

Company Announcements Office  
ASX Limited  
20 Bridge Street  
Sydney NSW 2000

27 September 2021

**RE: SECURITIES TRADING POLICY**

In accordance with Listing Rule 12.10, attached is an updated Ambertech Limited (ASX:AMO) Securities Trading Policy.

On Behalf of the Board of Ambertech.



Robert Glasson  
Company Secretary  
**Ambertech Limited**

## Ambertech Limited Securities Trading Policy

### 1. Purpose

Ambertech is committed to maintaining a high standard of integrity, investor confidence and good corporate governance. These Rules form part of Ambertech's risk management framework and outline the requirements regarding dealing in Securities. The Rules clarify and set out the extent of the obligations for parties and Securities which require prior clearance to deal.

### 2. Scope

These Rules apply to the following Specified Persons:

- a. All Ambertech employees, including Ambertech directors.
- b. Your spouse, de facto partner or any children residing with you.
- c. Companies, trusts, self-managed and other super funds, and entities which are controlled by you or these persons (collectively, your Connected Persons).

These Rules are in place to:

- a. protect you against contravening Australia's laws on insider trading.
- b. make you aware of the restrictions under the law.
- c. establish a best practice procedure for dealing in Securities.

### 3. Insider Trading

An overriding principle is that if you know price sensitive information regarding Ambertech Securities that has not been publicly released, you must not, at any time:

- a. Deal in those securities
- b. promote another person to deal in those Securities; or
- c. communicate the information or tip off another person who is likely to deal in those Securities.

It is an offence under the Corporations Act to trade using inside information, or communicate inside information to others who will, or are likely to, trade on the inside information.

### 4. Inside Information

Inside Information is information that is not generally available and that, if it were generally available, a reasonable person would expect it to have a material effect on the price or value of relevant shares (Price Sensitive Information).

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Examples of information that might be Price Sensitive Information include information relating to:

- a. financial performance.
- b. a material acquisition or disposal of assets.
- c. an actual or proposed takeover or merger.
- d. an actual or proposed change to capital structure.
- e. the entry into or termination of a material contract.
- f. a material claim or other unexpected liability.

Information is considered generally available if:

- a. it is available in the public domain;
- b. investors have been notified by an ASX announcement, and a reasonable period has passed since the announcement; or
- c. it consists of observations, deductions, conclusions or inferences made or drawn from public information.

### 5. Market Perception and Reputation

Strict compliance with this trading policy is important so that public confidence in Ambertech is maintained. It would be damaging to the reputation of Ambertech if the market perceived that an Ambertech employee was taking advantage of their position to make financial gains by trading in securities.

You must exercise care and judgment in deciding whether to trade securities.

### 6. Short Term or Speculative Trading

Specified Persons must not sell Ambertech Securities within 3 months after their purchase except for the sale of Ambertech Securities resulting from the vesting or release from restrictions under the Ambertech Employee Share Option Scheme.

Specified Persons are also not permitted to Trade in Ambertech Securities on a speculative basis (including short selling).

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### 7. Blackout Periods

There are certain periods during the year, given the proximity to the release of Ambertech financial or trading results, in which people covered by the scope of this policy should not deal in Ambertech shares, given the heightened risk of actual or perceived insider trading. Ambertech directors, senior executives and other employees are restricted from trading in Ambertech shares during those periods, called 'blackout periods', as set out below.

Designated Event	Blackout Period
Release of ASX Appendix 4E (full year results)	From end of 30 June of the relevant year up until the market open on the trading day following the release of results.
Release of ASX Appendix 4D (half year results)	From end of 31 December of the relevant year up until market open the trading day following the release of results.
Annual General Meeting (AGM)	From the notice of the AGM until the completion of the AGM.

The Board, on the recommendation of the Company Secretary, may vary or impose restriction on trading during other periods where deemed appropriate.

### 8. Clearance to Trade

Any person covered by the scope of this policy who wishes to trade in Ambertech shares at any time must seek approval from the relevant approver as per below:

Person Requesting	Approver
Chair of the Board	Company Secretary
Directors	Chair of Board or Company Secretary
Company Secretary	Chair of Board
Key Management Personnel and other executives	Company Secretary
All other specified persons	Company Secretary

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### 9. Exceptions

Specified Persons do not need to seek approval to trade where the trade of securities arises from:

- a. Transfers of Ambertech shares already held where the trade results in no change of beneficial ownership.
- b. Undertakings to accept, or the acceptance of, a takeover offer.
- c. Trading under an offer or invitation made to all or most of the shareholders, such as, a rights issue, a purchase plan, a dividend reinvestment plan and an equal access buy-back, where the plan that determines the timing and structure of the offer has been approved by the Board.

### 10. Exceptional Circumstances

In exceptional circumstances, a Specified Person, who is not in possession of inside information in relation to Ambertech, may be given prior written clearance to sell or otherwise dispose of Ambertech shares during a Blackout Period where the person is in severe financial hardship or there are other exceptional circumstances.

A person is considered in severe financial hardship if he or she cannot satisfy a pressing financial commitment otherwise than by selling the relevant Ambertech shares. The determination as to whether a person qualifies for clearance under exceptional circumstances can only be made by the Chair of the Board or the Company Secretary and must be made with notice of not less than 5 business days prior to the proposed transaction.

### 11. Notification

In any case, Directors and Officers must notify either the Chair or the Company Secretary prior to dealing in Ambertech shares and confirm transactions within 48 hours of completion. Notification via email is considered acceptable.

### 12. Compliance

Compliance is monitored by the Company Secretary and the Ambertech Audit and Risk Management Committee.