

## POLICY FOR TRADING IN COMPANY SECURITIES

### ALCHEMY RESOURCES LIMITED ("COMPANY")

Directors, officers and employees<sup>1</sup> who wish to trade in the Company's securities must first have regard to the statutory provisions of the Corporations Act dealing with insider trading.

Insider trading is the practice of dealing in a company's securities (ie. shares or options) by a person with some connection with a company (eg. a director, officer or employee) in possession of information generally not available to the public, that may be relevant to the value of the company's securities or may influence a person's decision to transact in the company's securities. It may also include the passing on of this information to another person. **Legally, insider trading is an offence which carries severe penalties, including imprisonment.**

### Insider Trading Prohibition

In summary, directors, officers and employees of the Company must not, whether in their own capacity or as an agent for another, subscribe for, purchase or sell, or enter into an agreement to subscribe for, purchase or sell, any securities (ie. shares or options) in the Company, or procure another person to do so:

1. if that director, officer or employee possesses information that a reasonable person would expect to have a material effect on the price or value of the securities or influence a person's decision to buy or sell the securities in the Company if the information was generally available;
2. if the director, officer or employee knows or ought reasonably to know, that:
  - (a) the information is not generally available; and
  - (b) if it were generally available, it might have a material effect on the price or value of the securities or influence a person's decision to buy or sell the securities in the Company.

Further, directors, officers and employees must not either directly or indirectly pass on this kind of information to another person if they know, or ought reasonably to know, that this other person is likely to deal in the securities of the Company or procure another person to do so.

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<sup>1</sup> In this policy references to directors, officers and employees includes all associates of the directors, officers and employees.

## **Blackout Period**

In addition to the prohibitions on insider trading set out in the Corporations Act, the Company requires that directors, officers and employees must not trade:

- in the two weeks prior to, and the 24 hours after, the lodgement of the Company's quarterly, half-yearly and full year results with the ASX;
- in the 24 hours prior to, and the 24 hours after, the release of price sensitive information to the market; and
- in the two weeks prior to, and the 24 hours after, the holding of the Annual General Meeting or any other General Meeting.

A person may trade in the Company's securities inside of the blackout period described above in the following circumstances:

1. the Chair approves in writing the trade by a director or officer upon the director or officer satisfying the Chair that they do not possess unpublished price sensitive information about the Company and a failure to trade in the Company's securities would result in exceptional circumstances such as financial hardship;
2. the Chief Executive Officer (CEO) (or equivalent) approves in writing the trade by the Chair upon the Chair satisfying the CEO (or equivalent) that they do not possess unpublished price sensitive information about the Company and a failure to trade in the Company's securities would result in exceptional circumstances such as financial hardship;
3. the CEO (or equivalent) approves in writing the trade by an employee upon the employee satisfying the CEO (or equivalent) that they do not possess unpublished price sensitive information about the Company and a failure to trade in the Company's securities would result in exceptional circumstances such as financial hardship;
4. where trading is required for compliance with a court order, or other legal or regulatory requirement;
5. where the trade is part of a managed securities portfolio where the person is not in a position to influence choices in the portfolio; and
6. where the trade results from a dividend reinvestment plan where the person has given ongoing instructions to reinvest dividends.

The Company wishes to encourage directors, officers and employees to defer trades if an announcement of a major event or the release of price-sensitive information is likely to occur shortly after a proposed trade, even if it is outside the blackout period.

## **Long Term Trading**

The Company wishes to encourage directors, officers and employees to adopt a long term attitude to investment in the Company's securities. Therefore, directors, officers

and employees must not engage in short term or speculative trading of the Company's securities.

### **Prohibited Transactions**

Directors, officers and employees must not enter into transactions or arrangements which operate to limit the economic risk of their security holding in the Company without first seeking and obtaining written acknowledgement from the Chair.

Executives are prohibited from entering into transactions or arrangements which limit the economic risk of participating in unvested entitlements.

### **Notification**

Directors must disclose details of changes in securities of the Company they hold (directly or indirectly) to the Company Secretary as soon as reasonably possible after the date of the contract to buy and sell the securities ("**Contract Date**") but in any event:

1. no later than 3 business days after the Contract Date; or
2. if you begin to have or cease to have a substantial shareholding or there is a change in your substantial holding, the business day after the Contract Date.

Directors are referred to the Company's *Director's Disclosure Obligations* document and *Director's Declaration of Interest Form*. The Company Secretary is to maintain a register of notifications and acknowledgements given in relation to trading in the Company's securities. The Company Secretary must report all notifications of dealings in the Company's securities to the next board meeting of the Company.

Directors are reminded that it is their obligation under section 205G of the Corporations Act to notify the market operator within 14 days after any change in a director's interest.

### **Breaches**

Breach of the insider trading prohibition could expose you to criminal and civil liability. Breach of insider trading law or this Policy will be regarded by the Company as serious misconduct which may lead to disciplinary action and/or dismissal.

This Policy does not contain an exhaustive analysis of the restrictions imposed on, and the very serious legal ramifications of, insider trading. Directors, officers and employees who wish to obtain further advice in this matter, are encouraged to contact the Company Secretary.

This Policy also applies to the Company's related entities.

Approved by the Board of Alchemy Resources Limited on 5 July 2023.