

Purpose and Scope

To establish a formal policy for Coventry Group Ltd. (CGL) for trading in its securities by its Key Management Personnel (KMP).

Authority

The Executive Leadership Team (ELT) is to authorise all policies. This policy was prepared by the Chief Financial Officer and is known in this policy as the Policy Owner.

Policy

General Prohibition (Insider Trading)

No KMP of CGL is permitted to trade in CGL's securities if they are in possession of market sensitive information which when disclosed publicly would be likely to materially affect the market price of CGL's securities. This reinforces the prohibition on insider trading as contained in the Corporations Act.

Restricted Trading Periods

Subject to the general prohibition clause, KMP's are not permitted to trade in CGL's securities except for the following non-restricted periods:

- For a 30-day period after the full year result announcement
- For a 30-day period after annual general meeting
- For a 30-day period after the half year result announcement

Exceptional Circumstances

A KMP member who is not in possession of any price sensitive information relating to CGL may seek prior written approval from the Chairman to sell CGL securities during a restricted trading period in exceptional circumstances.

Hedging, Short Term Trading and Margin Loans

No KMP is permitted to:

- Enter into a transaction that is designed or intended to hedge that person's exposure to a CGL security that is subject to retention arrangements or an unvested option;
- Engage in short-term or speculative trading in CGL securities;
- Grant security interest over any CGL securities they own, including any margin loan without first receiving the written consent of the Chairman.

It is the responsibility of each KMP to ensure that closely connected persons entities are aware of the laws prohibiting insider trading. A breach of insider trading prohibitions or failure to comply with this policy could result in termination of employment and exposure to criminal penalties (including imprisonment) or civil liability.

Exclusions

Forms of trading in securities in CGL are not subject to this policy are:

- Participating in a dividend reinvestment plan;
- Participation in a rights or similar issue as announced from time to time;
- Dealings which result in no change to the beneficial interest in the securities;
- The acceptance of a take-over offer; and
- Share buy-backs by CGL during a share buy-back period – provided the securities are in class to which the buy-back applies.



Associated Documents

- CORP 120 02 PR - Securities Trading Procedure

Policy History

<u>Description</u>	<u>Reference #</u>	<u>Date</u>	<u>Authority</u>
Original Policy	CORP 120 00	December 2010	Board
Revision #1	CORP 120 01	February 2016	Board
Revision #2	CORP 120 02	February 2018	Board
Next Review Due		February 2020	

