

Securities Trading Policy

Purpose

This policy establishes AnteoTech Ltd's framework for regulating dealings in AnteoTech Securities by Restricted Persons to prevent insider trading and protect market integrity. Trading on material non-public information is a criminal offence under Part 7.10 of the Corporations Act 2001 (Cth), and AnteoTech is committed to ensuring all dealings in its securities are conducted lawfully.

Scope

This policy applies to all Restricted Persons — directors, officers, employees, and contractors with or likely to have access to Inside Information — and to their Related Parties, including spouses, dependants, and entities they control. The Company Secretary maintains the Restricted Persons list, reviewed at least annually. This policy is publicly available on AnteoTech's website and is to be read alongside the Corporate Governance Policy and Continuous Disclosure & Market Communications Policy.

Inside Information

Inside Information means 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 or value of AnteoTech Securities

Policy Statement

This policy outlines AnteoTech's position in relation to securities trading. The organisation shall:

- Prohibit all Restricted Persons from dealing in AnteoTech Securities at any time when they possess Inside Information, regardless of whether a Trading Window is open.
- Restrict dealing to defined Trading Windows and require prior written clearance from the Clearance Officer before any trade is executed.
- Prohibit short selling, hedging arrangements over unvested equity, use of derivatives and/or CFD's, and the use of AnteoTech Securities as collateral for margin loans, at all times.
- Require prompt ASX notification of all changes in notifiable interests of directors under ASX Listing Rule 3.19A.
- Comply with the insider trading prohibitions in Part 7.10 of the Corporations Act 2001 (Cth), ASX Listing Rules 3.19A and 12.9–12.12, and ASIC Regulatory Guide 222.

Securities Trading

Securities Trading includes buying, selling, transferring, exercising ADO shares and/or options (other than where specifically exempted), entering into agreements to buy or sell, granting security interests, or any arrangement that changes beneficial ownership.

Our Commitments

AnteoTech is committed to:

- Publishing standard Blackout Periods (the four weeks prior to each full year and half year results release and each Quarterly Report release, and two days post release, as determined by the Clearance Officer in companywide communications.) to all Restricted Persons at the start of each financial year, with ad hoc updates communicated promptly. Restricted Persons are permitted to deal in Company Securities throughout the year except during standard Blackout Periods described above or any ad hoc Blackout Period as notified by the Company Secretary and only after written clearance has been obtained. The Clearance Officer may approve trading during a Blackout Period in exceptional circumstances (such as severe financial hardship or a court order), provided the applicant is not in possession of Inside Information.

- Maintaining a Clearance Register of all requests, approvals, and declinations, reviewed by the Board at least annually.
- Annual training on insider trading laws, clearance procedures, and prohibited arrangements, supported by written annual attestations from all Restricted Persons.

Our Responsibilities

The Clearance Officer (Chair of the Board for directors; Company Secretary for all others) will:

- Respond to clearance requests within two business days; clearance is valid for five business days and may be declined without reasons, with any declination kept confidential.
- Assist directors with lodgement of all change of director's interest notices with ASX within five business days of each transaction.

All Restricted Persons will:

- Never deal in AnteoTech Securities while in possession of Inside Information — whether directly, through a Related Party, nominee, or other arrangement. Insider trading is a serious criminal offence that may result in substantial fines, imprisonment and civil penalties under the Corporations Act.
- Submit a written clearance request to the Clearance Officer before any trade during a Trading Window, confirming they do not hold Inside Information, and deal or transact within five business days of approval.
- Take reasonable steps to ensure their Related Parties do not deal during Blackout Periods, and immediately notify the Clearance Officer if they suspect a Related Party has done so.

Our Outcomes

This policy aims to protect AnteoTech, its personnel, and its shareholders from the legal, financial, and reputational consequences of insider trading and market misconduct. Through consistent application, AnteoTech will uphold market integrity, meet its obligations as an ASX-listed entity, and maintain the confidence of investors and regulators.

Nothing in this Policy affects the right of:

- Restricted Persons from purchasing Company Securities by the exercise of options lawfully granted to them
- Transferring Company Securities already held in a superannuation fund or similar scheme of which the Restricted Person is a member/ beneficiary.
- An undertaking to accept, or the acceptance of a takeover offer of the Company; or
- Trading under an offer or invitation made to all or most of the security holders in AnteoTech, such as a Share Purchase Plan, a rights issue or a share restructure where the timing and structure of the plan has been approved by the Board.

Endorsement

This policy is endorsed by the Board of Directors and reviewed annually.

Approval

Approved by: 

Position: MD/CEO

Date: 26/8/2026