

# Policy

## Share Trading Policy

### 1. Purpose

This policy sets out the rules for directors, officers, employees, and contractors of Technology One Limited and its subsidiaries (TechnologyOne) regarding trading in the company's securities.

### 2. Scope

This policy applies to all directors, officers, employees, and contractors of TechnologyOne and its subsidiaries (referred to as "Covered Persons").

### 3. Definitions

- a) "Securities" include shares, options, derivatives, and any other financial products of TechnologyOne that can be traded on a financial market.
- b) "Trading" includes buying, selling, or otherwise dealing in Securities.
- c) "Inside Information" is information that is not generally available and, if it were, would be likely to have a material effect on the price or value of TechnologyOne's Securities.

### 4. Inside Information

#### 4.1 Definition

Inside Information is information that:

- a) Is not generally available to the market; and
- b) If it were generally available, a reasonable person would expect it to have a material effect on the price or value of TechnologyOne's Securities.

#### 4.2 Examples of Inside Information

Inside Information may include, but is not limited to:

- a) Financial performance, including unpublished financial results
- b) Changes in TechnologyOne's actual or anticipated financial condition or business performance
- c) Significant new contracts, products, or discoveries
- d) Major acquisitions, mergers, or sell-offs
- e) Changes in Key Management Personnel (KMP) or the Board of Directors
- f) Potential or actual legal proceedings
- g) Changes in TechnologyOne's capital structure, including new share issues or debt arrangements
- h) Major changes in operations or business strategy
- i) Information materially affecting TechnologyOne's technology or intellectual property

#### 4.3 Obligations

Covered Persons who possess Inside Information:

- a) Must not Trade in TechnologyOne's Securities
- b) Must not communicate the information to others who might Trade in TechnologyOne's Securities

c) Should seek advice from the Company Secretary or legal counsel if unsure about the status of information they possess.

#### 4.4 Duration

Information remains Inside Information until it has been fully disclosed to the ASX.

### 5. General Prohibition

Covered Persons must not Trade in TechnologyOne's Securities while in possession of Inside Information.

### 6. Blackout Periods

Covered Persons are prohibited from Trading in TechnologyOne's Securities during the following blackout periods:

- a) From the first day of the month preceding the Annual General Meeting (1 February) until the completion of the Annual General Meeting.
- b) From the first day of the month following the Annual General Meeting (1 March) to the day following the announcement of the half-year results to the ASX.
- c) From the first day of the month preceding the end of the full-year financial reporting period (1 September) until the day following the announcement of the full-year results to the ASX.

Additional blackout periods may be imposed by the Board or CEO as necessary.

Periods of time outside of a blackout period are a Trading Window.

### 7. Exemptions

In exceptional circumstances, the Chair (for directors) or the Company Secretary (for all other Covered Persons) may grant written permission to Trade during a blackout period.

Exceptional circumstances may include severe financial hardship or a court order requiring the sale of Securities.

### 8. Approval of Trading outside of Blackout Periods

The Chair, Directors and KMP are required to be granted approval from the following before Trading:

- Directors & KMP (CEO, COO or CFO): Approval by the Chair and notification to Company Secretary
- Chair: Approvals by the Chair of the Audit & Risk Committee and the Managing Director (or another Director if one of these is unavailable) and notification to the Company Secretary

Details of Trading in TechnologyOne Securities undertaken by the Chair, Directors or KMP are to be provided to the Company Secretary as soon as possible and within two business days of the Trade at the latest so that notification can be made via the ASX Announcements Platform.

### 9. Prohibited Trading Practices

Covered Persons are prohibited from:

- Short-term trading (buying and selling Securities within a 3-month period)
- Short selling TechnologyOne's Securities
- Using TechnologyOne's Securities as security for loans or margin lending

Covered Persons are not permitted at any time to enter into a transaction that is designed or intended to hedge their exposure to TechnologyOne securities which have not vested or are subject to a holding lock or dealing restriction.

## 10. Compliance

Compliance with this policy is mandatory.

Breaches may result in disciplinary action, including termination of employment or contract.

Breaches may also result in civil or criminal penalties under the Corporations Act 2001 (Cth).

## 11. Review

This policy will be reviewed annually by the Board to ensure it remains relevant and compliant with applicable laws and regulations.