



(the Company)

7 DEALINGS IN FE INVESTMENTS GROUP LIMITED SECURITIES

PURPOSE

The purpose of this Policy is to:

- (a) provide a brief summary of the law which prohibits insider trading; and
- (b) set out restrictions on dealing in securities by key management personnel of FE Investments Group Limited (FEIG); and

POLICY

Whenever a person has inside information which may affect the value of securities, they must not:

- (a) deal in those securities; or
- (b) communicate the information to anyone else

This rule applies regardless of how the inside information was obtained. It applies not only to FEIG securities but also to the securities of other companies.

WHO IS COVERED BY THIS POLICY

This policy applies to the key management personnel (KMP) of FEIG, including all Directors, executive employees, contractors and consultants as well as the KMP spouse (marriage or de facto) and dependents under the age of eighteen (18) years old.

If a KMP is a trustee of a trust and is also a beneficiary of the trust, the implications of this Policy will also extend to the trust

THE SECURITIES COVERED BY THE POLICY

This Policy applies to all FEIG securities including fully paid Ordinary Shares, Options, Performance Rights, Convertible Notes and any other derivatives and other financial products issued by FEIG.

INSIDE INFORMATION

Inside information about FEIG might include

- Proposed changes in the capital structure, capital returns and buy backs of financial products;
- Information relating to FEIG 's financial results;
- Material (more than 5%) changes in FEIG 's financial forecasts or expectations;
- A material acquisition, divestment or realisation of assets;
- Proposed dividends and share issues;
- Changes to the Board;
- Possible events which could have a material impact on profits (negatively or positively);
- Proposed changes in the nature of the business of FEIG; and

- Notification to FEIG of a substantial shareholding;

In very broad terms insider trading will be committed, when a person:

- (a) deals in FEIG securities whilst possessing any of the above information ahead of the general public; or
- (b) communicates any of the above information to another person knowing that the other person will or could likely use the information to deal in, or procure someone else to deal in FEIG securities.

DEALINGS IN FEIG SECURITIES BY KMP

Prohibited Periods

In order to prevent the occurrence of dealing in FEIG securities during times when a KMP has access to inside information, the Company has created Prohibited Periods.

Prohibited Periods for the purposes of this Trading Policy are defined as:

- (a) the ten (10) trading day period immediately leading up to the day of the announcement of the Company's quarterly, Half-yearly, Annual Report and disclosure document offering securities in the Company and two (2) days after these Announcements are made; and
- (b) the five (5) trading day period prior to the anticipated release of price sensitive information/results.

During these Prohibited Periods **no** trading in FEIG Securities may occur without the permission of the Chairman through the preparation of a notice to deal.

The notice to deal must include a statement that the KMP does not believe they are in possession of any Inside Information and are not involved in short term or speculative dealing in FEIG securities. The notice to deal must include:

- (a) the name of the KMP and Related Party (if applicable);
- (b) whether the interest in the Company's Securities held by the KMP was direct or indirect (and if it was indirect, the circumstances giving rise to the interest);
- (c) the date of the Dealing;
- (d) the amount paid or received for the Securities;
- (e) the number of Securities held by the KMP, directly and indirectly, before and after the trading in Securities; and
- (f) whether there are exceptional circumstances - severe financial hardship which means a KMP has a pressing financial commitment that cannot be satisfied otherwise than by selling FEIG Securities or there is a court order requiring the sale or transfer of FEIG securities

Approval will be applied taking into account the circumstances of the KMP, the number of securities to be acquired and weighing this against any perceived detriment to FEIG's reputation or risk to a stable market for FEIG's securities.

The KMP must confirm with the Company Secretary that the dealing has occurred within three (3) business days. A copy of all purchase confirmations will be sent to the Company Secretary for the official file.

ASX DISCLOSURE OBLIGATIONS

The acquisition or sale of FEIG securities by FEIG Directors must be disclosed to the ASX under Listing Rule 3.19A within five (5) business days of the transaction taking place.

The details of the dealing must be provided to the Company Secretary as soon as possible after the dealing to allow the Company Secretary adequate time to complete and release of the documentation to the ASX on the Director's behalf. Details of any changes in Directors' interest in FEIG securities must be noted in the Board minutes of the next meeting.

Restricted persons with a substantial shareholding in FEIG securities (more than 5% of the issued capital) are also required to comply with the substantial shareholding notification provisions of the Corporations Act 2001 when there is a change in their holding. In this instance a notice must be provided to the ASX and to FEIG in the prescribed form within two (2) business days of the change.

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