

APPENDIX 3.2

Securities Trading Policy

SECURITIES TRADING POLICY

The purpose of the policy is to ensure that employees and Directors of the Company do not trade in the securities of the Company in a way which:

- Breaches the Corporations Act and/or other legislative prohibitions on insider trading, or
- Compromises confidence in the Company's practices in relation to securities dealings.

This will be achieved by establishing procedures relating to buying and selling securities that provide protection to AMMTEC and its directors, management and employees.

This policy should be read in conjunction with the *Continuous Disclosure Policy* which details AMMTEC's obligations to disclose material information to the ASX.

This policy applies to:

- all Directors and senior management of AMMTEC and its subsidiaries
- employees nominated as being in possession of material information
- all employees of AMMTEC and its subsidiaries.

AMMTEC is required under the ASX Listing Rules to immediately provide all information which may have a material effect on the price or value of the Company's shares (material information). In some circumstances, employees may come into possession of material information before the Company has made that information available to the market or the Company may need to rely upon exclusion to the requirement to provide that information to the market. In these circumstances it is imperative that all employees comply with this policy to ensure they keep that material information confidential and do not trade in securities before that material information is released and becomes generally available. To deal in AMMTEC securities at these times would breach the insider trading provisions of the Corporations Act which provide as follows:

A person is prohibited from dealing in, or procuring others to deal in, securities of a relevant entity where:

- the person possesses information which is not generally available, and
- that information may have a material effect on the share price of the relevant entity, and
- the person knows or ought reasonably to know that the information is not generally available and if it were, it might have a material effect on the share price.

Trading Restrictions on AMMTEC Securities

A person must not trade in the Company's securities during the following circumstances:

- Two months immediately preceding the preliminary announcement of AMMTEC's results or, if shorter, the period from the relevant financial year end up to and including the time of the announcement; and
- Two months immediately preceding the publication of the half-yearly report or, if shorter, the period from the relevant financial period up to and including the time of such publication.

At other times employees may trade in the Company's securities. In so doing, directors and senior management of the Company must notify the Company Secretary to ensure that they are not in possession of material information that is not generally available before they trade.

Where doubt exists as to the possession of material information not available to the market, advice should be sought from the Company Secretary.

The Directors must advise the Company Secretary of AMMTEC Limited of any change in their security holdings in the Company within 3 days of that change occurring.

Employees may subscribe for AMMTEC securities under prospectuses, or by participating in the AMMTEC Dividend Reinvestment Plan during blackout periods.

When the Company is relying upon exceptions to the continuous disclosure requirements as to the release of material information, it may be necessary to prohibit the trading of securities in the Company by senior executives and Directors or employees or a group of employees. In these circumstances, the Company Secretary will advise directors or senior management or the relevant employees of the prohibition on trading that will apply and the term of that prohibition.

Any known or suspected instances of non-compliance will be reported to the Company Secretary for full investigation and appropriate disciplinary action. Employees should be aware that breaches of this directive may result in summary dismissal and may also attract civil or criminal legal penalties.