



eBet Limited  
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## **SECURITIES TRADING POLICY**

**Dated : 29 May 2009**

In accordance with ASX Corporate Governance Principles and Recommendations (Second Edition), eBet Limited (referred to as the Company) sets out acceptable securities trading policy for all Company Directors, officers, and employees.

### **Trading**

Trading in the Company's shares, options or other securities or derivatives is prohibited when Company Directors, officers, employees and consultants are in possession of unpublished price-sensitive information concerning the Company. Price-sensitive information is information which a reasonable person would expect to have a material effect on the price or value of the securities in the Company. It is assumed for the purpose of this policy that some of the Company's Directors, officers, employees and consultants are likely to be in possession of price-sensitive information by virtue of their position.

Company Directors, officers, employees and consultants should not (directly or indirectly) communicate or cause the price-sensitive information to be communicated, to any other person who they know, or ought reasonably know, would be likely to deal in the Company securities or induce another person to deal.

### **General Non-Trading Periods**

Unless there are unusual circumstances as determined by the Board, trading in the Company's shares, options or other securities or derivatives by directors, officers, employees and consultants is restricted in the following periods:

- From 31 December each year to close of business on the date of release of the Company's half-year results to the ASX.
- From 30 June each year to close of business on the date of release of the Company's annual report to the ASX.
- Any period where a prospectus has been issued and is current (such as a rights or share issue) and where the person concerned is in possession of any price-sensitive information which has not been made publicly available to the market.

### **Prohibited Trading**

Directors, officers, employees and contractors are prohibited from trading in the Company's securities in the following circumstances:

- If in possession of price-sensitive information; or
- Preceding a pending ASX announcement; or
- Trading for a short-term gain.

Directors, officers, and employees are prohibited from dealing in the securities of outside companies about which they may gain price-sensitive information by virtue of their position with the Company.

## **Disclosure**

In addition, the Company advises that:

- Directors should inform the Chairman of a proposed trade in the Company's shares, options or other securities or derivatives prior to any trade, and confirm they are not in possession of any unpublished price-sensitive information.
- Officers, employees and consultants should notify the Chief Executive Officer or Company Secretary of a proposed trade in the Company's shares, options or other securities or derivatives prior to any trade, and confirm they are not in possession of any unpublished price-sensitive information.

The requirements imposed by this policy are separate from, and additional to, the legal prohibitions in the Corporations Act on insider trading.

## **Special Dispensation**

There may be instances where there is a determination that these policies may be circumvented. Consideration can be given to circumstances where an individual has a special need to dispose of his or her shares, options or other securities or derivatives (for reasons such as financial hardship) where an exception can be made to this policy, but only after determining that there is no breach of appropriate laws.