

HaemaLogiX_____

Securities Trading Policy

HaemaLogiX Limited
ACN 603 314 496

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1. INTRODUCTION

- (a) This Securities Trading Policy (**Policy**) sets out the policy of HaemaLogiX Limited (**HaemaLogiX** or the **Company**) on dealings by directors of the Company (**Directors**) and employees in:
 - (i) securities of the Company (**Company Securities**); and
 - (ii) securities of other entities.
- (b) For the purposes of this Policy:
 - (i) **Closely Connected Persons** of a Restricted Person are:
 - (A) a **close family member**, being means a spouse or de facto, any minor children or children living with the Restricted Person (including children of the Restricted Person's spouse or de facto); and
 - (B) a **closely connected entity**, being any family company or family trust which the Restricted Person or their close family members control or have an interest in.
 - (ii) **Restricted Persons** are:
 - (A) all Directors including the Managing Director & Chief Executive Officer;
 - (B) all other key management personnel of the Company; and
 - (C) all employees and contractors to the Company.
 - (iii) **Securities** means shares, debentures, options to subscribe for new shares and options over existing shares, warrant contracts and other derivatives relating to the shares.
- (c) If you do not understand any part of this Policy, the summary of the law or how it applies to you, you should raise the matter with your manager or the Company Secretary before dealing with any securities covered by this Policy.

2. RATIONALE FOR THE POLICY

- (a) Australian insider trading laws operate to prohibit people in possession of non-public, price sensitive information from dealing in securities or passing on the information to other people who may deal in securities.
- (b) This Policy is intended to:
 - (i) ensure that all Directors, employees and contractors of the Company (and their associates) are aware of the insider trading laws generally and specifically as they apply to trading in Company Securities; and
 - (ii) protect the reputation of the Company and its Directors and officers by seeking to avoid the possibility that misconceptions, misunderstandings or suspicions might arise as a result of trading by Directors and others who may be, or be perceived to be, in possession of Inside Information (defined below).

- (c) This Policy seeks to support this by imposing additional restrictions on the trading of Company Securities by Restricted Persons.

3. INSIDER TRADING LAWS

3.1 Inside Information

- (a) **Inside Information** is information which:
 - (i) is not generally available; and
 - (ii) if it were generally available, a reasonable person would expect that it would (or would be likely to) influence investors in deciding whether to buy or sell particular securities.
- (b) The financial impact of the information is important, but strategic and other implications can be equally important in determining whether information is Inside Information. The definition of **information** is broad enough to include rumours, matters of supposition, intentions of a person (including the Company) and information which is insufficiently definite to warrant disclosure to the public.
- (c) Importantly, you need not be an **insider** to come across Inside Information. That is, it does not matter how you come to know the Inside Information (for example, you could learn it in the course of carrying out your responsibilities or in passing in the corridor or in a lift or at a dinner party).

3.2 Examples of Inside Information

Inside Information could include, but is not restricted to:

- (a) the financial performance of the Company against budget;
- (b) a possible acquisition or sale of any material assets by the Company;
- (c) a possible change in the Company's capital structure;
- (d) senior management changes;
- (e) development of a new product;
- (f) grant of a new patent;
- (g) results of clinical trials;
- (h) the granting of market authorisation;
- (i) the conclusion of R&D, licensing, distribution or other agreement for the product; or
- (j) any possible claim against the Company or other unexpected liability.

3.3 Prohibition

If you have any Inside Information about the Company (or another relevant entity, such as a company with which the Company is considering a transaction) which is not publicly known, it is a criminal offence for you to:

- (a) trade in Company Securities (or securities of the other relevant entity) (**Affected Securities**);
- (b) advise or procure another person to trade in Affected Securities; or
- (c) pass on Inside Information to someone else (including colleagues, family or friends) knowing (or where you should have reasonably known) that the other person will, or is likely to, use that information to trade in, or procure someone else to trade in, Affected Securities.

3.4 Consequences of insider trading

This offence, called **insider trading**, can subject you to:

- (a) criminal liability including large fines and/or imprisonment;
- (b) a civil penalty (fine) of up to hundreds of thousands of dollars; and
- (c) civil liability, which may include being sued for any loss suffered as a result of insider trading.

3.5 Insider trading is prohibited at all times

- (a) If you possess Inside Information, you must not buy or sell Company Securities, advise or get others to do so or pass on the Inside Information to others. This prohibition applies regardless of how you learn the information.
- (b) The prohibition on insider trading applies not only to information concerning Company Securities. If a person has Inside Information in relation to securities of another company, that person must not deal in those securities.

4. CONFIDENTIAL INFORMATION

4.1 Duty

Related to the above, Directors, employees and contractors also have a duty of confidentiality to the Company. You must not reveal any confidential information concerning the Company, use that information in any way which may injure or cause loss to the Company, or use that confidential information to gain an advantage for yourself.

4.2 Consequences of misuse

Misuse of confidential information may:

- (a) cause the Company damage;
- (b) breach an agreement the Company has with another party;
- (c) expose the Company to a claim for damages;
- (d) result in disciplinary action, including termination, against the misuser; and
- (e) expose the misuser to a claim for breach of duty.

5. TRADING RESTRICTIONS IMPOSED BY THIS POLICY

5.1 Additional restrictions

- (a) Additional restrictions on trading in Company Securities apply to Restricted Persons.
- (b) Each Restricted Person must also ensure their Closely Connected Persons:
 - (i) are aware of this Policy and the restrictions it contains; and
 - (ii) undertake trading accordance with this Policy as if they were Restricted Persons.

5.2 Reasons for additional restrictions

- (a) Restricted Persons are in positions where it may be assumed that they may come into possession of Inside Information and, as a result, any trading by Restricted Persons (or their Closely Connected Persons) may embarrass or reflect badly on them or on the Company (even if a Restricted Person has no actual Inside Information at the time).
- (b) This Policy is designed to prevent misconceptions, misunderstandings or suspicions arising and also to protect the reputation of the Company and Restricted Persons.

5.3 Restrictions on dealing

Restricted Persons must not deal in Company Securities:

- (a) without prior approval (see paragraph 5.4); or
- (b) during any of the following blackout periods:
 - (i) the period each year from the close of trading on ASX at the end of the full financial year until 10.00am on the next trading day following the announcement by the Company to ASX of the preliminary final statement or full year results;
 - (ii) the period each year from the close of trading on ASX at the end of the financial half year until 10.00am on the next trading day following the announcement by the Company to ASX of half-yearly results;
 - (iii) the period each year from the close of trading on ASX at the end of each quarterly reporting period until 10.00am on the next trading day following the announcement by the Company to ASX of the quarterly reports; and
 - (iv) any other period that the Company specifies from time to time.

5.4 Prior clearance for dealing

- (a) Restricted Persons are only permitted to deal in Company Securities if they have given notice and obtained approval as set out below (and on the basis that the rule contained in paragraph 3 does not apply).
- (b) Restricted Persons must notify the Company in advance of any proposed dealing in Company Securities. The notification must be made to the

applicable person set out in paragraph 6 (**Approver**) and confirm that they do not hold any Inside Information.

- (c) Only after confirmation by the Approver that there is no objection to the trading may the Restricted Person undertake the proposed dealing. The confirmation may specify a period of time within which the trading is to occur.

5.5 Exceptions for certain trading

- (a) As an exception to the rule set out in paragraph 5.3(b), Restricted Persons are permitted to trade Company Securities in the following circumstances:
 - (i) transfer of Company Securities to a Closely Connected Person or a Restricted Persons' superannuation fund, in respect of which prior clearance has been obtained as set out in paragraph 5.4;
 - (ii) a disposal of Company Securities arising from the acceptance of a takeover offer, scheme of arrangement or equal access buy-back;
 - (iii) a disposal of rights acquired under a pro rata issue;
 - (iv) an acquisition of Company Securities as a result of an automatic conversion or other event which does not involve any action by the Restricted Person during a blackout period;
 - (v) an acquisition of Company Securities under a security purchase plan or dividend purchase plan where the Restricted Person did not commence or amend their participation in the plan during a blackout period; or
 - (vi) an acquisition of Company Securities under an employee incentive scheme where the acquisition is the result of an application for those Company Securities which was made outside the blackout period (however, the restrictions in this Policy apply to any subsequent trade of those Company Securities).
- (b) Restricted Persons are reminded that they must still comply with the insider trading laws even where they would otherwise be permitted by this paragraph 5.5 to trade in Company Securities.

5.6 Exceptional circumstances

- (a) If a Restricted Person needs to deal in Company Securities due to exceptional circumstances but such dealing would breach this Policy, the Restricted Person must apply to the Approver for a waiver from compliance with the provisions in paragraph 5.3(b).
- (b) **Exceptional circumstances** include severe financial hardship, compulsion by a court order or any other circumstances which are deemed exceptional by the Approver.
- (c) The Restricted Person seeking a waiver under this paragraph 5.6 must apply in writing to the 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.

- (d) A waiver will only be granted if the Restricted 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 and confirmation that the person does not possess Inside Information.
- (e) A decision to grant a waiver must be made by the Approver, without giving reasons. Once given, a waiver can also be withdrawn if new circumstances come to light.
- (f) If a waiver is granted, the Restricted Person will be notified in writing (which may include notification via email) and include the duration of the waiver to deal in securities, which will be no more than 5 trading days.
- (g) Unless otherwise specified in the notice, any dealing permitted under this paragraph 5.6 must comply with the other paragraphs of this Policy (to the extent practicable).

5.7 Requirements after trading

Once a Restricted Person has completed a trade in Company Securities, the Company Secretary must be:

- (a) advised that the trade has been completed; and
- (b) in the case of Directors, provided with sufficient information to enable the Company to comply with the requirements to notify a change of interests to ASX. Ideally, the confirmation must be provided on the day of the trade to enable the Company to comply with its disclosure obligations under ASX Listing Rules.

5.8 Speculative trading, short-selling, hedging and margin lending transactions

A Restricted Person must not:

- (a) engage in short-selling in respect of the Company's Securities;
- (b) engage in transactions designed to hedge their exposure to Company Securities or otherwise alter their economic risk associated with their holding of Company Securities;
- (c) enter into margin lending or other secured financing arrangements in respect of Company Securities; or
- (d) trade in Company Securities on a short-term basis or for speculative trading gain. The Company considers short-term to be a period of 6 months or less.

6. CONSENTS AND NOTIFICATIONS

Where this Policy requires a notification to occur, or consent, or waiver to be obtained (unless the context requires otherwise) the table below sets out each Restricted Person's Approver.

Restricted Person	Approver
Chairman of the Board	Chairman of the Audit & Risk Committee
Chairman of the Audit & Risk Committee	Chairman of the Board
Other Directors	Chairman of the Board
Managing Director / CEO	Chairman of the Board
Chief Financial Officer	Chairman of the Board
Other Restricted Persons	Chairman of the Board

7. BREACHES OF THIS POLICY

Strict compliance with this Policy is a condition of employment. Breaches of this Policy will be subject to disciplinary action, which may include termination of employment.

8. FURTHER INFORMATION

- (a) Employees should contact their Approver if they are unsure about whether it is acceptable to deal or communicate with others in relation to Company Securities or other securities.
- (b) Any questions in relation to this Policy should be directed to the Company Secretary.

9. POLICY REVIEW

This Policy cannot be amended without approval from the Company's Board. This Policy will be reviewed from time to time to ensure that it remains effective and meets best practice standards and the needs of the Company.

10. APPROVED AND ADOPTED

This Policy was approved by the Board on 9 July 2025 and adopted on the date the Company is listed on the ASX.