



Securities Trading Policy

Symal Group Limited

Date of adoption: 12/06/2026

1. Purpose and scope

1.1 Purpose

The ordinary shares and options of Symal Group are listed on ASX. The Company aims to achieve the highest possible standards of corporate conduct and governance.

The Board has adopted this Securities Trading Policy (**Policy**) to regulate when and how directors, members of its executive team, Employees and their families and closely related entities of directors and the Executive Team, may trade (that is, buy or sell) in the Company's Securities.

This Policy is also designed to regulate the communication of Market Sensitive Information and Inside Information by directors, members of the Executive Team and Employees with the intention of minimising the risk or appearance of Insider Trading and the significant reputational damage to the Company that may result from Insider Trading. As such, this policy is to be read in conjunction with the Company's Continuous Disclosure Policy which can be found at symal.com.au.

In this Policy, it is important to understand:

- the pre-approval process before trading in the Companies' securities;
- the Company's **Blackout Periods** for trading;
- the trading restrictions that apply;
- the types of trading that are **excluded** from the trading requirements under this Policy; and
- what constitutes an **exceptional circumstance** in which trading may be permitted during a **prohibited period** and the procedures for obtaining written clearance to do so.

This Policy outlines the laws prohibiting Insider Trading, the obligations on directors, members of the Executive Team and Employees in relation to the use of Inside Information to gain an improper advantage for themselves or someone else, and the consequences for the Company and its directors, members of the Executive Team and Employees in the event of a breach of these laws.

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The Company requires strict compliance with this Policy.

To promote compliance with the Insider Trading prohibitions under the Corporations Act as well as this Policy, a copy of this Policy will be distributed to all employees and directors upon induction.

1.2 Regulatory alignment (ASX and ASIC)

This Policy is intended to support compliance with applicable Australian laws and ASX requirements relating to dealing in the Company’s securities, including the insider trading prohibitions in Part 7.10 Division 3 of the *Corporations Act 2001 (Cth)* (including section 1043A), and the director notification and disclosure framework under section 205G of the *Corporations Act 2001 (Cth)* and ASX Listing Rules 3.19A and 3.19B (including Appendix 3Y/3Z notifications).

- **Insider trading prohibition:** You must not trade (or procure/encourage others to trade, or disclose Inside Information) while you possess Inside Information.
- **Blackout periods and clearance:** The Company may restrict trading during Blackout Periods and require written clearance before dealing.
- **Director disclosure:** Directors must notify the Company Secretary of any change to their relevant interests in Company securities immediately after the dealing occurs and in any event within 1 business day, so the Company can meet its disclosure obligations to ASX under Listing Rule 3.19A (Appendix 3Y/3Z) and directors can comply with section 205G of the Corporations Act.
- **Restricted Persons:** Directors, members of the Executive Team and their direct reports, any other persons the Company Secretary designates to be a Restricted Person from time to time, and each of their **Closely Related Parties**. Restricted Persons have additional pre-trade clearance requirements under this Policy.
- **ASX trading policy requirement:** The Company will provide this Policy (and details of any material changes to it) to ASX in accordance with Listing Rule 3.19B.

1.3 Who does this Policy apply to?

This Policy applies to the following persons (**You**):

The Company directors and members of the Executive Team	<p>The Company's directors, Executive Team members (including the Managing Director, CEO and CFO) and any other person who has the authority and responsibility for planning, directing and controlling the activities of the Company directly or indirectly.</p> <p>In holding an executive position, such as a director or senior executive, in the Company, you are most likely to be in possession of Inside Information and Market-Sensitive Information about the Company and are therefore more likely to be vulnerable to allegations of Insider Trading.</p>
Families and close related entities of the Company directors and Executive Team members	<p>Each director and member of the Executive Team is obliged to ensure that each of their related or associated entities complies with this Policy, on the basis that they may also have access to, or come into possession of, Market Sensitive Information or Inside Information.</p>

Families and closely related entities of directors and Executive Team members include:

- a spouse and any non-adult children
- a Family Company or Family Trust; and
- a company in which a director, officer or employee of the Company is a director, has a relevant interest (as that term is defined in sections 608 and 609 of the Corporations Act) or in which they hold voting power in respect of 20% or more of the shares of that company.

Employees

This Policy regulates how and when Employees can trade in the Company's Securities, Derivatives and other secured financing arrangements where they may have access to, or come into possession of, Market Sensitive Information or Inside Information ahead of the market. Some Employees are also designated as Restricted Persons and have additional pre-trade clearance requirements (see the definition of Restricted Persons and section 3).

For the purposes of this Policy, "Employees" include all employees, contractors, consultants, secondees and independent contractors of the Company.

1.4 What are You required to do before you trade

All Employees (including Restricted Persons) must not trade if they have any Inside Information (as defined in section 2.1).

In addition, Restricted Persons must seek written clearance before trading in any Securities, even where trading is proposed outside a designated Blackout Period (see section 2.2), or where the trade is proposed in exceptional circumstances (see section 4(b)) or is an Excluded Trade (see section 4(a)). A Restricted Person must:

- not be aware of any reason why clearance should not be provided; and
- have received written clearance to trade, and that clearance remains valid when they trade.

2. Trading Restrictions

2.1 Insider Trading is prohibited at all times

If You are aware of any Inside Information, You **must not** trade in the Securities or Derivatives.

Inside Information is any information relating to the Company that is not generally available but which, if it were generally available, a reasonable person would expect the knowledge of that information to have a material effect on the price or value of the Company's Securities (**Inside Information**).

Information has a "material effect" (positive or negative on share price) if it would be likely to influence persons who commonly acquire securities (in general) in deciding whether or not to acquire or dispose of the relevant securities.

The requirements imposed by this Policy are separate from, and additional to the legal prohibitions in the Corporations Act on Insider Trading, which makes it a serious criminal offence for someone who is in reasonable possession of Inside Information and knows or ought reasonable to know that it is Inside Information:

- (a) to acquire or dispose;
- (b) to encourage or induce anyone else to acquire or dispose (regardless of whether they have Inside Information);
- (c) to give or communicate Inside Information to anyone who may be likely to acquire or dispose or encourage anyone else to acquire or dispose of the Company Securities or the securities of another entity.

Care must be taken to ensure that the confidentiality of Inside Information is not unintentionally breached due to the information being provided or made available to anyone. The Corporations Act prohibition on "insider trading" (dealing in securities with Inside Information) also extends to passing on any Inside Information to third persons (who may deal in the Company's Securities). If you pass on or communicate Inside Information to anyone – that is an offence in the same manner as "insider trading".

The penalties specified under the Corporations Act for "insider trading" or passing on Inside Information to third parties is severe including both jail sentences and significant penalties – and of course the professional reputation of those involved would be adversely affected.

If You are in possession of Inside Information concerning the Company, You are prohibited from trading in the Company Securities and the securities of any other entity (e.g. another listed company with which the Company is confidentially negotiating a significant transaction) whilst in the possession of what You ought reasonably to know is Inside Information and have a duty to:

- (a) keep that information confidential;
- (b) take all reasonable steps to secure and keep secure that information in your possession; and
- (c) not disclose or communicate that information to any person without the prior written consent of the Board.

If You possess Inside Information about the Company's Securities, Derivatives and other secured financing arrangements, You **are prohibited from trading, even where:**

- (a) the trading occurs outside the designated Blackout Period as specified in this Policy;
- (b) the trading falls within an exclusion in section 4(a) of this Policy; or
- (c) You have been given clearance under section 3 of this Policy to trade.

If You are unsure, or have any doubt as to whether they are in possession of any Inside Information that might preclude You from trading at that time, **You should not trade.**

Examples of Inside Information

Examples of Inside Information include, but are not limited to, the following:

- (a) information on material changes in project forecasts;
- (b) information relating to the Company's financial results or forecast results;
- (c) a material acquisition, joint venture, realisation or disposal of assets;
- (d) a threat of material litigation against the Company;

- (e) the Company's profit results materially exceeding or falling short of the market's expectations or the previously announced guidance by the Company;
- (f) a material change in debt, liquidity or cash flow;
- (g) the granting or loss of a major contract;
- (h) a management or business restructuring proposal;
- (i) a change in the capital structure, such as capital return or buy back;
- (j) a payment of dividends or a share issue;
- (k) a change to the Board or significant changes in Executive Team; and
- (l) any other information required to be announced to the market pursuant to ASX Listing Rule 3.1 which is yet to be released to the market.

2.2 What are the Blackout Periods?

In addition to the general prohibition on trading while in possession of Inside Information, **all Employees** (including Restricted Persons) must not trade in the Company's Securities during the following blackout periods (**Blackout Periods**), unless the trade is an Excluded Trade (see section 4(a)) or written clearance has been granted to trade in exceptional circumstances (see section 4(b)):

- (a) each period of 5 business days before the announcement of a dividend or any other capital management initiative that might have a material impact on the share price;
- (b) the period commencing 5 business days prior to the release of the Company's half-year financial results to the ASX and ending at the beginning of trading on the next trading day after such release;
- (c) the period commencing 5 business days prior to the release of the Company's full-year financial results to the ASX and ending at the beginning of trading on the next trading day after such release;
- (d) the period commencing 5 business days prior to the Company's Annual General Meeting and ending at the beginning of trading on the next trading day after the Annual General Meeting; and
- (e) any other period that the Board specifies from time to time (and communicates to You).

Note: Restricted Persons also require written clearance under section 3 *even when trading outside* a Blackout Period.

2.3 What are the prohibitions on hedging transactions?

Hedging transactions have the effect of limiting exposure to risk. Directors, members of the Executive Team and their Closely Related Parties are prohibited from entering into Hedging Transactions with respect to the Company Securities.

Employees are also prohibited from entering into Hedging Transactions with respect to the Company Securities.

3. Who must seek approval before trading?

The following persons must obtain written approval before trading in any Securities or Derivatives of the Company (each a **Restricted Person** for the purposes of the pre-trade clearance process in this section):

Company Chair	Must notify and obtain approval to trade from the Chair of the Audit, Risk and Compliance Committee (or their delegate) and Company Secretary (or their delegate).
Directors	Must notify and obtain approval to trade from the Company Chair (or their delegate) and Company Secretary (or their delegate). If you are a director, you must notify the Company Secretary of any change to your relevant interests in Company securities immediately after the dealing occurs and in any event within 1 business day (to enable the Company to lodge an Appendix 3Y/3Z within the timeframe required by ASX Listing Rule 3.19A) and comply with your obligations under section 205G of the Corporations Act.
Restricted Persons (other than Directors)	Must notify and obtain approval to trade from the Company Secretary (or their delegate).
Company Secretary	Must notify and obtain approval to trade from the Company Chair (or their delegate) or the CEO (or their delegate).

Important: Trading clearance under this Policy is an internal control only. It does not constitute legal advice and does not override your obligations under the Corporations Act (including insider trading prohibitions) or the Company's and directors' disclosure obligations under ASX Listing Rules (including Listing Rules 3.19A and 3.19B).

The notification of intention to trade must be made using a Trading Notification Form available from the Company Secretary (**Trading Notice**).

The Trading Notice must be provided no less than one business day before the proposed trade in order to determine whether such a transaction might be sensitive or infringe the general prohibition on Insider Trading (see above section 2.1 in relation to the general prohibition).

Trading clearance will not be given to Restricted Persons in the periods between 30 June and the trading day after the Company releases its full year financial results, or 31 December and the trading day after the Company releases its half year financial results unless exceptional circumstances apply.

With respect to Trading in exceptional circumstances (i.e. within Blackout Period), the Trading Notice must be provided no less than 5 business days before the proposed trade. If you are seeking clearance to trade within a Blackout Period in exceptional circumstances, the Trading Notice must provide sufficient information (in the opinion of the person providing the clearance) that the circumstances warrant the granting of approval to trade.

You must not trade in Securities or Derivatives, unless and until permission for the proposed trade is received. A decision to permit or not to permit the proposed trade is at the sole discretion of the person who will consider your request, taking into account:

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- the person's circumstances and the ASX Listing Rules;
- the information set out in the Trading Notice;
- whether the Company is about to release a periodic financial report or other financial data that might come as a surprise to the market;
- whether the Company is about to make an announcement of Market Sensitive Information; and
- whether the proposed date(s) for the trade(s) align with the periods specified in section 2.2,

A clearance to trade can be granted or refused without reason or if there is a change in your circumstances (that is, You no longer have an exceptional circumstance that applies), the person who considers your request may withdraw their clearance.

Clearance is automatically deemed to be withdrawn if You become aware of Inside Information prior to trading.

The decision of the person who considers your request is final and binding on You.

Where clearance to trade is refused or withdrawn, You must keep that information confidential and not disclose the fact that your clearance to trade has been refused or withdrawn.

After receiving trading clearance, You must complete the trade within 5 business days of the confirmation (or as specified in the confirmation), otherwise the approval is no longer effective and new clearance must be sought.

Any clearance to trade is an exemption from the operation of this Policy and is not an endorsement of the trade. You are personally responsible for any decision to trade in Securities or Derivatives, and for compliance with relevant laws.

4. What types of trading are permitted?

This Policy permits trading in a number of circumstances, namely outside a Blackout Period, or if there are exceptional circumstances which enable the trading to occur. Some of these circumstances are outlined in more detail below.

However, if You are in possession of Inside Information about the Company's Securities prior to or while trading, **no exception applies and the trading is prohibited** under relevant Insider Trading laws.

(a) Excluded trades

The following types of trades are expressly excluded from the operation of, and the restrictions specified under this Policy:

- investing or trading in a fund or scheme where the investment decisions are made by a third party, provided that the fund or scheme does not invest exclusively in the Company's shares;
- trading in securities by a restricted person as a trustee – who is not also a beneficiary of the trust – and the decision to trade is made by other trustees or investment managers independently of the restricted person;
- a disposal of Securities arising from the acceptance of a takeover offer, scheme of arrangement or an equal access buy-back;

- (iv) an acquisition of Securities, or disposal of rights acquired, under a pro rata issue;
- (v) an acquisition of Securities under a security purchase plan or a dividend or distribution reinvestment plan where:
 - A. You did not commence or amend your participation in the plan during a prohibited period; and
 - B. the Policy does not permit You to withdraw from the plan during a prohibited period other than in exceptional circumstances;
- (vi) transfers of Securities already held between You and a close family relation (ie spouse, non-adult child, Family Company or Family Trust) or into their superannuation fund with prior written consent;
- (vii) indirect and incidental trading that occurs as a consequence of You dealing in Securities issued by a managed investment scheme, listed investment company, exchange-traded fund or similar investment vehicle that is managed by a third party and that happens to hold, as part of its portfolio, Securities in the Company;
- (viii) the acquisition of Securities under an employee incentive scheme; and
- (ix) the obtaining by a director of a share qualification.

(b) Trading within Blackout Period in exceptional circumstances

The Company recognises that You may need to trade in the Company's Securities in exceptional circumstances (even within a Blackout Period).

Securities may be traded due to exceptional circumstances if:

- (i) the exceptional circumstances relate to severe financial hardship that cannot be remedied in any way other than by selling the Securities; or
- (ii) the Board determines that there are exceptional circumstances that warrant granting approval to You to trade; and
- (iii) You are not in possession of Inside Information; and
- (iv) You have complied with the procedures to clear trade contained in section 3 of this Policy.

If You wish to trade in the Company Securities in exceptional circumstances, subject to compliance with the law, You must first obtain clearance in accordance with section 3 of this Policy.

5. Policy Control

5.1 What are the consequences of breaching this Policy?

The Company's shares are listed on ASX and therefore under Australian law, it is a serious offence for a person including a Director, member of the Executive Team or Other Employee who possess Inside Information to:

- (a) engage in Insider Trading themselves; or
- (b) communicate (directly or indirectly) Inside Information to another person if they know or ought to know the other person would be likely to engage in Insider Trading.

The Company Secretary must be immediately advised of any breach of this Policy who, in turn, will report to the Board.

A breach of this Policy may result in disciplinary action, which may include summary termination of employment (without notice) in serious cases.

A single offence for breach of Insider Trading provisions by You may result in imprisonment, a substantial fine or both, in addition to other consequences (for example, paying compensation for damages suffered by the other party to the transaction or banning orders issued by ASIC which prohibit a person from supplying financial services).

5.2 Any questions?

Where uncertain on the underlying rules or application of this Policy, You should seek appropriate counsel whether that be from within the Company or even appropriately qualified external professionals.

If you have any queries with respect to this Policy, please contact the Company Secretary.

5.3 Review

This Policy will be periodically reviewed to ensure it continues to operate effectively and will be amended as required from time to time.

6. Definitions

In this Policy:

ASIC means the Australian Securities and Investments Commission

ASX means ASX Limited ACN 008 624 691

Blackout Period means any blackout period specified in section 2.2 of this Policy.

Closely Related Party or Closely Related Parties has the meaning given to the term "closely related party" in section 9 of the Corporations Act, which for the purposes of this Policy includes but is not limited to:

- (a) a spouse or child of a director or Executive Team member
- (b) a dependent of a director or the Executive Team member or the director or Executive Team member's spouse
- (c) anyone else who is one of the director's or Executive Team member's family and may be expected to influence the director or Executive Team member, or be influenced by the director or Executive Team member in the director or Executive Team member's dealings with the Company; or
- (d) a company the director or Executive Team member controls

Company or the Company means Symal Group Limited.

Derivatives means products such as warrants, exchange-traded and over-the-counter options and contracts for differences, which are issued over or in respect of the Company's Securities.

Employee(s) means any employee, contractor, consultant, secondee, intern or other individual engaged by the Company (whether full-time, part-time, fixed-term or casual).

Executive Team means a member of the executive team as identified by the Company from time to time

Family Company has the meaning given to that term in the ASX Operating Rules

Family Trust has the meaning given to that term in the ASX Operating Rules

Hedging Transactions means any transaction or arrangement which partly or totally offsets the risk relating to a current holding, or an element or remuneration, that either has not vested or has vested but remains subject to a holding lock.

Inside Information means any information that is not generally available but which, if it were generally available, a reasonable person would expect the knowledge of that information to have a material effect on the price or value of the Company's Securities.

Insider Trading means buying or selling, or procuring or encouraging another person to buy or sell Securities whilst in the possession of Inside Information

Market-Sensitive Information means any information concerning the Company that a reasonable person would expect to have a material effect on the price or value of the Company's Securities.

Restricted Persons means Directors, members of the Executive Team and their direct reports, any other persons the Company Secretary designates to be a Restricted Person from time to time, and each of their **Closely Related Parties**. For the avoidance of doubt, Restricted Persons are a subset of Employees and related persons who are subject to additional pre-trade clearance requirements under section 3.

Security means:

- (a) a share in the Company
- (b) a debenture of the Company
- (c) a right or interest in a share or debenture of the Company
- (d) a renounceable or non-renounceable right to subscribe for a share in or debenture of the Company
- (e) a right to acquire an issued or unissued share or debenture; or
- (f) an option over an issued or unissued share or debenture of the Company

and **Securities** has a corresponding meaning:

Trading Notice means a notice given in writing as defined under section 3 of this Policy

SAMPLE FORM FOR APPROVAL TO TRADE

Part A - For completion by director, member of the Executive Team or Employee (You)

Name	
Nature of agreement/dealing (sale / purchase / subscription) including number/value	
Proposed date of transaction (i.e. proposed completion date)	
Exceptional circumstances (if relevant)	

I confirm that:

(a) I have read and understand the Company's Securities Trading Policy

I am not in possession of any Inside Information (being information that is not generally available to the public and that would reasonably be expected to have a material effect on the price or value of the Company Securities)

I understand that if I later become aware of any Inside Information, any clearance that I have been given will automatically be deemed to be withdrawn; and

the transaction in the Company Securities described above does not contravene the Securities Trading Policy of the Company.

Signed:	
Dated:	

Part B - For completion by the Company Secretary/Company Chair/CEO

I acknowledge:

(a) the confirmations given by You; and

(b) in addition, that either:

- the proposed dealing in the Company Securities described above does not occur during a **Blackout Period** during which time directors, members of the Executive Team and Employees are prohibited from trading; or
- where the proposed dealing in the Company Securities described above occurs during a **Blackout Period**, the dealing relates to exceptional circumstances and written clearance has been granted, or the dealing is an Excluded Trade under the Policy.

This acknowledgment expires 5 business days after the date that it has been provided.

You must provide further notification of any trade in the Company Securities occurring after the expiry of that 5 business day period (or any other dealing in the Company Securities which is otherwise not described in Part A above). We cannot give advance approval for trading beyond 5 business days from the date of clearance.

Name:	
Title:	
Signature:	
Dated:	

The completed form is to be sent to the Company Secretary.