



# Dealing in the Securities of Beadell Resources Limited Policy

## 1. Introduction

The Corporations Act 2001 (Cth) ("**Corporations Act**") prohibits any person who possesses inside information (whether as principal or agent) from using that information to deal in securities, either for personal gain or for the gain of any other person.

Inside information is information that is not generally available and, if it were available, a reasonable person would expect to have a material effect on either the price or value of the applicable security.

The main provision dealing with insider trading is section 1043A of the Corporations Act.

The following Policy and Procedures have been produced to provide guidance to Directors and employees of the Group, and their associates, when dealing in the Company's securities (which includes shares and options issued by the Company).

## 2. Policy on Trading in Company Securities

Directors and employees of the Group:

- (a) must not deal in any security of the Company whilst in possession of inside information;
- (b) should never engage in short term trading of any securities of Company;
- (c) should advise the company secretary, or in his absence, a Director, of any purchase or sale of securities of the Company within 2 business days.

## 3. Procedure for Trading in Company Securities

Subject to the requirements of the Corporations Act and the above Policy requirements, a Director, an employee or their associate may:

- (a) provided that the person is not in possession of any inside information, deal in any security of the Company;

- (b) not deal in any security of the Company within 5 days prior to the release of:
  - (i) the half-yearly financial report to ASX;
  - (ii) the annual financial report to ASX, and
  - (iii) a prospectus for the offer of equity securities in Company;
- (c) acquire securities in the Company under a bonus issue made to all holders of securities of the same class;
- (d) acquire securities of the Company under a dividend reinvestment, or top-up plan that is available to all holders of securities of the same class;
- (e) acquire, or agree to acquire, shares or options under any employee share or option plan implemented by the Company;
- (f) exercise options granted by the Company (pursuant to any option plan or otherwise), but may only sell all or part of the shares received upon such exercise in accordance with the above Policy and these Procedures, and;

In the case of Directors only, section 205G of the Corporations Act requires that a Director must notify the Australian Stock Exchange Limited of the acquisition or disposal of any security of the Company. A copy of any such notification should be forwarded by the relevant Director to the Company Secretary within 2 business days of a deal occurring.

#### 4. Adoption of the policy

This policy and these procedures were formally adopted by resolution of the Directors of the Company on 23 September 2009.

#### 5. Definitions

In this Policy on Dealing in the Securities of the Company:

"**associate**" includes nominee companies, spouses, dependent children, family trusts, etc.

"**security**" includes shares, debentures, rights, options, employee options, prescribed interests and warrants.

"**deal**" includes any transaction associated with buying, selling or converting a security.

"**group**" means the Company and its subsidiaries.

"**inside information**" is information that if it was generally available and known to the market would have material effect on the price or value of the applicable security, and includes, without limitation:

- (a) sales figures;

- (b) profit forecasts;
- (c) borrowings;
- (d) liquidity and cash flow information;
- (e) significant changes in operations;
- (f) management restructuring;
- (g) significant litigation;
- (h) impending mergers acquisitions, reconstructions, takeovers;
- (i) material exploration results;
- (j) major asset purchases or sales; and
- (k) new products and technology.