



Board Charter

Corporate Governance Policy

Section 1 Board of Directors

1.1 General

This document sets out the main principles adopted by the Board of Directors of the Company to implement and maintain a culture of good corporate governance both internally and in its dealings with outsiders.

The Board of the Company is committed to administering the policies and procedures with openness and integrity, pursuing the true spirit of corporate governance commensurate with the Company's needs.

The matters set out in this document are subject to the Corporations Act, the Companies Act, the Constitution and the AIM Rules and the ASX Listing Rules.

The purpose of preparing and disclosing the matters set out in this document is to:

- (a) formalise procedures to ensure the Company and the Board act in a transparent and appropriate manner in their respective internal and external dealings;
- (b) ensure that appropriate checks, balances and procedures are in place to monitor the operations of the Company and those charged with its management; and
- (c) provide shareholders with a transparent method to evaluate the performance of the Company from a corporate governance perspective.

In preparing and implementing these strategies, the Company and the Board are mindful of the Corporate Governance Principles and Recommendations and the AIM Rules.

1.2 Functions, powers and responsibilities of Board

Generally, the powers and obligations of the Board are governed by the Corporations Act, the Companies Act and the general law.

Without limiting those matters, the Board expressly considers itself responsible for the following:

- (a) ensuring compliance with the Corporations Act, the Companies Act, the ASX Listing Rules, the AIM Rules and all other relevant laws;
- (b) providing leadership and developing, implementing and monitoring strategic operational and financial objectives for the Company and the overall performance of the Company;
- (c) appointing appropriate staff, consultants and experts to assist in the Company's operations;



- (d) ensuring appropriate financial and risk management controls are implemented;
- (e) setting, monitoring and ensuring appropriate accountability and a framework for remuneration of Directors and executive officers;
- (f) establishing and overseeing the Company's process for making timely and balanced disclosure of all material information in accordance with the ASX Listing Rules and the AIM Rules;
- (g) implementing appropriate strategies to monitor performance of the Board in implementing its functions and powers;
- (h) implementing and overseeing the Company's risk management framework to enable risk to be identified, assessed and managed and to set the risk appetite the Board expects Management to operate within;
- (i) appointing the Chairperson;
- (j) appointing and removing the Chief Executive Officer and Company Secretary;
- (k) approving the appointment and, where appropriate, removal of members of Management;
- (l) contributing to and approving Management's development of corporate strategy and performance objectives;
- (m) monitoring Management's implementation of strategy and performance generally, and ensuring appropriate resources are available to Management;
- (n) monitoring the effectiveness of the Company's governance practices;
- (o) approving and monitoring the progress of major capital expenditure, capital management and acquisitions and divestitures;
- (p) approving the annual budget;
- (q) liaising with the Company's external auditors;
- (r) approving and monitoring financial and other reporting systems of the Company (including external audit) and the integrity of these systems; and
- (s) appointing and overseeing Committees where appropriate to assist in the above functions and powers.

1.3 Structure of Board

The structure of the Board is determined in accordance with the following principles:

- (a) to aim for, so far as is practicable given the size and the nature of the operations of the Company, a majority of the Board being Independent Directors;
- (b) to aim for, so far as is practicable given the size and the nature of the operations of the



Company, the appointment of a Chairperson who is an Independent Director;

- (c) to aim for, so far as is practicable given the size and the nature of the operations of the Company, a Chairperson who is not the chief executive officer;
- (d) to aim for, so far as is practicable given the size and the nature of the operations of the Company, a Board comprising members with diverse backgrounds; and
- (e) to have a minimum of three Directors.

1.4 Independence of Directors

In assessing the independence of Directors, the Company has regard to Principle 2 of the Corporate Governance Principles and Recommendations and regards an Independent Director as a non-executive Director (that is, not a member of management) who:

- (a) is not, and has not in the past three years been, a substantial shareholder of the Company or an officer of, or otherwise associated directly with, a substantial shareholder of the Company;
- (b) within the last three years has not been employed in an executive capacity by the Company or another group member;
- (c) does not receive performance-based remuneration (including options or performance rights) from, or participate in an employee incentive scheme of the Company;
- (d) within the last three years has not been in a material business relationship (by example, as a supplier, professional advisory, consultant or customer) with the Company or other group member, or an officer of, or otherwise associated with, someone in such a relationship;
- (e) does not have close family ties with any person who falls within any of categories (a) - (d) described above; and
- (f) has not served on the Board for a period which could, or could reasonably be perceived to, materially interfere with the Director's ability to act in the best interests of the Company or otherwise compromise their independence.

When considering whether a Director is an Independent Director, the materiality of such interest, position, association or relationship must be assessed to determine whether it might interfere, or might reasonably be perceived to interfere, in a material respect, with the Director's capacity to bring an independent judgement to bear on issues before the Board and to act in the best interests of the Company and its shareholders.

A Director must advise the Chairperson (or, in the case of the Chairperson, a member of the Nominations Committee) if there is a change in his or her interests, positions, associations or relationships that could bear on his or her independence at the earliest opportunity.

1.5 Composition of the Board

In an effort to ensure that the Board comprises members with a broad range of experience, expertise and skills relevant to the Company, the Board may establish a Nominations



Committee or will otherwise consider the guidelines set out under the Nominations Committee Charter.

In determining the composition of the Board, the Board and the Nominations Committee (if applicable), should have regard to the “skills matrix” below which identifies the collective skills that the Board should possess:

Skill	Skill	Skill
Corporate governance	Acquisitions	CEO/CFO/COO experience
Engineering	Human resources	Financial acumen
Health & safety	Technology	Public relations
Strategy/Risk	Marketing	Other sector experience - on a director-by-director basis
Global experience	Community development	
Capital projects	Expertise in geology and mineral resources	Project discovery, evaluation and production experience

The Board may disclose the extent to which those skills are present, or absent, from the members comprising the Board from time to time.

Section 2 Board Responsibilities

2.1 Chairperson

The Chairperson is responsible for leadership of the Board, for efficient organisation and conduct of the Board's function and the briefing of all Directors in relation to issues arising at Board meetings. The Chairperson is also responsible for shareholder communication and arranging Board performance evaluation.

2.2 Chief Executive Officer/Managing Director

The Chief Executive Officer or Managing Director (if any) is responsible for running the day to day affairs of the Company under delegated authority from the Board and to implement the policies and strategies set by the Board, within the risk appetite determined by the Board. In carrying out his or her responsibilities, the Chief Executive Officer or Managing Director must report to the Board in a timely manner and ensure that all reports to the Board are clear and accurate and present a true and fair view of the Company's financial position and operating results.

The Chief Executive Officer or Managing Director (if any) (together with the Chief Financial Officer and/or Finance Director) will be required to state in writing to the Board that the financial records of the Company have been properly maintained and that the financial reports of the Company comply with relevant accounting standards and represent a true and fair view, in all material respects, of the Company's financial position and performance.



2.3 Company Secretary

The role of the Company Secretary is to support the effectiveness of the Board and the Committees. In carrying out his or her responsibilities, the Company Secretary is accountable directly to the Board in the performance of this role which includes, without limitation:

- (a) advising the Board and the Committees of governance matters;
- (b) monitoring compliance with Board and Committee policy and procedures;
- (c) coordinating the timely completion and despatch of Board and Committee papers;
- (d) ensuring that the business at Board and Committee meetings is accurately recorded in the minutes; and
- (e) helping to organise and facilitate the induction and professional development of Directors.

2.4 Induction of New Directors and Ongoing Director Education

On their first appointment, Directors will have the benefit of an induction program aimed at deepening their understanding of the Company, its activities and the business, environment and markets in which the Company operates. As part of the program Directors will receive a manual of essential Board and Company information and will be given briefings by Management.

As part of the induction process new Directors may complete a self-assessment of their capabilities and competencies to determine areas where further development will be beneficial in contributing to the Board's performance. Development in these areas will then be considered and discussed with the new Director by the Nomination Committee (if established) or the Chairperson.

The Company will provide an ongoing education and development program for Directors which includes both formal and informal sessions. The program is intended to cover overall competencies required of any Director and also specific knowledge relevant to the Company's business. It is desirable for all Directors to complete the Australian Institute of Company Directors Course (or equivalent) and related formal assessment.

Directors are also expected to keep themselves abreast of changes and trends in the Company's business, environment and markets and to keep abreast of changes and trends in the economic, political, social and legal climate generally. Directors are expected to have an appropriate base level of understanding on accounting matters. Additional development and training in this area can be discussed with the Nomination Committee (if established) or the Chairperson by a Director. The Company will also provide briefings on developments in accounting standards.

2.5 Independent Advice

A Director may seek independent advice, including legal advice, where he or she believes it is necessary to properly discharge his or her duties as a Director. The Company will pay for the reasonable cost of this advice provided that the Director has obtained the prior written



approval of the Chairperson (including for the cost of the advice)

If the Chairperson wishes to seek independent advice and wishes for the Company to pay for the reasonable costs of that advice, the Chairperson must obtain the prior written approval (including for the cost of the advice) of the chairperson of the Corporate Governance Committee or other applicable Committee.

Where a Director's request in respect of independent advice is approved as set out above, the Director and the Chairperson should agree who will provide instructions to the independent adviser. If the Chairperson has requested the advice, the Director who provided the approval to obtain the advice should undertake this role.

Where a Director's request in respect of independent advice is approved as set out above, a copy of the advice obtained will be provided to all Directors together with an explanation as to why the advice was obtained unless the Chairperson determines that this is not appropriate or that a different approach should be taken.

The other Directors will be advised if the Chairperson approves or declines a request to obtain independent advice unless the Chairperson determines such notification is not appropriate or that a different approach should be taken.

Section 3 Corporate Ethics and Continuous Disclosure

The Company has adopted a Corporate Ethics & Continuous Disclosure Policy which has been agreed to by each member of the Board setting out, in addition to these principles, the obligations of integrity and honesty on each member of the Board and his or her obligations with respect to trading in Securities in the Company (which is more comprehensively dealt with in the Trading Policy) and disclosure to the ASX and to AIM.

In addition to the Corporate Ethics Policy, the Company also adheres to the statement of principles and responsibilities set out below in Section Section 4 with respect to both its internal dealings with employees and consultants, and external dealings with shareholders and the community at large.

The Company has separately adopted a Whistleblower Policy.

Section 4 Corporate Code of Conduct

4.1 Introduction

This code of conduct sets out the standard which the Board, Management and employees of the Company are encouraged to comply with when dealing with each other, shareholders and the broader community.

4.2 Corporate values

In interpreting this code of conduct, regard should be had to the following values of the Company:



- (a) to conduct business with honesty, integrity, and fairness; and
- (b) to comply with all relevant laws and regulations applicable to it.

4.3 Commitment of Board and Management to Code of Conduct

The Board and Management approve and endorse this code of conduct. The Board and Management are committed to not only complying with the Company's legal obligations but also to acting ethically and responsibly.

The Board and Management encourage all employees to consider the principles of the code of conduct and use them as a guide to determine how to respond when acting on behalf of the Company.

4.4 Responsibilities to shareholders and financial community generally

The Company aims:

- (a) to increase shareholder value within an appropriate framework which safeguards the rights and interests of the Company's shareholders and the financial community;
- (b) to comply with systems of control and accountability which the Company has in place as part of its corporate governance; and
- (c) to act with honesty, integrity and fairness.

4.5 Responsibilities to clients, customers and consumers

The Company will comply with all legislative and common law requirements which affect its business. Any transgression from the applicable legal rules is to be reported to Management as soon as a person becomes aware of such a transgression.

4.6 Employment practices

The Company will seek to employ the best available staff, both male and female, and from diverse backgrounds with the skills required to carry out their roles. The Company will establish measurable objectives for achieving Diversity through the development and adoption of a Diversity Policy.

The Company is committed to the ideal of equal employment opportunity, to providing a workplace that is free of harassment and discrimination and to respecting the human rights of its employees. The Company will ensure a safe workplace and maintain proper occupational health and safety practices commensurate with the nature of the Company's business and activities. To this end, the Company will observe the rule and spirit of the legal and regulatory environment in which the Company operates.

4.7 Responsibility to community and environment

The Company will recognise, consider and respect legal requirements affecting its operations and comply with all applicable legal requirements.

The Company will act with honesty, integrity and fairness in all dealings with the community



and will act responsibly towards the environment.

4.8 Responsibility to individuals

The Company recognises and respects the rights of individuals and, to the best of its ability, will comply with the applicable legal rules regarding privacy, privileges, private and confidential information.

The Company and the Board will maintain the Company's and its shareholders', customers' and suppliers' information confidentiality unless required to be disclosed by law.

4.9 Obligations relative to fair trading and dealing

The Company will deal with others in a way that is honest and fair and will not engage in deceptive practices. The Company is committed to complying with the laws and regulations of the countries in which its businesses operate and acting in an ethical manner, consistent with the principles of honesty, integrity, fairness and respect.

The Company believes that a fraudulent or corrupt act could significantly impact on the confidence of the Company's stakeholders and significantly diminish the Company's reputation. Accordingly, the Company has a zero tolerance policy to fraud and corruption and will thoroughly investigate and apply the full force of the law where sufficient evidence is obtained.

The Board may implement a fraud prevention and corruption control framework in its Anti-Bribery and Corruption Policy, and will comprehensively investigate all suspected incidents of fraud or corruption using the principles of independence, objectivity and the rules of natural justice.

All Directors, Management and employees of the Company and group members must exercise reasonable care and diligence in the prevention of fraud or corruption by or against the Company.

The Company is committed to ensuring no one suffers detrimental treatment as a result of refusing to take part in conduct that may constitute fraud or corruption or raises a genuine concern in respect of any such conduct.

4.10 Conflicts of interest

The Board, Management and employees of the Company must not involve themselves in situations where there is a real or apparent conflict of interest between them as individuals and the interests of the Company (excluding those matters which may be subject to legal professional privilege). Where a real or apparent conflict of interest arises the matter should be brought to the attention of the Chairperson in the case of a Director or the Managing Director or Chief Executive Officer in the case of a member of Management and a supervisor in the case of an employee, so that it may be considered and dealt with in an appropriate manner for all concerned.

4.11 Compliance with Code of Conduct

Any breach of compliance with this code of conduct is to be reported directly to the Chief Executive Officer, Managing Director or Chairperson, as appropriate. Non-compliance with



this code of conduct may result in disciplinary action.

4.12 Periodic review of Code of Conduct

The Company will monitor compliance with this code of conduct periodically by liaising with the Board, Management and staff especially in relation to any areas of difficulty which arise from the code of conduct and any other ideas or suggestions for improvement of the code of conduct. Suggestions for improvements or amendments to the code of conduct can be made at any time.

4.13 Code of Conduct for Directors, employees and contractors

The Company will endeavour to ensure that the above principles in this code of conduct are implemented and adopted by Directors, employees and contractors of the Company by importing the following principles into the terms of such engagements. Specifically, Directors, employees and contractors will be encouraged and expected to:

- (a) act in the best interests of the Company;
- (b) actively promote the highest standards of ethics and integrity in carrying out their duties for the Company and act honestly;
- (c) comply with the laws and regulations that apply to the Company and its operations;
- (d) not knowingly participate in any illegal or unethical activity;
- (e) disclose any actual or perceived conflicts of interest of a direct or indirect nature of which they become aware and not enter any arrangement or participate in any activity that would conflict with the Company's best interest or which they believe could compromise in any way the reputation or performance of the Company;
- (f) respect confidentiality of all information of a confidential nature which is acquired in the course of the Company's business and not disclose or make improper use of such confidential information to any person unless specific authorisation is given for disclosure or disclosure is legally mandated;
- (g) deal with the Company's customers, suppliers, competitors and each other with the highest level of honesty, fairness and integrity and to observe the rule and spirit of the legal and regulatory environment in which the Company operates;
- (h) protect the assets of the Company to ensure availability for legitimate business purposes and ensure all corporate opportunities are enjoyed by the Company and that no property, information or position belonging to the Company or opportunity arising from these is used for personal gain or to compete with the Company; and
- (i) report any breach of this code of conduct to Management, who will treat reports made in good faith of such violations with respect and in confidence.



Section 5 Communications with investors

The Company aims to ensure that shareholders are kept informed of all major developments affecting the state of affairs of the Company. To achieve this, the Company communicates information regularly to shareholders through a range of forums and publications.

The Company's website is one of its key communication tools and the Company endeavours to keep its website up-to-date, complete and accurate. The Company's website also contains a facility for shareholders to direct inquiries to the Company and to elect to receive communications from the Company via email.

The Company uses its annual general meeting (**AGM**) as an opportunity to further engage with its shareholders and seek their input on the management of the Company. The Company will undertake a number of steps to seek to maximise shareholders' ability to participate in the AGM process by:

- (a) making Directors, members of Management and the external auditor available at the AGM;
- (b) allowing shareholders in attendance at the AGM a reasonable opportunity to ask questions regarding the items of business, including questions to the external auditor regarding the conduct of the audit and the preparation and content of the auditor's report; and
- (c) providing shareholders who are unable to attend the AGM with an opportunity to submit questions in advance of the AGM.

Section 6 Selection of external auditor and rotation of audit engagement partner

6.1 Responsibility

The Board is responsible for the initial appointment of the external auditor and the appointment of a new external auditor when any vacancy arises. Any appointment made by the Board must be ratified by shareholders at the next AGM of the Company.

6.2 Selection criteria

- (a) Mandatory criteria

Candidates for the position of external auditor of the Company must be able to demonstrate independence from the Company and an ability to maintain independence through the engagement period. Further, the successful candidate must have arrangements in place for the rotation of the audit engagement partner on a regular basis.

- (b) Other criteria

Other than the mandatory criteria mentioned above, the Board may select an external auditor based on criteria relevant to the business of the Company such as experience in the industry in which the Company operates, references, cost and any other



matters deemed relevant by the Board.

6.3 Review

The Audit and Risk Management Committee will review the performance of the external auditor on an annual basis.

Section 7 Committees

7.1 Formation of special purpose Committees

As set out in Section 1.2, one of the functions of the Board is to form and monitor any special purpose Committees established to review certain aspects of the operations of the Company, having regard to the principles under this Board Charter.

The Company has established the following Committees for this purpose:

- (a) Nominations & Remuneration Committee;
- (b) Audit and Risk Management Committee.

The Charters of each of these Committees are set out in separate documents.

7.2 Further Committees

In addition, the Company may in the future (if the Directors consider that the Company is of a size or its affairs of such complexity as to justify their formation) establish a Corporate Governance Committee.

Section 8 Standing Rules of Committees

8.1 Application

- (a) These Standing Rules apply to and are deemed to be incorporated into the Charter of each Committee, except where the terms of these Standing Rules conflict with those of the relevant Charter.

8.2 Composition

- (a) The composition of each Committee will be determined in accordance with the following principles:
 - (1) each Committee will aim to have membership which comprises only non-executive Directors, save where there is not a sufficient number of non-executive Directors or the Board considers that to do so for a particular Committee would be unnecessary or desirable, in which case, the Board may appoint one or more executive Directors to the Committee;
 - (2) each Committee will aim to have a majority of its members being Independent



Directors (where appropriate, given the size of the Company and the Board);

- (3) where the Committee includes at least one Independent Director, the chairperson of the Committee will be an Independent Director provided such appointment is appropriate; and
 - (4) the Committee will comprise at least three members.
- (b) Membership of each Committee will be disclosed in the Corporate Governance Statement, the Company's annual report or the Company's website.
 - (c) Committee members are appointed by the Board.
 - (d) The term of appointment as a member is for a period of no more than one year, with Committee members generally being eligible for re-appointment for so long as they remain Directors. The effect of ceasing to be a Director is the automatic termination of that individual's appointment as a member of each Committee.
 - (e) Membership of each Committee should be confirmed annually by the Board at the Board's first meeting following its annual shareholder meeting.
 - (f) Each Director may attend Committee meetings but will have no voting rights unless he or she is a member of the relevant Committee.

8.3 Chairperson

- (a) The chairperson of each Committee is selected by the Board.
- (b) Should the chairperson be absent from a meeting and no acting chairperson has been appointed, the members of the relevant Committee present at the meeting have authority to choose one of their number to be chairperson for that particular meeting.

8.4 Meetings

- (a) Each Committee will meet at such intervals as required to fulfil its obligations but must meet at least two times annually, unless otherwise specified in the Charter applicable to that Committee.
- (b) In addition, the chairperson of a Committee is required to call a meeting of that Committee if requested to do so by any member of that Committee, the external auditors, the internal auditors, the Chairperson or another Board member.
- (c) The chairperson of each Committee will appoint an executive or the Company Secretary to act as secretary to that Committee who will be responsible:
 - (1) in conjunction with the chairperson, for drawing up the agenda, supported by explanatory documentation, and circulating it to the relevant Committee members prior to each meeting; and
 - (2) for keeping the minutes of each meeting of that Committee and circulating them to Committee members and to the other members of the Board.



- (d) A quorum will consist of two members.
- (e) The chairperson of each Committee will report to the Board following each meeting of that Committee on the decisions made by the Committee.
- (f) Meetings may be held in any location and may be held by means of teleconference or videoconference.

8.5 Fees

No member of any Committee is entitled to receive remuneration for their role. If at any time the Board deems it appropriate to remunerate members for their Committee appointment, this amount is to be determined by the Nominations & Remuneration Committee.

8.6 Review of Charter

- (a) Each Charter is to be reviewed annually by the relevant Committee to ensure it remains consistent with that Committee's authority, objectives and responsibilities.
- (b) Significant changes to the Charter must be recommended by the relevant Committee and approved by the Board.

8.7 Duties and responsibilities

- (a) The duties and responsibilities of a member of each Committee are in addition to those duties set out for a Director of the Board.
- (b) The duties and responsibilities of a member of each Committee are set out in each Charter.

Section 9 Definitions

AIM means Alternative Investment Market.

AIM Rules means the AIM Rules for Companies, being the official listing rules of AIM as amended or replaced from time to time.

Anti-bribery and Corruption Policy means the policy developed from time to time by the Board establishing controls to ensure compliance with all applicable anti-corruption laws and regulations, and to ensure that the Company conducts business in a socially responsible manner.

ASIC means the Australian Securities and Investments Commission.

ASX means the ASX Limited ABN 98 008 624 691.

ASX Listing Rules or Listing Rules means the Official Listing Rules of the ASX as amended or replaced from time to time.

Audit and Risk Management Committee means the Committee charged with determining, implementing and assessing controls for financial management, financial reporting and risk



management generally for the Company.

Board means board of Directors of the Company.

Chairperson means the chairperson of the Board.

Charter means the charter adopted from time to time with respect to each Committee, as applicable to that Committee.

Chief Executive Officer means the person (if any) engaged by the Company in the role of the chief executive officer of the Company.

Chief Financial Officer or Finance Director means the person (if any) engaged the Company in the role of the chief financial officer of the Company.

Committee means a committee created by the Board including without limitation, the Audit and Risk Management Committee, the Corporate Governance Committee and the Nominations & Remuneration Committee (as applicable to the relevant Charter and as established from time to time).

Companies Act means the *Companies Act 2006* of the United Kingdom, as amended from time to time.

Company means Atlantic Lithium Limited ACN 12 215 132.

Company Secretary means a person appointed by the Company to be the company secretary.

Constitution means the constitution of the Company.

Corporate Ethics & Continuous Disclosure Policy means the policy adopted by the Company setting out directors' duties given their position with the Company, obligations with respect to trading in securities and general disclosure obligations.

Corporate Governance Policy means the policies and procedures set out in this document.

Corporate Governance Committee means the Committee charged with reviewing compliance by the Board with, among other matters, the provisions of this document.

Corporate Governance Principles and Recommendations means the *Corporate Governance Principles and Recommendations Fourth Edition* issued by the ASX Corporate Governance Council in 2019 as amended or replaced from time to time.

Corporate Governance Statement means the statement referred to in Listing Rule 4.10.3 which discloses the extent to which the Company has followed the Corporate Governance Principles and Recommendations.

Corporations Act means the *Corporations Act 2001* (Cth) as amended or replaced from time to time.

Director means a director of the Company.

Diversity includes, but is not limited to, matters of gender, age, disability, ethnicity, marital or family status, sexual orientation, gender identity and religious or cultural background.



Diversity Policy means the policy developed from time to time by the Board establishing measurable objectives for achieving Diversity.

Independent Director means a Director who has a sufficient level of independence to the Company, determined in accordance with subclause 1.4 of this document.

Management means the executive Directors and senior management of the Company.

Managing Director means the Director (if any) engaged by the Company in the role of the managing director of the Company.

Nominations & Remuneration Committee means the Committee for assisting the Board in relation to, among other things, the appointment of members to the Board and of senior management and in assessing the performance of such individuals, and reviewing remuneration levels for Directors and senior management.

Official List means the official list of the ASX.

Securities has the meaning given in section 92 of the Corporations Act.

Standing Rules means the general and procedural rules of each Committee set out in Section 8 of this Corporate Governance Policy.

Trading Policy means the policy developed from time to time by the Board setting out the procedure for trading in Securities of the Company by Directors, managerial staff, employees and any other persons who may be associated with the Company.