

# REEDY LAGOON CORPORATION LIMITED

## SHARE DEALING POLICY

### **1 No dealing with inside information**

The Corporations Law prohibits a person from dealing in shares if they possess information which is not generally available and which, if it were generally available, a reasonable person would expect to have a material effect on the price or value of those shares (“**inside information**”).

Directors of Reedy Lagoon Corporation Limited (“**RLC**”) are likely to be in possession of inside information from time to time. Until that information has been made generally available (which requires that a reasonable period has elapsed since it was first disclosed) Directors in possession of the inside information must not deal in RLC Shares.

### **2 Further policy restrictions**

In addition to the prohibition on dealing when in possession of inside information, the Board of RLC has adopted a policy of prohibiting dealing in RLC Shares in certain circumstances in order to promote shareholder and market confidence in the integrity of RLC and its directors.

In this policy:

Chairman	means the chairman of directors or, if none has been appointed, the Managing Director or if the person affected is the Chairman, another Director.
Director	includes the Managing Director.
RLC Shares	means ordinary shares in RLC and includes options over ordinary shares.
Associate	in relation to a dealing by a person means a spouse, partner, child, relative, trusts, family companies and nominees of that person where that person indirectly or directly controls the dealing or benefits from the dealing.
Management	means any officer of RLC.
Window Period	means each period of 3 weeks commencing 24 hours after: <ul style="list-style-type: none"><li>(i) the release of any quarterly, half yearly or annual reports, or</li><li>(ii) any announcements to the ASX which may or are likely to affect the value of RLC’s assets in a material way; or</li><li>(iii) announcement of the annual results; or</li><li>(iv) issue of a qualifying prospectus.</li></ul>

The Company Secretary will advise Directors if a prospectus is a qualifying prospectus for the purposes of this policy.

**A Pre-Listing**

**What is prohibited:** any dealing in RLC Shares prior to RLC Shares being listed on the ASX.

**Who is affected:** Directors, Management and their respective Associates.

This blanket prohibition will cease once RLC Shares are listed.

**B. Short term dealing**

**What is prohibited:** dealing in the same RLC Shares within 12 months of initial acquisition.

**Who is affected:** Directors, Management and their respective Associates.

The Chairman has a discretion to allow a short term dealing by a Director in special circumstances where application of this policy would cause excessive hardship.

**C. Dealing outside Window Periods**

**What is prohibited:** any dealing in RLC Shares outside of a Window Period.

**Who is affected:** Directors and Management exposed to profit reporting details and their respective Associates.

**D. Dealing during the Window Periods**

Once RLC Shares are listed, Directors and Management exposed to profit reporting details may deal in RLC Shares during a Window Period if they do not possess inside information.

A Window Period is not necessarily a “safe harbour” and dealing will still be prohibited if the Director possesses inside information.

**3 General**

**3.1 Consult before dealing**

Prior to any dealing in RLC Shares, Directors and Management must consult the Chairman.

If in doubt as to whether information is inside information refer the matter to RLC’s Company Secretary.

**3.2 Information is Confidential**

Directors and Management must treat all information in relation to RLC, which has not been released to the Stock Exchange and the media, as confidential.

In addition the Corporations Law prohibits a person from directly or indirectly communicating inside information to another person if they know, or ought reasonably to know, that the other person would or would be likely to deal in RLC Shares.