

SECURITIES TRADING POLICY

OVERVIEW

Directors and employees of the Company (Ask Funding Limited or “**ASK**”) and its subsidiaries are encouraged to be long term holders of the Company’s shares. However as the Company’s shares are listed on the Australian Securities Exchange (“**ASX**”) it is essential that care is taken in the timing of any acquisition or disposal of those shares and any other financial instrument issued or created over those shares by the Company or by third parties (for example: share options, margin loans) to ensure conduct known as “insider trading” and any other trading conduct specifically prohibited by the Company is avoided.

PURPOSE

The purpose of this policy is to:

1. ensure that the Company’s directors, officers, consultants, members of senior management (collectively referred to in this policy as “**designated officers**”) and other employees (“**staff**”) are aware of the legal restrictions on trading in Company shares, options or other securities while in possession of unpublished price-sensitive information concerning the Company; and
2. minimise the chance that misunderstandings or suspicions arise that the Company’s designated officers and staff are trading while in possession of unpublished price-sensitive information (“**inside information**”).

The policy recognises that it is illegal for a person to trade in the Company’s shares, options or other securities while in possession of inside information concerning the Company. This is regardless of whether the terms of the policy have been complied with.

A breach of this policy or the relevant laws will be regarded as serious misconduct which may lead to disciplinary action including dismissal.

POLICY

Subject to the prohibitions described below, this policy sets out:

1. when designated officers and staff may trade in the Company’s financial products. For the purpose of this policy, “financial products” includes the Company shares or options (whether vested or unvested in the holder), financial products issued or created over its shares by third parties, and associated products which operate to limit the economic risk of a holding in the Company’s shares or options; and
2. procedures to reduce the risk of trading in the Company’s financial products whilst in the possession of inside information (“**insider trading**”).

This policy is applicable to all designated officers and staff of ASK and any subsidiary company. Additionally the insider trading prohibitions set out in the Corporations Act 2001 and discussed under “Inside information” below apply to all persons (including family members).

The Company Secretary should be contacted if any of the provisions of this policy are unclear or if there is any uncertainty regarding the possession of information which may be classified as inside information.

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PROHIBITED CONDUCT

1. INSIDE INFORMATION

The insider trading provisions of the Corporations Act 2001 operate to prohibit a person (which includes a company) in possession of “inside information” about financial products from:

- (a) Dealing (applying for, acquiring or disposing of) in the financial products or entering into an agreement to do so;
- (b) Procuring another person to deal in the financial products; or
- (c) Providing the information to another person who the person knows, or ought to reasonably have known, is likely to deal or procure someone else to deal in the financial products.

Inside information is information that is:

- not generally available; and
- if was generally available, a reasonable person would be taken to expect the information to, or be likely to, have a material effect on the price or value of the Company’s financial products.

Information is generally available if it:

- is readily observable;
- has been made known in a manner likely to bring it to the attention of persons who commonly invest in financial products of the relevant type and a reasonable period for that information to be disseminated has elapsed since it was made known; or
- consists of deductions, conclusions or inferences made or drawn from available or observable information.

It is assumed for the purpose of this policy that the designated officers are likely to be in possession of price sensitive information by virtue of their position and accordingly, designated officers must provide notification to the Company Secretary of any intended trading activity in the Company’s financial products.

2. CLOSED PERIODS

The Company’s designated officers are prohibited from trading in the Company’s financial products during a “**closed period**”. A closed period means the period between:

1. 1 January and 24 hours after the time of the release of the Half Year Report to ASX;
2. 1 July and 24 hours after the time of the release of the Full Year Report to ASX; and
3. Any periods from time to time when the Company is considering matters which are subject to Listing Rule 3.1A (Continuous Disclosure – Exceptions to the General Rule).

3. SHORT TERM SPECULATIVE GAINS

The Company’s designated officers and other staff are prohibited dealing in the Company’s financial products for short term speculative gains and therefore they cannot dispose of such financial products within six months of their acquisition (“short term speculative gains”).

4. HEDGING

The Company’s designated officers are prohibited from entering into transactions in financial products which operate to limit the economic risk of both vested or unvested holdings in the Company’s securities including, without limitation, any hedging or similar arrangement in respect of unvested entitlements or restricted entitlements held or granted under any equity based remuneration scheme.

5. STOCK LENDING

The Company's designated officers are prohibited from entering into any stock lending or similar arrangement in relation to their holdings of the Company's financial products.

6. DEALING THROUGH THIRD PARTIES

The Company's designated officers are prohibited from procuring another party to trade in the Company's financial products in circumstances in which that designated officer is himself or herself precluded from trading in the Company's financial products under this policy and by law.

The above prohibition extends to:

- dealings by designated officers where they use nominees, agents or other associates, such as family members, family trusts and family companies; and
- designated officers procuring third parties to deal in the Company's financial products, which includes inducing or encouraging those third parties to deal.

EXEMPTIONS

1. EXCLUDED TRADING

A designated officer may trade in the Company's financial products during a closed period if that trading falls within one of the following categories of "excluded trading"

1. transfers of the Company's financial products held by a designated officer where such transfer does not constitute a change in the beneficial ownership;
2. an investment in a scheme or other arrangement (other than a scheme investing only in the Company's financial products) where investment decisions are exercised by a third party over which the designated officer has no control or influence;
3. undertakings to accept or the acceptance of a takeover offer;
4. trading under an offer or invitation made to all or most of the Company's shareholders such as a rights issue, security purchase plan, dividend reinvestment plan or an equal access buy-back, where the plan determines the structure and timing of the offer has been approved by the Board;
5. disposal that is the result of a secured lender exercising their rights, for example under a margin lending arrangement; or
6. trading under any Company executive or employee incentive scheme in accordance with the rules of a Board approved Incentive Plan.

2. TRADING WITH CONSENT

A designated officer may trade during a closed period if that person obtains written permission to do so.

3. PROCEDURE FOR OBTAINING WRITTEN CONSENT TO TRADE

A designated officer who wishes to trade in the Company's financial products during a closed period ("**Applicant**") must obtain prior written consent of the Chairperson or where the Chairman is the Applicant, the Deputy Chairperson.

Consent may only be provided if:

1. the applicant has provided an undertaking that he or she is not in possession of inside information;
2. the applicant is in severe financial hardship or other exceptional circumstances exist; and
3. the Chairperson (or if applicable the Deputy Chairperson) is satisfied that there is no inside information which has not been disclosed to the ASX.

Consent must be obtained not less than two (2) business days before the proposed trade.

Consent will remain valid only for a period of fourteen (14) business days and all details of trading in this period must be provided to the Company Secretary to ensure that all relevant notifications to ASX are completed.

Copies of the written application and consent must be provided to the Company Secretary and retained as a part of the Company's corporate records.

4. SEVERE FINANCIAL HARDSHIP AND EXCEPTIONAL CIRCUMSTANCES

Severe financial hardship could include but not be limited to the applicant having a pressing financial commitment that cannot be satisfied otherwise than by selling the relevant financial product.

Exceptional circumstances could include but is not limited to the applicant being required by a court order to transfer or dispose of the Company's financial products or there is some other overriding legal or regulatory requirement for him or her to do so.

WHEN STAFF MAY BUY OR SELL

Staff, other than designated officers, may buy or sell the Company's financial products provided he or she:

1. does not hold inside information; and
2. are not engaging in short term speculative gains.

WHEN A DESIGNATED OFFICER MAY BUY OR SELL

Designated officers may buy or sell the Company's financial products outside of a closed period if he or she:

1. does not hold inside information;
2. have notified the Company Secretary of his or her intention to trade in the Company's financial products; and
3. are not engaging in short term speculative gains.

Designated officers may buy or sell the Company's financial products within a closed period if he or she has obtained written consent through the process and having met the conditions outlined above.

ASX NOTIFICATION BY DIRECTORS

Directors are required to notify the Australian Securities Exchange (ASX) of any change to their holding of relevant interests in the Company's financial products. Whilst the Corporations Act requires Directors to notify the ASX of any changes to their holdings within 14 days, the Listing Rules requires Directors to notify these changes to the ASX within five business days of the change.

To enable ASK to comply with these requirements, Directors must furnish the relevant information within four (4) business days to the Company Secretary, who will facilitate the transmission of these notifications to the ASX.

Directors must also notify the Company Secretary within four (4) business days of any margin loan arrangement entered into or proposed to be entered into in relation to the Company's financial products.

AVAILABILITY OF THIS POLICY

This trading policy, or a summary of its main provisions, will be made publicly available by posting it on the Company's website in a clearly marked corporate governance section.

It will also be included in the Employee Handbook provided to each new employee as a part of the Company's Induction Program.

It will also be given to the ASX for release to the market. Any subsequent material changes to this policy will also be given to the ASX for release to the market.