

SECURITIES TRADING POLICY

1. Introduction

- From January 2011, Companies listed on the Australian Securities Exchange must have in place a "Securities Trading Policy".
- The Securities Trading Policy governs when employees and directors of Money3 (and its subsidiaries) can trade in securities of Money3. Employees and directors may in the course of their employment become aware of information that may be 'inside information' for the purpose of the Corporations Act.
- A person who is in possession of 'inside information' is generally not permitted to trade in listed securities except in certain circumstances. The insider trading provisions are intended to preserve the integrity of the market and ensure that both purchasers and sellers of securities have access to the same information when entering into a transaction to buy or sell a security.
- As a general rule, information obtained through your employment is usually confidential and subject to your duties of confidence to the Company. The insider trading rules in the Corporations Act are in addition to these general confidentiality provisions and may result in serious civil and criminal liability.

2. What is inside information?

- You have inside information if you have information that is not generally available but if it were, a reasonable person would expect it to have a material effect on the price or value of the security. You must also know (or should know) that the information is inside information.

3. Information

- Information means any fact, matter or circumstance, but also includes:
 - matters of supposition and other matters that are insufficiently definite to warrant being made known to the public; and
 - matters relating to the intentions, or likely intentions, of a person.

4. Generally available

- Information is generally available if:
 - it consists of readily observable matter; or
 - it has been made known to people (or would likely to be brought to the attention of people) who commonly invest in securities and a reasonable period has elapsed for it to be disseminated to those people; or
 - it consists of deductions, conclusions or inferences made or drawn from readily observable matter or information that has been disseminated.

5. Securities

- Although the inside trading provisions apply to financial products the key products in relation to Money3 are 'securities', these include shares, options, debentures, convertible notes and interest in managed investment schemes.

6. What is material effect?

- Information has a material effect on the price or value of securities if the information would, or would be likely to, influence people who commonly acquire financial products in deciding whether or not to acquire or dispose of the securities.
- Once the inside information becomes generally available, it is no longer inside information

7. What can be inside information?

- Inside information includes:
 - financial information and results;
 - material transactions;
 - material acquisitions or disposals of assets (proposed or actual) or sale of some or all of a business;
 - changes to share capital (ie fund raising, takeovers); and
 - major litigation (proposed or actual).

8. What you cannot do

- If you are in possession of inside information, you must not deal in securities.
- Deal includes:
 - apply for, acquire, or dispose of, securities of Money3 (including entering into an agreement to apply for, acquire or dispose) either for yourself or for another person, (for example a family or friend); and
 - procure another person to apply for, acquire or dispose of a security on your behalf or for another person.
- You must also not, either directly or indirectly, disclose the inside information to any other person, or allow it to be disclosed to another person.

9. Hedging Arrangements

- Directors and Executives may not engage in hedging arrangements, deal in derivatives or enter into other arrangements which vary economic risk related to the Company's securities including, for example, dealing in warrants, equity swaps, put and call options, contracts for difference and other contracts intended to secure a profit or avoid a loss based on fluctuations in the price of the Company's securities.

10. Trading windows

- The following additional rules apply to directors and senior management employees:
 - trading in the Company's financial products on a financial market is restricted to a 45 day period immediately following two days after:
 - (i) the release of Money3's half year and yearly results;
 - (ii) the issue of a disclosure document offering securities in Money3; and
 - (iii) the annual general meeting,
 - to trade outside these windows, approval must be obtained from the Chairman and Managing Director and demonstrate special circumstances exist.
- A director or senior management employee may not trade during these windows if they are in possession of inside information.

11. Legal advice

- The policy is not intended to be a substitute for you obtaining your own legal advice. If you have any particular concerns on insider trading you should speak with the Company Secretary.