

# Securities Trading Policy

## 1. Purpose

Straker Limited (“Straker” or “we”) is committed to fair, transparent, and lawful trading in our securities.

This policy ensures compliance with:

- New Zealand Financial Markets Conduct Act 2013
- Australian Corporations Act 2001
- ASX Listing Rules and Guidance Note 27
- ASX Corporate Governance Principles (Principles 3 and 5) – promoting ethical conduct and timely, balanced disclosure

Our goal is to prevent insider trading, maintain market integrity, and protect Straker’s reputation. This policy supports ethical conduct and transparency in market dealings.

## 2. Scope

This policy applies to (“Relevant Persons”):

- All Straker directors, officers, and employees
- Contractors, consultants, secondees, and representatives
- Any company, trust, or entity controlled by the above
- Anyone with access to Straker’s confidential or price-sensitive information

It applies to **all Straker securities**, including:

- Ordinary shares quoted on ASX
- Options, rights, notes, debentures, and derivatives over Straker securities

## 3. Key Definitions

### Inside Information

Information that:

- Is not generally available to the public; and
- If generally available, would be likely to materially affect the price of Straker securities.

It can include definite or uncertain matters such as financial results before release, major contracts, acquisitions, disposals, capital raisings, leadership changes, litigation, or unexpected liabilities.

Rumours, incomplete developments, and intentions can also be Inside Information.

### Designated Person

Includes:

- Directors
- CEO
- Direct reports to the CEO
- Any other role designated by the Board

The list of Designated Persons may be updated from time to time by the Board.

## 4. Insider Trading – Always Prohibited

If you have Inside Information, you must not:

- Buy, sell, or otherwise deal in Straker securities
- Encourage or procure others to trade
- Share that information with anyone likely to trade

These prohibitions apply regardless of how the information was obtained and at all times, not just during closed periods.

## 5. Trading Windows and Closed Periods

You may only trade if you:

- Do not have Inside Information; and
- Are outside the following **Closed Periods** (all dates and times are based on Sydney, Australia time — AEST or AEDT as applicable):
  - 14 calendar days before half-year and full-year close until 10am on the day after results are released to ASX (no trading is permitted before this time); and
  - Any other period declared closed by the Board

## 6. Designated Persons – Clearance Required

Designated Persons must obtain **written clearance** before trading at any time.

Clearance:

- Must be requested in writing (email or clearance form) and specify the intended transaction
- Is valid for **7 calendar days** from the date of approval
- Is automatically withdrawn if Inside Information arises or a Closed Period commences before the trade is completed

## 7. Exceptional Circumstances

Trading during a Closed Period may be approved if:

- You have no Inside Information; and
- There is **severe financial hardship**, a **court order**, or another Board-approved reason such as urgent legal compliance or significant personal circumstances beyond your control

## 8. Prohibited Conduct

You must not:

- Short-term trade (buy/sell within 6 months) without approval
- Trade in derivatives over Straker securities without approval
- Hedge unvested or restricted securities
- Short sell Straker securities
- Use margin loans over unvested or restricted securities without approval

## 9. Securities of Other Companies

If you hold Inside Information about another listed company (e.g., from Straker business dealings), you must not trade in that company's securities.

## 10. Clearance Process

1. **Request:** Submit the Clearance Form to the relevant Clearance Officer:
  - Chair of Audit & Risk Committee (if requestor is Chair)
  - Chair of the Board (if requestor is NED, CEO, or CEO direct report)
  - CEO or Company Secretary for others as delegated
2. **Decision:** Approval/refusal is in writing. No reasons required.
3. **Post-Trade:** Notify the Clearance Officer immediately after trading so ASX disclosures can be made.

## 11. Breach of Policy

Breaches may result in:

- Disciplinary action (including termination)
- Criminal prosecution
- Civil liability

## 12. Responsibilities

- **Board** – Oversees compliance and reviews the policy
- **Company Secretary** – Manages daily operation, keeps records of Clearances and Closed Periods, ensures training
- **All Relevant Persons** – Understand and comply with the policy and applicable laws

## 13. Monitoring & Review

This policy will be reviewed periodically to ensure it remains consistent with legal requirements, ASX rules, and governance best practice. Amendments require Board approval.

## 14. Related Policies

This policy should be read alongside:

- Continuous Disclosure Policy
- Whistleblower Policy
- Code of Conduct

*Last reviewed: October 2025*