

# GLOBAL MINING

INVESTMENTS LIMITED

Level 20, 101 Collins Street, Melbourne VIC 3000  
Tel 03 9235 1700 ■ Fax 03 9235 1722 ■ [www.globalmining.com.au](http://www.globalmining.com.au)  
ABN 31 107 772 467

## Securities Trading Policy

The purpose of this policy is to regulate Key Management Personnel, and related entities of those persons, and other people to which this policy applies in their dealings in securities issued by Global Mining Investments Limited (“the Company”). This document is intended to assist and ensure compliance with both the Australian Securities Exchange (ASX) and Corporations Act (2001) requirements regarding trading in the securities of the Company by a Director or Officer.

### 1. Persons to whom this policy applies

This policy applies to

- Key Management Personnel of the Company, being the Directors of the Company;
- the Company Secretary;
- staff members of Bell Asset Management Limited (the Manager of the Company) who are involved in the provision of services to the Company; and
- any other person notified by the Company Secretary that this policy applies to them.

### 2. Prohibited and Acceptable periods to trade in the Company’s shares

Key Management Personnel and other people to whom this policy applies may buy or sell or deal in the Company’s securities for a period of 7 business days following the day of release of the monthly Net Tangible Assets (NTA) to the ASX.

Key Management Personnel and other people to whom this policy applies are however prevented from dealing in the Company’s Securities at any time from 30 June until the day following the release of the full year results of the Company, and from 31 December until the day following the release of the Half – Year results of the Company. After the release of the Half-Year or Full Year results, a Director or Officer is permitted to deal in the securities of the Company for a period of seven business days commencing the day following the release of the results.

### **3. Exclusions from the trading policy**

Key Management Personnel and other people to whom this policy applies may also deal in the Company's securities within a period that is ordinarily closed in the following circumstances:

- Issue of the Company's shares offered to all holders of the Company's shares;
- Prospectus lodged with ASIC;
- Offer of securities under a dividend reinvestment plan or share purchase plan; or
- Share buy-back plan maintained by the Company; or
- A Takeover bid by an entity for the Company's shares.

### **4. Insider trading prohibitions**

Despite the above provisions a Director or Officer is not permitted to deal in the Company's securities if they are in possession of insider information.

If a Director or Officer of the Company is in possession of information relating to its securities and they are aware, or ought to be aware that the information they possess:

- a) would have a material effect on the price of securities of the Company; and
- b) is not generally available,

That person must not buy, sell or deal in the securities nor may they procure or encourage another person to deal in those securities.

Price sensitive information includes the following

- a) signing of significant agreements or contracts;
- b) changes in the Company's profit forecasts;
- c) borrowing or other financing arrangements;
- d) involvement by the Company in takeovers

This list should not be considered exhaustive.

'Generally Available' information

Information is generally available if:

- a) It consists of readily observable matter; or
- b) It has been brought to the attention of investors through an announcement to the ASX, and a reasonable period of time has elapsed since the announcement.

## **5. Disclosure of Directors' Interests**

Under ASX listing rule 3.19A, the entity must notify the ASX of any change in a Director's interest in the Company, within 5 business days of the change.

Changes to notifiable interests include off market transfers, and transfers between interests of the Director, despite there being no change in beneficial ownership.

Section 205G of the Corporations Act 2001 defines interests that are notifiable interests and a Director's duties in relation to those interests. A notifiable interest includes:

- a) interests in securities of the Company or a related company;
- b) contracts:
  - i) To which the Director is a party or under which the director is entitled to a benefit; and
  - ii) That confers a right to call for or deliver shares in, the Company or a related body corporate.

## **6. Exceptional Circumstances**

There are currently no exceptional circumstances during which permission can be granted to allow trading in securities outside of the above policy.

## **7. Notification**

To ensure compliance with ASX Listing Rule 3.19A, Directors must immediately notify the Company Secretary of any dealings by them in the Company's securities.

December 2010