

Share Trading Policy

Issue Number 3

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26 September, 2022

1. Policy

This policy lays down the rules for trading of shares by the staff of Inventis Group.

2. Purpose

To set process for ensuring no insider trading occurs and no employee including directors and their respective related parties use any information acquired in their capacity as an employee or director, to gain an improper advantage for themselves or someone else.

3. Scope

This Policy applies to all personnel who work in any of the Inventis Group Companies.

4. Definitions and Interpretation

1. *Key Management Personnel*: The key management personnel of the Inventis consolidated group are those persons having authority and responsibility for planning, directing and controlling the activities of the group either directly or indirectly. To remove any doubt, the following are considered Key Management Personnel for the Inventis consolidated group:
 - a. All Directors (whether executive or non- executive);
 - b. Chief Financial Officer;
 - c. Company Secretary;
 - d. General Manager;
 - e. Middle Management being direct reports to the General Manager or the Chief Financial Officer (whether employee or contractor); and
 - f. Executive Assistants of the General Manager and the Chief Financial Officer (irrespective of their designations).
2. *Closely Related Party*: A closely related party of a member of the key management personnel for the Inventis consolidated group means:
 - a. A spouse or child of the member; or
 - b. A child of the member's spouse; or
 - c. A dependent of the member or the member's spouse;
 - d. Anyone else who is one of the member's family and may be expected to influence the member, or be influenced by the member, in the member's dealings with the entity; or
 - e. A company that either the member or a closely related party of the member controls.
3. *Closed periods*: Closed periods or blackout periods are as follows:
 - a. from 15 June each year until 24 hours after the release of the Company's Preliminary financial report for the year ended 30 June each year; and
 - b. from 15 December each year until 24 hours after the release of the consolidated interim financial report of the Company for the half year ended 31 December each year.
4. *Insider Information*: A person possesses "Inside Information" in relation to an entity where:

- a. The person possesses information that is not generally available to the public and, if the information were generally available, a reasonable person would expect it to have a material effect on the price or value of the Company's securities (or a decision whether or not to trade in them); and
 - b. The person knows, or ought reasonably to know that the information is not generally available and, if it were generally available, a reasonable person would expect it to have a material effect on the price or value of the Company's securities.
5. *Reasonable Person:* A reasonable person would be taken to expect information to have a material effect on the price or value of securities if the information would, or would be likely to, influence a person who commonly invests in securities to either deal or not deal in securities in any way.
6. *To Deal:* For the purposes of this policy "to deal" in the Company's securities includes subscribing for, purchasing or selling the Company's securities or entering into an agreement to do any of those things.

5. Procedure

1. **Insider Trading:** To curtail the risk of insider trading the Company has implemented the following procedure:
 - 1.1. *General Prohibition:* KMPs are prohibited to trade in IVT securities and other products as stated in 1.2, during the closed periods. To ensure that this is implemented, all KMPs will be notified as an employment condition of the closed periods and their consent be taken to ensure they have understood the policy.
 - 1.2. *Types of Trading Prohibited:* The General Prohibition is only on the following types of trading in IVT related securities:
 - 1.2.1. Trading – Whether ordinary shares or other shares as listed at ASX from time to time.
 - 1.2.2. An option – An option over an unissued share in the company.
 - 1.2.3. A Right – A renounceable or unrenounceable right to subscribe for a share in the Company.
 - 1.2.4. Trading in derivatives – As issued from time to time.
 - 1.2.5. Short-term trading – Where there is a trading of shares (buying and selling) within 3 months or such time as prescribed by Company from time to time.
 - 1.2.6. Short selling – Where a shareholder borrows the security and sell it in hope that they will be able to buy the security back at a lower price at some time in future and close out their short position at a profit.
 - 1.2.7. Hedging Transactions – This prohibits the employees of the Group from entering into hedging transactions to limit their exposure in respect of any unvested entitlement to securities they receive under the Employee Share Option Plan (ESOP).
 - 1.2.8. Margin Lending and other secured financing arrangements-provided it is permitted on case to case basis by the Board.
 - 1.2.9. Trading in securities of other company- being an entity with which IVT is in confidential negotiations about a material transaction.

1.3. *Exceptions to the General Prohibition:* The following type of trading is excluded from this Share Trading Policy:

- 1.3.1. Off market transfers – for restructuring by transferring to closely related party or a superannuation fund.
- 1.3.2. Equal Access buy back
- 1.3.3. Disposal of rights under a pro-rata issue
- 1.3.4. An acquisition under ESOP.
- 1.3.5. Any trading with prior written clearance from the Board.

2. **Specific Prohibition:** In addition to 1.1 above, the KMPs are prohibited from trading during:

- 2.1. 24-hour period before any announcement which is price sensitive in nature;
- 2.2. 24-hour period after any announcement which is price sensitive in nature;
- 2.3. 24-hour period before an Annual General Meeting or any other Shareholder meeting where security holders are provided with a trading update and information about material post-balance date events.
- 2.4. 24-hour period after Chairman's address or any other announcements including results of any resolutions in an Annual General Meeting or any other Shareholder meeting.
- 2.5. 24-hour period after a prospectus, product disclosure statement or cleansing notice is issued in connection with an offer of securities.
- 2.6. Any other period which the Board may consider and notify its KMPs to be ad-hoc closed period.

3. **Consents and Notifications:**

3.1. All KMPs are required to seek approval for the proposed dealing outside a closed period if such KMP is not sure whether information in their possession is price sensitive information. The Approving Authority for such transactions is the Board.

3.2. All KMPs are required to notify of any dealing in IVT securities to the Company Secretary within 3 days of confirmation of transaction.

Breach of This Policy: A breach of this policy will be regarded as serious misconduct which may lead to disciplinary action, up to and including dismissal.

Further Information: If you require any further information or assistance or are uncertain about the application of the law or this trading policy in any situation, please contact the Company Secretary.

Changes to this Policy: If the Company makes a material change to this policy, the amended trading policy will be provided to the ASX for release to the market within 5 business days of the material changes taking effect.

Review: This policy is to be reviewed every two years.

Approved by the Board

Date for next review of this policy: **September 2025**