



INSIDE INFORMATION & SECURITIES DEALING POLICY



Inside Information & Securities Dealing Policy

This policy describes how we use, handle, and share insider information. We appropriately manage inside information and refrain from trading stocks while it is in the midst of it.

Introduction:

Market manipulation compromises the integrity of the financial system and undermines public trust in securities and derivatives. By requiring information disclosure and outlawing insider trading, numerous laws, rules, and regulations are in place to safeguard the openness and integrity of markets.

While in possession of inside information, we appropriately manage it, develop it, and avoid trading in securities. Failure to manage and use inside information in accordance with applicable laws could harm our reputation and result in audits, fines, or other sanctions for the business or specific employees.

The Fosgro approach to the usage, handling, and disclosure of inside information is outlined in this inside information and securities dealing policy.

Our Commitment and Application:

This policy is applicable to any personnel working for a Fosgro office or industrial asset that is directly or indirectly owned, controlled, or operated by Fosgro anywhere in the world, including employees, directors, and officers as well as contractors who are directly supervised by Fosgro.

We might have access to inside knowledge about a different publicly traded firm (such an investment made by the Fosgro Group or one of its subsidiaries, a partner in a joint venture, a client, or a supplier, for instance).

When we have access to a publicly traded company's inside knowledge, we do not trade in its securities. Except in situations where disclosure is postponed to protect the legitimate interests of the Fosgro Group and when the information can remain confidential, Fosgro always makes inside information about the Fosgro Group available to the markets as soon as practicable. We must make sure that the information is correct and comprehensive before disclosing it to the market.

We also employ protocols for locating and controlling insider information. We implement safeguards to stop any unauthorised disclosure by anyone entrusted with inside information when disclosure is postponed in accordance with the law.

Consequences:

Fosgro has a zero-tolerance policy against retaliation against anybody who speaks up about behaviour they think to be unethical, unlawful, or not in line with our Code of Conduct and standards, even if the complaint is unfounded and so long as they haven't submitted a false report with intent.

Fosgro takes violations of our policies and code of conduct seriously. The severity of the violation will determine the consequences, which may range from a warning to termination of employment. There can also be civil or criminal liability in some circumstances.



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