



The company's share trading policy regulates dealings by directors, officers, and employees, in shares, options and other securities issued by the company.

This policy has been formulated to ensure that directors, officers, and employees are aware of the legal restrictions on buying and selling company securities while a person is in possession of unpublished price-sensitive information. This policy is also intended to minimise any misunderstandings or suspicions that staff are buying or selling company securities while in possession of unpublished price-sensitive information.

Consistent with the legal prohibitions on insider trading, under this share trading policy, directors, officers, and employees are prohibited from buying or selling the company's shares, except within the following trading windows:

Select Harvests Limited

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> P0 Box 5 Thomastown Victoria 3074 Australia

Telephone (613) 9474 3544 Facsimile (613) 9474 3588 www.selectharvests.com.au

> ACN 000 721 380 ABN 87 000 721 380

Event

Release of Preliminary Final Result to ASX

Annual General Meeting

Release of Half Year Result to ASX

Issue of Prospectus

Other

Period

Between 48 hours and 4 weeks from date of release to ASX Between 48 hours and 4 weeks from the date of AGM Between 48 hours and 4 weeks from date of release to ASX Between 48 hours and 4 weeks from date of release to ASX At any such other times as the Board of Directors of the company permits

Buying and selling company securities by directors, officers, and employees outside the above trading window is prohibited.

Buying and selling securities issued by the company within the trading windows listed above is subject to the proviso that the parties concerned are not in possession of any unpublished price sensitive information.

If a director, officer, or employee of the company proposes to acquire or sell company securities during any of the above trading windows, a "Notification Form to Deal in Select Harvests Securities" must be completed and forwarded to a "Notification Officer". The director, officer, or employee (as the case may be) must receive written approval from the Notification Officer before acquiring or disposing of the company securities.

For the purposes of this policy, the relevant Notification Officer for directors, officers, and employees are as follows:

Designated Person

Chairman Non-Executive Directors Managing Director Senior Officers Employees

Notification Officer(s)

Chairman of the Audit Committee Chairman Chairman Managing Director Company Secretary

Exceptions and variations to the policy:

a) Executive Share Option Plan

Directors, officers, or employees participating, or eligible to participate, in the company's share option plan are permitted to:

- 1. Accept an invitation to participate in a grant of options under the plan;
- 2. Exercise options to acquire Select Harvests' securities (as applicable) under the plan; and
- 3. Exercise any other action or right permitted under the plan,

at any time, whether or not the above actions occur within the trading windows specified above.

b) Payment by shares in lieu of cash

Directors, officers, or employees who desire to receive payment of directors' fees or salary by way of shares in lieu of cash are permitted to make an election in writing to receive payment by the purchase of shares on the share market on the following conditions:

- 1. An election to receive payment by shares in lieu of cash must be made within a trading window on the basis that the director or employee is not in possession of any unpublished price sensitive information
- 2. An election made within a trading window to receive payment by shares in lieu of cash must be for a minimum period of 12 months
- 3. A director of employee can, by notice in writing, withdraw an election to receive payment by shares in lieu of cash only after a full 12 month period has elapsed and only within a trading window after the expiry of the 12 month period, provided the director or employee is not in possession of any unpublished price sensitive information.

For clarity, the actual purchase of shares on the share market by the company on behalf of the director or employee will occur on a quarterly basis and may be outside the trading windows detailed above.

c) Exceptional Circumstances

If there are exceptional circumstances and the person concerned declares that they do not possess any unpublished price sensitive information, the applicable Notification Officer may, after consulting with, and obtaining approval from, the Chairman, allow an officer, or employee to sell company securities outside a trading window. Should the Chairman or any Director wish to sell company securities outside a trading window, the applicable Notification Officer will need to seek the approval or otherwise of the full Board of Directors of the company.

This policy encourages directors, officers, and employees to be long-term holders of the company's securities, and discourages short-term trading.

It also reinforces the directors' statutory obligation to notify the ASX within 3 days after any dealing in the company's securities, which results in a change in the relevant interests of the director in the company's securities. As contemplated by the ASX listing rules, each director has agreed to provide notice of such dealings to the company within five business days of any such dealing to enable the company to comply with its corresponding obligation to notify the ASX.