



## **HYPERION FLAGSHIP INVESTMENTS LIMITED**

### **Dealings in the Company's Shares by Directors and Employees**

Directors and employees may trade in Hyperion Flagship Investments Limited shares and any other securities issued by the Company EXCEPT:

1. In the period from the 1<sup>st</sup> of the month until notification of financial information to the ASX such as NAV, profit information or announcements of share issues or capital raisings, or
2. If a Director is in possession of any price sensitive information

This policy is designed to provide a level of legal protection to the Company, its directors and employees by restricting the opportunity for directors and employees to trade when they may be in possession of non-public, price-sensitive information and thus minimise the risk of insider trading. It is also designed to preserve the reputation of the Company, the board and employees in the market and reduce any suspicion that they are able to take advantage of their position.

Trading in the Company shares includes both buying and selling shares.

#### **Who is governed by the Company Share Trading Policy**

- The Chairman of the Board
- Managing Director
- Non-executive Directors
- Company Secretary
- Any other employee of the Company

#### **Individuals in possession of non-public price-sensitive information**

Before trading in the Company securities, individuals should still consider whether they are in possession of non-public price sensitive information concerning the Company. Should this be the case, the individual should not trade, as to do so may constitute a breach of insider trading provisions of the Corporations Act.

An individual in possession of information must not influence others to deal in the shares of the Company.

#### **Approval Required**

All directors and employees are required to obtain prior approval from the Chairman or the Chair of the Audit and Compliance Committee if the Chairman is unavailable in respect to any dealings in the Company's securities. The Chairman requires prior approval from the Chair of the Audit and Compliance Committee in advance of any proposed dealings.

#### **Exceptions to the rules**

In exceptional cases of hardship the Chairman has discretion to approve share disposals that would otherwise be prohibited.

Acquiring shares as part of the Dividend Reinvestment Plan is exempted.