



Securities Trading Policy

1. Purpose

- This Securities Trading Policy is designed to ensure that Contact and its directors and employees do not breach prohibitions on insider trading and to avoid any perception of directors or employees dealing in shares when they should not do so.

2. Application

- This policy applies to all directors, and all employees including contingent workers such as secondees, contractors and consultants of Contact and its subsidiaries (collectively “employee/s”).

3. Fundamental Rule - Prohibition on Insider Trading

- Directors and employees who possess “material information” about Contact must not:
 - a) trade in Contact securities;
 - b) advise or encourage others to trade or hold any Contact securities;
 - c) advise or encourage a person to advise or encourage another person to trade or hold any Contact securities; or
 - d) pass material information about Contact on to others in circumstances where they should not.
- “Contact securities” include Contact shares and bonds and any other securities of Contact or its subsidiaries.
- The prohibition on insider trading is a matter of law. It is not restricted to Contact securities. If an employee has material information in relation to listed securities of another issuer that employee must not trade in those securities. It applies regardless of how the material information is acquired and regardless of why a director or employee is trading.
- “Material information”, for the purposes of this policy, is information relating to Contact’s securities that:
 - is not generally available to the market; and
 - if it were generally available to the market, would have a material effect on the price of Contact’s listed securities.
- Information is “generally available to the market” if it has been released as an NZX/ASX announcement or investors that commonly invest in the relevant securities can readily obtain the information.
- This policy does not apply to:
 - acquisition and disposal by gift or inheritance; or
 - acquisition through an issue of new Contact securities; or
 - acquisition through an employee share plan where the employee has no discretion over the timing of the acquisition (e.g. an acquisition through Contact Share or vesting of share rights under the Employee Equity Scheme).

- Directors and employees will be considered responsible for the actions of trusts and companies they control. In this respect, “control” is not construed in a technical way but by looking at how decisions are made in practice.
 - Directors and employees should not engage in short term trading (the buying or selling of Contact securities within a six month period), unless there are exceptional circumstances discussed with and approved by the General Counsel.
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4. Restrictions on trading during “black-out” periods

- Directors and employees are prohibited from trading in Contact securities during the following specific “black-out” periods, unless Contact’s Board provides a specific exemption:
 - between 1 January and the date of the announcement of half year results (inclusive) by Contact;
 - between 1 July and the date of the announcement of full year results (inclusive) by Contact; and
 - any other period determined by the General Counsel.
 - Outside of a black-out period, a director or employee may trade in Contact securities if they are not in possession of material information.
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5. Additional obligations on Restricted Persons

- The following people are deemed “Restricted Persons”:
 - a) directors, and any nominated alternate directors, of Contact;
 - b) the Chief Executive Officer;
 - c) all Leadership Team members and direct reports to the Chief Executive Officer;
 - d) all direct reports to the Leadership Team (including Executive Assistants); and
 - e) other people nominated by the General Counsel.
- Before trading in Contact securities, a Restricted Person must obtain the approval of the General Counsel by:
 - completing the Request for Consent to Trade form setting out the details of the trade including the security type and expected quantity;
 - confirming that they are not in possession of material information that is not generally available to the market; and
 - confirming there is no known reason to prohibit trading in Contact securities.
- In the case of proposed trading by a director, the Request for Consent to Trade should be approved by the Chair (or the Chair of the Audit Committee in the case of proposed trading by the Chair of the Board).
- In the case of proposed trading by the General Counsel the Request for Consent to Trade should be approved by the Chief Executive Officer.
- If, after submitting the Request for Consent to Trade but before completing the trade, the director or employee comes into possession of material information that is not available to the market, the director or employee must not complete the trade.
- Following trading in Contact securities, the Restricted Person must promptly confirm the details of the trade submitted to the General Counsel.

6. Disclosure obligations

- Directors and senior managers of Contact must comply with any disclosure obligations they have under subpart 6 of Part 5 of the Financial Markets Conduct Act 2013.
- The General Counsel or delegate can assist with and will normally make the disclosure to NZX and ASX on a director/employee's behalf. However, it is the director/employee's responsibility to ensure that the disclosure notice is filed with NZX and ASX on time and in the correct form. Neither Contact nor the General Counsel is responsible for any charge or fine incurred under law if the disclosure notice is not filed properly or on time.

7. Compliance

- Contact requires all of its directors and employees to comply with this policy. Compliance with this policy will be periodically monitored by the General Counsel.
- Any known or suspected instances of non-compliance should be reported to the General Counsel for full investigation and appropriate disciplinary action. Alternatively, any employee who is aware of a breach of this policy can take action in accordance with Contact's *Protected Disclosures (Whistleblowing) Policy*.

Approved

16 June 2022

Document owner

General Counsel