

17 January 2011

Manager of Company Announcements
ASX Limited
Level 5, 123 Eagle Street
Brisbane QLD 4000

WBB Shares & Securities Trading Policy

In accordance with ASX Listing Rule 12.9, Wide Bay Australia Ltd (WBB) provides the Company's 'Shares & Securities Trading Policy' effective 01 January 2011.

Yours sincerely,



Bill Schafer
Company Secretary

SHARES & SECURITIES TRADING POLICY
FOR DIRECTORS, KEY MANAGEMENT & STAFF
effective 01 January 2011

The Board is conscious of the legal prohibition on insider trading and all Directors, officers and employees are prohibited from trading in Wide Bay Australia Ltd ("Wide Bay") shares or other securities while in possession of price sensitive information. This information is classified as information that a reasonable person would expect to have a material effect on the price or value of securities. The requirement also applies to entities or trusts that are controlled by any of the Directors, officers or employees.

The responsibility for compliance is the personal responsibility of every party involved and any failure to comply will be considered by the Board as a serious breach.

In accordance with the ASX Listing Rules, particularly Rule 12.12, Wide Bay's policy addresses specific circumstances in accordance with Rule 12.12.1. Wide Bay's closed periods, which applies to Directors and designated employees are:-

- trading in Wide Bay's listed products on the ASX, currently fixed shares, is restricted to a four week period immediately following:-
 - the announcement to the ASX of Wide Bay's 6 months trading results;
 - the announcement to the ASX of Wide Bay's 12 months trading results;
 - the annual general meeting,
 - any profit forecasts issued by the Board in respect of the current year's trading.

These trading periods however are still subject to limitations on trading during these periods, if the Director or designated employee is in possession of price sensitive information not available to the market.

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Approval to trade in these periods:-

- in the case of Directors requires approval from the Chairman,
- in the case of designated employees, who are not Directors, approval must be obtained from the Managing Director or his nominee,
- in the case of the Chairman, approval must be obtained from the Chairman of the Audit Committee.

It is possible for trading outside of these periods, but only if special and extenuating circumstances exist. These special circumstances would in general be limited to personal circumstances creating hardships or other internally related circumstances. In the case of designated employees, permission must be obtained from the Managing Director or in the case of Directors, from the Chairman and in the case of the Chairman, from the Chairman of the Audit Committee.

The Company Secretary will retain a register of designated employees and their relevant trading activities.

This policy encompasses all employees of Wide Bay if they are in possession of price sensitive information not available to the market and such that a reasonable person would expect to have a material effect on the price or value of the securities.

Employee Distribution

This policy will be issued to all existing employees of Wide Bay and will form part of the procedure applicable to the employment of all new staff as part of their induction package.

This policy is subject to constant review by the Board as considered necessary and appropriate to comply with the relevant legislation applicable.

ENDS

