

Insider Trading Policy

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1. BACKGROUND

This Policy is designed to provide guidelines to all Directors, officers, staff, and consultants of Globus Bank Limited ("Globus Bank") to prevent insider trading (or even allegations of same), inadvertent disclosure or misuse of non-public information and protect the reputation and integrity of the Bank.

2. DEFINITIONS/EXPLANATIONS

2.1. Insider Trading

Insider Trading refers to buying or selling a company's stock or other securities based on material non-public information about the company.

2.2. An Insider

An insider is any person who possesses material non-public information capable of being used to his advantage.

2.3. Material Information

Materiality of information is dependent on each circumstance. Information is considered "material" if there is a substantial likelihood that a reasonable investor would consider it important in making an investment decision, i.e., whether to buy, sell or hold those securities.

Material information includes but not limited to the following:

- i. Changes in the Directorship of a company;
- ii. The death, resignation, dismissal, or appointment of a principal officer;
- iii. Change in the accounting year-end;
- iv. Annual and interim results or any recommendation or decision that dividend or scrip issues will or will not be made;
- v. Profit warnings or a change in the financial forecast or expectation;
- vi. Proposed capital raising or restructuring exercise or changes in the capital structure;
- vii. Any proposed change in the business model or general character or nature of the business of the company;
- viii. Major new developments in the company's sphere of activities including major new products, contract awards and expansion plans;
- ix. Any change in voting control or in beneficial ownership of the securities carrying voting control;
- x. Any proposed alteration of the Memorandum or Articles of Association;
- xi. Any other information necessary to enable shareholders to appraise the position of the company and to avoid the establishment of a false market in the shares of the company;
- xii. Financial forecasts of any kind, including earnings estimates or changes in previously announced earnings estimates;
- xiii. Significant business trends and metrics;
- xiv. Gain or loss of substantial customers;
- xv.

- xvi. Execution or termination of significant contracts;
- xvii. Financings or restructurings;
- xviii. Significant unusual gains or losses;
- xix. Developments in significant litigation or government investigations;
- xx. Public or private debt or equity offerings;
- xxi. Significant changes in senior management;
- xxii. Share repurchases.

2.4. Non-public information

Information is "non-public" if it is not known or available to the public. Information may still be non-public even though it is widely known within a company.

2.5. Related Person or Party

A related person or party includes but is not limited to a person's spouse and children and anyone else living in such person's household.

2.6. Closed Period

Any period during which trading is restricted is termed as a closed period.

The closed period shall be at the time of:

- i. Declaration of Financial results (quarterly, half-yearly and annual)
- ii. Declaration of dividends (interim and final)
- iii. Issue of securities by way of public offer or rights or bonus, etc.
- iv. Any major expansion plans or the winning of bid or execution of new projects
- v. Amalgamation, mergers, takeovers and buy-back
- vi. Disposal of the whole or a substantial part of the undertaking
- vii. Any changes in policies, plans or operations of a company that are likely to affect the prices of the securities of the company materially;
- viii. Disruption of operations due to natural calamities;
- ix. Litigation/dispute with a material impact;
- x. Any information which, if disclosed, in the opinion of the person disclosing the same is likely to materially affect the prices of the securities of the company.

3. SCOPE

3.1. Persons Covered

This Policy applies to all directors, officers and employees of the Bank and their closely related persons/parties. These include all family members who reside with or who do not live in the household of above-listed persons but whose transactions are subject to that person's influence or control (such as parents or children who consult with any member before they trade in securities). All persons covered under this Policy are responsible for making sure that any transaction in securities by any of these people complies with this Policy.



3.2. Companies Covered

This Policy applies to trading in the securities of other firms, such as those with which the Bank may be negotiating a major transaction with.

4. SPECIFIC POLICIES

4.1. Prohibited Trading in Securities

- a. No Insider may place purchase, sell orders, or recommend that another person place a purchase or sell order involving the securities of another company if such Insider learns of material non-public information about such other company during such Insider's employment or other special relationship. In addition, no director, officer, or employee of the Bank shall effect any transaction in the securities of another entity, the value of which is likely to be affected by actions of the company that have not yet been publicly disclosed.
- b. The period prior to the declaration of price-sensitive information is particularly sensitive for transactions in a company's securities. This sensitivity is because the Directors, people discharging managerial responsibility and advisers of the company and their connected persons will, during that period, often possess unpublished price sensitive information. During such a sensitive period, no Director, person discharging relationship management responsibility and their connected persons shall trade in a company's securities.
- c. All Directors, persons discharging relationship management responsibility and advisers of a company shall conduct all their dealings in the securities of that company only during the "free period" and shall not deal in any transaction involving the purchase or sale of the company's securities during closed periods or during any other period as may be specified by a company from time to time.

4.2. Non Disclosure of Material Non-public information

Material non-public information relating to a company is the property of that company, and unauthorized disclosure of such information is forbidden.

4.3. Closed Period

- a. No Director or employee of the Bank and their connected persons shall deal in the securities of a company when the trading window is closed.
- b. The period of closure shall be effective from fifteen (15) days prior to the date of any meeting of the Board of Directors proposed to be held to consider any of the matters referred to above or the date of circulation of agenda papers pertaining to any of the matters referred to above.

5. INVESTIGATIONS AND SUPERVISION

- a. If any person subject to this policy has reason to believe that material, non-public information of the company has been disclosed to an outside party

without authorization, that person should report this to the Chief Compliance Officer immediately.

- b. If any person subject to this Insider Trading Policy has reason to believe that an Insider or someone outside of the Bank has acted, or intends to act, on inside information, that person should report this to the Chief Compliance Officer immediately.
- c. If it is determined that an individual maliciously and knowingly reports false information to the Bank with the intent to do harm to another person or the company, appropriate disciplinary action will be taken according to the severity of the charges, up to and including dismissal. All such disciplinary action will be taken at the sole discretion of the company.

6. CONSEQUENCES OF INSIDER TRADING

Any individual who trades on material, non-public information or tip information to others can be subject to an array of civil and criminal penalties. Violations are taken seriously by the regulatory authorities and potential sanctions may apply.

7. PUBLICATION OF THE POLICY

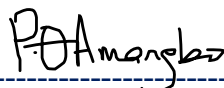
This Policy will be hosted on the Bank's website. From time to time, reminders on insider trading will be sent through e-mails to all applicable persons.

8. MONITORING AND REVIEW

- (a) Internal Audit shall conduct an internal review to assess this policy's compliance and effectiveness.
- (b) The Board Governance, Nominations and Remuneration Committee, in the performance of its duties shall review this policy. It shall present to the Board any proposals it deems fit with respect to the issues contained herein and to ensure that same complies with relevant regulatory provisions.

9. REVIEW

The Board Governance, Nominations and Remuneration Committee, in performance of its duties, shall review this policy at least once every three years.



Chairman, Board of Directors