

Intega Group Limited

Securities Trading Policy

1. PURPOSE

The Corporations Act 2001 (Cth) (Corporations Act) prohibits the trading in shares, options, debentures (including convertible notes) and other securities (Securities) of a company by any person who is in possession of price sensitive information regarding that company that is not generally available. The Corporations Act:

- i. imposes substantial penalties on persons who breach those provisions; and
- ii. applies to the extent of any inconsistency between it and this policy.

This policy regulates dealings by directors and certain officers of Intega Group Limited (Intega or the Company) and other designated persons, in securities in Intega about which they acquire inside information through their position or dealings with Intega.

The requirements imposed by this policy are in addition to any legal prohibitions on insider trading. This policy will be made available on the Intega website.

If you require any further information or assistance, or are uncertain about the application of the law or this trading policy in any situation, please contact the Company Secretary.

2. DEALING PROHIBITION FOR ALL EMPLOYEES

Do not deal in Intega securities if you have price sensitive information relating to Intega. The consequences for breach of the insider trading prohibitions are severe and could expose the person responsible to criminal and civil liability. Compliance with insider trading laws and this policy is an individual's responsibility and breach will be regarded by Intega as serious misconduct which may lead to disciplinary action and/or dismissal.

- If you are in possession of information that is not generally available to the public and which if it were, a reasonable person would expect it to have a material effect on the price or value of Intega's shares (or a decision whether or not to trade in them), do not:
 - deal in securities; or
 - advise, procure or encourage another person to buy or sell securities.
- Do not pass on information to any other person, if you know or ought reasonably to know that the person may use the information to buy or sell (or procure another person to buy or sell) securities.
- For the purposes of this policy, 'Employees' includes an advisor, consultant, short-term contractor or long-term contractor who may be in possession of price sensitive information, but not including a Director, Manager or Financial Services Employee.

3. DEALING PROHIBITION FOR DIRECTORS, MANAGERS AND FINANCIAL SERVICES EMPLOYEES

Directors, Managers and Financial Services Employees (hereinafter referred to as "Designated Persons") are not permitted to buy or sell or trade in Intega's shares during blackout periods.

- The blackout periods are:
 - from the close of the ASX trading day on 15 December each year, until 10:00am AEDT on the ASX trading day following the day on which the Company's half yearly results are released to the ASX;

- from the close of the ASX trading day on 15 June each year, until 10:00am AEDT on the ASX trading day following the day on which the Company's full year results are released to the ASX;
- from the close of the ASX trading day two weeks prior to the date of the Company's AGM until 10:00am AEDT on the ASX trading day following the date of the Company's AGM; and
- any other period that the Board specifies from time to time.
- If 15 June or 15 December are not ASX trading days, then the Blackout Period begins on the preceding ASX trading day.
- If a Designated Person wishes to deal in Intega securities at any other time outside the blackout periods, then they must obtain a "No Objection" notice which will be issued by the Company Secretary after consultation with the Chief Executive Officer, Chairman or Chair of the Audit, Risk & Compliance Committee, as appropriate.
- The notice will only be considered after the Designated Person confirms in writing, on a "No Objection Request" form, that they are not in possession of any price sensitive information. The "No Objection" notice may be given or refused by the Company in its discretion, without giving any reasons. It is final and binding on the Designated Person seeking the clearance but the Company may withdraw a "No Objection" notice if new information comes to light or there is a change in circumstances.
- Designated Persons may trade once a "No Objection" notice has been issued but only until the earlier of 10 business days after issue of the notice, the date they become aware of unpublished price sensitive information or the date the "No Objection" notice is withdrawn by the Company. If a "No Objection" notice is not approved, then the Designated Person seeking the clearance must keep that information confidential and not disclose it to anyone.
- The Company reserves the right to impose trading blackout periods on Directors, Executive Managers and Financial Services Employees in addition to those fixed blackout periods stated in this policy.

4. COMPANY SECRETARY TO MAINTAIN RECORDS

The Company Secretary will maintain a copy of:

- iii. all requests for an approval to deal in Intega's securities submitted by a Designated Person; and
- iv. details of all dealings in Intega's securities made by an Intega person.

5. OTHER RESTRICTIONS

- All Employees shall in all circumstances be prohibited from:
 - "short-selling" Securities (or an interest in Securities) - that is selling Securities, or an interest in Securities, beyond the level of the individual's holdings;
 - trading in Securities which operate to limit the economic risk associated with an individual's holding of unvested Securities which are to be issued, subject to the individual having satisfied certain performance conditions, under the Company's Performance Equity Plan or the Employee Tax Exempt Share Acquisition Plan;
 - trading in Securities which enable an individual to profit from a decrease in the market price of Securities;
 - dealing in Securities in connection with a margin lending arrangement; or
 - trading through any member of their family, or through a trust, company, fund or other related party over which they have influence or control, in circumstances where they would have been prohibited under this policy or by law from trading in their own name;
- Where an individual to whom this policy applies is acting as a trustee, dealing in the Securities by that trust is not permitted where the individual would have been prohibited under this policy or by law from trading in their own name, unless:

- that person is not a beneficiary of the trust; and
- the decision to deal is taken by the other trustees or by investment managers on behalf of the trustees independent of that person to whom this policy applies.

6. EXCLUSIONS

- The following dealings are not subject to the provisions of this policy and therefore do not require lodgement of a “No Objection” notice:
 - where Securities are being acquired through the exercise of options or rights granted under the Company’s share plan;
 - through the exercise of options or rights granted under the Company’s performance equity plan;
 - where Securities are obtained through entitlements under a rights issue or other offer;
 - where Securities are acquired through the Dividend Reinvestment Plan;
 - through the acceptance of a takeover offer;
 - through a share buy-back; or
 - under an acceptance of offers made to all shareholders.

7. ASX NOTIFICATIONS

- Intega must notify ASX within 5 business days after any change to a director’s relevant interest in Intega securities or a related body corporate of Intega, including whether the change occurred inside a Blackout Period and, if so, whether prior written clearance was provided.
- To enable Intega to comply with the obligation set out above, a director must immediately (and no later than 3 business days after any relevant event) notify the Company Secretary in writing of the requisite information for the Company Secretary to make the necessary notifications to the Australian Securities and Investments Commission and ASX as required under the Corporations Act and ASX Listing Rules.
- If Intega makes a material change to this trading policy, the amended trading policy will be provided to the ASX for release to the market within 5 business days of the material changes taking effect.

8. GLOSSARY

DIRECTOR means a Director of Intega Group Limited.

DIVIDEND REINVESTMENT PLAN means the Dividend Reinvestment Plan of Intega Group Limited.

FINANCIAL SERVICES EMPLOYEE means an Employee who is involved in the preparation of Intega’s half year or full year financial results.

KEY MANAGEMENT PERSONNEL means those persons having authority and responsibility for planning, directing and controlling the activities of Intega, directly or indirectly.

MANAGER means the Chief Executive Officer, Key Management Personnel, Presidents of a Division and Division Managers within Intega. It also includes any person who by their role or otherwise, becomes aware of price sensitive information that is not generally available to the public, including (but not limited to) Intega board papers (e.g. executive assistants or IT technicians who may have access to a Manager’s email or document folders).

DOCUMENT HISTORY

Effective Date	Description of Revision	Prepared By	Reviewed By	Approved By
09/05/2019	Draft issue for concept review	L. Whitton		
09/05/2019	Updated for entity change	L. Whitton		
22/07/2019	Renamed	L. Whitton		
22/07/2019	Reformatted	M. Morrison		
10/12/2020	Updated blackout start date on a non ASX trading day	J. Williams	C. Marsden	C.Marsden