



## **Personal Account Trading & Restricted Securities Policy**

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**Dates:** Policy Takes Effect: June 2015

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**Approved:** Mint Asset Management Board Resolution

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**Responsible Officer:** Amplifi Group Chief Executive Officer (Group CEO)

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**Relevant To:** All Mint employees - this includes fixed term and temporary or contract employees and contractors and Directors of Mint

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Version	Date	Modifier	Document Changes
1	29/06/2015	Simon Haworth	Existing Policy adopted
2	24/10/2017	Simon Haworth	Changes made include referencing the FMCA 2013, expanding the definition of securities to include derivatives, expanding upon the definition of inside information and other general tidy ups.
3	July 2018	Simon Haworth	Changes to reallocate CIO responsibilities to the CEO
4	November 2021	Simon Haworth	Changed maintenance of restricted list from CEO to Compliance Officer
5	December 2022	Gina Delgado	Changed responsibilities from the HOI to COO when applicable. Changes in Annual Staff declaration referencing the Compliance Policy.
6	October 2023	Gina Delgado	Adding COO for trade pre-clearance.
7	September 2024	Gina Delgado/Simon Haworth	Change the annual declaration form and update COO references to GM.
8	November 2025	Jen Grayson	Removed references to GM, streamlined descriptions and procedural steps for approval. Updated policy to strengthen insider trading controls and align with FMA guidance that non-public information relating to one issuer may be material to another issuer. Clarified restricted list escalation expectations, strengthened record keeping requirements for significant trades, and streamlined approval workflow and responsibilities.

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February  
2026

Jen Grayson

Approved by the Board on 10 February 2026

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## 1. Introduction

- 1.1. This Personal Account Trading & Restricted Securities Policy (Policy) sets out rules by which Staff Members of Mint Asset Management Limited (“the Manager”) may buy and sell securities on their own account (“personal account trading”).
- 1.2. This Policy is to be read in conjunction with the Financial Markets Conduct Act 2013 (FMCA). Insider trading is prohibited by the FMCA. It is each Staff Member’s responsibility to ensure that he or she is familiar with and complies with both this Policy and the provisions of the FMCA and any subsequent law.

## 2. Roles and responsibilities

- Group CEO (pre-clearance authority)
- Head of Compliance (restricted list + register maintenance)
- Staff Members (disclosure + recordkeeping + escalation of insider info)

## 3. Principles of the Policy

No personal trading is permitted where Mint is active in the security or where Mint or the Staff Member holds non-public information that is, or may reasonably be, material to the security being traded (including related issuers).

- 3.1. These rules are designed to avoid conflicts between a Staff Member’s personal interests and Mint’s duties to clients. Personal trading must not occur where it could overlap with Mint activity in the same security or during any restricted period.

For the purposes of this Policy, prohibited concurrent trading includes:

- trading the same security while Mint has an active or pending order in that security
  - trading during an active order window, or
  - trading within a restricted period (including where a security has been placed on the Restricted List).
- 3.2. The rules are also designed to discourage financial speculation and dealing in financial instruments characterized by high leverage or potentially unlimited downside risk. Derivatives trading is discouraged and may be restricted or declined at the Group CEO/Head of Compliance’s discretion
  - 3.3. The Policy applies to the purchase and sale of all securities (which include shares, stocks, bonds, commercial bills and derivatives) in any financial market. Managed funds where the Company is the manager and or advisor are not included within the scope of this policy but Staff Members are reminded of their obligations under the Financial Markets Conduct Act 2013, particularly in regard to ensuring they do not front run.
  - 3.4. All Staff Members must declare all their securities holdings upon commencement of employment with the Manager.
  - 3.5. All Staff Members must keep an up-to-date register of all personal interests in securities which is to be disclosed to the Audit, Risk and Compliance Committee annually. As part of their annual disclosure, Staff Members are also required to provide a copy of the trade confirmation for each trade undertaken during the previous 12 months.

3.6. Staff Members will be required to follow this Policy if:

- a. they intend to buy and sell securities on their own account; or
- b. their partner, parent, child, company, trust or other associate intends to trade and the Staff Member has effective control over the trade.
- c. Corporate actions such as takeovers, bonus issues, share splits/consolidations, dividend re-investment plans, non-renounceable rights etc. are not subject to pre-trade approval however this does not override restrictions relating to Mint activity, restricted lists, or inside information. This does not override restrictions relating to Mint activity, restricted lists, or inside information.

3.7. The following principles apply to the purchase and sale of securities:

- a. the Manager's clients must be placed first at all times;
- b. any actual or potential conflict between personal interest and duty to clients must be avoided and be seen to be avoided; and
- c. a Staff Member must not obtain any inappropriate advantage from that Staff Member's fiduciary position.
- d. Staff Members are responsible for keeping a record of their trading, including retaining contract notes to verify compliance with this Policy. Records of all personal security transactions must be able to be produced for regulatory purposes if required. In addition to keeping contract notes, Staff Members must, where practical, record a brief contemporaneous rationale for significant personal trades where the Staff Member or the Company holds non-public information relating to one listed issuer (Issuer A) and the Staff Member proposes to trade in a different but related listed issuer (Issuer B). The rationale must document why the Staff Member and approver have assessed that the non-public information is not material information in relation to the issuer(s) being traded, and therefore that trading may proceed under this Policy. If the information is assessed as material information in relation to any issuer being traded, the trade must not proceed and the Head of Compliance must be notified.

3.8. Staff Members must not:

- a. buy or sell a security when the Manager is active in that security;
- b. buy or sell financial derivatives in any securities when the Manager is active in those securities or the securities that underlie them;
- c. buy or sell more than 5% of the issued share capital of a listed issuer;
- d. buy and sell the same securities within a 30-day period;
- e. seek financial exposure to markets that are beyond their financial resources;
- f. seek financial assistance in any form from any market participant;
- g. trade, or advise or encourage another person to trade or hold, quoted financial products where that Staff Member is an "information insider"; or
- h. disclose "inside information" to another person where the Staff Member knows or reasonably believes that person will likely trade or advise or encourage another person to trade or hold, quoted financial products.

For clarification:

An "information insider", means a person that:

- a. has material information relating to a security that is not generally available to the market;
- b. knows or ought reasonably to know that the information is material information; and

- c. knows or ought reasonably to know that the information is not generally available to the market.

"inside information" means the information in respect of which a person is an information insider of the security in question.

"material information" means information that:

- a. a reasonable person would expect, if it were generally available to the market, to have a material effect on the price of quoted financial products; and
- b. relates to financial products, a particular listed issuer, or listed issuers, rather than to financial products generally or listed issuers generally.

Ascertaining whether information is "generally available to the market" involves assessing:

- a. whether information 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 financial products and, since it was made known, a reasonable period for it to be disseminated among those persons has expired; or
- b. if it is likely that persons who commonly invest in relevant financial products can readily obtain the information; or
- c. if it is information that consists of deductions, conclusions, or inferences made or drawn from either or both of the kinds of information referred to in paragraphs (a) and (b).

d. **Application to information about other issuers**

For the purposes of this Policy, Staff Members should be aware that non-public information relating to one listed issuer (Issuer A) may, in some circumstances, constitute "material information" in relation to another listed issuer (Issuer B), due to the relationship, degree of connection or similarity between Issuer A and Issuer B. In assessing whether information is material information in relation to any issuer, Staff Members must consider whether a reasonable person who commonly invests in shares would expect that information, if generally available, to have a material effect on the price of the quoted financial products of that issuer.[2][1]

- e. When considering whether non-public information about Issuer A may be material information about Issuer B, relevant factors may include:

- whether Issuer B operates in the same sector, industry, or peer group as Issuer A;
- whether Issuer B has a commercial relationship with Issuer A (for example, as a supplier, customer, funder, joint venture partner, or competitor);  
whether the information relates to a transaction or event (including a capital raising, M&A activity, restructuring, or market sounding) that could reasonably affect other issuers connected to that transaction or sector;
- whether Issuer A and Issuer B have historically demonstrated market correlation or are commonly traded as substitutes by investors;
- whether Issuer A and Issuer B are commonly included in the same index, theme, or investment basket, such that information may result in broader market repricing;
- the nature, specificity, and potential magnitude of the non-public information, including whether a reasonable person would expect it to influence the price of Issuer B's quoted financial products;
- the timing of the information and proximity to any expected market announcement or event; and

- whether the information is likely to influence investor expectations about Issuer B due to read-through impacts, valuation changes, or sector re-rating effects.

### **Non-public information and trading decisions**

Where a Staff Member is considering a personal trade and there is any possibility that the Staff Member or Mint holds non-public information that could be material to the issuer(s) being traded (including related issuers), the Staff Member must not trade and must consult the Head of Compliance.

In deciding whether to proceed with personal account trading, the Staff Member and the approver must consider whether a reasonable person would expect the information to have a material effect on the price of any quoted financial products the Staff Member intends to trade while in possession of that information.[1][2]

## **4. Restricted Lists**

- 4.1. The Head of Compliance is responsible for the maintenance of a restricted list of securities.
- 4.2. If a Staff Member becomes an “information insider” in relation to a potential capital event or announcement in a security, they must notify the Head of Compliance in writing immediately, along with any expected timeframe for which dealings in the security to be restricted. The notification should also identify any other listed issuers (Issuer B) that may reasonably be expected to be affected by the information, including issuers in the same or a closely related sector
- 4.3. The receipt of inside information can occur unintentionally and its materiality is not always obvious. Staff may seek guidance from the Group CEO or Head of Compliance, who are the designated contacts for insider information soundings where a Staff Member is unsure if the information they have received makes them an information insider in relation to any issuer, including where the information relates to Issuer A but may be material to another issuer.
- 4.4. The restricted list is maintained to prevent any dealings in affected securities. A security will be removed from the restricted list only once the relevant information has been released to the market and is considered generally available and in the public domain. When considering whether to place securities on the restricted list, the Head of Compliance, will consider whether non-public information about Issuer A may be material information about any other issuer (Issuer B) and may add such issuers to the restricted list where appropriate, having regard to sector concentration, price correlation and the likely impact of the information
- 4.5. The Head of Compliance must maintain a written register of all restricted securities.

## **5. Internal Process**

- 5.1. Before trading any security, including purchasing from an Initial Public Offering, all Staff Members must:
  - a. Confirm with the Group CEO that the Manager is not active in that particular security or intending to be;
  - b. Complete a personal account trading form;
  - c. Obtain pre-clearance from the Group CEO;

- d. If the Group CEO who wishes to trade in a security, pre-clearance must be obtained from a Director of the Manager.
- 5.2. Approved trades are valid for execution only on the day of approval. A new authorisation is required if the trade is not executed on that day.
- 5.3. The Head of Compliance will update the Personal Account Trading register noting all transactions.

## **6. Breaches**

- 6.1. Breaches of the Personal Account Trading and Restricted Securities Policy may form grounds for disciplinary action including up to immediate dismissal.



## Staff annual declaration

[Date]

I confirm that as of the date of this declaration:

*The section below is relevant solely to Mint employees and contractors.*

- 1) I have fulfilled my duties in line with Mint Asset Management's employment expectations and have complied with my obligations under the Compliance Policy.
- 2) I understand that non-public information about one listed issuer can, in some circumstances, constitute material information about another listed issuer and may restrict my ability to trade in one or more issuers or sector-related products, and I have complied with these obligations under the Personal Account Trading – Restricted Securities Policy

*The section below is relevant to Mint employees, contractors, and Directors.*

- 3) I complied with my obligations under the Code of Ethics.
- 4) Any potential conflicts of interest have been declared, and the Register of Interests is accurate and up to date.
- 5) My personal investments have been declared and are up to date as required by the Personal Account Trading & Restricted Securities Policy.

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Signature

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Name

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Role



## Personal Account Trading Approval Form

\_\_\_\_\_ is seeking approval to BUY/SELL

(Person's name)

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\$ \_\_\_\_\_ of the following security

(Volume, approx.)(Name of security)

Date: \_\_\_\_\_ Time: \_\_\_\_\_ (of application)

**BUSINESS IS ACTIVE / INACTIVE IN ABOVE STOCK**

Permission GRANTED / NOT GRANTED by

\_\_\_\_\_ GROUP CEO/DIRECTOR

Date: \_\_\_\_\_ Time: \_\_\_\_\_

1. After completion, this form should be forwarded to the Group CEO.
2. Approval document must be sent to Head of Compliance to update Personal Account Trading Register