



## Share Trading Policy

# Medical Developments International Limited

**ABN 14 106 340 667**

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## Share Trading Policy

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### 1. Introduction and Purpose

- 1.1 The ordinary shares of Medical Developments International Limited (ASX: MVP) are listed on ASX. MVP aims to achieve the highest possible standards of corporate conduct and governance.
- 1.2 The purpose of this share trading policy is to ensure compliance with the ASX Listing Rules, and to ensure that Key Management Personnel and their associates are aware of the legal restrictions in dealing in MVP's shares while such a person is in possession of unpublished price sensitive information concerning MVP.
- 1.3 The Share Trading Policy regulates dealings by MVP Directors in MVP securities (in this Policy including options and other financial products issued by third parties) and securities of any other entity that may be affected by inside information.
- 1.4 Where uncertain on the underlying rules or application of the policy, relevant staff or Directors should seek appropriate counsel whether that be from within MVP or even appropriately qualified external professionals.

### 2. Application of the Policy

- 2.1 This Share Trading Policy applies to the following Designated Persons:
  - a) Directors ;
  - b) Officers;
  - c) Senior Management; and
  - d) Any employee or consultant who has access to MVP confidential financial and Board documentation.

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### 3. Reasons for the Policy

3.1 The Corporations Act 2001 prohibits persons who are in possession of price sensitive information in relation to particular securities that is not generally available to the public from:

- a) Dealing in the securities; or
- b) Communicating the information to others who might deal in the securities.

3.2 The objectives of this policy is to ensure that:

- a) MVP Staff are aware of the legal restrictions on trading in securities whilst a person is in possession of MVP inside information; and to
- b) establish a regime for the Company to prevent inadvertent non-compliance.

### 4. Restrictions on Trading

#### 4.1 Inside Information

Inside Information is information relating to MVP, which is not generally available but would, if the information were generally available, be likely to have a material effect on the price or value of MVP's Securities ("**Inside Information**")

Information has a "material effect" if it would be likely to influence persons who commonly acquire securities (in general) in deciding whether or not to acquire or dispose of the relevant securities.

Staff are prohibited from trading in MVP securities and any other entity (e.g., another listed company with which MVP is confidentially negotiating a significant transaction) whilst in the possession of what they ought reasonably to know is inside information.

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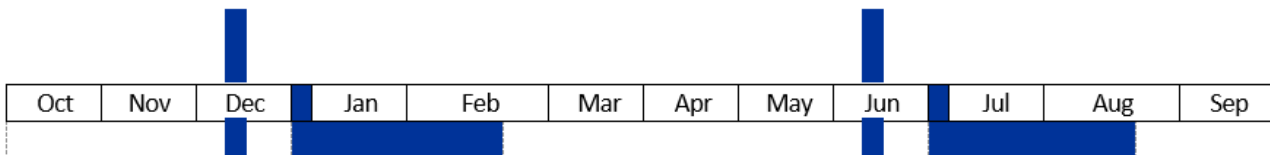
### 4.2 Black Out Periods

Designated Persons are prohibited from dealing in (that is, applying for, acquiring or disposing of) MVP Securities during the “Black Out Periods”; all other times of the year subject to notification to the company of the intention to trade.

Under this policy, the following periods are “Black Out” Periods:

- a) 31 December until midday Melbourne Local Time (MLT) on the next business day after the day on which the half year results are announced;
- b) 30 June until midday MLT on the next business day after the day on which the full year results are announced; and
- c) At such other times as the Board of Directors of MVP prohibits (which will be communicated to employees by the Company Secretary.

The following table illustrates the minimum applicable “Black Out Periods” in general terms.



Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep

### 4.3 Insider Trading

The requirements imposed by this policy are separate from, and additional to, the legal prohibitions in the Corporations Act on insider trading, which makes it a serious criminal offence for someone who is in reasonable possession of “inside information” (information not generally available that a reasonable person would expect to have a material effect on the price or value of securities of MVP or any other entity) and knows or ought reasonable to know that it is inside information:

- a) to acquire or dispose;
- b) to encourage or induce anyone else to acquire or dispose (regardless of whether they have inside information);
- c) to give inside information to anyone who may be likely to acquire or dispose or encourage anyone else to acquire or dispose, of securities of MVP or that other entity.

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### 5. Trading during a “Black Out Period” in Exceptional Circumstances

5.1 MVP recognises that directors, officers, or employees may need to trade in MVP shares in exceptional circumstances (even during a “closed period”).

5.2 MVP shares may be traded due to exceptional circumstances, if:

- a) the circumstances relate to severe financial hardship that cannot be satisfied other than by selling the securities;
- b) the person is not in possession of inside information; and
- c) the person has complied with the approval process contained in this policy.

5.3 If a director, officer, or employee wishes to trade in MVP shares in exceptional circumstances he/she must give written notice to the Company Chair seeking consent no less than 5 business days before the proposed trade. Such notice must set out:

- a) the number of shares to be traded;
- b) the proposed date(s) for the trade(s);
- c) the exceptional circumstances involved; and
- d) a statement confirming that they are not in possession of any inside information.

### 6. Trading Excluded from the Policy

6.1 The following types of trades are expressly excluded from the operation of this policy:

- a) investing or trading in a fund or scheme where the investment decisions are made by a third party, provided that the fund or scheme does not invest exclusively in MVP’s shares;
- b) trading in securities by a restricted person as a trustee – who is not also a beneficiary of the trust – and the decision to trade is made by other trustees or investment managers independently of the restricted person;
- c) acceptance of a takeover offer;
- d) trading under an offer or invitation made to all or most security holders, including DRPs, share purchase plans and rights issues and an equal access buy-back, where the timing and structure of the plan has been approved by the board;

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### 7. Notification

7.1 Prior to any trade being undertaken by any person to which this policy applies, notification in writing is required to be made 24 hours prior to the intended trade, in accordance with the below:

- Company Chair – required to notify and obtain approval from the Chair of the Audit and Risk Committee and Company Secretary.
- Directors – required to notify and obtain approval from the Company Chair and Company Secretary.
- Employees – required to notify and obtain approval from the Company Secretary

The notification of intention to trade can be summarised in email form or otherwise using the template provided in Schedule 1 of this document.

Once a trade of shares has been made by or for an Employee, its completion, including volume must be reported in writing to the Company Secretary.

7.2 Directors of the Company must report all acquisitions or disposals of shares without exception, including date, price, volume, whether the acquisition or disposal occurred during a Closed period where prior written clearance was required and, if so, whether prior written clearance was provided, so that the Company can comply with the ASX reporting obligations. This information is to be provided to the Company Secretary within 24 hours of settlement occurring

### 8. Breach of Insider Trading Prohibitions

8.1 Any breach of this policy must be immediately advised to the Company Secretary, who in turn will report to the Board.

8.2 A breach of this policy may result in:

- a) criminal liability – penalties include heavy fines and imprisonment;
- b) civil liability - legal action by another party or MVP for any loss suffered as a result of illegal trading activities; and
- c) disciplinary action including dismissal.

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### 9. Definitions

“**ASX**” means Australian Stock Exchange

“**Board**” means the board of directors of Medical Developments International Limited

“**Company Chair**” means Chair of the Board of Directors

“**Closed Period/Black Out Period**” has the meaning given to that term in clause 4.3(a) & 4.3(b)

“**Dealing**” includes:

- a) Any application for acquisition or disposal of any shares;
- b) Entering into agreement to apply for, acquire or dispose of any shares; and
- c) The grant, acceptance, acquisition, disposal, exercise or discharge of any option or other right or obligation to acquire or dispose of shares

“**MVP**” means ASX code for Medical Developments International Limited

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### 10. Schedule 1 - Notification Form to Deal in MVP Securities

#### Part A - For completion by Designated Person

Name of Designated Person	
Nature of agreement/dealing (sale/purchase/subscription) including number/value	
Proposed date of transaction (i.e., proposed completion date)	

I confirm that:

- I am not in possession of any unpublished information which, if generally available, might materially affect the price or value of MVP Securities; and
- the transaction in MVP Securities described above does not contravene the Share Trading Policy of Medical Developments International Ltd.

Signed:	
Dated:	

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### Part B - For completion by the Company Secretary/Company Chair/CEO

I acknowledge:

- a) the confirmations given by the Designated Person; and
- b) in addition, that the proposed trading in MVP Securities described above does not fall within a Black Out Period during which time all Staff are prohibited from trading.

This acknowledgment expires 5 business days after the date that it has been provided.

The Designated Person must provide further notification of any dealing in MVP Securities occurring after the expiry of that 5-business day period (or any other dealing in MVP Securities which is otherwise not described in Part A above).

Name:	
Title:	
Signature:	
Dated:	

***The completed form is to be sent to the Company Secretary or his/her delegator, if the Company Secretary wishes to deal in MVP Securities, the Company Chair of the Board or the CEO.***

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