Share Trading and Conflicts Policy

Webjet Group Limited

Version 3.0

www.webjetgroup.com

Version Control

Document Owner/s	Group CEO & MD & Company Secretary		
Document Name	Share Trading and Conflicts Policy		
Version Control	1.0	October 2024	Document created on demerger and formation of Webjet Group Limited.
	2.0	August 2025	Addition of Purpose (Section 2), Review clause (Section 21), reference to key regulatory requirements
	3.0	November 2026	Annual review. Corrected internal cross-references and defined terms. Changes to length of Executive Trading Window and Blackout Periods. New provisions on examples of inside information, hedging of unvested incentive securities (s206J), definition of short selling (3 month threshold). Updated clearance procedures. Conflicts of interest provisions aligned with the Director Conflict of Interest Policy. New Schedule 1 summary table.
Material Changes	• change to length of Executive Trading Windows and Blackout Periods; • expanded prohibition on hedging of unvested/restricted incentive securities (Corporations Act s206J); • expanded examples of inside information; • new definition of speculative/short-term dealing (3-month threshold); • updated clearance procedures; • revised definition of exceptional circumstances for sell-only clearances; • alignment of Director conflicts of interest provisions with the Director Conflict of Interest Policy; • new Schedule 1 summary table of trading restrictions. •		
Approved by	Webjet Group Limited Board		
Date Approved	November 2026		
Review Period	Annual		
Date of Next Review	August 2027		
Regulatory Requirements	• Internal Risk Governance • ASX Listing Rules – particularly Listing Rule 12.9 to 12.12 and Guidance Note 27 on Trading Policies. • Corporations Act 2001 (Cth) – especially the insider trading provisions in s1042A–1043L Corporations Act (Cth) • Australian Securities and Investments Commission Act 2001 (Cth)		

Supporting Documents.

Document Name	Description
Risk Management Framework	Framework that sets out the totality of systems, processes, and methodologies for the management of risk at Webjet Group Limited
Market Disclosure and Communication Policy	Disclosure requirements aligned to ASX requirements.
Director Conflict of Interest Policy	Sets out the processes for identifying, disclosing and managing actual, potential and perceived conflicts of interest at Board level

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1 Introduction

1.1 The ordinary shares of Webjet Group Limited ("the Company") are listed on ASX.

1.2 This policy outlines:

1.2.1 when Designated Officers and Employees may deal in Company Securities;

1.2.2 when Designated Officers and Employees may deal in the securities of another entity;

1.2.3 procedures to reduce the risk of insider or inappropriate trading of the shares of the Company; and

1.2.4 when Designated Officers may hold office in or be actively involved or interested in any business or activity which is the same or similar to the business of the Company or which may adversely impact on the standing or reputation of the Group.

2 Purpose

2.1 The purpose of this policy is to set standards for trading in company securities and managing conflicts of interest in a way that protects the Company and the Group, its Employees, and shareholders from reputational and legal risk.

2.2 This policy applies to Directors, executives, Employees, contractors, and in some cases, Connected Persons.

2.3 Nothing in this policy relieves any person of their obligations under the insider trading provisions of the Corporations Act. Compliance with this Policy does not, of itself, mean that a dealing is lawful. The insider trading prohibition applies at all times, including during an Executive Trading Window and after a clearance has been given.

3 Defined terms

In this policy:

Approving Officer means:

(a) for a Designated Officer who is not a Director, the Group CEO & MD of the Company from time to time;

(b) for a Director (except the Chair), the Chair from time to time; and

(c) for the Chair, the Chair of the Board Audit and Risk Committee from time to time.

ASX means ASX Limited**.**

Blackout Period means each period between:

(a) **15 September** and the date of the release of the Company's half year results to ASX;

(b) **15 March** and the date of the announcement of the Company's full year results to ASX; and

(c) 12.01am on the preceding day and one hour after each of the following events:

(i) publication by ASX (on the Company Announcement Platform) of the Company's half year results;

(ii) publication by ASX (on the Company Announcement Platform) of the Company's full year results; and

(iii) the formal convening of each annual general meeting of the Company; and

(d) any other period specifically designated by the Board to be a 'Blackout Period'.

Board means the board of Directors of the Company.

Chair means the chair of the Board.

Group CEO & MD means the Chief Executive Officer of the Company.

Company means Webjet Group Limited.

Company Securities includes:

(a) shares in the Company or a Group member;

(b) options over the shares set out in paragraph (a);

(c) any other financial products of the Group traded on ASX; and

(d) any derivative or associated instruments the value of which is determined (in whole or in part) by any security listed in paragraph (a), (b) or (c).

Connected Person means, in relation to a person:

(a) a spouse, child or grandchild of that person;

(b) a child or grandchild of that person's spouse;

(c) a dependant of that person or of that person's spouse;

(d) anyone else who is one of that person's family and may be expected to influence that person, or be influenced by that person, in that person's dealings with the Company;

(e) a company or superannuation fund that person controls; or

(f) a trust (including family trust) of which that person is a beneficiary.

Corporations Act means the Corporations Act 2001 (Cth), as amended from time to time.

Deal or dealing in securities means:

(a) applying for, acquiring or disposing of, securities;

(b) entering into an agreement to apply for, acquire or dispose of, securities; and

(c) granting, accepting, acquiring, disposing, exercising or discharging an option or other right or obligation to acquire or dispose of securities

(d) transferring the security, whether or not for consideration and whether or not the transfer involves a change in beneficial ownership; and

(e) any other transaction or arrangement that has the effect of acquiring or disposing of the security or of an interest in it.

Designated Officer means:

(a) all Directors; and

(b) all key management personnel (as defined in the Accounting Standards) and all other senior managers engaged in the executive management of the Group; and

(c) All officers of the Company's controlled entities; and

(d) any other person who has been advised by the Company Secretary that they are subject to the requirements of this policy, whether as an Employee of the Group or as a consultant to the Group.

Director means a director of the Company.

Employee means an employee of the Company or any of its controlled entities.

Executive Trading Windows means each four week period commencing on the first trading day after the date of:

(a) the release of the Company's half year results to ASX;

(b) the announcement of the Company's full year results to ASX; and

(c) the Company's annual general meeting.

Group means the Company and each of its controlled entities.

Inside Information has the meaning given in clause 5.

4 Insider trading

4.1 If a person has information about securities and the person knows, or ought reasonably to know, that the information is Inside Information, it is likely to be illegal for the person to:

4.1.1 deal in the securities;

4.1.2 procure another person to deal in the securities; or

4.1.3 give the Inside Information to another person who the person knows, or ought reasonably to know, is likely to:

4.1.3.1 deal in the securities; or

4.1.3.2 procure someone else to deal in the securities.

4.2 Insider trading is a criminal offence. It is punishable by substantial fines or imprisonment or both. A company may also be liable if an employee or director engages in insider trading.

4.3 Insider trading may also attract civil penalties. A court may impose substantial pecuniary penalties for insider trading and order payment of compensation to persons who suffer loss or damage because of insider trading.

5 What is Inside Information?

5.1 Inside Information is information that:

5.1.1 is not generally available; and

5.1.2 if it were generally available, a reasonable person would expect it to have a material effect on the price or value of the relevant securities.

5.2 It is not a requirement of the law that only information of the Company can be Inside Information in respect of the Company Securities. Information of another company / entity will be Inside Information in respect of the Company Securities if it is information which, if generally available, would be expected to have a material effect on the price or value of the Company Securities.

5.3 Information is generally available if it:

5.3.1 consists of readily observable matter;

5.3.2 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 securities of the kind whose price might be affected by the information and a reasonable period for that information to be disseminated has elapsed since it was made known; or

5.3.3 consists of deductions, conclusions or inferences made or drawn from information falling under clauses 5.3.1 or 5.3.2.

5.4 Examples of information that **may** constitute inside information include, but are not limited to:

5.4.1 mergers, acquisitions, disposals, demergers or other significant corporate transactions;

5.4.2 proposed changes to the Company's capital structure, such as equity raisings, rights issues, buy-backs, redemptions or capital reorganisations;

5.4.3 knowledge that a substantial acquisition or disposal of the Company's securities is being contemplated by the Company or a major shareholder;

5.4.4 the giving or receipt of a takeover proposal or notice of intention to make a takeover offer;

5.4.5 unreleased information concerning dividends or distributions;

5.4.6 actual or expected changes to earnings, profit guidance, forecasts or other financial projections;

5.4.7 significant business strategies, operational changes or proposed changes to the nature or direction of the business;

5.4.8 significant new contracts or customers;

5.4.9 pending market announcements or other information intended for release to the ASX;

5.4.10 changes to the composition of the Board or executive leadership team;

5.4.11 significant legal proceedings, investigations or regulatory matters involving the Company;

5.4.12 industry, market or competitive developments that are not publicly known and could materially affect the Company's performance.

6 Excluded Dealings

6.1 The following dealings in Company Securities are excluded from the restrictions in this policy (**Excluded Dealings**). The restrictions on dealing in Company Securities in this policy do not apply to Excluded Trading:

6.1.1 an acquisition of Company Securities under a dividend reinvestment plan, a security purchase plan or another plan that is open to all holders of Company Securities on equal terms, where the person did not commence, amend or terminate their participation in the plan during a Blackout Period, or at any other time at which the person was not permitted to deal in Company Securities under this policy;

6.1.2 an acquisition of Company Securities under a pro rata issue, and a disposal of rights acquired under a pro rata issue;

6.1.3 an acquisition of Company Securities on the grant, vesting or exercise of an entitlement under an employee or executive incentive plan of the Group, but not a subsequent disposal of the Company Securities acquired;

6.1.4 a disposal of Company Securities arising from acceptance of a takeover bid, a scheme of arrangement, an equal access buy-back or a similar transaction that is open to all holders of Company Securities on equal terms;

6.1.5 a transfer of Company Securities by a Designated Officer or Employee to a Connected Person, or to a superannuation fund in respect of which prior written clearance for the transfer has been given by the Approving Officer;

6.1.6 an acquisition or disposal of Company Securities that occurs indirectly and incidentally as a result of a person dealing in an interest in a managed investment scheme, listed investment company, exchange traded fund or similar investment vehicle that is managed by a third party and that holds Company Securities as part of its portfolio.

6.2 A Designated Officer who undertakes Excluded Trading must notify the Approving Officer and the Company Secretary in writing of the details of the dealing within 2 business days after it occurs.

6.3 Excluded Trading is excluded from this policy only. It is not excluded from the insider trading provisions of the Corporations Act. A person who possesses Inside Information in relation to Company Securities must not deal in Company Securities, and must not procure another person to deal in Company Securities, even if the dealing would otherwise be Excluded Trading.

6.4 A dealing is not Excluded Trading if it is undertaken for the purpose of avoiding a restriction in this policy.

7 When Employees may deal

7.1 **Subject to paragraph 8 below**, an Employee (who is not a Designated Officer) may deal in Company Securities or the listed securities of another entity if he or she does not have information that he or she knows, or ought reasonably to know, is inside information in relation to Company Securities or the securities of the other entity.

8 When Employees may not deal

8.1 An Employee (who is not a Designated Officer) must not deal or procure another person to deal in Company Securities or the listed securities of another entity:

8.1.1 in the period commencing at 12.01am on the preceding day and ending one hour after each of the following events:

8.1.1.1 publication by ASX (on the Company Announcement Platform) of the Company's half year results to ASX;

8.1.1.2 publication by ASX (on the Company Announcement Platform) of the Company's full year results; and

8.1.1.3 the formal convening of each annual general meeting of the Company.;

8.1.2 if he or she has information that he or she knows, or ought reasonably to know, is Inside Information in relation to Company Securities or the securities of the other entity; or

8.1.3 if the Chair has by notice to the Employees under paragraph 12 temporarily halted or restricted dealing in Company Securities.

8.2 It is to be noted that an Employee who:

8.2.1 has information concerning the Group is precluded from dealing in the securities of another entity if that information would be inside information in respect of the securities of the other entity; and

8.2.2 has information concerning another entity is precluded from dealing in the Company Securities if that information would be Inside Information in respect of the Company Securities.

9 When a Designated Officer may deal

9.1 Subject to paragraph 10, a Designated Officer may deal in Company Securities:

9.1.1 during the Executive Trading Windows provided he or she immediately notifies the Approving Officer, copied to the Company Secretary, of the dealing; or

9.1.2 outside the Executive Trading Windows provided he or she has complied with paragraph 11 prior to the dealing.

9.2 A Designated Officer may deal in the listed securities of another entity if he or she does not have information that he or she knows, or ought reasonably to know, is Inside Information in relation to those securities.

9.3 While not seeking to limit the right of a Designated Officer to deal in Company Securities outside the Executive Trading Windows, the preference of the Company is, and Designated Officers are encouraged, that, as a general rule, dealings in Company Securities should take place within an Executive Trading Window.

10 When a Designated Officer may not deal

10.1 A Designated Officer must not deal or procure another person to deal in Company Securities:

10.1.1 if he or she has information that he or she knows, or ought reasonably to know, is inside information in relation to Company Securities;

10.1.2 during a Blackout Period;

10.1.3 at any time that the Chair has by notice given under paragraph 12 to the Designated Officers and / or Employees temporarily halted or restricted dealing in Company Securities; or

10.1.4 outside the Executive Trading Windows if he or she has not complied fully with paragraph 11 prior to the dealing.

10.2 A Designated Officer may not deal or procure another person to deal in the listed securities of another entity if he or she has information that he or she knows, or ought reasonably to know, is inside information in relation to those securities.

11 Clearance from the Approving Officer

11.1 Before dealing in Company Securities under paragraph 9.1.2, a Designated Officer must first inform (in writing) and obtain a clearance (in writing) from the Approving Officer, copied to the Company Secretary.

11.2 The Approving Officer must not give a clearance if:

11.2.1 there is any matter which would be or be reasonably likely to be classified as inside information which is not generally available relevant to the Group or Company Securities (whether the Designated Officer knows about the matter / information or otherwise) current at the time when the Designated Officer requests clearance or proposes to deal in Company Securities; or

11.2.2 the Approving Officer believes that the proposed dealing breaches this policy or any other corporate governance standard of the Company; or

11.2.3 the Approving Officer believes that the proposed dealing, if undertaken, may adversely impact on the reputation and standing of the Company.

11.3 The Approving Officer must:

11.3.1 keep a written record of:

11.3.1.1 any information received from a Designated Officer in connection with this policy; and

11.3.1.2 any clearance given under this policy; and

11.3.2 send a copy of the written record to the Company Secretary for safe keeping.

11.4 The Company Secretary must keep a file of any written record referred to in clause 11.3.

11.5 A clearance given under this clause is valid for 5 business days from the date it is given (unless the Approving Officer specifies a shorter period), after which a new notification must be given and a new consent and/or clearance must be obtained.

11.6 A Designated Officer who deals in Company Securities after obtaining a clearance must confirm the details of the completed dealing to the Approving Officer and the Company Secretary in writing within 2 business days after the dealing.

11.7 A Designated Officer requesting a clearance must confirm in writing, at the time of the request, that he or she is not in possession of any Inside Information in relation to Company Securities.

11.8 The Approving Officer may refuse a request for a clearance in his or her absolute discretion and is not required to give reasons for a refusal. A decision to refuse a clearance is final and binding on the person who requested it.

11.9 The Approving Officer may withdraw a clearance at any time before the dealing takes place if new information comes to light or there is a change in circumstances. A clearance that is withdrawn has no further effect and the Designated Officer must not deal in reliance on it.

11.10 A Designated Officer whose request for a clearance is refused, or whose clearance is withdrawn, must keep that fact confidential and must not disclose it to any person other than the Approving Officer and the Company Secretary.

11.11 A clearance is not an endorsement of the merits of the proposed dealing. Each Designated Officer remains individually responsible for his or her own investment decisions and for complying with the insider trading provisions of the Corporations Act. A Designated Officer who comes into possession of Inside Information after a clearance is given must not deal in Company Securities, despite holding that clearance.

12 Temporary halts on dealings

12.1 Where the Chair reasonably believes that the circumstances warrant a temporary halt or restriction on dealing in Company Securities, he or she may:

12.1.1 revoke any earlier clearance given under clause 11 for a Designated Officer to deal in Company Securities; or

12.1.2 for such period as determined by the Chair, declare that no dealings in Company Securities by an Employee or a Designated Officer are to take place.

12.2 The Chair may decide (in his / her absolute discretion) if circumstances are sufficiently exceptional to warrant a temporary halt or restriction on dealing in Company Securities under clause 12.1 and, if so, the duration of that temporary halt or restriction on dealing in Company Securities.

12.3 For clarity, the Chair is not limited in the exercise of his / her absolute discretion to impose a temporary halt or restriction on dealing in Company Securities to only those circumstances where there is Inside Information in relation to the Group or the Company Securities which is not generally available.

12.4 A person who is notified of a temporary halt or restriction under this clause must keep the notice, and the fact that a halt or restriction has been imposed, confidential and must not disclose either to any person who is not subject to the halt or restriction

13 Exceptional circumstances

13.1 The Approving Officer may give clearance for a Designated Officer to sell (but not buy) Company Securities in exceptional circumstances where the Designated Officer would otherwise not be able to do so under this policy. Circumstances that may be exceptional include:

13.1.1 severe financial hardship, or a pressing financial commitment that cannot reasonably be satisfied otherwise than by selling Company Securities;

13.1.2 an order of a court, or an order or agreement made under family law, requiring the transfer or sale of Company Securities;

13.1.3 a legally binding commitment entered into before the person came under the relevant restriction; and

13.1.4 any other circumstance the Approving Officer considers, on reasonable grounds, to be exceptional.

13.2 The Approving Officer must refuse to give clearance under the exception in paragraph 13.1 if there is a matter about which there is Inside Information which is not generally available in relation to Company Securities (whether or not the Designated Officer knows about the matter) when the Designated Officer requests clearance or proposes to deal in Company Securities.

13.3 Any clearance given in exceptional circumstances must be given in writing, must specify the period for which it is valid and any conditions attaching to it, and must record the Approving Officer's reasons for concluding that the circumstances are exceptional.

14 Dealings by Connected Persons

14.1 If a Designated Officer is not permitted to deal in the Company Securities, he or she must use all reasonable endeavours to stop any dealing in the Company Securities by any Connected Person (including family or nominee companies, private investment funds and family trusts).

14.2 For the purposes of clause 14.1, and subject to clause 14.3, a Designated Officer must:

14.2.1 inform any Connected Person of the periods during which the Designated Officer may and may not deal in Company Securities; and

14.2.2 request any Connected Person to inform the Designated Officer immediately after they have dealt in Company Securities.

14.3 A Designated Officer does not have to comply with clauses 14.1 and 14.2 to the extent that to do so would breach their obligations of confidentiality to the Group.

15 Communicating inside information

15.1 If an Employee / Designated Officer has information that he or she knows, or ought reasonably to know, is Inside Information in relation to Company Securities or the listed securities of another entity, the Employee / Designated Officer must not directly or indirectly communicate that information to another person if he or she knows, or ought reasonably to know, that the other person would or would be likely to:

15.1.1 deal in Company Securities or those securities of the other entity; or

15.1.2 procure another person to deal in Company Securities or the securities of the other entity.

15.2 An Employee / Designated Officer must not inform colleagues about Inside Information or its details.

16 Financing of dealings

16.1 A Designated Officer must not, without prior written clearance, finance or seek to finance a dealing in Company Securities by means of a margin facility, share lending facility, hedging or other arrangement that involves the use of Company Securities as security or collateral for the funding used or to be used to acquire Company Securities or the shares or other securities of another entity (collectively referred to in this clause as 'Scrip Finance Facility').

16.2 If a Designated Officer wishes to use a Scrip Finance Facility to assist in the acquisition of Company Securities or the shares or other securities of another entity, he or she must first inform (in writing), and obtain a clearance (in writing) from, the Approving Officer.

17 Speculative dealing

17.1 A Designated Officer must not deal at any time in Company Securities on considerations of a short term or speculative nature. For the purposes of this policy, the following transactions are considered to be transactions of a short term nature:

17.1.1 acquiring Company Securities with an intention to sell within a period of 3 months or less; or

17.1.2 selling Company Securities with an intention to repurchase within a period of 3 months or less.

18 Hedging of incentive securities

18.1 A Designated Officer must not enter into, and must ensure that no Connected Person enters into, any transaction or arrangement that operates to limit the economic risk of, or hedge that person’s exposure to, any Company Securities that:

18.1.1 have been granted or acquired under an employee or executive incentive plan and have not yet vested; or

18.1.2 have vested but remain subject to a holding lock or disposal restriction.

18.2 The prohibition in this clause reflects section 206J of the Corporations Act and applies in addition to, and does not limit, the rules of any Company Employee or executive incentive plan. A breach of this clause by key management personnel of the Company may also be a contravention of the Corporations Act.

19 Conflicts of interest

19.1 Subject to clause 19.2, a Designated Officer must not hold office or shares or other securities in, or deal in the shares or other securities of, another entity if:

19.1.1 the other entity is engaged or concerned or interested in any business or activity which is the same or similar to the business (or a material part of it) of the Company; or

19.1.2 the other entity may, in the ordinary course of its business or activities, engage or be concerned or interested in any business or activity that may adversely affect, on any reasonable and objective basis, the business standing or reputation of the Company; or

19.1.3 the participation of the Designated Officer as a shareholder, officer or in any other capacity in the other entity would, or would be likely in the future to, result in that Designated Officer's participation in the management of the Company being materially and adversely affected; or

19.1.4 in the case of dealing in the shares or other securities of any other entity, he or she has information that he or she knows, or ought reasonably to know, is inside information in relation to those securities.

(It is to be noted that a Designated Officer who has information concerning the Company is precluded from dealing in the securities of another entity if that information would be inside information in respect of the securities of the other entity.)

19.2 Nothing in clauses 19.1.1 to 19.1.3 (inclusive) will prevent a Designated Officer from holding shares or other securities in another entity if both of the following apply:

19.2.1 the holding is immaterial in the context of that other entity (for listed companies, the holding must be less than 5% and for unlisted companies, the maximum holding is to be determined on a case by case basis); and

19.2.2 the holding is not material in the context of the financial and personal circumstances of the Designated Officer.

19.3 This clause does not apply to a Director. The identification, disclosure and management of conflicts of interest at Board level are governed by the Company's Director Conflict of Interest Policy and the Board Charter, and each Director must comply with those documents. Where a person is a Director and is also an executive management personnel or senior management, this clause applies to that person only in their capacity as a member of executive key management personnel or senior management and, in the event of any inconsistency, the Director Conflict of Interest Policy prevails to the extent of the inconsistency.

20 Breach of policy

20.1 A breach of this policy by an Employee / Designated Officer is serious and may lead to disciplinary action, including dismissal in more serious cases. It may also be a breach of the law.

21 Assistance and additional information

21.1 Employees / Designated Officers who are unsure:

21.1.1 whether any information that they have in their possession may restrict their ability to deal in Company Securities (or the securities of any other company); or

21.1.2 if a holding of shares or other securities in another entity or a dealing in Company Securities or the shares or other securities of another entity is permitted under this Policy, should contact the Approving Officer or the CEO.

22 Policy Review

22.1 This Policy must be reviewed at least annually to ensure it remains current, effective, and aligned with relevant legal, regulatory, and operational requirements.

22.2 The Policy may be reviewed and updated more frequently where there is a material change in applicable legislation, business operations, risk environment, or other relevant circumstances that warrant earlier review. Responsibility for the review lies with the Policy Owner.

Schedule 1 – Summary of trading restrictions

This Schedule is a summary only and is provided for convenience. If there is any inconsistency between this Schedule and the body of this Policy, the body of this Policy prevails.

Designated Officers

Period	Dates	Trading restrictions
Executive Trading Window	Each 4-week period commencing on the first trading day after: • release of half-year results to ASX; • announcement of full-year results to ASX; or • the annual general meeting.	May trade without prior approval, provided the Approving Officer is notified (copied to the Company Secretary) within 2 business days. Trading remains prohibited where the person holds Inside Information or the Chair has ordered a temporary halt on trading.
Outside an Executive Trading Window	Any time that is not within an Executive Trading Window and is not a Blackout Period.	May trade only with prior written clearance from the Approving Officer, copied to the Company Secretary. Clearance is valid for 5 business days. The Company's preference is that dealings occur within an Executive Trading Window.
Blackout Period (closed period)	• Each period between: – 15 September and release of half-year results; – 15 March and announcement of full-year results; – 12.01am on the preceding day until one hour after publication of half-year or full-year results or the formal convening of the AGM; • Any other period designated by the Board.	No trading.

All other Employees

Period	Dates	Trading restrictions
Blackout Period	From 12.01am on the preceding day until one hour after publication of half-year results, publication of full-year results, or the formal convening of the AGM, and any other period designated by the Board.	No trading.
Outside a Blackout Period	Any time that is not within a Blackout Period.	Trading permitted, and no approval is required. Trading remains prohibited where the person holds Inside Information or the Chair has ordered a temporary halt on trading.



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