

# Securities Trading Policy

## 1. Purpose and Commitment

Select Harvests Limited and each of its subsidiaries (Select Harvests) is committed to operating in a legal and ethical manner.

The Securities Trading Policy exists to ensure employees, directors, contractors and consultants and their associates comply with legal obligations when trading Select Harvests securities, prevent insider trading and protect Select Harvests reputation.

## 2. Values

Select Harvests recognises that by living our values and maintaining a high level of trust and integrity, we all contribute to the long-term success of the business.



## 3. Scope of Policy

This Policy applies to all Select Harvests Persons, including employees, directors, contractors and consultants and their associates. Contractors and consultants must be made aware of this Policy where relevant to their engagement and are expected to comply with it.

This policy sets out the requirements of Select Harvests Limited (**Select Harvests**) for trading in Select Harvests Securities (**Policy**) to:

- comply with insider trading laws under the *Corporations Act 2001* (Cth);
- protect the reputation of Select Harvests and its people; and
- maintain confidence in the trading of Select Harvests securities.

It also restricts certain types of transactions by Select Harvests Persons that may be inconsistent with market expectations or give rise to reputational risk.

You must not trade in Select Harvests Securities if you have inside information. This applies at all times and overrides all other parts of this Policy.

If a Select Harvests Person is unsure whether an instrument is a Security, or how this Policy applies to a proposed trade, they should seek advice from the Company Secretary before trading.

## 4. Definitions

In this Policy, words have the following meaning unless the context otherwise requires:

**Associate** means a person who is closely connected to a Select Harvests Person or Designated Person (described as a 'first person' in this definition) and may influence, or be influenced by, their investment decisions. This includes:

- spouses or partners;
- family members (including children);
- nominees (including an investment manager managing funds on the first person's behalf);
- a trust of which the first person, or any member of the first person's family, or any family controlled company, are the trustee or beneficiary;
- a person in partnership with the first person or any of their connected persons mentioned above; and
- a company which the first person or their family controls.

**ASX** means the Australian Securities Exchange.

**Blackout Periods** means those periods of time specified in section 7 of this Policy during which Trading in Select Harvests Securities is prohibited.

**Corporations Act** means the *Corporations Act 2001* (Cth).

**Derivatives** has the meaning given in the Corporations Act and includes the following if they relate to or derive value from Select Harvests Securities: put or call options, exchange traded options, forward contracts, futures, warrants, depository receipts, structured financial products, swaps, contracts for difference, spread bets and caps and collars.

**Designated Person** means:

- Senior Executive;
- Director; and
- other person designated as such by the Company Secretary from time to time, and any Associate of any such person.

**Director** means a non-executive director or an executive director of Select Harvests Limited.

**Inside information** is defined in section 5.2.

**Securities** means shares and other instruments considered to be a security for the purposes of the Corporations Act or the ASX Listing Rules, and Derivatives. The definition includes not only ordinary shares but also options and rights over ordinary shares, as well as exchange traded options and warrants.

**Select Harvests Group** means Select Harvests and its controlled entities.

**Select Harvests Person** means:

- employee of the Select Harvests Group, whether full time, part time or casual;
- contractor and employee of an incorporated contractor engaged by the Select Harvests Group;
- Senior Executive; and
- Director.

**Senior Executive** means the Managing Director & Chief Executive Officer and all of his or her direct reports.

**Trade** and **Trading** includes subscribing for, buying, selling or otherwise transferring the beneficial or legal interest in Securities of Select Harvests.

## 5. Insider Trading

### 5.1 Prohibition on Trading

Anyone who has inside information relating to Select Harvests (including any company within the Select Harvests Group) it is illegal, under the Corporations Act, for that person to:

- Apply for, buy, sell or otherwise deal in Select Harvests Securities;
- Advise, procure or encourage another person (including, but without limitation, a relative, friend, family company or trust) to deal in Select Harvests Securities; or
- Pass on information to any other person if they know, or ought reasonably to know, that the person may use the information to deal (or procure another person to deal) in Select Harvests Securities.

Each Select Harvests Person is personally responsible for ensuring that they, and where relevant their Associates, comply with insider trading laws.

A breach of these laws may result in civil or criminal penalties.

These requirements apply at all times, including outside Blackout Periods, and override all other provisions of this Policy. Approval to Trade does not permit a person to Trade if they possess inside information.

### 5.2 What is 'inside information'?

Inside information means information relating to Select Harvests or any company in the Select Harvests Group that is not generally available, and would, if the information were generally available, be likely to have a material effect on the price or value of Select Harvests Securities, meaning that it would likely influence persons who commonly invest in Securities in deciding whether or not to buy or sell Select

Harvests Securities. The information does not have to come from Select Harvests in order to be inside information.

Examples of possible price-sensitive information include, but are not limited to the following:

- Budgeted or forecast financial results, including material variations against forecast results and market expectations;
- Material acquisitions, divestments or joint ventures;
- Material contracts with suppliers or customers;
- Actual or proposed takeovers, schemes of arrangement or mergers;
- Actual or proposed changes to Select Harvests' capital structure;
- Proposed dividends or changes in dividend policy;
- Changes in Select Harvests' Board or key management personnel; or
- Material claims against Select Harvests or other unexpected liabilities.

### 5.3 When is information 'generally available'?

Information is generally available if:

- It consists of readily observable matter;
- It has been made known in a manner likely to bring the information to the attention of people who commonly invest in Securities of a kind whose price or value might be affected by the information, and, since it was made known, a reasonable period for it to be disseminated among such persons has elapsed; or
- It consists of observations, deductions, conclusions or inferences made or drawn from other generally available information.

### 5.4 Dealing in Securities of Other Companies

If a person has inside information about a company other than Select Harvests, the same insider trading laws apply to trading in that company's securities.

In the course of their work, Select Harvests Persons may obtain inside information about other companies. This may occur, for example, where:

- Another company provides information during a proposed transaction;
- A company that Select Harvests is dealing with provides information about itself or a third party; or
- Actions or decisions by Select Harvests (such as a planned transaction or strategic change) could affect another company.

Select Harvests Persons must also maintain the confidentiality of any information obtained about other companies in the course of their duties.

## 6. Exclusions from Policy

This Policy does not apply to the following categories of Trading, however, Select Harvests Persons must comply with insider trading laws at all times, including when engaging in the Trading activities listed below:

- Transfers of Select Harvests Securities into a superannuation fund or other savings scheme where the Select Harvests Person is a beneficiary;
- Trading by a trust where the Select Harvests Person is a trustee, provided they are not a beneficiary and do not influence the trading decision (including during a Blackout Period or ad hoc restriction period);
- Undertakings to accept, or acceptance of, a takeover offer or scheme of arrangement;
- Trading under an offer made to all or most security holders (for example, a rights issue, security purchase plan, dividend reinvestment plan or equal access buy-back), where the timing and structure of the offer has been approved by the Board. This includes decisions to take up or sell entitlements;
- Disposal of Securities resulting from a secured lender exercising their rights;
- Acquisition of Securities under an employee incentive plan. Any subsequent Trading of those Securities must comply with this Policy; or

- Trading in a managed investment portfolio where the Select Harvests Person does not influence investment decisions
- Trading in a managed investment portfolio where the Select Harvests Person does not influence investment decisions.

## 7. Limitation Periods for Trading in Securities

### 7.1 Blackout Periods

Trading whilst in the possession of inside information is prohibited at all times.

Select Harvests also restricts Select Harvests Persons from Trading in Select Harvests Securities during certain periods where there may be a perception that Select Harvests Persons possess or have received inside information. These periods are referred to as "Blackout Periods" and all Select Harvests Persons are prohibited from Trading in Select Harvests Securities during such periods, unless otherwise excepted under this Policy.

The Blackout Periods are the period from close of trading on:

- 31 March each year until the release of the announcement to the ASX of the Company's half year results (usually in the last week of May); and
- 30 September each year until the release of the announcement to the ASX of the Company's full year results (usually in the last week of November).

### 7.2 Ad hoc restrictions

The Board may decide, from time to time, that certain activities or knowledge within Select Harvests require ad hoc restrictions on Trading outside of the Blackout Periods to be imposed on certain Select Harvests Persons. These may be imposed on specific Select Harvests Persons or a class of Select Harvests Persons.

Due to the sensitive nature of the activities or knowledge requiring the ad hoc restriction referred to above, it is unlikely that details of the ad hoc restriction will be communicated to all Select Harvests Persons. The Board will communicate directly with those Select Harvests Persons who are subject to the ad hoc restriction. Any such communication is to be treated as confidential.

### 7.3 Trading During Limitation Periods - Exceptional Circumstances

It is recognised that exceptional circumstances specific to individuals may require a Select Harvests Person to dispose of Select Harvests Securities during a Blackout Period or other ad hoc restriction period. In such cases, the Select Harvests Person or, if applicable, their Associates, are required to seek the prior approval of the Company Secretary who shall seek approval from the Chairman of the Board. In seeking approval, the Select Harvests Person must complete the relevant clearance request form obtained from the Company Secretary setting out:

- Demonstrate that their circumstances are exceptional and that the proposed Trading is the only reasonable course of action available; and
- Provide a signed declaration that they do not possess any inside information.

The request for prior approval must be made in writing, and any approval must also be provided in writing.

If approval is granted, Trading by the Select Harvests Person or, where applicable, their Associate may only occur during the period specified in that approval.

Approval may be granted or withheld by the Chairman of the Board at their discretion, subject to law, and any decision is final and binding. For Designated Persons, the above approval for Trading may only be granted in the following exceptional circumstances:

- The Designated Person or their Associate will be in severe financial hardship if they cannot Trade in the Select Harvests Securities;
- The Designated Person or their Associate are required by a court order to transfer or sell the Select Harvests Securities; or
- The circumstance has been deemed exceptional by the Chairman of the Board or, where the Chairman of the Board is seeking approval, the Chair of the Audit & Risk Committee.

Any approval may be withdrawn if new information comes to light or if there is a change in circumstances.

If approval is withheld or withdrawn, the Select Harvests Person and their Associates must not deal in Select Harvests Securities during the relevant Blackout Period or other applicable restriction period and must keep all relevant information confidential.

Trading outside Blackout Periods or other restriction periods remains subject to insider trading laws. This obligation also applies to any Trading undertaken pursuant to an approval granted during a Blackout Period or other restriction period.

**7.4 Pre-Arranged Buy-Back Plans**

A pre-arranged on-market buy-back plan is exempt from the restriction of Trading during a Blackout Period, provided the following are in place prior to the commencement of the applicable Blackout Period:

- The buy-back has been approved by the Board (and, if required, by shareholders);
- The buy-back is conducted in accordance with the Corporations Act and ASX Listing Rules; and
- Select Harvests is not in possession of inside information at the time the buy-back program or trading plan is established.

**7.5 Designated Persons - Notification of Trade**

Prior to any Trading in Select Harvests Securities, a Designated Person must submit a notification using the form provided by the Company Secretary:

Designated Person	Person to notify prior to intended Trade
Chairman of the Board, or their Associates	Chair of the Audit & Risk Committee, with a copy to the Company Secretary
Directors (except for the Chairman of the Board), or their Associates	Chairman of the Board, with a copy to the Company Secretary
Senior Executives (except for the Managing Director & Chief Executive Officer), others designated as Designated Person by the Company Secretary, or their Associates	Managing Director & Chief Executive Officer, with a copy to the Company Secretary

The above notification obligation operates at all times. Designated Persons must not Trade in Select Harvests Securities until this notification has taken place and the Designated Person has received written approval.

The person intending to Trade in Select Harvests Securities is personally responsible for any decision to Trade and compliance with this Policy and the law.

**7.6 ASX Notification by Directors**

Directors must notify the Chairman of the Board and the ASX of any change in their holding of notifiable interests in Select Harvests Securities.

While the Corporations Act requires Directors to notify the ASX of such changes within 14 days, Select Harvests must notify the ASX within five business days under the ASX Listing Rules. To enable this, Directors must provide the relevant information to the Company Secretary as soon as practicable, and in any event no later than two business days after the change occurs.

The Company Secretary will then notify the Chairman of the Board and the ASX.

A notifiable interest has a broad legal definition and includes indirect holdings. If a Director is uncertain whether a change constitutes a notifiable interest, they should seek guidance from the Company Secretary.

**7.7 Other Prohibitions**

**7.7.1 Hedging**

All Select Harvests Persons must not engage in hedging arrangements (including, for example, the use of certain Derivatives) over unvested Select Harvests Securities issued pursuant to any employee share,

option or rights plan. In addition, any hedging over vested Select Harvests Securities must comply with this Policy.

**7.7.2 Short Selling**

Designated Persons must not engage in short selling of any Select Harvests Securities. Short selling refers to the technique whereby a person borrows the Security (on the belief that its market price is set to fall) and sells it in the hope that they will be able to buy the Security back at a lower price at some point in the future and close out their short position at a profit.

**7.7.3 Short-Term Trading**

Designated Persons must not engage in short-term trading of any Select Harvests Securities. Short-term trading for these purposes refers to:

- Purchasing Select Harvests Securities with the intention of disposing of or selling Select Harvests Securities within a three month period;
- Disposing of or selling Select Harvests Securities with the intention of purchasing Select Harvests Securities within a three month period; and/or
- Entering into short-term arrangements (such as forward contracts) in relation to Select Harvests Securities.

The prohibition on short-term trading does not apply to:

- Select Harvests Securities acquired as a result of the exercise of an option (or similar right) under Select Harvests’ employee incentive plans; or
- Select Harvests shares acquired under Select Harvests’ employee incentive plans.

**7.7.4 Margin Lending**

Designated Persons must not engage in margin lending or other secured financing arrangements over Select Harvests Securities.

**8. Breaches of this Policy**

Breach of the insider trading prohibition by an Select Harvests Person could lead to criminal and/or civil liability. This may include imprisonment, fines and/or payment of compensation. Breach of insider trading laws or this Policy will also be regarded by Select Harvests as serious misconduct which may lead to disciplinary action and/or dismissal. Any person who becomes aware of an actual or potential breach of this Policy should immediately report it to the Company Secretary.

**9. Adoption of Policy and periodic review**

This Policy was adopted by the Board on 23 April 2026 and takes effect from that date and replaces any previous Policy in this regard. The Policy will be reviewed and reassessed every three years and, on each occasion, obtain the approval of the Board to any amendments to the Policy.

**10. Authorisation and Approval**

<b>Document Name</b>	Securities Trading Policy – SHV-LEG-POL002
<b>Document Manager</b>	General Counsel & Company Secretary
<b>Document Department</b>	Legal
<b>Contact</b>	General Counsel & Company Secretary
<b>Approval Authority</b>	Managing Director
<b>Approval Signature</b>	
<b>Release Date</b>	26 May 2026
<b>Renewed Date</b>	
<b>Review Date</b>	+3 years
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