

Securities Trading Policy

This Policy was approved on 16th May 2019.

1. Scope of this Policy

This policy applies to private dealings in Whitefield's issued securities by Key Management Personnel (KMP). Key Management Personnel (KMP) comprise the Directors, Officers and Senior Executives of the Company.

2. Prohibitions on Dealing in the Company's Securities

- 2.1. KMPs must not deal in the Company's securities when they possess information which if disclosed might have a material effect on the market price of the Company's securities.
- 2.2. KMPs must not deal in the Company's securities during prohibited periods (closed periods) unless exceptional circumstances apply and written approval is given to a transaction in advance.
- 2.3. KMPs must not engage in short selling of the Company's securities

3. Prohibited (Closed) Periods

- 3.1. KMPs are not permitted to trade in the Company's Securities during the period from the end of a financial reporting period until the day after the preliminary announcement of the half-yearly or annual results.
- 3.2. KMP's are not permitted to trade in the Company's Securities during the period from the end of a calendar month until the day after the release of the monthly Net Asset Backing Announcement.
- 3.3. The Company may from time to time designate a period of time as a prohibited period under this Policy.

4. Exclusions to the General Policy

- 4.1. The following circumstances are excluded from the application of Section 2 of this Policy.
 - (a) Transfers of securities where there is no change in relevant interest;
 - (b) An investment in an entity where the assets of the entity are invested at the discretion of a third party;
 - (c) Responding to a corporate action or offer which has been made to all the Company's security holders of the same class;
 - (d) Transactions conducted between a KMP and a close family member
 - (e) Transactions which are outside the control of the KMP, including those which result from the application of law.

5. Exceptional Circumstances

- 5.1. A KMP may be given approval to transact on the Company's securities if application is made in writing in advance to the Managing Director. The Managing Director must refer the matter to the Chairman, or Deputy Chairman. Approval may only be provided to such a request where both the Managing Director and Chairman or Deputy Chairman (a) consider there to be a sufficiently exceptional circumstance that the implementation of the general Policy would produce an inappropriate outcome, and (b) only if the KMP has confirmed that they are not in possession of any price sensitive information that has not been disclosed to market.
- 5.2. Any such approval provided will be provided in writing, including via email, and will specify the scope and timing of the transaction approved.