

Securities Trading Policy



DataDot Technology Ltd

DataDot Technology Limited ACN 091 908 726 (“DDT”)

Securities trading policy

1. Preliminary

1.1 Policy objectives

- (a) to establish procedures for dealing in securities that provide protection to DDT, its subsidiaries and their officers and employees against inadvertently breaching the law; and
- (b) to manage reputational risk associated with insider trading.

1.2 Application

Section 2 of this policy applies to all Officers and Employees of DDT.

An **Officer** is each director or company secretary of DDT or any of its subsidiaries.

An **Employee** is each full-time, part-time or casual employee of DDT or any of its subsidiaries.

This policy also sets out additional obligations that apply if you are a Designated Person.

A **Designated Person** is any Officer; the Chief Executive Officer; an Employee who reports directly to the Chief Executive Officer; or an Employee who, as a consequence of their role in the company, permanently has access to confidential or price sensitive information regarding the company’s outlook or prospects.

This policy is given to all Officers and Employees. It is your responsibility to read, and comply with, this policy. Any non-compliance will be regarded as serious misconduct which may result in the termination of your employment or other engagement.

1.3 Who to contact

If you are in any doubt regarding your proposed dealing in securities you should contact the Company Secretary on (02) 89774900.

2. The insider trading prohibitions

2.1 Persons to whom this section applies

This section applies to all Officers and Employees, and reflects the insider trading prohibitions set out in the Corporations Act.

2.2 Prohibited conduct

The Corporations Act prohibits insider trading. That is, if you are aware of any price sensitive information:

- (a) you must not deal in any securities which are affected by the price sensitive information; and
- (b) you must not procure another person to deal in those securities.

Price sensitive information need not relate to DDT.

A breach of the insider trading laws would have serious consequences for you personally and for DDT.

No permission from anyone in DDT can absolve you of these prohibitions.

Key terms

Price sensitive information is information which is confidential or otherwise not generally available to investors and, if the information were generally available, a reasonable person would expect it to have a material effect on the price or value of the relevant securities.

Information will be **likely to have a material effect** on the price or value of particular securities if the information would be likely to influence persons who commonly acquire securities in deciding whether or not to acquire or dispose of those securities.

Dealing in securities is a broad concept and covers more than simply buying or selling securities on ASX. It extends to applying for, acquiring, or disposing of, securities or entering into an agreement to do any of those things.

2.3 Relationship to the continuous disclosure regime

The continuous disclosure regime under the ASX Listing Rules requires DDT to tell the ASX about any price sensitive information concerning DDT immediately DDT becomes aware of the information, subject to limited exceptions.

Given the exceptions, there are circumstances in which disclosure of price sensitive information concerning DDT will not be required, and people who are aware of the information would breach the insider trading prohibition if they dealt in the shares before the information had been released to ASX.

3. Additional restrictions that apply to Designated Persons

3.1 Persons to whom this section applies

If you are a Designated Person, you must comply with the specific restrictions set out in this section in addition to the obligations above.

3.2 Closed Periods

There are certain fixed periods (**Closed Periods**) when information about the financial position or performance of DDT is being finalised for release to ASX, during which dealing in DDT securities by Designated Persons will generally be prohibited.

Each period starting on 31 December or 30 June and ending on the day after the day that the financial results of DDT for the half-year or full-year (as the case may be) are released to ASX is a Closed Period.

The Board may notify Designated Persons that any additional period is also a Closed Period, for example, because the Company is considering matters which are subject to an exception to the continuous disclosure rules.

Designated Persons and their associates are prohibited from dealing in DDT securities during a **Closed Period**.

3.3 Associates

Designated Persons must take all reasonable steps to ensure that their associates do not deal in any DDT securities when they are prohibited from doing so. Your associates include:

- (a) immediate family members who live with you (e.g. spouse or partner, children, parents); and
- (b) companies, trusts, superannuation funds and other entities you control.

3.4 Margin loans

Designated Persons are prohibited from entering into or maintaining margin loan arrangements over DDT securities due to the risk of forced sale of those securities, in breach of this policy.

3.5 No short selling, stock lending or hedging

Designated Persons are prohibited from entering into agreements or other arrangements:

- (a) to short sell DDT securities;
- (b) for stock lending in relation to DDT securities; or
- (c) to hedge their existing holdings of or entitlements to DDT securities.

These prohibitions also include derivatives on the DDT securities.

3.6 Exempt transactions

There may be instances of transactions being allowed under this section even if they occur during a Closed Period. Where this is the case the Chairman will notify the relevant Officers and Employees.

3.7 Clearance

A Designated Person may request a clearance to allow the Designated Person (or their associate) to deal in DDT securities when they would otherwise be prohibited from doing so.

A clearance will only be granted where the Designated Person is experiencing severe personal hardship or another exceptional circumstance; **and** the Designated Person is not in possession of any price sensitive information affecting the relevant DDT securities.

A request for clearance must:

- (a) be in writing signed by the Designated Person;
- (b) set out details of the circumstance warranting the clearance;
- (c) set out details of the proposed dealing in DDT securities, including its type (e.g. whether sale or purchase), the number and class of DDT securities, the circumstances of the proposed dealing (e.g. whether by the Designated Person on ASX or between associates) and the likely date or dates of the proposed dealing; and
- (d) confirm that the Designated Person does not possess any price sensitive information affecting the relevant securities.

The written request for clearance must be submitted to the Chairman, unless the Chairman is seeking the clearance in which case it must be submitted to the Chair of the Audit and Risk Committee, through the Company Secretary. Once all relevant information has been received, the request will be considered and the clearance may be granted (with or without conditions) or refused in the absolute discretion of the person considering it.

3.8 Notification

Before dealing in any DDT securities:

- (a) the Chairman must notify the Chair of the Audit and Risk Committee;
- (b) a Director, Chief Executive Officer, and Company Secretary must notify the Chairman;
- (c) each other Designated Person must notify the Chief Executive Officer and Company Secretary.

A notice of intention to deal in DDT securities by a Designated Person (or his or her associate) must:

- (a) be in writing and set out details of the proposed dealing in securities, including its type (e.g. whether sale or purchase), the number and class of securities, the circumstances (e.g. whether by the Designated Person on ASX or between associates) and the likely date or dates of the proposed dealing; and
- (b) confirm that the Designated Person does not possess any price sensitive information affecting the relevant securities.

Designated Persons must notify the Company Secretary promptly after dealing in any DDT securities.

3.9 When *may* a Designated Person deal in DDT securities?

You may only deal in DDT securities if:

- (a) the dealing is outside a Closed Period, or is an exempt transaction, or you have obtained clearance for the dealing;
- (b) you have given the required notice of intention to deal; and
- (c) you do not possess any price sensitive information affecting the relevant securities.

Effective date: 1 July 2016

Date amended: 30 November 2023