



Securities Trading Policy for Directors and Employees

Konekt Limited
May 2016

Registered Office: Level 3, 33 Erskine Street, Sydney NSW 2000
ASX code: KKT
ABN: 79 009 155 971

This policy replaces Konekt Limited's Securities Trading Policy dated February 2012 and applies to all trading of securities from 3 May 2016.

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1. Overview

- 1.1 The Securities of the Company are quoted on Australian Securities Exchange Ltd (ASX Limited).
- 1.2 This Securities Trading Policy (**Policy**) relates to trading in Securities issued by Konekt Limited (**Company**) by Directors and Employees of its responsible entity and of its related bodies corporate. Consistent with Australian law, this Policy does not only apply to the Shares of the Company but has a much broader application, applying to all Securities of the Company as defined in **section 2.1**.
- 1.3 This policy outlines:
- (a) when Designated Officers, Employees and Associates must not Deal in Company Securities;
 - (b) when Designated Officers, Employees and Associates must not Deal in quoted Securities of another entity; and
 - (c) certain limited exceptions.

2. Definitions

2.1 Interpretation

Capitalised words and phrases are defined terms. For definitions, refer to **section 2.2**.

2.2 In this Policy:

Accounts means the financial results of the Company lodged with ASX, being the half-yearly results or the full year results of the Company.

Associate means someone that a Designated Officer or Employee (**the Principal**) can be regarded as having investment control or influence over, including:

- (a) family members of the Principal (including children);
- (b) nominees of the Principal (including an investment manager managing funds on the Principal's behalf);
- (c) a trust of which the Principal, or any family member, or any family-controlled company is the trustee or beneficiary;
- (d) a person in partnership with the Principal or a connected person mentioned above; and
- (e) a company which the Principal controls.

ASX means ASX Limited or the financial market operated by it, as the context requires.

Board means the directors of the Company from time to time, acting as a board.

Chairman means the chairman of the Company or in his/her absence, their nominee.

Clearance means permission given to a Designated Officer, Employee, or Associate to sell or otherwise dispose of, but not buy, Company Securities in circumstances otherwise prohibited by this policy.

Clearance Officer means:

- (a) for an Employee, the company secretary;
- (b) for a Designated Officer who is not a director, the company secretary;
- (c) for a director (except the chairperson of the board), the chairperson of the Board;

- (d) for the company secretary, the chairperson of the Board;
- (e) for the chairperson of the Board, the chairperson of the Board's Audit and Risk committee;
and
- (f) for an Associate, the Clearance Officer of their Principal.

Closed Period and **Trading Blackout** have a corresponding meaning as outlined in [section 6](#).

Corporations Act means the *Corporations Act 2001* (Cth) as amended or modified from time to time.

Company means Konekt Limited A.C.N. 009 155 971.

Company Secretary means the Company Secretary of the Company or in his/her absence their nominee.

Company Securities include Securities and Derivatives of the Company.

Deal and **Dealing** have a corresponding meaning as outlined in [section 5](#).

Derivatives has the meaning given in the Corporations Act, and includes the following if they relate to or derive their value from Company Securities: put or call options, forward contracts, futures, warrants, depositary receipts structured financial products, swaps, contracts for difference, spread bets, caps and collars, and any other hedging or investment arrangement.

Designated Officer means any director of the Company and each other person with authority and responsibility, whether direct or not, for the planning, direction and control of the Company's activities (i.e. key management personnel).

Directors mean directors of the Company and Director means any one of them.

Employee includes, in addition to Group employees, any contractor or consultant whose terms of engagement incorporate this policy.

Group means the Company and its controlled entities.

Inside Information has the meaning given in [section 4.5](#).

Prescribed Employees are Employees who, because of their seniority or the nature of their position, are likely to come in contact with key financial, operational and strategic information about the Company, that will, or is likely to have, a material effect on the price or value of the Securities of the Company.

For the avoidance of doubt, the following persons are all automatically Prescribed Employees:

- (a) Executives of the Company;
- (b) Employees of the Company that routinely come in contact with key financial, operational and strategic information about the Company; and
- (c) Assistant of either of the above.

Executives may also nominate selected individuals in their business units to be added to the list of Prescribed Employees.

The Company maintains the Register of Prescribed Employees. The Company will notify Prescribed Employees when they are added to the list. On notification, Prescribed Employees

must immediately provide the Company with the HIN/SRN and other personal information relating to their Company holdings for their personal accounts and any other accounts that they control.

Securities include shares (including but not limited to ordinary and preference shares), debentures, any legal or equitable right or interest in shares or debentures as well as performance rights over shares by third parties, structured financial products, swaps, futures contracts, contracts for differences, spread bets, options, convertible notes, interests in managed investment schemes and other financial products, warrants, depositary receipts or other derivatives over or related to the performance of Shares.

Shares mean ordinary shares in the issued capital of the Company.

Trading Blackout means Closed Period as outlined in [section 6](#).

3. Reasons for the policy

Directors and Employees are encouraged to be long term holders of Securities. However, it is important that they conduct their personal investment activity in a manner that is lawful and avoids conflict of interest between the Directors or Employees personal interest and those of the Company.

The Policy is specifically designed to raise awareness and minimise any potential for breach of the prohibitions on insider trading contained in the Corporations Act and to provide guidance to Directors and Employees when Dealing in Securities, so as to minimise the chance that Directors and Employees Dealings in Securities may be misinterpreted as Dealing while in possession of Inside Information.

4. Insider Trading

4.1 Background

The principal insider trading prohibition is section 1043A of the Corporations Act. Subject to limited exceptions, it prohibits a person (**insider**) who has Inside Information relating to Company Securities or the quoted Securities of another entity from:

- (a) dealing in relevant Securities;
- (b) procuring another person to do so; or
- (c) communicating, directly or not, Inside Information to someone else when the insider knows, or ought reasonably to know, that the other person would or is likely to:
 - (i) Deal in relevant Securities; or
 - (ii) procure another person to do so.

4.2 It does not matter how the insider received the information.

4.3 Insider trading is a criminal offence, punishable by substantial fines or imprisonment or both. The Company may also be liable if a Designated Officer or Employee engages in insider trading.

4.4 Insider trading may also attract civil penalties. A court may impose substantial pecuniary penalties, and order compensation paid to persons suffering related loss or damage.

4.5 Inside Information

- (a) Inside Information is information that:
 - (i) is not generally available; and
 - (ii) if it were generally available, would, or would be likely to, influence persons who normally invest in securities in deciding whether to acquire or dispose of the relevant securities.
- (b) Information is generally available if it:
 - is readily observable;
 - (i) has been made known in a way that is likely to bring it to the attention of persons

who normally invest in the relevant type of securities, and a reasonable time for the information to be circulated has since passed; or

- (ii) consists of deductions, conclusions or inferences drawn from information that has been made known in that way or is readily observable.
- (c) Inside Information is also called 'material price sensitive information'. It need not relate only to the Company. It could also be information about a customer, or supplier of the Company, or a party with whom the Company is discussing future opportunities or negotiating a significant transaction.
- (d) In order to minimise the risk of insider trading, the Company must immediately disclose to the market material price sensitive information not otherwise excluded from the disclosure, as set out in the Company's continuous disclosure policy.
- (e) Material price sensitive information is Inside Information even if it does not trigger a disclosure obligation under the continuous disclosure regime.

5. What is Dealing in Securities?

5.1 Dealing in Securities includes:

- (a) applying for, acquiring or disposing of, Securities;
- (b) entering into an agreement to do so; or
- (c) granting, accepting, acquiring, disposing, exercising or discharging an option or other right or obligation to acquire or dispose of Securities.

5.2 Dealing in Company Securities can include, but is not limited to:

- (a) buying or selling Company Securities by way of an on-market or off-market transaction;
- (b) granting, acquiring or disposing of a beneficial interest in Company Securities, such as through a trust that holds Company Securities;
- (c) applying for, acquiring or exercising options or rights over Company Securities;
- (d) acquiring Company Securities (or an interest in them) under any employee share plan operated by the Company;
- (e) accepting, or taking up entitlements under, a dividend reinvestment plan, rights issue, bonus issue, share purchase plan or any other offer of Securities made by the Company;
- (f) accepting an offer under a takeover bid for Company Securities;
- (g) entering into a Derivative; and
- (h) agreeing to do any of the above things.

6. Prohibited dealings in securities

6.1 When Employees or their Associates must not Deal

An Employee (who is not a Designated Officer) or their Associate must not, in any circumstances, Deal or procure another person to Deal in Company Securities or quoted Securities of another entity if they have Inside Information in relation to Company Securities or Securities relating to that other entity.

6.2 When a Designated Officer or their Associates must not Deal

- (a) A Designated Officer or their Associate must not, in any circumstances, Deal or procure another person to Deal in Company Securities if they have Inside Information in relation to Company Securities.

- (b) A Designated Officer or their Associate must not, in any circumstances, Deal or procure another person to Deal in Securities relating to another entity if they have Inside Information in relation to those Securities.

6.3 When an Employee or Designated Officer or their Associates must not Deal

- (a) An Employee or Designated Officer or their Associate must not Deal or procure another person to Deal in Company Securities during any of the following **Closed Periods (Trading Blackouts)**:
 - (i) the period commencing one month prior to the release of the Company's half-yearly results to ASX and ending 24 hours after such release; and
 - (ii) the period commencing one month prior to the release of the Company's full year results to ASX and ending 24 hours after such release; and
 - (iii) the period commencing 2 weeks prior to the Company's annual general meeting and ending 24 hours after the annual general meeting; and
 - (iv) any additional period the Board may specify from time to time.

- (b) The Closed Period trading prohibition does not limit any other obligations of Designated Officers prescribed by this policy.

6.4 Third parties

Directors and Employees must not Deal in securities in a company that the Company is transacting with or has an interest in, where the Director or Employee becomes privy to Inside Information about that company in the course of their service or employment with the Company.

When dealing with advisers and contractors, it is important that Directors and Employees seek to ensure confidentiality if and when these third parties may become privy to Inside Information. Where practicable, this will be achieved by entering into a confidentiality agreement with the relevant parties or inserting a confidentiality clause in the respective agreements. However, and notwithstanding that a confidentiality agreement may have not been entered into, **if an adviser or contractor of the Company (including professional services providers) Deals in Securities while in possession of Inside Information, this may result in the termination of their working relationship with the Company.**

6.5 No short-term speculative trading of Securities

Short-term speculative trading (i.e. buying Securities and disposing of them within twelve weeks or less from the date of acquisition of Securities) in Shares does not promote market confidence in the integrity of the Company.

Directors and Employees must not deal in the same Shares of the Company within any 3 month period.

This prohibition does not restrict the vesting of performance rights over Shares in the Company and the subsequent sale of the underlying Shares of the Company within a 3 month period.

6.6 Hedging of Securities

Directors and Employees are only permitted to **buy** a derivative position (for example the Policy permits entering into a contract to **buy** a put or a call option, however not a contract to sell a put or a call option). The intention of the Policy is that it only permits hedging arrangements which are in the control of the Director or Employee rather than control of any third party. In taking out such approved positions Directors and Employees must observe the requirements of the Policy at all times.

The intention of the Policy is that it only permits hedging arrangements which are within the control of the Director or Employee rather than conferring control of any purchase or sale decision to a third

party. In entering into and in taking any action pursuant to any derivative transaction, Directors and Employees must observe the requirements of the Policy at all times.

6.7 Margin loans

Margin loans to support an investment in Company Securities can compromise compliance with this policy, as the loan's terms may compel the sale of Company Securities during a prohibited period or when the Employee or Designated Officer has relevant Inside Information.

Employees and Designated Officers are prohibited from entering into margin loan arrangements to fund the acquisition of Company Securities or in relation to which Company Securities may be used as security against loan repayment.

7. Permitted dealings in securities

7.1 Dealing in Securities

Subject at all times to not being in possession of Inside Information Directors and Employees can Deal in Securities at any time except during Trading Blackouts, subject to the notification and approval procedures in [section 8](#).

7.2 Trading Blackouts

The designated Trading Blackouts in relation to Securities are outlined in [section 6](#).

Notwithstanding these designated Trading Blackouts, the Company may declare a Trading Blackout in respect of Securities at any time at its absolute discretion and without prior notice if considered necessary by the Directors.

Trading Blackouts will operate automatically at the times described in [section 6](#). The Company Secretary will notify Directors and Employees by e-mail when a Trading Blackout commences or closes and may include a daily reminder that the Blackout is in effect in the Company's internal newsletter until the Blackout period ceases.

No Dealing in Securities may occur within the Trading Blackouts without special leave being granted by the Chairman or the Company Secretary of the Company. Leave will ordinarily only be granted in situations of financial hardship and only in the event that the person involved is not in possession of Inside Information affecting Securities.

7.3 Participation in corporate actions and share plans

Company Directors and Prescribed Employees who are eligible, may participate in dividend reinvestment plans, rights issues or bonus issues (**Corporate Actions**) which are offered to all Company Shareholders, even where the Corporate Action is made, or acceptance falls, within a Company Director and Prescribed Employee Blackout Period.

However, Company Directors and Prescribed Employees must not elect to participate in a Corporate Action or change their election while they have inside information about the Company.

Prescribed Employees may accept an invitation to participate in an employee share plan, regardless of when the offer is made, or even if acceptance falls within a Company Directors and Prescribed Employees. Prescribed Employees must then comply with all rules in this policy for dealing in the Securities of the Company acquired under an employee share plan.

However, in such situations, the procedures outlined in [section 8](#) of the Policy in relation to obtaining prior written approval to deal in the Securities of the Company during a Closed Period still apply.

8. Pre-notifications, reporting and conduct of dealings

8.1 Approval to Deal during Closed Period

An Employee, who is not in possession of insider information affecting the Securities of the Company, may be given prior written approval by the Company to sell or otherwise dispose of the Securities of the Company outside of a Trading Window (**Closed Periods**) where there are **exceptional circumstances**.

It is noted that approval given in response to a request to sell or otherwise dispose of Securities of the Company during a Closed Period is a compliance monitoring function only, and is not an endorsement of the proposed dealing.

8.2 Exceptional Circumstances

- (a) An Employee (who is not a Designated Officer) or their Associate may Deal or procure another person to deal in Company Securities if they do **not** have Inside Information in relation to Company Securities.
- (b) A Designated Officer or their Associate may Deal or procure another person to Deal in Company Securities outside of the Closed Periods if they do **not** have Inside Information in relation to Company Securities and the Designated Officer has provided notification in accordance with **section 8.3**.
- (c) A Designated Officer or their Associate may Deal in Company Securities if they have obtained Clearance in accordance with **section 8.3**.
- (d) Section 6 does not apply to Dealing by a Designated Officer or their Associate that involves or results directly from any of the following, provided that the Designated Officer has provided notification in accordance with **section 8.3**:
 - (i) Dealing in Company Securities under an offer or invitation made by the Company to all or most of its ordinary shareholders – such as an offer or invitation under a rights issue, bonus issue, share purchase plan, dividend reinvestment plan, an equal access buy-back or in lieu of a cash dividend (and including, without limitation, decisions relating to whether or not to take up entitlements, and the sale of entitlements required to provide for the take-up of the balance of entitlements, under a renounceable rights issue) – or under an equal reduction of capital undertaken by the Company;
 - (ii) undertaking to accept, or accepting, an offer for Company Securities made under a takeover bid or disposing of Company Securities under a court-approved compromise or arrangement under Part 5.1 of the Corporations Act;
 - (iii) Dealing in units of or interests in, a fund or other scheme (other than a scheme investing primarily in Company Securities) where the assets of that fund or scheme are invested at a third party's sole discretion;
 - (iv) where the Designated Officer or their Associate is the trustee of a trust, Dealing in Company Securities by that trust provided that neither the Designated Officer nor any Associate is a beneficiary of the trust and any decision to trade during a prohibited period is taken entirely independently of the Designated Officer or their Associate;
 - (v) disposal of Company Securities effected by a change in the trustee of a trust;
 - (vi) accepting an offer to acquire Company Securities, or acquiring Company Securities, under any employee share plan that the Board from time to time determines is a plan to which this clause applies;
 - (vii) the exercise (but not the sale of Company Securities following exercise) of an option or right under an employee share plan, or the conversion of a convertible security, where the final date for exercise or conversion falls during a prohibited period; and the Company has been in an exceptionally long prohibited period or has had a number of consecutive prohibited periods and exercise or conversion could not reasonably have occurred outside a prohibited period;

- (viii) the forfeiture, lapse, cancellation or surrender of Company Securities under an employee share plan; or
- (ix) an off-market transaction involving the transfer or other disposal of Company Securities between a Designated Officer or Associate and any of the following:
 - a. an Associate of the relevant Designated Officer (or, in the case of an Associate, the Designated Officer);
 - b. a company, trust or other entity over which the relevant Designated Officer or Associate of that Designated Officer has control or significant influence (whether alone or jointly with any of their close Associates); or
 - c. a superannuation fund or other pension or saving scheme in which the relevant Designated Officer or an Associate of that Designated Officer is a beneficiary.
- (e) All Dealing referred to in **sections 8.2 (c)** and **8.2 (d)** is subject to the overriding inside trading prohibition – that is, a Designated Officer or Associate must not Deal if they have Inside Information in relation to Company Securities.
- (f) A Designated Officer may Deal in the quoted Securities relating to another entity if they do not have Inside Information in relation to those Securities.

8.3 Consent for Dealing

- (a) If a Designated Officer proposes to Deal in Company Securities at any time, they must, prior to such Dealing, provide:
 - (i) written notice, either by hand or email, of their intention to the Clearance Officer; and
 - (ii) confirmation that they are not in possession of Inside Information, in the form of the template in **Appendix A**. After such Dealing, the Designated Officer must provide the Clearance Officer with a transaction confirmation.
- (b) The Clearance Officer may give a Clearance in **exceptional circumstances**. Exceptional circumstances may include:
 - (i) if a person is required by court order, or enforceable undertaking (e.g. in a bona fide family settlement) to transfer or sell Company Securities or there is another overriding legal requirement to do so; or
 - (ii) if a person has a pressing financial commitment that cannot otherwise be satisfied and all reasonable alternatives have been investigated.
- (c) A tax liability will not generally constitute a pressing financial commitment unless it fits the definition in **section 8.3 (b)(ii)**.
- (d) A Clearance Officer may delegate his or her authority in writing to an appropriate person in the event of illness or absence, provided that person is not a member of the class for which they are the Clearance Officer.
- (e) The Clearance Officer has discretion to determine that circumstances other than in **section 8.3 (b)** nevertheless warrant Clearance.
- (f) Clearance will not be given:
 - (i) retrospectively, or
 - (ii) if there is a matter about which there is Inside Information in relation to Company Securities (regardless of whether the applicant is aware of it) when Clearance is requested; or
 - (iii) if there is other reason to believe that the proposed Dealing breaches this policy.
- (g) A request for Clearance must:
 - (i) be in writing and given by hand or email to the Clearance Officer at least five business days prior to the proposed disposal of Company Securities;
 - (ii) set out the number of Company Securities proposed to be disposed of, and whether the proposed transaction will be on-market or off-market; and

- (iii) include:
 - a. sufficient information to demonstrate exceptional circumstances and that the proposed disposal is the only reasonable course of action available to the applicant; and
 - b. a declaration that the applicant does not believe they have any Inside Information.
- (h) The Clearance Officer must:
 - (i) keep a written record of:
 - a. any information or request received in connection with this policy; and
 - b. any Clearance given; and
 - (ii) send a copy of that record to the Company Secretary for keeping.
- (i) The Company Secretary must keep a file of materials received under **sections 8.3 (a)** and **8.3 (i)**.
- (j) A Clearance:
 - (i) must be in writing and may be given by hand or emailed;
 - (ii) will only be given if the Clearance Officer is satisfied that the applicant has no Inside Information and the circumstances are exceptional;
 - (iii) cannot extend for more than 10 business days (with the effect that the relevant sale or disposal must be commenced within that period); and
 - (iv) lapses immediately if the applicant acquires Inside Information.
- (k) A Clearance is not an endorsement. Designated Officers, Employees and Associates remain responsible for their compliance with this policy and the Corporations Act.

8.4 Dealing in Securities during Closed Periods

Subject to the general prohibition from engaging in insider trading, dealing in the Securities of the Company by Employees will generally be permitted during a Closed Period where it is proposed to acquire the Securities of the Company under for example;

- (a) a bonus issue made to all holders.
- (b) a dividend reinvestment or top-up plan available to all holders, or
- (c) an employee share plan, or executive performance rights plan or similar.

However, in such situations, the procedures outlined in **section 7** of the Policy in relation to dealing in the Securities of the Company during a Closed Period still apply.

8.5 Dealings by an Associate

- (a) If a Designated Officer may not Deal in Company Securities, they must prevent such Dealing by their Associate.
- (b) A Designated Officer must:
 - (i) inform any Associate of the periods during which the Designated Officer must not Deal in Company Securities;
 - (ii) inform any Associate that they must not Deal in Company Securities on a speculative basis; and
 - (iii) request any Associate to inform the Designated Officer immediately after Dealing in Company Securities.
- (c) A Designated Officer does not have to comply with **sections 8.5 (a)** and **8.5 (b)** to the extent that compliance would breach their obligation of confidence to the Group.

8.6 Communicating Inside Information

- (a) A Designated Officer, Employee or Associate must not directly or indirectly communicate Inside Information in relation to Company Securities or quoted Securities relating to another entity, if they know, or ought reasonably to know, that the other person would be likely to:
 - (i) Deal in relevant Securities; or
 - (ii) procure another person to so Deal.
- (b) The provisions of **section 8.6** do not limit, and are additional to, other duties of confidentiality.

8.7 Notice of change in director's interest

- (a) If a Designated Officer is a director, they must ensure that an Appendix 3Y Change of Directors' Interest Notice is completed (including the disclosures required by Part 3 of that document titled: 'Closed Period') and provided to the Company's company secretary within 2 business days after the commencement of any Dealing in Company Securities.
- (b) The company secretary must provide the Appendix 3Y notice to ASX within 5 business days after the transaction's commencement.

9. Takeovers and schemes of arrangements

The restrictions in this Policy do not prevent a Director or an Employee from accepting a takeover bid or from selling Securities under a scheme of arrangement in respect of the Company.

10. Breaches

- 10.1 Insider trading, or the perception of insider trading, by any Director or Employee, will not be tolerated. Any allegation of insider trading would be likely to have a serious detrimental impact on the Company's business. We must all be seen to be actively and diligently upholding the law and complying with this Policy
- 10.2 Breaches of this Policy will be viewed seriously and may lead to disciplinary action being taken against the relevant Director or Employee. In serious cases, such action may include dismissal or removal from office. Any Director or Employee who becomes aware of a violation of this Policy should immediately report the violation to the Company Secretary
- 10.3 It should also be noted that, in some circumstances, the Company may be obliged to notify regulatory and/or criminal authorities of a serious breach of this Policy. Insider trading is a crime and can result in penalties.
- 10.4 In addition, the insider trader, and any other persons involved in the contravention, may also be liable to compensate third parties for any resulting loss.

11. Distribution of policy

- 11.1 Directors will be provided with a copy of this Policy upon appointment. Employees will receive a copy of the Policy upon employment.
- 11.2 A full copy of the Policy will be placed on the Konekt intranet.

12. Review of policy

This Policy will be reviewed regularly by the Directors of the Company having regard to the changing circumstances of the Company and any changes to the Policy will be notified in accordance with the process in section 6 (i.e. by email from the Company Secretary). If Directors, Employees or advisers have any comments or views concerning the operation or effectiveness of the Policy, they should be communicated to the Company Secretary.

13. Amendment

13.1 Amendments to this policy not of a purely administrative nature must be approved by the Board.

13.2 Amendments to this policy that relate to:

- (a) Closed Periods; or
- (b) exclusions from its operation; or
- (c) exceptional circumstances in which trading may be permitted during a prohibited period; or
- (d) are otherwise material, must be given to ASX by the company Secretary for release to the market.

13.3 This policy was approved and adopted by the Board on April 26 2016.

14. Further information

If you have information that you think might be Inside Information and are unsure whether you can Deal in Company Securities or Securities of another quoted entity, you should contact your Clearance Officer for assistance and additional information.



Securities trading policy

Appendix A – Notification and Clearance Form

Konekt Limited
ACN 009 155 971

[date _____]

The Clearance Officer
Konekt Limited
Level 3, 33 Erskine
Street
Sydney NSW 2000

NOTICE - TRADING OF COMPANY SECURITIES

In accordance with **section 8** of Konekt Limited’s securities trading policy, I give notice to you that I am proposing to Deal with Company Securities in the following manner:

- Sell/buy Company Securities
- transfer Company Securities vested under an equity incentive plan to me
- transfer Company Securities to a related party (e.g. family company, trust or superannuation fund)
- exercise options over Company Securities
- utilise derivatives and enter into a hedging transaction

The number of securities that I propose to Deal with is [number _____].

The transaction will be carried out [on-market/off-market] within 10 business days from [date _____]. I confirm that have no insider information and will comply with the Konekt’s Limited securities trading policy in relation to my Dealing. I agree to notify the company secretary of the results of this action for the purposes of disclosure in the annual report or to ASX.

[Designated Officer/Employee/Associate]

Name..... Signature.....

Title/Capacity Date:

CLEARANCE

If trading will take place during a Closed Period, please provide details of exceptional circumstances to enable the Clearance Officer to provide clearance as set out below.

I confirm that subject to you not gaining any Inside Information, you are authorised to Deal in Company Securities within a not more than 10 business day window starting on [date _____] and ending on [date _____] as outlined above.

Clearance Officer

Name..... Signature.....

Title Date: