

Share Trading Policy

Introduction

This policy outlines some of the legal issues relating to the trading of your SAI Global shares and provides you with guidelines to ensure that both you and SAI Global comply with the law. This policy does not provide you with comprehensive legal advice on share trading. If you do not fully understand any aspect of this policy, you should speak to the Company Secretary or seek independent legal advice.

Disclosure of information

Under the listing rules of the Australian Stock Exchange, SAI Global must immediately disclose to the ASX any information concerning SAI Global that a reasonable person would expect to have a material effect on the price or value of SAI Global shares, once SAI Global becomes aware of that information. The Corporations Act imposes similar obligations on SAI Global in relation to information which is not generally available ("price sensitive information").

Price sensitive information includes information on matters that have not yet been finalised, for example, material contracts that SAI Global is negotiating, any potential acquisitions or dispositions or any substantial litigation that SAI Global may be involved in. Price sensitive information also includes information that has not yet been released to the market, for example relating to the actual financial performance of SAI Global.

If you become aware of any information that may be price sensitive information, you must immediately pass that information onto the Company Secretary who will consult with the Managing Director, and if agreed the information price sensitive, report that information to the board. The board will then ensure that SAI Global complies with its obligations under the listing rules.

In addition, if you hold price sensitive information, you must not sell or buy SAI Global shares. If you sell or buy SAI Global shares, you could be guilty of insider trading, which is an offence under the Corporations Act. An insider includes directors, other officers and

employees of SAI Global and their associates. Therefore, you could also be guilty of insider trading if you pass price sensitive information to a third party who then buys or sells SAI Global shares. You may be subject to a penalty which may include a fine or imprisonment. For these reasons, the directors have adopted a share trading policy. The purpose of the policy is to ensure that you only sell or buy SAI Global shares when the market has up-to-date information about SAI Global. The share trading policy is as follows:

Share trading by Directors

Directors of SAI Global, or any subsidiaries of SAI Global, should generally only deal in the SAI Global securities in the six week periods following the release of the SAI Global half yearly and the yearly results, and the annual general meeting. If the directors of SAI Global, or its subsidiaries, want to deal inside or outside these trading windows they must satisfy themselves that they are not in possession of any price sensitive information that has not been released to the ASX.

Before placing any order to buy, sell or otherwise deal with any SAI Global securities the directors should inform the Chairman, or in his absence the Managing Director, of their intentions.

Share trading by Employees

Key employees of SAI Global are defined as first and second reports, and others as advised from time to time.

Key employees of SAI Global, or any of its subsidiaries, should generally only deal in SAI Global securities in the six week period following the release of SAI Global half yearly and yearly results and the annual general meeting.

If the key employees want to deal inside or outside these trading windows they must satisfy themselves that they are not in possession of any price sensitive information that has not been released to the ASX.

Key employees should not discuss the trading of SAI Global shares among themselves as this may involve sharing of price sensitive information.

Before placing any order to buy, sell or otherwise deal in any SAI Global securities outside the trading windows, the key employees must inform the Company Secretary of their intentions.