Securities Trading Policy

v1.0

Adopted by the Epiminder Board on 4 September 2025

Epiminder Limited

ACN 616 831 684

1 Definitions

ASIC	means the Australian Securities and Investments Commission.
ASX	means ASX Limited or the Australian Securities Exchange (as appropriate).
ASX Listing Rules	means the official listing rules and requirements from time to time of the ASX.
Board	means the board of Directors of the Company as constituted from time to time.
Chairman	means the Chairman of the Board from time to time.
Closed periods	means all time periods other than the Trading Windows.
Company	means Epiminder Limited.
Company Personnel	means all executive and non-executive Directors, officers, employees, contractors and consultants of the Company or one of its subsidiaries from time to time, including all Key Management Personnel.
Company Secretary	means the company secretary of the Company from time to time.
Corporations Act	means the *Corporations Act 2001* (Cth).
dealing or **trading**	includes: (a) any acquisition or disposal of any securities of the Company; (b) entering into any agreement to acquire or dispose of any securities of the Company; and (c) the grant, acceptance, acquisition, disposal, exercise or discharge of any option or other right or obligation to acquire or dispose of any securities of the Company, and **deal** or **trade** has a corresponding meaning.
Designated Officer	means: (a) in the case that the Chairman is the person applying to deal in the securities of the Company, the Chairman of the Audit and Risk Committee; or (b) in the case that the Chief Executive Officer or a Director is the person applying to deal in the securities of the Company, the Chairman; or

	(c) in the case of all other Relevant Persons applying to deal in the securities of the Company, the Chief Executive Officer.
Director	means any director of the Company from time to time.
generally available	in relation to information, means any such information which: (a) is readily observable; (b) has been made known in a manner which is likely to bring it to the attention of persons who commonly invest in securities provided that a reasonable period for that information to be disseminated has elapsed since it was made known; or (c) consists of deductions, conclusions or inferences made or drawn from information falling under either paragraphs (a) or (b) above.
inside information	has the meaning given to that term in section 3.1.
Leadership Team	means the members of the executive management of the Company, including the Chief Executive Officer, his or her direct employees and senior executives.
Key Management Personnel	has the meaning given to that term in the ASX Listing Rules, being those persons having authority and responsibility for planning, directing and controlling the activities of the Company, directly or indirectly, including any Director (whether executive or otherwise), and **Key Management Person** has a corresponding meaning.
Prohibited Period	has the meaning given to that term in section 7.
related party	includes, in relation to an individual: (a) a spouse or de facto spouse of that individual; (b) a parent, son or daughter of that individual; (c) any company, trust or other entity over which a person referred to in (a) or (b) above has control; or (d) any company, trust or other entity over which two or more persons referred to in (a) or (b) above together have control.
Relevant Person	means each of: (a) the Key Management Personnel; (b) the Leadership Team; (c) any employee of the Company or one of its subsidiaries (including consultants and contractors) who by their

		role or otherwise, becomes aware of inside information by having access to confidential material including Company board papers, periodic disclosure materials or any other relevant document;
	(d)	in relation to a person identified in paragraphs (a) or (b) above, a related party of that person; and
	(e)	any other person determined by the Board to be a Relevant Person from time to time.
securities	includes:	
	(a)	ordinary shares;
	(b)	partly paid shares;
	(c)	preference shares;
	(d)	hybrid securities;
	(e)	debentures;
	(f)	legal or equitable rights or interests in (a) to (e) above; and
	(g)	any derivatives including but not limited to options in respect of any of (a) to (e) above.
Trading Window	has the meaning given to that term in section 5.1	

2 Introduction

2.1 This Policy has been approved by the Board. The Board may approve any updates, amendments to and exemptions to this Policy from time to time. If this Policy conflicts with any other policy concerning this subject matter, this Policy prevails to the extent of the inconsistency.

2.2 The ordinary shares of the Company will be or are listed on the ASX. The Company aims to achieve the highest possible standards of corporate conduct and governance.

2.3 The purpose of this Policy is to ensure compliance with the ASX Listing Rules and the Corporations Act, and to ensure that Relevant Persons are aware of the legal restrictions that exist on dealing in the Company's securities while such a person is in possession of inside information concerning the Company.

2.4 The Corporations Act and this Policy recognise that it is illegal for a person to deal in the Company's securities when he or she is in possession of inside information concerning the Company and that information has not been disclosed to the market or is not generally available. This is regardless of whether the terms of this Policy have been complied with.

2.5 To ensure that Relevant Persons do not inadvertently breach the insider trading laws, Relevant Persons are not permitted to deal in the Company's securities during certain periods determined by this Policy.

2.6 It is the responsibility of each Relevant Person to comply with this Policy. Any non-compliance with this Policy will be considered serious misconduct.

2.7 The restrictions set out in this Policy are in addition to any provisions governing or restricting the trading of securities set out in any agreement between the Company and a Relevant Person or a person holding securities in the Company or any provisions in the Company's employee incentive plans (if any). Where the provisions of an agreement between the Company and a Relevant Person or a person holding securities in the Company conflict with the provisions of this Policy, the most restrictive provisions will prevail.

3 Insider Trading

3.1 A person engages in insider trading if that person deals in securities of a relevant entity while possessing information that:

(a) is not generally available; and

(b) if it were available, may have a material effect on the price or value of the relevant entity's securities, and

(c) the person knows, or ought reasonably to know, that the information is not generally available and, if it were, it might have a material effect on the price or value of the entity's securities.

This type of information is commonly referred to as "**price sensitive information**" or "**inside information**".

3.2 Information is considered to have a material effect on the price or value of securities of a company if the information would, or would be likely to, influence persons who commonly invest in securities in deciding whether or not to subscribe for, buy or sell those securities.

3.3 The prohibition against insider trading applies to:

(a) direct trading in the Company's securities;

(b) procuring another person to trade in the Company's securities; or

(c) communicating price sensitive information to another person who is likely to trade in the Company's securities.

3.4 Insider trading is a criminal offence, punishable by substantial fines and/or imprisonment. The Company may in certain circumstances also be liable if a Relevant Person engages in insider trading. Insider trading may also attract civil liability, including liability to pay compensation to those who suffer loss or damage as a result of the insider trading.

3.5 The prohibitions against insider trading apply equally where inside information is held by a person about another listed company or entity. This may occur, for example, where in the course of negotiating a transaction with the Company, another listed entity provides confidential information about itself or another listed entity. Accordingly, if a person possesses inside information in relation to the securities of another listed entity, they must not take any of the actions specified in section 3.3 above in relation to those securities.The requirements imposed by this Policy are separate from, and in addition to, the legal prohibitions on insider trading in Australia. Accordingly, under insider trading laws a person who possesses inside information may be prohibited from trading even where the trading may be permitted by this Policy.

4 Scope of Policy

4.1 This Policy extends to dealing in the securities of the Company by Relevant Persons.

4.2 The Board has the discretion to lift the restrictions in section 5 and allow trading during a Prohibited Period in the following circumstances, provided the Relevant Person is not in possession of inside information:

(a) transfers of securities of the Company which result in no change to the beneficial interest in the securities;

(b) transfers of securities of the Company between a Relevant Person and a related party of the Relevant Person;

(c) transfers of securities of the Company by a Relevant Person to his or her superannuation fund;

(d) undertakings to accept or the acceptance of, or a disposal of securities of the Company arising from, a takeover offer, scheme of arrangement or equal access buy-back;

(e) trading under an offer or invitation made to all or most of the securityholders, 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) a disposal of securities of the Company that is the result of a secured lender or financier exercising their rights under a loan agreement;

(g) an acquisition or disposal of securities of the Company under a pre-determined investment or divestment plan for which prior written approval has been provided by the Designated Officer and where:

(i) the Relevant Person entered into or amended the plan during a Trading Window; and

(ii) the plan does not permit the Relevant Person to exercise any discretion over how, when or whether to acquire or dispose of securities of the Company; and

(h) an acquisition of securities of the Company under an employee incentive scheme.

5 Trading Windows

5.1 Subject to compliance with the procedure set out in section 6, dealing by Relevant Persons in the Company's securities may only take place during the following periods which will be confirmed by the Board ahead of the trading window opening:

(a) the period of up to 6 weeks commencing on the business day after the public announcement of the Company's half year financial results;

(b) the period of up to 6 weeks commencing on the business day after the public announcement of the Company's year end financial results;

(c) the period of up to 6 weeks commencing on the business day after the Company's Annual General Meeting but expiring no later than 31 December in the relevant year;

(d) the period of up to 6 weeks commencing on the business day after the Company's release of quarterly announcements to ASX (if required); and

(e) any other period designated by the Board from time to time,

(collectively, the "**Trading Windows**").

5.2 Subject to the terms of this Policy, dealing by Relevant Persons in the Company's securities is not permitted during a Prohibited Period. The Board may also subsequently close any Trading Window if circumstances change or the Board deems it appropriate.

5.3 Notwithstanding any term of this Policy, no dealing in the Company's securities will be permitted at any time if that Relevant Person possesses (or is deemed to possess) any inside information.

6 Pre-Dealing Procedure - trading during Trading Windows

6.1 For all periods during which dealing in the Company's securities is permitted in accordance with this Policy, Relevant Persons must apply to the Company Secretary on behalf of the Designated Officer to deal in the securities of the Company. The application must be in writing (which, for the avoidance of doubt, can be made via email or other internal electronic system as the Company advises from time to time) in the form set out in the Schedule and submitted to the Company Secretary on behalf of the Designated Officer.

6.2 Relevant Persons, as part of their application, must confirm that they are not in possession of any price sensitive or inside information.

6.3 On receipt of an application under section 6.1, the Company Secretary shall procure that the Designated Officer considers the application. No dealing in the Company's securities may be undertaken before the Relevant Person receives the written approval of the Designated Officer (which may be refused or given subject to any conditions the Designated Officer determines reasonably necessary to comply with this Policy).

6.4 Any approval to deal in the Company's securities by a Relevant Person in accordance with section 6 is automatically deemed to be withdrawn if the Relevant Person becomes aware of any inside information prior to or during any approved dealing in the Company's securities.

7 Discretion to prohibit trading

In addition to the Closed Periods, the Board has the discretion to prohibit trading by any Relevant Person during any additional periods when the Company is considering matter that are subject to the exception to the continuous disclosure requirements set out in Listing Rule 3.1A (together with the Closed Periods, the **"Prohibited Period"**).

8 Dealing outside of Trading Windows in exceptional circumstances

8.1 Relevant Persons may in exceptional circumstances apply to the Company Secretary on behalf of the Designated Officer for approval to deal in the Company's securities during a Prohibited Period, provided that the Relevant Person is not in possession of any inside information. The application must be in writing (which, for the avoidance of doubt, can be made via email or other internal electronic system as the Company advises from time to time) in the form set out in the Schedule and submitted to the Company Secretary on behalf of the Designated Officer.

8.2 On receipt of an application under section 8.1, the Company Secretary shall procure that the Designated Officer considers the application. No dealing in the Company's securities may be undertaken before the Relevant Person receives the written approval of the Designated Officer (which may be refused or given subject to any conditions the Designated Officer determines necessary to comply with this Policy).

8.3 The Designated Officer may grant the Relevant Person written permission to deal in the Company's securities during a Prohibited Period if the Designated Officer is satisfied (in its absolute discretion) that the Relevant Person's circumstances amount to exceptional circumstances. Exceptional circumstances may include, for example, severe financial hardship or compliance with a court order, undertaking or regulatory requirement.

8.4 If a Relevant Person receives written permission from the Designated Officer to deal in the Company's securities during a Prohibited Period, that permission will automatically expire (and no such dealing in the Company's securiites must occur) on the date that is one week after written permission has been granted by the Designated Officer.

8.5 The Designated Officer may refuse to grant permission to deal in the Company's securities in its absolute discretion and is not required to give any reasons for its decision. If permission is refused, the Relevant Person must keep that information confidential and not disclose it to any other person.

8.6 The Designated Officer's decision whether or not to permit dealing in the Company's securities is final and binding on the Relevant Person.

9 Maintenance of records

The Company Secretary will maintain a copy of:

(a) all requests for an approval to deal in the Company's securities submitted by a Director or Relevant Person; and

(b) details of all dealings in the Company's securities made by a Director or Key Management Person.

10 Other restrictions

10.1 Speculative trading

Directors and Relevant Persons must not engage in short-term or speculative trading in the Company's securities. This prohibition includes short term direct dealing in the

Company's securities as well as transactions in the derivative markets involving exchange traded options, share warrants, contracts for difference and other similar instruments which are short term or speculative.

10.2 Prohibition on margin loans, hedging and security arrangements

Directors and Relevant Persons are prohibited from entering into:

(a) a margin loan, risk hedging or other security arrangement in respect of the Company's securities; and

(b) protection arrangements in respect of the Company's securities and any associated products, including any arrangement that limits the economic risk of security holdings in the Company over unvested entitlements or otherwise enables a Relevant Person to profit from a decrease in the market price of securities (e.g. short selling).

11 ASX Notifications

11.1 The Company must notify the ASX within 5 business days after any change to a Director's relevant interest in Company securities or a related body corporate, including whether the change occurred during a Prohibited Period and, if so, whether prior written clearance was provided.

11.2 To enable the Company to comply with the obligation set out in section 11.1, a Director must notify the Company Secretary, as soon as possible and no later than three business days, in writing of the requisite information for the Company Secretary to make the necessary notifications to the ASX and as required under the ASX Listing Rules.

11.3 If the Company makes a material change to this Policy, the amended Policy will be provided to the ASX for release to the market within 5 business days of the material change taking effect.

12 General

12.1 A breach of this Policy will be regarded seriously by the Company and may lead to disciplinary action, including but not limited to dismissal.

12.2 Any Director or Relevant Person who is unsure of the nature of the information that they have in their possession or whether they may deal in the Company's securities should contact the Company Secretary before dealing in any securities of the Company.

Revision History

Version	Change	Author	Approval Date	Approver	BCR#
1.0	Introduction	JR	2025-09-04	Epiminder Board	004

Schedule 1 Application to Trade

To: The Company Secretary
Epiminder Limited ACN 616 831 684

In accordance with the Company's Securities Trading Policy, I request the Designated Officer's approval for the following proposed transaction to be undertaken either by me or by persons associated with me:

Name:	
Name of registered holder transacting (if different):	
Residential address:	
Office or position in the Company:	
Type of transaction (circle):	Sale/ Purchase/ Other (specify)
Description and number of securities that are subject of the proposed transaction:	
To be transacted (circle):	On ASX/ Off-market trade/ Other (specify)
Likely date of the transaction (on or about):	

The following information is only required if you are seeking approval to deal in the Company's securities during a Prohibited Period:

Details of the exceptional circumstances pursuant to which I make this application:	

I declare and confirm that:

1 I have read and understood the Company's Securities Trading Policy and my decision to deal in securities of the Company has not been made on the basis of any "inside information" (as that term is defined in the Company's Securities Trading Policy).

2 The Company is not advising or encouraging me to trade in any securities of the Company and does not provide any recommendations or advice regarding such trades; and

3 I know of no reason to prohibit me from trading in the Company's securities and certify that the details given in this application are complete, true and accurate.

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Signed by

Print name: __________________________

Print date: __________________________

Designated Officer Consideration

(For Completion by Designated Officer)

I have reviewed the contents of this application and hereby [approve]/[do not approve] the proposed transaction described in the application.

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Signed by the Designated Officer

Print name of the Designated Officer: __________________________

Print position of the Designated Officer: __________________________

Print date: __________________________