Policy
(Board Approved)

Trading in Securities Policy
Document Number – GOV-POL-28

1.0 Policy Statement

Trading in the securities of a company or companies, while in possession of 'inside information' either directly or through another person, is a serious offence under the provisions of the *Corporations Act 2001* (Cth), known as 'insider trading'.

It is punishable by substantial fines, imprisonment or both.

We want to ensure that you understand your obligation **NOT** to engage in insider trading.

2.0 Scope

This policy applies to Stanwell's directors and employees and to all contractors working for or at Stanwell (our people).

3.0 Purpose

This policy establishes a common understanding of the appropriate conduct expected of our people in relation to trading in securities.

4.0 Content

Insider Trading is the buying and selling of securities by a person while in possession of 'inside information'.

It includes procuring or inducing another person to buy or sell securities about which inside information is known and communicating inside information to another person knowing or reasonably expecting that the person to whom they provide the information will use it to trade in securities.

Inside Information

Inside information is information that:

- is not generally available; and
- may have a material effect on the price of a company's securities if it were generally available.

Examples of inside information include but are not limited to:

- likely or actual entry into, or loss of, a material contract;
- material acquisition of sales or assets by a company;
- an undisclosed significant change in the company's market share;
- proposed changes in the nature of the business of a company; and
- changes in the company's actual or anticipated financial condition or business performance.

If you have 'inside information' about a company, you must **NOT**:

- trade in securities of that company;
- encourage anyone else to trade in securities of that company; or
- pass the information to anyone you know (or should reasonably know) will trade in those securities or encourage someone else to do so.

In addition to your general obligation not to misuse inside information, you must at all times comply with all relevant legislation relating to **insider trading**.

We may need to ask some of our people not to trade in the securities of a particular company for a period of time if we are working on a specific project that involves that particular company. In these circumstances, you will be notified in writing of these requirements.

Generally Available Information

If information is generally available, then it will not be 'inside information'. Information is generally available if it is readily visible or otherwise made known in a manner that would be likely to bring it to the attention of investors and the securities market.

Circumstances where information would be considered generally available would include where the information:

- has been published via a formal media release; or
- has been made available in a company announcement to the ASX, including a financial or other report lodged with ASX.

To help you follow this policy, we will:

- train you about this policy and if applicable the procedure and your obligations under the *Corporations Act 2001 (Cth)*; and
- provide adequate resources to manage and investigate breaches of the policy and procedure.

Example

You are negotiating with a company about a potential contract. If the company wins the contract, its share price is likely to increase significantly.

You **MUST NOT**:

- trade in the securities of that company;
- encourage anyone else to trade in the securities of that company; or
- pass that information on to anyone who you know (or should know) will trade in the securities of that company.

You **MUST** keep 'inside information' confidential.

If you fail to comply with this policy, disciplinary action may be taken against you.

5.0 Responsibilities and Authorities

Our people must

- comply with this policy and the *Corporations Act 2001 (Cth)*; and
- follow the Protected Disclosures Procedure to report any breaches.

Managers and Supervisors must:

- make sure your employees and contractors know about the policy and procedures;
- ensure the procedures for addressing and managing trading in securities are complied with; and
- follow the relevant procedure to report any breaches of the policy.

The **Company Secretary** must:

- from time to time, review the policy, procedure and any changes in the law, and make recommendations regarding any necessary policy changes and implications;
- advise the Executive Leadership Team and the Board about policy changes and implications for the policy and procedure;
- give advice, guidance and assistance about the policy and procedure; and
- ensure appropriate records are kept about every breach.

The **Executive General Manager** Business Services must ensure our people are trained on this policy, the procedure and relevant legislation, codes and guidelines;

The **Executive Leadership Team** members must comply with this policy and the procedure and make sure that the policy and procedure are followed.

The **Stanwell Board** has ultimate accountability for the Trading in Securities Policy.

6.0 Review and Consultation (Prior to Approval)

The Executive Leadership Team and the Stanwell Board of Directors.

This Document is required to be reviewed, as a minimum, every 2 years.

7.0 Communication Plan (After Approval)

This policy is available electronically in Content Manager and is available on GenNet.

8.0 Definitions

Nominated Personnel	are those Directors, employees and contractors working at or for Stanwell, who because of their official duties to Stanwell or due to the sensitivity of projects that they are working on for Stanwell, are required to be subject to securities trading restrictions.
Official duties	are the day to day activities performed by our people as part of their role accountabilities.
Our people	refers to Stanwell Directors, employees and all contractors working for or at Stanwell, in your capacity as a director, employee or contractor of Stanwell.
Restricted Companies	are those companies where nominated personnel, through their official duties to Stanwell, may become aware of or be exposed to, inside information relating to those companies.

Securities	refers to any listed class of share, right, share option, convertible note, bond or warrant in respect of an entity listed on the Australian Stock Exchange (ASX) or foreign stock exchange
Stanwell and Corporation	refers to Stanwell Corporation Limited and subsidiaries
Trade in	refers to buying, selling or otherwise dealing in (for example, an option to buy)

9.0 References (Including Records Management)

Code of Conduct – GOV-POL-30
Confidential Information Policy – GOV-POL-27
Conflicts of Interest Policy - GOV-POL-26
Restricted Securities Trading Procedure – GOV-PROC-16
Whistle-blower Protection Policy – GOV-POL--29
Protected Disclosure Procedure – GOV-PROC-36
Corporations Act 2001 (Cth)

10.0 Revision History

Rev. No.	Rev. Date	Revision Description	Author	Approved. By
0	29.02.2012	Policy created to reflect the new Stanwell Corporation after the merger of Stanwell Corporation, TEC and CS Energy sites Mica Creek and Swanbank.	K. Buckley	Board
1	29.04. 2014	Minor amendments made to reflect the 'current' title of the Executive General Manager allocated 'responsibility' under this Policy and to reflect current governance processes	K Buckley	Board
2	12.07.2016	Minor amendments made as a result of biennial review	K Buckley	Board
3	03.07.2018	Biennial review undertaken, no amendments are required	K Buckley	Board
4	28.10.2020	Biennial review undertaken. Only minor administrative changes required at this review.	K Buckley	Board
5	6.10.2022	No amendments identified as being required at this review.	K Buckley	Board
6	17.10.2024	Biennial review undertaken. Only minor administrative amendments made	K Buckley	Board
7	16.10.26	Biennial review undertaken. Only minor administrative changes made.	S Niblock	Board