



# EVZ LIMITED SHARE TRADING POLICY

NOVEMBER 2023

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## 1. Introduction

This document sets out EVZ Limited's Share Trading Policy on dealing in:

- o EVZ Limited Securities; and
- o by its directors, officers, senior executives, relatives of senior executives and employees.

If you do not understand any part of this policy or how it applies to you, you should contact the Company Secretary before dealing with any securities covered by this policy.

## 2. Purpose

The law prohibits people in possession of non-public price-sensitive information from Dealing in Securities or passing on information to others who may Deal in Securities ("Insider Trading").

EVZ Limited has adopted this policy to ensure all directors, officers, senior executives, relatives of senior executives and employees are aware of their obligations.

## 3. Scope

This policy applies to all:

- (a) directors and officers of the EVZ Limited Group;
- (b) Senior Executives of the EVZ Limited Group and Closely Connected Persons;
- (c) employees of the EVZ Limited Group;
- (d) any entities controlled by or otherwise associated with (a) to (d) ("Restricted Persons").

## 4. Insider Trading Laws

### (a) Prohibition

If you have any inside information about EVZ Limited (or another entity, such as a company with which EVZ Limited is considering a transaction), it is criminal offence for you to:

- o Deal in EVZ Limited Securities (or securities of the other entity);
- o advise or procure another person to Deal in EVZ Limited Securities (or securities of the other relevant entity); or
- o pass on inside information to someone else (such as colleagues, family, or friends) knowing (or where you should have reasonably known) that the other person will, or is likely to, use that information to Deal in, or procure someone else to Deal in, EVZ Limited Securities (or securities of the other entity).

What type of information is 'inside information'?

Inside information is information that:

- is not generally available; and
- if it were generally available, a reasonable person would expect it to have a 'material effect' on the price of EVZ Limited Securities or securities of another entity (in that it would, or would be likely to, influence persons who normally invest in securities in deciding whether or not to acquire or dispose of the relevant Securities).

What type of information is 'price sensitive'?

The following list is illustrative only:

- the financial performance of EVZ Limited.
- a possible acquisition or sale of any assets by the EVZ Limited Group.
- a possible change in EVZ Limited's capital structure.
- a proposed dividend.
- senior executive changes.
- development of a new product; or
- any possible claim against EVZ Limited or other unexpected liability.

What is 'Dealing' in Securities?

Dealing in Securities includes applying for, acquiring, disposing of, or entering into an agreement to apply for, acquire or dispose of, EVZ Limited Securities or Securities of another entity.

#### (b) Consequences of Insider Trading

Penalties for Insider Trading can include:

- criminal liability including large fines or imprisonment;
- a civil penalty of up to \$220,000; and
- civil liability, which may include being sued by another party or EVZ Limited, for any loss suffered as a result of illegal trading.

## 5. Trading Restrictions Imposed by this Policy

### (a) Trading Windows

Restricted Persons may only Deal in EVZ Limited Securities during periods when the Trading Window is open. The status of the Trading Window will be notified by the Company Secretary, if are intending to Deal in EVZ Limited Securities, prior to Dealing you must complete a Share Trading Approval Form and submit it to the Company Secretary to obtain approval to determine the status of the Trading Window and gain approval to Deal prior to proceeding to Deal.

The Share Trading Approval Form is available from the Company Secretary and it's submission is a mandatory step in gaining approval to proceed to Deal.

Periods when it is expected that the Trading Window will be closed due to the expected presence of sensitive information are detailed below.

1. From 30 June to release of EVZ Limited's full year results.
2. From 31 December to release of EVZ Limited's half year results.
3. From the morning of the EVZ Limited's Annual General Meeting until the results of the AGM voting is released to the ASX; and
4. Five days before and after profit guidance in respect of EVZ Limited is released to the ASX.

Warning: Irrespective of whether a Trading Window is open, should you possess 'inside information' then you must not Deal in EVZ Limited Securities.

### (b) Ad hoc Trading Windows

The Company Secretary may, on an ad hoc basis, allow Restricted Persons to Deal in EVZ Limited Securities by opening a trading period outside of a normal trading period (Ad Hoc Trading Window). The Company Secretary will open an Ad Hoc Trading Window by notifying Restricted Persons directly by email, setting out the duration of the Ad Hoc Trading Window.

The Company Secretary may also prohibit certain or all Restricted Persons from Dealing in EVZ Limited Securities during a Trading Window or an Ad Hoc Trading Window. Where Restricted Persons are prohibited, the Company Secretary will notify them directly by email.

### (c) Application to employee share plans and incentive remuneration.



The restrictions in this policy do not affect a Restricted Person's participation in:

1. EVZ Limited's employee share plans or the exercise of rights under those plans;
2. An issue made to all holders of EVZ Limited Securities; or
3. a dividend reinvestment plan that is available to all holders of EVZ Limited Securities.

However, the restrictions in this policy will apply to any subsequent Dealing in any EVZ Limited Securities issued to (or for the benefit of) a Restricted Person in those circumstances.

(d) Margin lending and hedging arrangements

Restricted Persons must notify the Company Secretary immediately of any arrangement involving:

1. margin lending, other securities lending or the granting a charge, lien, or other encumbrance over EVZ Limited Securities; or
2. hedging or otherwise entering a contract with the purpose of securing a profit or avoiding a loss by reference to movements in the price of EVZ Limited Securities, where the EVZ Limited Securities subject to such arrangements represent 5% or more of EVZ Limited's issued capital.

On receiving such notification, the Company Secretary will inform the Board.

Directors, Senior Executives and Closely Connected Persons are prohibited from entering into margin loans, hedging or any other arrangement that would have the effect of limiting their exposure to risk in relation to an element of their remuneration that:

3. has not vested in that Director or Senior Executive; or
4. has vested in that Director or Senior Executive but remains subject to a holding lock.

(e) Short-selling and short-term dealing prohibited

Restricted Persons must not engage in 'short-selling' of EVZ Limited Securities. 'Short-selling' involves a person borrowing Securities to sell in the hope that they will be able to buy them back at a lower price in the future.

Restricted Persons must not engage in 'short-term dealing' in EVZ Limited Securities. Short-term dealing' includes buying and selling Securities within a three-month period and could involve frequent and regular trading.

(f) Dealing when the Trading Window is closed

Restricted Persons are prohibited from trading in EVZ Limited Securities at times when the Trading Window is closed, unless otherwise approved by the Company Secretary in exceptional circumstances. Exceptional circumstances include extreme financial hardship, or any other circumstances considered exceptional by the Chairman or, if the circumstances involve the Chairman, a consensus of the other Directors.

A Restricted Person must seek approval by sending an email to the Company Secretary outlining the details of the potential trade and the exceptional circumstances which justify the trade. The Company Secretary will notify the Restricted Person whether the request has been granted by return email. If granted, an approval will last for 7 days.

## 6. Notification of Dealing

The directors of EVZ Limited must notify the Company Secretary if their interest in EVZ Limited Securities changes, as soon as possible after such change occurs.

## 7. Confidential Information

Directors, Senior Executives, employees, and contractors have a duty of confidentiality in respect of information obtaining during the course of their employment or during the course of their involvement with the EVZ Limited Group. You must not reveal any confidential information concerning the EVZ Limited Group, use that information in any way which may injure or cause loss to the EVZ Limited Group, or use that confidential information to gain an advantage for yourself.

Furthermore, if you are a Restricted Person, you must not directly or indirectly communicate 'inside information' in relation to EVZ Limited Securities or other Securities relating to another entity, if you know, or ought reasonably to know, that that other person would be likely to:

1. Deal in EVZ Limited Securities or other relevant Securities; or
2. Procure another person to so deal.

## 8. Policy Adherence and Awareness

All directors, officers, Senior Executives, Closely Connected Persons, employees, contractors, and consultants of the EVZ Limited Group are required to comply with this policy and must notify the Company Secretary of any breach or suspected breach of this policy.

The policy will be provided to all new directors, officers, and Senior Executives at the commencement of their engagement with the EVZ Limited Group via the EVZ Limited website.

Strict compliance with this policy is a condition of employment. Breaches of this policy will be subject to disciplinary action, which may include termination of employment.

Senior Executives of the EVZ Limited Group must ensure that their associated Closely Connected Persons understand the application of the policy.

## 9. Monitoring Compliance

EVZ Limited does monitor Dealing in EVZ Limited Securities by Restricted Persons as part of the administration of this policy.

EVZ Limited will periodically update this policy to ensure that it meets regulatory standards and will notify the market and directors, officers, Senior Executives, employees, contractors, and consultants of the EVZ Limited Group accordingly.

## 10. Definitions

**ASX** means the ASX Ltd ACN 008 624 691

**Board** means the board of directors of EVZ Limited.

**Closely Connected Persons** means all of the following:

1. a spouse or de facto spouse of a Senior Executive of the EVZ Limited Group;
2. a child who is under the age of 18 of a Senior Executive of the EVZ Limited Group; and
3. a trust controlled by a Senior Executive of the EVZ Limited Group or a person referred to in (a) and (b) above.

**Corporations Act** means the Corporations Act 2001 (Cth).

**Deal** means to apply for, acquire, dispose of, or enter into an agreement to apply for, acquire or dispose of Securities.

**EVZ Limited** means EVZ Limited ACN 010 550 357. EVZ Limited Group includes EVZ Limited and its subsidiaries and entities it controls.

**EVZ Limited Securities** includes EVZ Limited shares, debentures, options to subscribe for new shares and options over existing shares, warrant contracts, contracts for difference and other derivatives relating to EVZ Limited shares.

**Securities** means shares, debentures, options to subscribe for new shares and options over existing shares, warrant contracts, contracts for difference and other derivatives relating to the shares.



**Senior Executives** means those persons having authority and responsibility for planning, directing, and controlling the activities of the entity, directly or indirectly, including any director.

**Share Trading Approval Form** is available from the Company Secretary.

**Trading Window** has the meaning set out at paragraph 5(a).

Version	Date Amended / Released	Amendments
1.0	12 December 2019	Initial Version
1.1	1 September 2022	Reformat
1.2	30 November 2023	Share Trading Approval Form

