

Trading In Securities

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1. Purpose

The purpose of this Policy is to specify the obligations regarding trading in securities of entities with which Seqwater interacts and the legal responsibilities that apply to Board members and all workers. This Policy is aligned to the Risk Management Policy Statement ([POL-00013](#)).

2. Scope

This Policy applies to all workers and Board members unless otherwise stated.

3. Policy

3.1. Holding and Dealing in Securities

3.1.1. Legal Requirements and Insider Trading

To preserve the reputation and integrity of Board members, Seqwater workers and Seqwater, it is essential that dealings in securities are not only fair, but are seen to be fair.

Board members and workers must not, if they possess inside information about a company:

- subscribe for, buy or sell securities of the company, or other price sensitive products to which the inside information relates, either for themselves, or for another person
- arrange for associated persons to subscribe for, buy or sell the affected securities or other price sensitive products, to which the inside information relates, for the Board member or worker, for another person or for themselves
- either directly or indirectly, give the inside information, or allow it to be given to another person who they know, or should know, would be likely to do any of the prohibited things described above.

If a Board member or worker has an arrangement with an agent to conduct discretionary trading on their behalf either through a blind trust or a self-managed superannuation fund, they should ensure that if they have prior knowledge of or control over the investment, that the affected securities or other price sensitive products to which the inside information relates are excluded from those securities or other price sensitive products that the agent is authorised to buy and sell.

Board members with a conflict of interest in any matter that comes or may come before the Board must comply with the requirements of the South East Queensland Water (Restructuring) Act 2007, the [POL-00007](#) Board Charter and [POL-00145](#) Board Code of Conduct. Workers with a personal interest in any matter in which they are involved as part of their duties in Seqwater must disclose that interest in accordance with [POL-00147](#) Conflict of Interest Policy and [PRO-00040](#) Conflict of Interest Procedure.

3.1.2. Contracts and proposed contracts with listed entities

Where Seqwater is considering entering into a contract with a listed entity, generally:

- no Board member or worker who is aware that a relationship is under consideration, should acquire securities in that entity

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- any Board member who already owns securities in that entity must comply with the requirements of the *South East Queensland Water (Restructuring) Act 2007*, the [POL-00007](#) Board Charter and the [POL-00145](#) Board Code of Conduct
- any worker who already owns securities in that entity must comply with the disclosure obligations of [POL-00147](#) Conflict of Interest Policy and [PRO-00040](#) Conflict of Interest Procedure.

Former Board members or workers should continue to observe the restriction on trading in securities where they have inside information in respect of contracts which were under consideration during their term as a Board member or during their employment with Seqwater. This restriction ceases to apply when information about the contract becomes publicly available.

Where Seqwater has an existing contract with a listed entity, no Board member or worker should trade securities in that entity (either acquire securities, or sell securities previously acquired) unless all information known to the Board member or worker is publicly available information.

3.2. Management of Potential Conflicts

Where a Board member or worker has any doubt about the appropriateness of trading in particular securities because of a relationship or proposed relationship between Seqwater and that company, the matter should be discussed as follows before the Board member or worker conducts any trade:

- Board member or Chief Executive Officer - Board Chairperson
- Executive Leadership Team member - Chief Executive Officer
- Other workers - General Manager to whom the worker reports or the Company Secretary and General Counsel.

The Board Chairperson, Chief Executive Officer, General Manager or Company Secretary and General Counsel shall determine what further action is required. The action may include:

- the Board member or worker refraining from taking part in activities or decision-making where any potential conflict may arise
- the Board member or worker withdrawing from discussions and/or being restricted in accessing information relating to any potential conflict
- the Board member or worker being requested to divest themselves of the personal interest
- re-arrangement of duties among workers so that the conflicted worker is not involved in any potential conflict.

While the Board Chairperson or senior management can decide that a potential conflict of interest should not preclude a Board member or worker from entering into a transaction, a transaction that would constitute insider trading cannot be permitted and will remain an offence under the Corporations Act 2001.

3.3. Training

Seqwater shall arrange periodic training for Board members and workers on compliance issues, including insider trading rules. Records of training provided will be maintained by Learning and Development.

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4. Definitions

Term	Definitions
Associated Persons	Means friends, family, nominees, agents, investment advisers, brokers or other associates of Board members or workers, and may include family trusts and family companies.
<i>Corporations Act</i>	Means the <i>Corporations Act 2001 (Cth)</i> .
Inside Information	Means information that is not generally available to the public, and, if the information were generally available, a reasonable person would expect it to have a material effect on the price or value of particular Securities (Section 1042A <i>Corporations Act</i>).
Insider Trading	Means the offence under section 1043A of the <i>Corporations Act</i> , which prohibits persons with Inside Information dealing in securities. The offence occurs if a person deals in securities where the person possesses inside information and knows, or ought reasonably to know, that the information is not generally available to the public, and, if the information were generally available, a reasonable person would expect it to have a material effect on the price or value of the securities.
Material effect	A reasonable person will be taken to expect information to have a material effect on the price or value of the securities if the information would, or would be likely to, influence people who commonly buy securities in deciding whether to buy or sell those securities.
Securities	Means <ul style="list-style-type: none"> • shares in a body • debentures of a body • interests in a registered managed investment scheme • legal or equitable rights or interests in shares or debentures • options to acquire any of the securities listed above.
Workers	Includes all permanent, temporary, and casual employees of Seqwater, and: <ul style="list-style-type: none"> • vocational and work experience placements • volunteers • contractors and consultants temporarily assigned to Seqwater whilst working for or on behalf of Seqwater.

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5. Roles and Responsibilities

Role	Responsibility
Board Chairperson	Provide advice to Board members and the CEO regarding their obligations under this Policy in relation to insider trading and the management of potential conflicts of interest as required.
Board members	Comply with the requirements of this Policy and the Corporations Act in relation to the use of inside information. Provide Declarations of Interest to the Company Secretary and General Counsel as required.
Chief Executive Officer (CEO)	Provide advice to General Managers regarding their obligations under this Policy in relation to insider trading and the management of potential conflicts of interest as required.
Company Secretary and General Counsel	Collect Declarations of Private Financial and Other Interests from the Chief Executive Officer and General Managers and maintain a register of declared interests. Provide advice to workers regarding insider trading and the management of potential conflicts of interest as required. Ensure relevant compliance training is provided to Board members and workers.
General Managers	Provide Declarations of Private Financial and Other Interests as required by POL-00147 Conflict of Interest Policy and PRO-00040 Conflict of Interest Procedure. Provide advice to workers regarding their obligations under this Policy in relation to insider trading and the management of potential conflicts of interest as required
People and Culture	Maintain records of training provided to Board members and workers
Workers	Comply with the requirements of this Policy and the <i>Corporations Act</i> in relation to the use of inside information. Comply with POL-00147 Conflict of Interest Policy and PRO-00040 Conflict of Interest Procedure.

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6. References and Related Materials

Description	Location
<i>Corporations Act 2001 (Cth)</i>	Commonwealth Legislation
POL-00007 Corporate - Board Charter	Rex & Waternet
POL-00013 Corporate – Risk Management Policy Statement	Rex & Waternet
POL-00145 Corporate - Board Code of Conduct	Rex & Waternet
POL-00147 Corporate - Conflict of Interest Policy	Rex & Waternet
PRO-00040 Corporate - Conflict of Interest Procedure	Rex & Waternet
Queensland Government - Government Owned Corporations Corporate Governance Guidelines	Contact Manager Corporate Governance
<i>South East Queensland Water (Restructuring) Act 2007 (Qld)</i>	Queensland Legislation

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