

# TRADING POLICY

## 1. Overview

Ambition Group Limited (Ambition) is a company listed on the Australian Securities Exchange (ASX).

The purpose of this policy document is to provide Directors, officers and employees of Ambition and its related entities with guidelines relating to the trading of Ambition securities.

This policy document has been adopted by the Board of Directors of Ambition and applies, without exception, to all Directors, officers and employees of Ambition and its related entities.

## 2. Continuous Disclosure

Continuous disclosure is the timely release of information to keep the market informed of company events and information as they occur. The Australian Securities Exchange requires that we disclose information, which a reasonable person would expect to have a material effect on the price or value of our shares. The company will, from time to time, release information of this kind and will keep employees informed of these releases.

In a Director, officer or employee became aware of any price sensitive information, he/she must immediately pass that information to the Chief Financial Officer or to the Company Secretary.

## 3. Insider Trading

Insider trading is a serious offence under the Corporations Act. The law prohibits insider trading which is the use of information acquired in the capacity of director or employee to gain an improper advantage for themselves or for someone else.

Insider trading is a criminal offence and the penalty for insider trading may include imprisonment and/or a fine. Civil penalties and compensation may be ordered against a person engaging in insider trading.

This policy expressly prohibits any conduct by a Directors, officer or employee in breach of insider trading laws.

In the course of your duties as Director, officer or employee, you may obtain price sensitive information in relation to non-Ambition entities. The prohibitions on insider trading outlined above extend to this information.

#### 4. Closed Periods

A closed period is when Directors, officers and employees are prohibited from trading in the company's securities. This policy prohibits trading at all times except for certain open periods.

Directors, officers and employees may only trade the company's securities at times when the Board considers the market to be fully informed about the Group's operation. This is to ensure that Directors, officers and employees do not trade securities based on knowledge that might not be available to the public at large.

Open periods will be advised each year. They are up to 28 days after:

- (a) Release of half yearly results to the ASX;
- (b) Release of annual results to the ASX;
- (c) Conclusion of the Annual General Meeting of the company; or
- (d) Any other time the Board considers the market to be fully informed about the Group's operations.

#### 5. Trading of securities that are not subject to this policy

Securities purchased through tax exempt employee share schemes, dividend reinvestment plans, or other employee share schemes are not subject to this policy and the purchases can be executed in a closed period.

#### 6. Trading in exceptional circumstances and procedure for obtaining clearance

The Chairman of the Board may, in exceptional circumstances and in compliance with insider trading laws, grant approval to a Director, officer or employees to trade during a closed period.

The procedure for obtaining prior written clearance to trade during a prohibited period is by written request to the Chairman explaining the circumstances giving rise to the request with accompanying supporting documentation.

Any clearance to trade can be given or refused by the chairman in his/her discretion without giving reasons and may be withdrawn if new information comes to light. The Chairman's decision to refuse clearance is final and binding on the person seeking the clearance and the person seeking the clearance must keep that information confidential and not disclose it to anyone.

#### 7. Queries

Should you have any queries in relation to this policy, no matter how small, please contact Nick Waterworth, Executive Chairman, Ambition Group Limited, on +61 2 9249 5000 or [nick.waterworth@ambition.com.au](mailto:nick.waterworth@ambition.com.au)