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AusQuest Limited

ABN 35 091 542 451

Securities Trading Policy

Adopted: 14 August 2026

1. Introduction

This document sets out restrictions and requirements for certain personnel of AusQuest Limited (**Company**) and its subsidiaries in relation to trading or otherwise dealing in the Company's securities.

2. Glossary of terms

In this document, a reference to:

ASX	means ASX Limited (ACN 008 624 691), or the securities market operated by ASX Limited known as the Australian Securities Exchange, as the context requires.
Board	means the Company's Board of Directors.
Closed Period	has the meaning given to that term in ASX Listing Rule 19.12.
Corporations Act	means the *Corporations Act 2001* (Cth), including any regulations made pursuant to that Act.
Deal or **Dealing**	in relation to Securities, includes: • applying for, acquiring or disposing of Securities, or entering into an agreement to do any of those things, as principal or agent; • granting, accepting, exercising or discharging an option or other right or obligation to acquire or dispose of Securities; • advising, procuring or encouraging another person (including a family member, friend, associate, colleague, or client) to apply for, acquire or dispose of Securities, or to enter into any agreement to do any of those things; • entering into agreements or transactions which operate to limit the economic risk of a person's holdings in Securities; • trading in financial products issued or created over Securities; and

- entering into transactions in financial products which operate to limit the economic risk of a person's holdings in Securities.

Designated Officer	means: • the chairperson of the Board (**Chairperson**); or • if the Chairperson is unavailable or is unable to act (including where the Chairperson is the relevant Designated Person), the Managing Director of the Company; or • If both are unavailable, the Chair of the Audit Committee.
Inside Information	in relation to a company, means the information that: • is not generally available to the public; and • a reasonable person would expect that information to have a material effect on the price or value of the relevant company's securities (i.e. it would, or would be likely to, influence a person who commonly acquires securities in deciding whether or not to acquire or dispose of that company's securities).
Key Management Personnel	means a director, executive or senior manager of the Company, or such other person who is "key management personnel" within the meaning of Accounting Standard AASB 124, including the Managing Director, Chief Financial Officer, the Company Secretary and all employees having significant knowledge of, or significant authority and responsibility for planning, directing and controlling all or major parts of the activities of the Company.
Prohibited Period	has the meaning given to that term in ASX Listing Rule 19.12.
Relevant Person	means directors, officers, employees, contractors, consultants and advisors of the Company and its subsidiaries.
Securities	means: • any shares in the Company, options to subscribe for shares in the Company, or other rights to acquire (including by way of issue) shares in the Company; • any debentures issued by the Company; • any other securities issued by the Company, including anything which falls within the definition of "security" in ASX Listing Rule 19.12; and

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- derivatives and other financial products issued by third parties in relation to the Company's shares, debentures and options.

Trading Day has the meaning given to that term in ASX Listing Rule 19.12.

3. Objectives

The objectives of this document are to:

- promote adherence to high ethical and legal standards by Relevant Persons in relation to their personal investments in Securities;
- minimise the risk of the personal investments of Relevant Persons conflicting with the interests of the Company and its Security holders;
- minimise the risk of Relevant Persons contravening insider trading laws;
- being admitted to ASX:
    - ensure the Company is able to meet its disclosure obligations under the ASX Listing Rules;
    - preserve market confidence in the integrity of dealings in Securities; and
- increase transparency with respect to dealing in securities of the Company by Relevant Persons.

This document is not designed to prohibit the Relevant Persons from Dealing in Securities, but does recognise that there may be times when Relevant Persons cannot, or should not, do so.

This document provides guidance to Relevant Persons as to the times when Relevant Persons may, or should not, Deal in Securities.

4. Scope

This document applies to all Relevant Persons. The Company expects that Relevant Persons will comply with this document.

5. Prohibition on insider trading and communication

5.1 Outline of prohibition

The Corporations Act prohibits a person from:

- trading or agreeing to trade a company's securities;
- procuring someone to trade or entering an agreement to trade a company's securities;

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- directly or indirectly communicating information to someone who they think might trade, enter into an agreement to trade or get another person to trade a company's securities,

while in possession of Inside Information about that company.

Information is generally available to the public if, amongst other things, it consists of readily observable matters, or it has been brought to the attention of investors by an announcement with the ASX and a reasonable period for its dissemination has elapsed since the announcement.

For the purposes of the legislation, it is irrelevant how a person comes into possession of Inside Information.

5.2 Possible Inside Information

From time to time, Relevant Persons may come into possession of Inside Information related to the Company, such as:

- information in relation to the Company's financial performance or position;
- details of a proposed material acquisition or disposition involving the Company;
- a significant business development or a proposed change in the nature of the Company's business;
- a significant milestone or event in relation to new products or service offerings being developed by the Company;
- details of material contracts that are being negotiated by the Company;
- potential litigation that would have a substantial effect on the Company;
- a proposed change to the share capital structure of the Company; and
- a major change to the Board or senior management.

Further, the Relevant Persons may obtain Inside Information in relation to another company. For example, in the course of negotiating a transaction with the Company, another company might provide confidential information about itself which is not generally available.

5.3 Obligations

A Relevant Person who is in possession of Inside Information must not:

- Deal in any Securities in any way;
- procure any other person to Deal in Securities in any way; or
- directly or indirectly communicate the Inside Information, or cause the information to be communicated, to another person.

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A Relevant Person who deals with Securities while in possession of Inside Information may be liable to receive serious civil and criminal penalties, including imprisonment, fines, liability for civil damages and compensation orders.

It is the responsibility of Key Management Personnel to ensure that external advisors who receive price sensitive information are bound by a confidentiality agreement or other enforceable confidentiality obligations.

5.4 Information on other companies

The Company may publish a confidential internal list of companies of which the Company has Inside Information.

Relevant Persons must not Deal in the securities of the companies on such list unless the Company has confirmed the relevant Inside Information which it possessed has become generally available.

Relevant Persons must not release copies of this list or details of the companies which it names.

5.5 Questions

A Relevant Person who is unsure whether they are in possession of Inside Information should contact the Managing Director and/or Chairperson, and in their absence the Company Secretary, and seek appropriate advice prior to any Dealings taking place.

6. General Dealings in Securities

6.1 Requirement to obtain approval

Directors and Key Management Personnel must give at least 2 Trading Days' notice to the Designated Officer and the Company Secretary of a proposed Dealing in Securities.

The notice must set out:

- details of the proposed Dealing, including the intended number and timeframe of Securities the subject of the proposed Dealing;
- confirmation that the director or member of Key Management Personnel is not in possession of any Inside Information.

A director or member of Key Management Personnel must not Deal in Securities unless and until the Designated Officer provides his or her prior approval to do so. Such approval is not an endorsement of the proposed Dealing. Directors and Key Management Personnel remain responsible for their own investment decisions and compliance with the law.

The Company Secretary must keep a record of all approvals given and confirmations of Dealing. All approved Dealings must occur within 1 week of the approval being granted unless otherwise specified.

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Approval to Deal in Securities may be withdrawn if new information comes to light or there is a change in circumstances. A decision to withhold or withdraw approval is final and binding on the person seeking approval and must be kept confidential by the person seeking approval.

6.2 Closed Periods applicable to Key Management Personnel

Directors and Key Management Personnel must not Deal in Securities during the following periods (**Closed Periods**):

- **financial year:** two weeks prior to, and 48 hours after the announcement of the Company's full year financial statements to the ASX;
- **half year**: two weeks prior to, and 48 hours after the announcement of the Company's half year financial statements to the ASX;
- **quarterly reporting:** two weeks prior to, and 48 hours after the announcement of the Company's quarterly reports required under the ASX Listing Rules;
- **meetings:** 10 Trading Days prior to any general meeting of the Company's shareholders until close of normal trading on the first Trading Day after the relevant meeting.

The Company may at its discretion vary this rule in relation to a particular Closed Period by general announcement to all Key Management Personnel either before or during the Closed Periods. However, if a member of Key Management Personnel is in possession of price sensitive information which is not generally available to the market, then he or she must not deal in the Company's securities at any time he or she is in possession of such information.

6.3 Prohibited Periods applicable to Key Management Personnel

The Company may, from time to time, impose and notify Directors, Key Management Personnel or other Relevant Persons of an additional Prohibited Period, including where the Company is considering or is aware of a matter that may involve Inside Information or may be subject to ASX Listing Rule 3.1A.

A notification may be given by email or any other method determined by the Company and may apply to all Relevant Persons or only to specified persons or classes of persons. The Company is not required to provide reasons for imposing a Prohibited Period. Any person who receives such a notification must keep the existence and terms of the Prohibited Period confidential and must not Deal in Securities during that period unless prior written clearance is obtained in accordance with this Policy.

6.4 Trading in exceptional circumstances

A director or member of Key Management Personnel who is not in possession of any Inside Information may Deal in Securities during a Closed Period or Prohibited Period, or engage in short-term trading, with prior written clearance from the Designated Officer if exceptional circumstances exist, being:

- such Dealing is required to comply with an applicable law or court order;

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- severe financial hardship demonstrated by compelling supporting information; or
- such other exceptional circumstances determined by the Designated Officer.

A director or member of Key Management Personnel requesting an exemption due to exceptional circumstances must provide the Designated Officer with the details of those circumstances before Dealing in Securities.

6.5 Trades by other Relevant Persons

Relevant Persons who are not directors or Key Management Personnel may Deal in Securities at any time provided that such persons:

- are not in possession of any Inside Information relating to those Securities; and
- have checked with the Designated Officer that he/she is not in possession of any Inside Information or may be deemed to be in possession of Inside Information; and
- notify the Company Secretary before Dealing in the Securities and, after the transaction has occurred, provides confirmation of the Dealing.

6.6 No short-term trading

The Company encourages Relevant Persons to adopt a long-term attitude to their investment in Securities.

Directors and Key Management Personnel must not engage in short-term trading in Securities without approval of the Designated Officer.

In general, the purchase of Securities with a view to resale within a 3-month period, and the sale of Securities with a view to repurchase within a 3-month period, would be considered short-term trading. However, the sale of shares immediately after they have been acquired through the conversion of a Security (e.g. exercise of an option) will not be regarded as short-term trading.

6.7 No hedging

Where a Relevant Person is entitled to equity-based remuneration arrangements, that Relevant Person must not enter into a transaction (e.g. writing a call option) that operates or is intended to operate to limit the economic risk of holdings of unvested Securities or vested Securities which are subject to a holding lock.

6.8 No margin lending by Key Management Personnel

Key Management Personnel must not at any time enter into a transaction that involves using Securities as collateral in any financial transaction, including margin lending arrangements, unless otherwise specifically approved by the Board.

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6.9 General exceptions

Subject to the insider trading provisions of the Corporations Act, Relevant Persons may at any time:

- acquire ordinary shares in the Company by conversion of Securities giving right of a conversion to ordinary shares;
- acquire Securities under a bonus issue made to all holders of Securities of the same class;
- acquire Securities under a dividend reinvestment plan, a rights issue or a share purchase plan that is available to all holders of Securities of the same class;
- acquire, or agree to acquire, Securities under an equity-based incentive plan operated by the Company;
- exercise options acquired under a Company incentive plan and receive shares (but may not dispose of the resulting shares other than in accordance with these procedures);
- transfer the Securities already held into a superannuation fund or other saving scheme of which the Relevant Person is a beneficiary;
- invest in, or trade any unit of, a fund or other scheme where the assets of the fund or other scheme are invested at the discretion of a third party; and
- accept a takeover offer or vote to approve a scheme of arrangement involving Securities.

6.10 Notifications by directors

A director must immediately notify the Company Secretary in writing of the requisite information for the Company Secretary to make the necessary notifications to the Australian Securities & Investments Commission and to ASX as required by the Corporations Act and the ASX Listing Rules.

7. Consequences of a breach

Strict compliance with this document is mandatory for all Relevant Persons.

Compliance with these guidelines for trading in the Company's securities does not absolve that individual from complying with the law, which must be the overriding consideration when trading in the Company's securities.

Breaches of the requirements set out in this document may damage the Company's reputation in the investment community and undermine confidence in the market for Securities. Accordingly, breaches will be taken very seriously by the Company and will be subject to disciplinary action, including possible termination of a person's employment or appointment.

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8. Questions and further information

If you have any questions or need further information on how to comply with this Policy, please contact the Company Secretary or the Designated Officer.

9. Corporate Group

In this document, a reference to the Company includes any 'related body corporate' (as defined in the Corporations Act) of the Company, as the context requires.

10. Review and publication of this Policy

The Board will review this Policy on a periodic basis, and may amend this Policy, to ensure that it is appropriate for the Company's business and operations and is up to date with applicable laws and regulations.

The Company will publish this Policy on the Company's website.

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