



# Securities Dealing Policy

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Enterprise-Wide Policy

5 April 2022

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## 1. Application of Policy

1.1. This Policy applies to the subsidiaries of OIG Holdings Pty Ltd (ACN 616 297 940) and to entities that may be considered as comprising the One Investment Group (**OIG**) including:

- (a) those companies that hold an Australian financial services licence (**AFS Licence**) to provide financial services to retail and/or wholesale clients and their OIG Corporate Authorised Representatives (each an **OIG Licensee**);
- (b) those companies that provide registry services (**ORS**);
- (c) corporate trust and custody (**OCTS**); and
- (d) those companies that provide fund administration services (**UFS**).

1.2. This policy applies to:

- (a) OIG Licensees that operate registered managed investment schemes (**Funds**) including:
  - (i) those listed on the Australian Securities Exchange (**ASX**) or quoted on Cboe Australia (**Relevant Market**)<sup>1</sup>; and
  - (ii) those not listed or quoted on any Relevant Market.
- (b) all OIG Staff and Board Members; and
- (c) where indicated, entities appointed by the OIG Licensee to manage the assets of the relevant Fund (**Investment Manager**).

## 2. Purpose of this Policy

2.1. This policy summarises the law relating to insider trading and sets out OIG's policy in respect of Staff dealing in Securities.

2.2. The Corporations Act 2001 (Cth) (**Corporations Act**)<sup>2</sup> prohibits dealing in any financial product by a person with Inside Information. By restricting dealings Securities in the manner described in this policy, OIG minimises the risk that its Staff trade with inside information or be perceived as doing so.

2.3. OIG expects Staff to act in accordance with its code of conduct including acting with integrity and in accordance with the law and so requires adherence to this policy. A breach of the law, this policy, or both, will also be regarded by OIG as serious misconduct which may lead to disciplinary action or dismissal.

## 3. What sections of this Policy apply to which people?

3.1. This policy applies as follows:

- (a) Clause 4 (insider trading laws), Clause 8.8 (Embargo), Clause 10 (Market Manipulation) and Clause 11 (confidentiality) apply to all OIG Staff;

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<sup>1</sup> Unless the Board has approved a different Securities Dealing Policy in respect of a particular Fund which is published on the website relevant to that Fund. The Board may adopt a different policy where, for example the Fund's Securities are stapled to another security and the stapled group has adopted a separate policy.

<sup>2</sup> See s1043A under The Corporations Act 2001 for full guidance on the regulatory provisions relating to insider trading.

- (b) Clause 9 (Dealing in Financial Products) applies to Staff that are not a Designated Person; and
- (c) Clauses 5 to 8 (trading policy) apply to (each, a **Designated Person**):
  - (i) all directors and officers of OIG Licensees, and other key management personnel of OIG allocated to the relevant Fund (eg the relevant Director, Operations); and
  - (ii) where UFS provides fund-administration services to the Fund, each UFS key management personnel involved in the provision of those services;
  - (iii) unless the Investment Manager has adopted and administers its own trading policy on terms acceptable to the OIG Licensee Board, all directors, officers and other key management personnel of the Investment Manager;
  - (iv) any other person designated by the Board from time to time; and
- (d) clause 5.5 (associates) applies the trading policy to the family and associates of Designated Persons.

## 4. Insider Trading Prohibitions in the Corporations Act

4.1. The Corporations Act<sup>3</sup> regulates dealing in Financial Products able to be traded on a Relevant Market, like the ASX, SSX, Cboe or others.

### What are the insider trading prohibitions?

- 4.2. The Corporations Act prohibits anyone with Inside Information relating to Securities from:
- (a) dealing in Securities or entering into an agreement to do so; or
  - (b) procuring another person to apply for, acquire or dispose of Securities or enter into an agreement to do so; or
  - (c) directly or indirectly communicating, or causing to be communicated, Inside Information to any other person if a person knows, or ought reasonably to know, that the other person would or would be likely to use the information to engage in the activities specified in paragraphs (a) or (b) above.
- 4.3. These prohibitions also apply to the application for, grant, exercise or transfer of an option over Securities and to the securities of other entities if a person possesses Inside Information about those entities.
- 4.4. It does not matter how or in what capacity Staff become aware of the Inside Information. It does not have to be obtained from OIG to constitute Inside Information.
- 4.5. Staff cannot avoid the insider trading prohibition by arranging for a member of their family or a friend to deal in the Securities nor may Staff give “tips” concerning Inside Information relating to the relevant Fund or the Securities to others.
- 4.6. These prohibitions always apply to everyone (not just Designated Persons) and to all Securities, not just OIG Securities.

### What is inside Information?

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<sup>3</sup> Specific prohibition of Inside Trading contained under Div 3 of the Corporations Act 2001

- 4.7. **“Inside Information”** is information, which is not generally available but, if the information was generally available, would be likely to have a material effect on the price or value of the Securities. Inside Information can include matters of speculation or supposition and matters relating to intentions or likely intentions of a person, company or relevant group.
- 4.8. Information is regarded as being likely to have a material effect if it would, or would be likely to, influence persons who commonly invest in Securities or other traded financial products in deciding whether or not to deal in the Securities.
- 4.9. Examples of Inside Information could be:
- (a) the financial performance of an entity against its budget;
  - (b) changes in an entity’s actual or anticipated financial condition or business performance;
  - (c) changes in the capital structure of an entity, including proposals to raise additional equity or borrowings;
  - (d) proposed changes in the nature of the business of an entity;
  - (e) changes to the Board or significant changes in key management personnel;
  - (f) in respect of a listed Fund, removal or replacement of the Responsible Entity or the Investment Manager;
  - (g) an undisclosed significant change to an entity’s market share;
  - (h) likely or actual entry into, or loss of, a material contract for that entity;
  - (i) material acquisitions or sales of assets by an entity;
  - (j) a proposed distribution or a change in distribution policy for a listed Fund; or
  - (k) a material claim against the assets of an entity or, in the case of a listed Fund, its Responsible Entity or other unexpected liability.

#### When is information generally available?

- 4.10. Information is generally available if:
- (a) it consists of readily observable matter or deductions;
  - (b) it has been brought to the attention of investors through an announcement to the Relevant Market or otherwise similarly brought to the attention of investors who commonly invest in Securities, and a reasonable period has elapsed since it was announced or brought to investors’ attention; or
  - (c) it consists of deductions, conclusions or inferences made or drawn from information referred to in paragraphs (a) or (b) above.
- 4.11. Examples of possible readily observable matters are:
- (a) a change in legislation which will affect the Responsible Entity’s ability to make certain types of investments; or
  - (b) a severe downturn in global securities markets.

4.12. Breach of the insider trading laws may subject Staff to:

- (a) criminal liability - penalties include heavy fines and imprisonment;
- (b) civil liability - Staff can be sued by another party or the OIG Licensee for any loss suffered as a result of illegal trading activities;
- (c) civil penalty provisions - the Australian Securities and Investments Commission (**ASIC**) may seek civil penalties against Staff and may even seek a court order that Staff be disqualified from managing a corporation; and
- (d) disciplinary action under this policy.

## 5. No dealing in OIG Securities during Prohibited Periods

5.1. To avoid the risk that Staff may be perceived as dealing, while in possession of Inside Information, in Securities issued by an OIG Licensee traded on a Relevant Market, OIG requires Designated Persons to adhere to the following dealing procedures.

### What is Closed and Prohibited Periods?

5.2. Designated Persons must not deal in OIG Securities during the following prohibited periods (except in accordance with this policy):

- (a) the following closed periods:
  - (i) from the day after the half year end (eg. 1 January or 1 July) to the close of trading on the business day after the Fund's half yearly results are announced to Relevant Market;
  - (ii) from the day after the financial year end (eg 1 July or 1 January) to the close of trading on the business day after the Fund's annual results are announced to Relevant Market;
  - (iii) from 28 days before, to the close of trading on the business day after, a general meeting to be held in respect of the Fund; and
  - (iv) from 28 days before a product disclosure statement, a prospectus or similar disclosure document is lodged by the Responsible Entity to the Relevant Market in respect of the Fund; and
- (b) any extension to a closed period, and any additional period, as specified by the Board,
- (c) while in possession of any Inside Information.

5.3. Designated Persons may deal in OIG Securities at other times subject to complying with insider trading prohibitions (See Clause 4) and the requirements of this policy.

### Notification officer and Associates

5.4. The Director Legal, Risk & Compliance will generally act as the Notification Officer for the purposes of this Securities Dealing Policy however:

- (a) they may appoint a delegate to act on their behalf in the case of temporary absence; and
- (b) where the Designated Person intending to trade is the Director Legal, Risk & Compliance, the Notification Officer is the CEO or in their absence, the Chairman of the

Compliance Committee.

- 5.5. This policy also applies to Associates of Designated Persons. A Designated Person must procure compliance with this policy by their Associates and communicate on behalf of their Associate with the Notification Officer for the purposes of this policy.

### Prior Notification

- 5.6. If a Designated Person proposes to deal in OIG Securities (including entering into an agreement to deal) they must first provide:
- (a) written notice of their intention to the Notification Officer; and
  - (b) written confirmation that they are not in possession of Inside Information, in the form of the template in Appendix A part A.

### Clearance

- 5.7. If the proposed dealing by the Designated Person would be in a Prohibited Period, before dealing in the Securities, the Designated Person must receive a written clearance in the form at Appendix A part B signed by the Notification Officer.
- 5.8. A clearance expires five business days from its date, unless the Clearance Notice specifies a different expiry date.
- 5.9. A clearance to trade confirms that the proposed dealing by the Designated Person is within the terms of the trading policy but does not otherwise constitute approval or endorsement by the Responsible Entity or the Notification Officer for the proposed dealing. Even if a clearance is granted, a Designated Person remains personally responsible for assessing whether the insider trading prohibitions apply to them.
- 5.10. A register of notifications and clearances is to be kept by Director Legal, Risk & Compliance.

### Confirmation of dealing

- 5.11. In addition to providing prior notification and seeking clearance under Clause 5.7, Designated Persons must confirm in writing to the relevant Notification Officer, within three business days from when the dealing in Securities has occurred, the number of Securities affected and the relevant parties to the dealing.
- 5.12. A register of Designated Person's interests in Securities is to be kept by Director Legal, Risk & Compliance.

### Board Members and dealings in ASX listed OIG Securities.

- 5.13. Under the ASX Listing Rules, Directors of an OIG Licensee that operates a Fund listed on the ASX, must announce to the market dealings by themselves or their Associates in OIG Securities.
- 5.14. Directors must as soon as practicable, and within 2 business days of the dealing, inform the Director Legal Risk & Compliance providing sufficient detail of the dealing to allow the required announcement be made to the ASX.

## 6. Exceptional circumstances for dealings in OIG Securities

- 6.1. If Exceptional Circumstances exists, then the following types of dealing are excluded from the operation of Clause 5 of this policy and may be undertaken at any time without requiring prior notification, approval or clearance or confirmation of dealing, subject to the insider trading prohibitions:
- (a) deal in Securities during a Prohibited Period; or
  - (b) dispose of Securities even if otherwise prohibited under Clause 5.
- 6.2. The Notification Officer will determine if Exceptional Circumstances exist, but they may include:
- (a) severe financial hardship, for example, a pressing financial commitment that cannot be satisfied otherwise than by selling the relevant OIG Securities;
  - (b) requirements under a court order or court enforceable undertaking or any other legal or regulatory requirements; or
  - (c) other exceptional circumstances as determined by the CEO (or Chairman of the Compliance Committee where the CEO is involved).
- 6.3. If the Notification Officer has any doubt whether exceptional circumstances exist, they should exercise their discretion with caution.

## 7. Permitted dealings in OIG Securities by Designated Persons

- 7.1. The following types of dealing are excluded from the operation of Clause 5 and may be undertaken by a Designated Person at any time without requiring prior notification, approval or clearance or notification of dealing, subject to the insider trading prohibitions:
- (a) (*superannuation*) transfers of Securities which are already held in a superannuation fund or other saving scheme in which the Designated Person is a beneficiary;
  - (b) (*third parties*) an investment in, or trading in units of, a fund or other scheme (other than a scheme only investing in OIG Securities) where the assets of the fund or other scheme are invested at the discretion of a third party;
  - (c) (*other trustees*) where a Designated Person is a trustee, trading in Securities by the respective trust provided the Designated Person is not a beneficiary of the trust and any decision to trade during a Prohibited Period is taken by the other trustees or by the Investment Managers independently of the Designated Person;
  - (d) (*takeover*) disposal of Securities arising from the acceptance of a takeover offer or scheme of arrangement;
  - (e) (*rights offers, SPPs, DRPs and buy-backs*) trading under an offer or invitation made to all or most of the security holders, such as a rights issue, a security purchase plan, a dividend or distribution reinvestment plan and an equal access buy-back, where the plan that determines the timing and structure of the offer has been approved by the Board. This includes decisions relating to whether or not to take up the entitlements and the sale of entitlements required to provide for the take up of the balance of entitlements under a renounceable pro rata issue;

- (f) (*lender disposal*) a disposal of Securities that is the result of a secured lender (or financier) exercising their rights, however, this does not extend to disposal under a margin lending agreement where such agreements are prohibited by this policy;
- (g) (*incentive scheme*) the exercise (but not the sale of Securities following exercise) of an option or right under an employee incentive scheme, or the conversion of a convertible security, where the final date for the exercise of the option or right, or the conversion of the security, falls during a Prohibited Period and the Prohibited Period has been extended or there have been a number of consecutive Prohibited Periods and the Designated Person could not reasonably have been expected to exercise it at a time when free to do so; and
- (h) (*trading plan*) trading under a non-discretionary trading plan for which prior written clearance has been provided in accordance with procedures set out in this policy and where:
  - (i) the Designated Person did not enter into the plan or amend the plan during a Prohibited Period; and
  - (ii) the trading plan does not permit the Designated Person to exercise any influence or discretion over how, when, or whether to trade.

7.2. However, this policy does not allow the Designated Person to cancel the trading plan or cancel or otherwise vary the terms of their participation in the trading plan during a prohibited period other than in exceptional circumstances.

- (a) (*bonus issue*) acquiring Securities under a bonus issue made to all holders of Securities of the same class;
- (b) (*subscription under disclosure document*) subscribing for Securities under a disclosure document.

## 8. Further restrictions in respect of Securities

### Margin lending

- 8.1. Designated Persons are not permitted to enter into margin lending arrangements in relation to OIG Securities. This is on the grounds that the terms may require OIG Securities to be sold during a Prohibited Period or when the Designated Person possesses inside information.
- 8.2. The restriction does not extend to other funding arrangements where OIG Securities may be included as security. Designated Persons should consult Director Legal, Risk & Compliance if they are uncertain as to whether an arrangement should be classified as a margin lending arrangement.

### No short term or speculative trading

- 8.3. OIG encourages Designated Persons to be long term investors in Funds and to hold OIG Securities for 12 months or more and Designated Persons must avoid short term (less than 12 months) trading in OIG Securities or in Financial Products associated with the relevant Fund or OIG Securities.
- 8.4. Designated Persons must not engage in short-selling or speculative trading of OIG Securities or in Financial Products associated with the relevant Fund or OIG Securities.

## No hedging

- 8.5. OIG does not remunerate its Staff with OIG Securities.
- 8.6. Subject to the law, Designated Persons who are not OIG Staff must not:
- (a) enter into transactions or arrangements with anyone which could have the effect of limiting their exposure to risk relating to an element of their remuneration that:
    - (i) has not vested; or
    - (ii) has vested but remains subject to a holding lock; or
  - (b) deal at any time in financial products associated with OIG Securities, except for the type of dealing permitted by law or a permitted dealing under this policy
- 8.7. Financial products include derivatives, options, warrants, futures, forward contracts, swaps and contracts for difference issued or created over or associated with OIG Securities including by third parties.

## Embargo – any Financial Product and any Staff Member

- 8.8. The CEO may extend this policy to restrict nominated Staff (including Designated Person) (**Embargoed Staff**) from dealing in specified Financial Products (**Embargoed Financial Products**) where the CEO determines this is required to avoid the perception that Staff may be dealing with Inside Information. The CEO may determine that Embargoed Staff will be prohibited from dealing in any Embargoed Financial Products until the Inside Information is generally available.
- 8.9. Embargoed Staff may submit to the Director Legal, Risk & Compliance a written request to deal in an Embargoed Financial Product:
- (a) confirming that they do not possess any Inside Information in respect of the relevant Financial Products;
  - (b) confirming that they face financial hardship and describing the hardship; and
  - (c) explaining why dealing in the Embargoed Financial Product is the only practical method of overcoming the financial hardship.
- 8.10. The Director Legal Risk & Compliance will only approve a waiver where they are satisfied the above conditions are met and usually only in relation to the sale, not the purchase, of Embargoed Financial Products.

## 9. Staff dealing in Financial Products that are not OIG Securities

- 9.1. Staff that are not Designated Persons are permitted to deal in Financial Products (including Securities) without prior notification or approval or post-trade confirmation provided:
- (a) they do not possess Inside Information in respect of the relevant Financial Product, or any Security held by a fund related to that Financial Product;
  - (b) the dealing is not in respect of an Embargoed Financial Product;
  - (c) the dealing would create an unacceptable conflict of interests; and

(d) the dealing will not involve any market misconduct including as described in Clause 10.

9.2. In accordance with OIG's Conflict of Interest and Related Party Transaction Policy, at least annually Staff must provide the Compliance Manager with a record of all Financial Products owned by them where a conflict of interest may arise<sup>4</sup>.

## 10. Market Misconduct

### Market Manipulation

10.1. Staff must not take part in or carry out a transaction that has, or is likely to have, the effect of creating or maintaining an artificial price for a Security.

### Creating a false or misleading appearance of dealing

10.2. Staff must not do, or omit to do, an act which is likely to have the effect of creating, or causing the creation of, a false or misleading appearance of active trading in a Security.

10.3. A Staff Member is taken to have created a false or misleading appearance of active trading in a particular Security if the Staff Member:

- (a) deals in those Securities in a manner that does not involve any change in their beneficial ownership whether directly or indirectly and in one or a series of transactions;
- (b) makes an offer to deal in a Security at a "specified price" and the Staff Member or their Associate has made or proposes to make an offer to deal in the same number (or substantially the same number) of those Securities at a price that is substantially the same as the "specified price".

### False trading and market rigging

10.4. Staff must not enter into, or engage in, a fictitious or artificial transaction or device if that transaction or device results in:

- (a) the price for trading in a Security being maintained, inflated or depressed; or
- (b) artificial fluctuations or volatility in the price of a Security.

## 11. Confidential Information

11.1. Staff must treat all sensitive, non-public information (**Confidential Information**) about OIG's Funds and Clients as confidential and belonging to OIG, the relevant Fund or the relevant Client. Staff must not disclose Confidential Information to others (including family members, relatives, business or social acquaintances) except as authorised or legally required. Staff must avoid inadvertent or indirect disclosure of Confidential Information.

11.2. Even within OIG, Confidential Information should be distributed to or discussed with others

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<sup>4</sup> For example, a UFS Senior Manager with responsibility for preparing the Unit Price for a Fund should consider carefully whether it is appropriate to invest in that Fund.

only on a need-to-know basis, and all Staff should consider information learned at work as Confidential Information. Staff must ensure that conversations are not overheard in elevators, aeroplanes or other public places and that Confidential Information is not left on conference tables, desks or otherwise unguarded.

- 11.3. Staff must take whatever steps are reasonably necessary to keep Confidential Information from being disclosed, except as authorised or legally required.

## 12. Training and compliance

- 12.1. The implementation of (including training on) and monitoring of compliance with this policy is undertaken in accordance with the *Enterprise-Wide Risk Management Framework*.
- 12.2. Compliance with this policy is mandatory and any actual non-compliance must be reported and assessed through the normal incident/ breach reporting process relevant to the member of staff involved. Any deliberate act of non-compliance by any employee may result in disciplinary action.
- 12.3. Any OIG member of staff that does not understand an aspect of this policy including if it applies to them or their family or associates, can contact the Director, Legal Risk & Compliance for guidance or obtain their own legal or financial advice before dealing in Securities.

## 13. Review and publication of this policy

- 13.1. This policy will be reviewed at the intervals and in the manner described in the *Enterprise-Wide Risk Management Framework*.
- 13.2. This policy is available on OIG's website and on the website maintained in respect of an ASX Listed Fund. Key features of the policy may also be in the Corporate Governance Statement available annually on that website.

## 14. Other relevant OIG Policies

In addition to the *Enterprise-Wide Risk Management Framework*, other OIG relevant policies are:

- (a) *Conflicts of Interest and Related Party Transaction Policy*;
- (b) *Code of Conduct*; and
- (c) *Whistle-blower Policy*.

## 15. Dictionary and Interpretation

- 15.1. In this policy, a reference to a person performing an act, for example *Director, Operations*, that person may delegate the performance of the relevant act to another, for example *Manager, Operations* provided they adequately supervise their delegate.
- 15.2. In addition to the terms defined in the *Enterprise-Wide Risk Management Framework*, when used in this policy, the following capitalised terms have the meanings set out below:

<b>Term</b>	<b>Meaning</b>
<b>Associate</b>	<p>Any person in respect of whom a Staff Member has the ability to control or influence decisions in relation to Financial Products, and includes the following:</p> <ul style="list-style-type: none"> <li>• a spouse, de facto partner, child or step-child (being a son or daughter under the age of 18 years) of the Staff Member (“<b>Immediate Family</b>”);</li> <li>• a self-managed superannuation fund for the Staff Member or their Immediate Family;</li> <li>• a private company of which the Staff Member or their Immediate Family is a director; and</li> <li>• a trust in which the Staff Member or their Immediate Family is a beneficiary.</li> </ul>
<b>Board</b>	Board of directors of the relevant OIG Licensee.
<b>Corporations Act</b>	Corporations Act 2001 (Cth).
<b>“deal” or “dealing”</b>	<p>Applying for, acquiring or disposing of a Financial Product and includes:</p> <ul style="list-style-type: none"> <li>• entering into an agreement or series of related transactions with respect to a Financial Product;</li> <li>• entering into transactions designed or intended to hedge, limit or extend the economic risks in that Financial Product (whether by way of swap or derivative or otherwise); and</li> <li>• any of these in relation to part of a Financial Product.</li> </ul>
<b>Designated Person</b>	<p>In respect of OIG Securities, each of the following:</p> <ul style="list-style-type: none"> <li>• all directors and officers of OIG Licensees, and other key management personnel of OIG allocated to the relevant Fund (eg the relevant Director, Operations); and</li> <li>• where UFS provides fund-administration services to the Fund, each UFS key management personnel involved in the provision of those services;</li> <li>• unless the Investment Manager has adopted and administers its own trading policy on terms acceptable to the OIG Licensee Board, all directors, officers and other key management personnel of the Investment Manager; and</li> <li>• any other person designated by the Board from time to time.</li> </ul>
<b>Embargoed Financial Product</b>	Has the meaning given to that term in Clause 8.8.
<b>External Committee Member</b>	An External Member of a Compliance Committee established by an OIG Licensee pursuant to Part 5C.5 of the Corporations Act.
<b>Financial Products</b>	<p>Division 3 financial products (as defined in Division 3 of Part 7.10 of the Corporations Act 2001) and therefore includes (but is not limited to):</p> <ul style="list-style-type: none"> <li>• securities (shares);</li> <li>• derivatives;</li> </ul>

Term	Meaning
	<ul style="list-style-type: none"> <li>• interests in a managed investment scheme;</li> <li>• other financial products that can be traded on a Relevant Market.</li> </ul>
<b>Inside Information</b>	Has the meaning given to that term in clause 4.
<b>Notification Officer</b>	Director Legal, Risk & Compliance or <ul style="list-style-type: none"> <li>• a delegate in the case of temporary absence; or</li> <li>• where the Designated Person intending to deal is the Director Legal, Risk &amp; Compliance, they must provide their written notice to the CEO or the Chairman of the Compliance Committee.</li> </ul>
<b>OIG</b>	Has the meaning given to that term in Clause 1.1.
<b>OIG Securities</b>	Financial Products issued by an OIG Licensee and listed, quoted or traded on a Relevant Market.
<b>Prohibited Period</b>	Has the meaning gibe to that term in Clause 5.2.
<b>Relevant Market</b>	A market or exchange where Financial Products are ordinarily able to be traded (even though trading in those products may be suspended), for example ASX, SSX or Cboe.
<b>Securities</b>	Financial Products that are listed, quoted or traded on a Relevant Market.
<b>Staff or Staff Member</b>	OIG employees, consultants, contractors, officers and directors (including non-executive directors and External Committee Members) regardless of their seniority, division or geographical location, and includes contractors.  A reference to a Staff Member in this policy may include an Associate of that Staff Member as the context requires.

## Appendix A

### Notification to deal in OIG Securities [#Name of Fund#]

*Instructions:*

*This form is to be used in conjunction with OIG’s Securities Dealing Policy which is available on the Fund’s website. Terms defined in the Securities Dealing Policy have the same meaning in this form. If Staff have any questions, please contact the Director Legal, Risk & Compliance.*

*Your Notification Officer is set out in the Securities Dealing Policy. If under the Securities Dealing Policy Staff are required to notify us of a proposed transaction, please complete Part A and send it to the Notification Officer.*

*If Staff require Clearance to trade, Staff must receive Part B completed by the Notification Officer before Staff trade.*

*If required, Staff must send a notification of dealing and details of your trade to the Notification Officer in the time required.*

#### **1 Part A- Notification by a Designated Person**

Name of Designated Person	<b>(“Designated Person”)</b>
Name of Fund	
Description of OIG Securities (ie number and class of Securities)	<b>(“Securities”)</b>
Nature of agreement/dealing ([on /off market] [purchase / sale] or subscription)	
Proposed date of transaction (ie completion date)	

I confirm that:

- (a) I am not in possession of any Inside Information (eg unpublished information which, if generally available, might materially affect the price or value of the OIG Securities); and
- (b) the transaction in the OIG Securities described above does not contravene the Securities Dealing Policy.

Signed: \_\_\_\_\_

Dated: \_\_\_\_\_

## 2 Part B - Clearance by the Notification Officer

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This clearance confirms that the proposed dealing by the Designated Person is within the terms of the Securities Dealing Policy but does not otherwise constitute an approval or endorsement of the proposed dealing.

Name: \_\_\_\_\_

Title: \_\_\_\_\_

Signature: \_\_\_\_\_

Dated: \_\_\_\_\_