the Company considered appropriate by the Managing Director from time to time (**Restricted Persons**).

Restricted Persons generally hold positions where it can be assumed that they will have inside information regarding the Company. Accordingly, additional restrictions to the general law apply for any proposed trading in shares by Restricted Persons as follows:

3.1 Requirements before trading

- 3.1.1 Before trading, or giving instructions for trading in the Company's securities a Director:

- (i) must notify the Board of his or her intention to trade;
- (ii) confirm that he does not hold any inside information;
- (iii) have been advised by the Board that there is no reason to preclude him or her from trading in the Company's securities as notified; and
- (iv) complied with any conditions on trading imposed by the Board (including, for example, any time limits applicable to the clearance).

- 3.1.2 The Board confirms that there is no reason to preclude trading.

- 3.1.3 In the case of any other Restricted Person, they must notify and obtain clearance from the Managing Director before trading or giving instructions for trading.

- 3.1.4 The requirement to obtain the Board's or the Managing Director's agreement, as the case may be, does not apply where the securities are being acquired through the exercise of options or the award of shares under the Company's long term incentive plans for employees. However the requirement does apply to the trading of those securities once they have been acquired.

3.2 Notification of trading

3.2.1 Directors must notify the Company Secretary of any dealings in the Company's securities immediately any such dealings occur.

3.3 Breaches of policy

3.3.1 Strict compliance with this policy is a condition of employment.

3.4 General

3.4.1 The requirements imposed by this policy are separate from and additional to, the legal prohibitions in the Corporations Act on insider trading.