Policy for Dealing in Securities

Frontier Digital Ventures Limited
ACN 609 183 959

Adopted by the Board	2 August 2016
Last reviewed by the Board	21 October 2024

38-9 The Boulevard, Mid Valley City
Lingkaran Syed Putra
59200 Kuala Lumpur, Malaysia
www.frontierdv.com

1 Introduction

The purpose of this Policy is to:

- explain the types of conduct in dealing in the Company's securities that are prohibited under the *Corporations Act 2001* (Commonwealth) ("Corporations Act**"**). Such prohibitions apply to all directors and employees of Frontier Digital Ventures Limited ("Frontier" or the "Company") and its related bodies corporate as defined in the Corporations Act (collectively the "Group"); and
- explain the Company's policy and procedure for the buying and selling of the Company's securities that protects the Company and its directors and employees against the misuse of unpublished information the disclosure of which could materially affect the price or value of securities.

The purpose of this policy is to ensure that you are aware of your legal obligations and to protect the Company and its reputation in the marketplace.

The Company aims to achieve the highest possible standards of corporate conduct and governance. The Board of directors considers that compliance with this Policy is essential to ensure that the highest standards of conduct are being met by all directors and employees.

Any non-compliance with this Policy will be regarded as serious misconduct which may entitle the Company to take corrective disciplinary action.

2 Persons to whom this Policy applies

This Policy applies to:

- all directors and officers of the Group (including the Chief Executive Officer (**CEO**));
- all direct reports to the CEO ("senior executives");
- all employees of the Group,

  (collectively, "Employees"); and
- Connected Persons of Employees.

In this Policy, the persons listed above will be collectively referred to as "Relevant Persons".

"Connected Person" means, in relation to an Employee:

(a) a family member of the Employee who may be expected to influence, or be influenced by, the Employee in his or her dealings with the Company or Company securities (this may include the Employee's spouse, partner and children, the children of the Employee's partner, or dependants of the Employee or the Employee's partner); and

(b) a company or any other entity which the Employee has an ability to control.

Where this Policy requires a Relevant Person to do an act or thing (for example, obtaining clearance in accordance with paragraph 3.3), the relevant Employee must do that act or thing to ensure that the obligations of a Connected Person under this Policy are complied with.

All Employees must ensure that external advisors who receive Price Sensitive Information are bound by a confidentiality agreement or other enforceable confidentiality obligations.

FRONTIER DIGITAL VENTURES

3 Restrictions on dealing in securities

3.1 No trading where in possession of inside information

A Relevant Person must not deal in the Company's securities where:

- they are aware of confidential information that is materially price sensitive or 'inside' information; or
- the Company has notified Relevant Persons that they must not deal in the Company's securities (either for a specified period, or until the Company gives further notice).

See section 4 which sets out further guidance as to what constitutes 'inside' or 'price sensitive' information.

In addition to your legal obligations, you must also protect the Company and its reputation in the marketplace. Therefore, in addition to considering whether you have price-sensitive information, you should also consider whether your proposed conduct could create a negative market perception (for yourself or for the Company).

A useful question to ask yourself is:

✓ *If the market was aware of all the current circumstances, could my proposed transaction be perceived by the market as me (or my Connected Persons) taking advantage of my position in an inappropriate way?*

✓ *How would it look if my transaction was reported on the front page of the Australian Financial Review?* (the "Front Page News Test")

If you have any perception concerns, you should note them in your relevant notification or approval request.

Where any approval is required for a dealing under this Policy, approval will not be granted where the dealing would not satisfy the Front Page Test in terms of causing reputational damage to the Company.

3.2 Other prohibited dealings

(a) Blackout periods

Relevant Persons must not deal in the Company's securities during any of the following blackout periods:

- the period from the close of trading on the ASX on 31 December each year, or if that date is not a trading day, the last trading day before that day, until the day following the announcement to ASX of the preliminary final statement or full year results;
- the period from the close of trading on the ASX on 30 June each year, or if that date is not a trading day, the last trading day before that day, until the day following the announcement of the half-yearly results; and
- any other period that the Board specifies from time to time.

For the avoidance of doubt, during the above periods Relevant Persons **must not** deal in financial products issued or created over or in respect of the Company's securities (for example, exchange-traded options, contracts for differences and other derivatives).

(b) Exceptional circumstances

If a Relevant Person needs to deal in securities during a blackout period due to exceptional circumstances and is not in possession of an 'inside' information, but such dealing is prohibited by paragraph 3.2(a) of this Policy, then, the Relevant Person may apply to:

- the Chair of the Board (if the Relevant Person is a director (other than the Chair of the Board), an officer or a senior executive, or one of their Connected Persons);
- the Chair of the Audit and Risk Committee (if the Relevant Person is the Chair of the Board or one of his or her Connected Persons); or
- the CEO (in the case of other Relevant Persons),

or their delegate (the "approver") for a waiver from compliance with the provisions of paragraph 3.2(a).

Exceptional circumstances are likely to include severe financial hardship or compulsion by court order or such other circumstances where the approver acting reasonably forms the view that there is genuine need sufficient to justify a waiver from compliance with the provisions of paragraph 3.2(a).

Relevant Persons seeking a waiver under this paragraph must apply in writing to the relevant approver setting out the circumstances of the proposed dealing (including an explanation as to the severe financial hardship or circumstances that are otherwise exceptional) and the reason the waiver is requested. A waiver will only be granted if the Relevant Person's application is accompanied by sufficient evidence (in the opinion of the approver) that the dealing of the relevant securities is the most reasonable course of action available in the circumstances.

If a waiver is granted, the Relevant Person will be notified in writing (which may include notification via email) and in each circumstance the duration of the waiver to deal in securities will be 2 business days.

Unless otherwise specified in the notice, any dealing permitted under this paragraph 3.2(b) must comply with the other sections of this Policy (to the extent applicable).

(c) No short-term dealing – buying and selling within 1-month period

Relevant Persons must not at any time deal in the Company's securities on a short-term trading basis. Short-term trading includes buying **and** selling securities on market within a 1-month period, and entering into other short-term dealings (for example, forward contracts).

3.3 Other permitted dealings: Directors and their Connected Persons

Where paragraphs 3.1 and 3.2 do not apply, Relevant Persons may deal in the Company's securities subject to the notification requirements set out below.

The restriction in paragraph 3.1 applies to all dealings in the Company's securities despite any approval given to a Relevant Person under this Policy, and the Relevant Person is responsible for ensuring that the dealing does not breach this restriction.

(a) Advance notification required

During any period other than a blackout period, directors and senior executives must notify of any dealing in the Company's securities (including any dealing by one of their Connected Persons) as follows:

- the Chair of the Board must notify the Board or the Chair of the Audit Committee in advance of any proposed dealing; and
- any other director of the Company (including the CEO) must notify the Chair of the Board in advance of any proposed dealing.
- any senior executive must notify the CEO in advance of any proposed dealing.

(b) Dealing must occur within one month

Upon provision of notification under paragraph 3.3(a), a director or senior executive (or the Connected Person) must undertake the proposed dealing within one month of the notification being provided. If the dealing is not undertaken within this time, the notification will no longer have effect and new notification will be required in accordance with paragraph 3.3(a)before the proposed dealing may be undertaken.

(c) Confirmation required

Upon provision of notification, a director (or the Connected Person) may undertake the proposed dealing.

3.4 Notification of dealings in Securities of the Company

(a) The ASX Listing Rules require the Company to notify ASX of dealings in notifiable interests in Securities by Directors within 5 business days after the change occurs.

(b) The Company must make arrangements (in the form of a letter agreement or a deed) outlining the director obligations to provide the necessary information to the Company to enable the Company to comply with ASX Listing Rule 3.19A and enforce them with each of the directors of the Company.

(c) Directors must notify the Company Secretary immediately after dealing in any Securities and provide the Company with the requisite details of the dealing to enable the Company to comply with the ASX Listing Rules.

3.5 Margin lending arrangements

(a) Any dealing in the Company's securities by Relevant Persons pursuant to a margin lending arrangement must be conducted in accordance with this Policy. Such dealings would include:

(1) entering into a margin lending arrangement in respect of the Company's securities;

(2) transferring securities in the Company into an existing margin loan account; and

(3) selling securities in the Company to satisfy a call pursuant to a margin loan.

(b) Directors and senior executives must obtain approval in accordance with the procedure set out in paragraph 3.3 for any proposed dealing in the Company's securities in connection with a margin lending arrangement, irrespective of any trading window.

(c) The Company may, at its discretion, make any approval granted in accordance with paragraph 3.5(b) conditional upon such terms and conditions as the Company sees fit (for example, with regard to the circumstances in which the Company's securities may be sold to satisfy a margin call).

3.6 Hedging of Company securities

(a) Hedging includes entering into transactions in financial products that operate to limit the economic risk associated with holding Company securities.

(b) Hedging of Company securities by a Relevant Person is subject to restrictions under the Corporations Act and, under this Policy, hedging of Company securities by a Relevant Person is subject to the following rules:

(1) the hedge transaction must not be entered into, renewed, altered or closed out when the Relevant Person is in possession of inside information;

(2) Company securities acquired under an employee, executive or director equity plan must never be hedged prior to the vesting of those Company securities; and

(3) Company securities must never be hedged while they are subject to a holding lock or restriction on dealing under the terms of any employee, executive or director equity plan operated by the Company.

(c) Relevant Persons are permitted to hedge their vested and unrestricted Company securities provided that the hedge transaction is treated as a dealing in Company securities for the purposes of this Policy, and the relevant approvals and notifications required under paragraph 3 are made on that basis.

3.7 Exclusions

Paragraphs 3.2(a), 3.2(c) and 3.3 of this Policy do not apply to:

(a) participation in an employee, executive or director equity plan operated by the Company (e.g. applying for an allocation of securities under an employee equity plan offer). However, where securities in the Company granted under an employee, executive or director equity plan cease to be held under the terms of that plan, any dealings in those securities must only occur in accordance with this Policy;

(b) the following categories of passive trades:

- acquisition of Company securities through a dividend reinvestment plan;
- acquisition of Company securities through a share purchase plan available to all retail shareholders;
- acquisition of Company securities through a rights issue; and
- the disposal of Company securities through the acceptance of a takeover offer, scheme of arrangement or equal access buy-back;

(c) dealings that result in no effective change to the beneficial interest in the securities (for example, transfers of Company securities already held into a superannuation fund or trust of which the Relevant Person is a beneficiary);

(d) trading under a pre-approved non-discretionary trading plan, where the Relevant Person did not enter into the plan or amend the plan during a blackout period, the plan does not permit the Relevant Person to exercise any influence or discretion in relation to trading under the plan and the plan cannot be cancelled during a blackout period, other than in exceptional circumstances;

(e) subject to paragraph 3.5, a disposal of securities of the Company that is the result of a secured lender exercising their rights, for example, under a margin lending arrangement; and

(f) indirect and incidental trading that occurs as a consequence of a Relevant Person dealing in units or shares of a managed investment scheme, listed investment company, exchange-traded fund or similar investment vehicle that is managed by a third party and that happens to hold as part of its portfolio securities in the Company.

However, such dealings remain subject to the insider trading rules in the Corporations Act and paragraph 3.1 of this Policy.

4 Insider trading

Broadly speaking, the law provides that a person who has "Inside Information" about a company (defined below) must not:

(a) buy or sell securities in a company, or enter in an agreement to buy or sell securities, or exercise options over securities, or otherwise apply for, acquire or dispose of securities ("deal");

(b) encourage someone else to deal in securities in that company; or

(c) directly or indirectly provide that information to another person where they know, or ought to know, that that person is likely to deal in securities or encourage someone else to deal in securities of that company ("tipping").

These restrictions apply to all securities, not just the Company's securities.

Inside Information is information that:

- is not generally available to the market; and
- if it were generally available to the market, a reasonable person would expect it to have a material effect (upwards or downwards) on the price or value of a security.

Inside Information may include matters of supposition, matters that are not yet certain and matters relating to a person's intentions.

5 Securities in other companies

While in general employees are free to deal in securities in other listed companies, the prohibited conduct under the Corporations Act includes dealings not only in the Company's securities but also in those of other listed companies with which the Company may be dealing (including the Group's customers, contractors or business partners) where an employee possesses 'inside information' in relation to that other company.

If a Relevant Person is aware of information that is not generally available but which, if it were generally available, a reasonable person would expect to have a material effect on the price or value of a security, the Relevant Person should not deal in the securities of the companies that it affects.

Relevant Persons may come into possession of 'inside information' where they are directly involved in client relationship management or negotiating contracts. For example, where the Relevant Person is aware that the Group is about to sign a major agreement with another company, the Relevant Person should not buy securities in either the Company or the other company.

6 Breach

Breaches of the insider trading laws have serious consequences for both the Relevant Person concerned and the Company.

Independently, breaches of this Policy are regarded by the Company as serious and will be subject to appropriate sanctions.

Any person who is suspected of breaching this Policy may be suspended from attending the workplace on full pay pending the outcome of investigations into the alleged breach.

Any person who is proven to have breached this Policy could face disciplinary action (including forfeiture of securities and/or suspension or termination of employment).

7 Who to contact

Any Employee who has queries about this Policy should contact the Company Secretary.

Company Secretary:	Sandra McIntosh
Via email:	s.mcintosh@acclime.com
Via phone:	+61 03 8689 9997