Securities Trading Policy

1. Introduction and Purpose of this policy

This policy applies to SHAPE Australia Corporation Limited and its related bodies corporate, pursuant to the Corporations Act 2001 (Cth) (**SHAPE**).

The Board of Directors **(Board)** of SHAPE Australia Corporation Limited consider it essential that SHAPE and its employees comply with both the law and high ethical standards. It considers "insider trading" to be both illegal and unethical. SHAPE prohibits insider trading.

The purpose of this Policy, which has been adopted by the Board, is to:

- Create awareness of the restrictions under law and this Policy on dealing in securities issued by SHAPE **(Securities)** and to establish governance procedures for dealing in Securities to prevent the misuse, or perception of misuse, of inside information; and
- Provide guidance to directors, members of the senior leadership team **(SLT)** and all other SHAPE employees and its controlled entities if they are considering dealing in Securities.

SHAPE recognises the importance of preventing insider trading and maintaining market confidence in the Securities.

Any failure to comply with this policy may have serious consequences. Individuals may face disciplinary action which may include instant dismissal. Where third parties are involved, we may cease working with those third parties. Criminal conduct will be reported to the appropriate authorities.

2. Scope of this Policy

This Policy applies to

1. SHAPE Personnel	2. Designated Personnel
SHAPE Personnel collectively refers to: • All directors • All members of the SLT • All other employees of SHAPE, including contractors, agents and consultants to SHAPE	Designated Personnel collectively refers to: • All directors • All members of the SLT • The Company Secretary • Employees involved with preparing SHAPE's financial reports; and • Any other people nominated by the Board or the Company Secretary (and who are notified accordingly).

This Policy also applies to your "associates". For the purposes of this Policy, your "associates" include:

(a) Your spouse, partner or dependent children (direct family members);

(b) Any company, trust or entity which is controlled by you or your direct family members; and

(c) Any other entity in which you are a director, secretary or executive officer, unless appropriate arrangements are in place within that entity so that you:

(i) Take no part in the decision by that other company or body to purchase or sell the Securities; and

(ii) Have not induced or encouraged that other company or body to purchase or sell the

Securities

All personnel have an individual responsibility to comply with the law relating to insider trading and this Policy. Any clearance to deal in Securities provided under this Policy is not an endorsement by SHAPE or any SHAPE officer of any dealing. Individuals remain responsible for their own investment decisions and compliance with the law.

3. Insider Trading Prohibition

3.1 General Prohibition

In accordance with the *Corporations Act 2001* (Cth) (**Corporations Act**), no SHAPE Personnel who possess inside information, or their associates, may:

a) Apply for, acquire, or dispose of the Securities, or enter into an agreement to apply for, acquire or dispose of the Securities; or

b) Procure another person to apply for, acquire or dispose of the Securities, or enter into an agreement to apply for, acquire or dispose of the Securities; or

c) Directly or indirectly communicate (or "tip") inside information, or cause the inside information to be communicated to another person who is likely to deal in the Securities

Insider trading is a criminal offence and can attract substantial fines and/or imprisonment. It may also attract civil liability, including liability to pay those who suffered loss or damage as result of the insider trading.

3.2 Inside Information

"Inside Information" is information relating to SHAPE that:

a) Is not generally available; and

b) If it were generally available, a reasonable person would expect it to have a material effect on the price or value of the Securities.

Information is expected to have a material effect on the price or value of the Securities if the information would, or would be likely to, influence persons who commonly invest in Securities in deciding whether to acquire or dispose of the Securities.

Examples of information which could be inside information include:

a) The financial performance of SHAPE

b) Changes in SHAPE's actual or anticipated financial condition or business performance

c) Changes in the capital structure of SHAPE, including proposals to raise additional capital

d) Proposed changes in the nature of the business of SHAPE

e) Changes to the Board or significant changes in the SLT

f) Likely or actual entry into, or loss of, a material Contract

g) Impending acquisitions or sales of assets by SHAPE

h) A proposed dividend or other distribution or a change in dividend policy; or

i) A material claim against SHAPE or other unexpected liability

3.3 Generally Available Information

Information is considered to be "generally available" if it:

a) Consists of readily observable matter

b) Has been made known in a manner that would (or would be likely to) bring it to the attention of persons who commonly invest in the Securities, and since it was made known, a reasonable period has elapsed. For example, it has been released to the ASX or published in an annual report or Prospectus; or

c) Consists of deductions, conclusions or inferences made or drawn from information referred to above

4. Restrictions for SHAPE Personnel

4.1 No Margin Lending

SHAPE Personnel are not permitted to enter into margin lending arrangements in relation to the Securities as the terms may require the Securities be sold when the Personnel possesses inside information.

4.2 No short term or speculative trading

SHAPE encourages all Personnel to adopt a long-term attitude to their investment in SHAPE. Consequently, they may not engage in short-term trading (that is, trading in and out of Securities over a period of 3 months or less) or speculative trading in the Securities. The Board may, at its discretion, exclude the disposal by employees of Securities received under SHAPE's employee incentive schemes from this restriction on short-term trading.

Additionally, SHAPE Personnel should not engage in short selling of the Securities.

4.3 Securities of other Companies

SHAPE Personnel are prohibited from dealing in the Securities of outside companies, about which they may gain inside information by virtue of their position within SHAPE.

4.4 Prohibition on hedging

SHAPE Personnel must not engage in hedging arrangements, deal in derivatives or enter into other arrangements which limit the economic risk related to the Securities. For the purposes of this Securities Trading Policy, this prohibition applies to any contracts for difference and other contracts intended to secure a profit or avoid a loss based on fluctuations in the price of the Company's Securities.

5. Further restrictions on Designated Personnel

5.1 Prohibited Trading Periods

Designated Personnel must not Trade in Securities during the following Prohibited Periods:

(a) From 30 June until commencement of the trading day immediately after the release of the full year results

(b) From 31 December until commencement of the trading day immediately after the release of the half yearly results

(c) From two weeks preceding until commencement of the trading day following the day on which the AGM is held

(d) The duration of the offer period for an offer of Securities or other financial products made pursuant to a Prospectus (or document containing equivalent information); and

(e) Any additional periods imposed by the Board from time to time (for example when SHAPE is considering matters which are subject to Listing Rule 3.1A).

However, even if a Prohibited Period is not operating, Designated Personnel must not Trade in Securities at that time if they are in possession of inside information.

5.2 **Exceptional circumstances exception**

SHAPE may, in exceptional circumstances, provide written approval to a Designated Person seeking to trade in the Securities during a Prohibited Period. No exceptional circumstances approval will be provided during the Prohibited Trading Periods set out in section 5.1 of this policy.

A request for approval must be submitted to the relevant officer (being the Chairperson of the Board or, in the case of an application from the Chairperson, the Chair of the Audit and Risk Committee) in writing and must provide evidence that each of the following requirements is satisfied:

a) The person is experiencing severe financial hardship or other exceptional circumstances

b) After investigating all reasonable alternatives, the sale of the Securities is the only practical way of addressing the exceptional circumstances; and

c) The person does not possess any inside information.

If the Relevant Officer has any doubt in making a determination of exceptional circumstances, they should exercise the discretion with caution.

If approval is granted in writing in accordance with this clause, the Designated Person must complete the dealing within 7 days of receiving such approval, or such earlier time as determined. Confirmation of the approved trading must be given to the Company Secretary when the approved trading has been completed.

5.3 **Limiting risk**

Designated Personnel are prohibited from dealing in any financial products issued or created over the Securities by third parties or dealing in associated products. In addition, Designated Personnel may not enter into a transaction that operates to limit the economic risk of their security holding in SHAPE.

5.4 **Blacklisted securities**

From time to time, SHAPE may be engaged in certain activities where inside information in relation to Securities of another entity may be available to a Designated Person as a result of their role or position within SHAPE. SHAPE wishes to minimise the risk that such persons might be perceived to be engaged in inappropriate dealings, and therefore SHAPE may blacklist certain Securities in relation to particular persons.

Where the Board or the Chairperson of the Board notifies a Designated Person in writing that they are subject to a blacklist in relation to the Securities of a particular entity (**Blacklisted Securities**), that person must not deal in the Blacklisted Securities from the time period specified in the notice, unless they first comply with the notification requirements set out in section 6 below (as if the Blacklisted Securities were the Securities), and then always subject to the law.

6. Process for trading for Designated Personnel

6.1 **Notification of proposed trade in the Securities**

Where a Designated Person, who believes that trading is permitted under this Policy proposes to deal in the Securities, they must first provide:

a) Written notice of their intention to trade to the Relevant Officer (being the Chairperson of the Board or, in the case of an application from the Chairperson, the Chair of the Audit and Risk Committee) and the Company Secretary; and

b) Confirmation that they are not in possession of any inside information

c) Any clearance to trade may be given or refused by the Relevant Officer in their discretion, without giving any reasons and clearance may be withdrawn if new information comes to light or there is a change in circumstances. The decision to refuse clearance is final and binding on the Designated Person seeking clearance, and if clearance is refused, the Designated Person seeking clearance must keep that information confidential.

No dealing may be undertaken before the Designated Person receives written clearance from the

Relevant Officer. If the Designated Person receives written clearance for their proposed dealing, that dealing must be completed within 7 days from the date of the clearance, unless it specifies otherwise.

6.2 **Confirmation of trading**

In addition to providing prior notice under section 6.1, Designated Personnel must confirm in writing to the Company Secretary, within 3 days of the dealing in the Securities occurring, the number of the Securities affected and the relevant parties to the dealing.

6.3 **Company secretary to maintain records**

The Company Secretary will maintain a copy of:

a) all requests for an approval to deal in SHAPE's securities submitted by a Designated Person;

b) details of all dealings in SHAPE's securities made by an Designated Person pursuant to such an approval; and

c) all of the other documentation received under section 6 or otherwise under this Policy.

7. Dealings excluded from this Policy

Sections 5.1, 5.2, 5.3 and 6 of this Policy do not apply to the following types of dealings (**Exempt Transactions**):

a) Transfer of the Securities by a Designated Person to a person closely related to the Designated Person (e.g. spouse or family trust) or to their superannuation fund

b) Disposal of the Securities arising from the acceptance of a takeover offer, scheme of arrangement or equal access buy-back

c) Acquisition of the Securities under a pro rata issue

d) Acquisition of the Securities under a security purchase plan or dividend reinvestment plan

e) Acquisition of the Securities under an employee incentive scheme; and

f) Any other transactions identified by the Board for this purpose

It is important to note that all Exempt Transactions remain subject to the Insider Trading Prohibitions in the Corporations Act.

8. Review of this Policy

The Board will review this Policy every two years. This Policy may be amended by resolution of the Board.

SHAPE Australia Corporation Limited ACN 654 729352	
Document number:	IS-7064-PO {3}
Date approved:	27 May 2026
Approved by:	The Board