

Effective Date: 20 April 2022

Our aim is to achieve the highest possible standards of corporate conduct and governance and act in compliance with the law at all times.

Our commitment

We are committed to ensuring that St Barbara Personnel and Connected Persons¹ comply with insider trading laws.

Our approach

We will implement procedures to minimise the risk of, or appearance of, insider trading and minimise the risk of damage to St Barbara's reputation or market confidence in St Barbara's securities.

Our principles

St Barbara Personnel are encouraged to be long-term holders of St Barbara securities. However, it is important to ensure that care is taken in the timing of any acquisition or disposal of such securities.

We will:

1. Take steps to ensure that St Barbara Personnel and their Connected Persons comply with the insider trading provisions of the *Corporations Act 2001* (Cth) at all times.
2. Regulate when and how St Barbara Personnel and their Connected Persons may deal in St Barbara securities to minimise the risk, or appearance of, insider trading, including by:
 - a. implementing Blackout Periods during which all St Barbara Personnel and their Connected Persons are prohibited from dealing in St Barbara securities; and
 - b. imposing additional restrictions on Designated Employees² and their Connected Persons dealing in St Barbara securities.
3. Impose restrictions to ensure that dealings in securities by St Barbara Personnel and their Connected Persons do not undermine market confidence in St Barbara's securities.
4. Impose other fit for purpose procedures relating to dealing in St Barbara securities and the securities of other companies to provide protection to St Barbara Personnel and their Connected Persons against the risk of contravening insider trading laws.

All St Barbara Personnel who have access to Inside Information about the St Barbara Group, **will not**:

1. Engage in insider trading.
2. Misuse or disclose St Barbara's Inside Information to any other person (whether directly or indirectly), if the St Barbara Personnel knows or ought to reasonably know that the other person may use the Inside Information to deal (or advise, procure or encourage someone else to deal) in St Barbara securities.

The detailed requirements of this Policy are set out in the Appendix.

¹ 'Connected Persons' has the meaning given in the Appendix.

² 'Designated Employees' has the meaning given in the Appendix.

Responsibilities and accountabilities

This is a Policy of St Barbara Limited (“St Barbara”) and its controlled entities (collectively, “St Barbara Group”). It applies to all directors, officers, employees, contractors, consultants and suppliers of each member of the St Barbara Group and to any other person or organisation acting for or on behalf of the St Barbara Group (“Personnel”).

This Policy will be freely available at all times, reviewed by the Board at least biennially and updated as required. The Company Secretary is responsible for ensuring that this Policy is implemented.

Policy governance

Policy approver: Board
Policy owner: General Counsel and Company Secretary
Review cycle: Biennial

Material policy revisions

Version	Approval Date	Effective Date	Details
6.0	20/04/2022	20/04/2022	Periodic review: incorporates transition to new template and alignment to the Policy Framework.

Appendix – Detailed Securities Dealings Policy

1. Application of this Policy

1.1. St Barbara Personnel

This Policy applies to all individuals at all levels who are employed by, act for, or represent St Barbara anywhere in the world (**St Barbara Personnel**). This includes:

- a. directors;
- b. officers;
- c. managers;
- d. employees;
- e. contractors;
- f. consultants;
- g. agents; and
- h. any other person representing or acting on behalf of St Barbara.

This Policy applies to St Barbara Personnel irrespective of their employment status (that is, whether they are employed on a full-time, part-time, maximum or fixed term, casual or temporary basis).

1.2. Designated Employees

Section 5 of this Policy applies to 'Designated Employees' only.

Designated Employees means:

- a. directors and executives;
- b. the General Counsel and Company Secretary;
- c. senior managers (being employees who are Level 4 and above); and
- d. any other person who is designated by the Chairman, the Managing Director / CEO or the General Counsel and Company Secretary to be a 'Designated Employee', by virtue of their position, role, activities or information available to them.

1.3. Connected Persons

This Policy also extends to Dealings in Securities by a St Barbara Personnel's **Connected Persons**, being, in respect of a St Barbara Personnel:

- a. the St Barbara Personnel's spouse or partner;
- b. that St Barbara Personnel's parents or children (including step-children);
- c. a relative of the St Barbara Personnel who has shared a household with them for 12 months or more;
- d. a business partner of the St Barbara Personnel, or any of the Connected Persons listed above;
- e. a company or business entity in which the St Barbara Personnel is a director or other officer, senior executive or holds a shareholding of more than 20%;
- f. a trustee where the beneficiaries of the trust include the St Barbara Personnel or any of the Connected Persons listed above; and
- g. any 'associate' or 'related party' of the St Barbara Personnel, within the meaning given to those terms in the Corporations Act.

It is the responsibility of all St Barbara Personnel to ensure that their Connected Persons are made aware of the restrictions in this Policy that apply to the activities of the Connected Person.

2. Definitions

The following definitions apply in this Policy:

Term	Definition
Blackout Period	Has the meaning given in section 4.1
Business Day	A day other than a Saturday, Sunday, a public holiday in Melbourne, Victoria or a day on which the Australian Stock Exchange is not open for trading.
Clearance Notice	Has the meaning given in section 5.1.
Connected Persons	Has the meaning given in section 1.3.
Corporations Act	<i>Corporations Act 2001 (Cth)</i> .
Dealing	For the purposes of this Policy: <ul style="list-style-type: none"> a. buying or selling of Securities, whether on market or off market; b. placing a buy or sell order in respect of Securities, even if that order is not completed; c. entering into an agreement or undertaking to buy or sell Securities at a future time; d. entering into an arrangement or acting to transfer the beneficial or underlying ownership of Securities (including a Securities lending arrangement); e. creating or granting a security interest in or over Securities, using Securities as collateral or entering into a margin loan in relation to Securities; f. entering into a contract or other arrangement with the purpose of securing a profit or avoiding a loss by reference to price fluctuations in Securities; or g. creating, acquiring or disposing of any other right or obligation, present or future, conditional or unconditional, to acquire or dispose of Securities.
Designated Employee	Has the meaning given in section 1.2.
Exceptional Circumstances	Has the meaning given in section 6.2.
Inside Information	Information in respect of an entity which: <ul style="list-style-type: none"> a. is not generally or publicly available; and b. if it were generally or publicly available, may have a material effect on the price of Securities of the entity (eg, would be likely to influence a reasonable investor in deciding whether to subscribe for, buy or sell those Securities). <p>Inside Information about St Barbara would include (but is not limited to):</p> <ul style="list-style-type: none"> a. information regarding a material increase or decrease in St Barbara's financial performance from previous results or forecasts; b. a proposed material business or asset acquisition or sale by St Barbara; c. material exploration results of St Barbara; d. the damage or destruction of a material operation of St Barbara; e. proposed material legal proceedings to be initiated by or against St Barbara; f. regulatory action or investigations undertaken against St Barbara by a government authority; g. the launch of a material new business by St Barbara; or h. a proposal by St Barbara to undertake a new issue of shares or major change in financing. <p>Inside Information may include information that is only available to a select group of institutional investors, undisclosed facts that are the subject of rumours (even if the rumours are widely circulated) and information that has been entrusted to St Barbara Personnel on a confidential basis until a public announcement of the information has been made.</p>
Securities	Any shares in a company (including St Barbara) or any other securities, derivatives, financial products or instruments (whether quoted or not) that are convertible into, or linked to, such shares. These include debentures, options, awards or rights, bonds and other forms of securitised debt.
Short Selling	Has the meaning given in section 7.3.

Term	Definition
St Barbara Personnel	Has the meaning given in section 1.1.

3. General Prohibition on Insider Trading

3.1. Prohibition

At all times, St Barbara Personnel who have Inside Information about St Barbara must not Deal in St Barbara's Securities.

Doing so would be insider trading, which is a criminal offence. A person convicted of insider trading can be imprisoned or ordered to pay compensation.

Broadly speaking, a St Barbara Personnel will be guilty of insider trading if that person possesses Inside Information about St Barbara and:

- a. Deals in St Barbara Securities (on their own account or on behalf of another person);
- b. procures another person to Deal in St Barbara Securities (this includes encouraging, persuading or causing someone else to buy, sell or Deal in St Barbara Securities); or
- c. discloses the Inside Information to another person (whether directly or indirectly), in circumstances where the St Barbara Personnel knows or should have known that the other person may use that Inside Information to Deal in St Barbara Securities.

Insider trading is illegal regardless of the person's motive or whether they make a profit from the activity.

It is important to note that the prohibition against insider trading applies even:

- a. where a Dealing occurs outside of Blackout Periods referred to in section 4.1 below;
- b. where the Dealing falls within an exclusion to this Policy; or
- c. where a St Barbara Personnel has obtained a Clearance Notice authorising a Dealing.

3.2. Securities of other companies

The prohibition on insider trading is not limited to St Barbara Securities. In the course of their role with St Barbara, St Barbara Personnel may become aware of Inside Information in relation to companies other than St Barbara (eg, because of dealings with St Barbara's suppliers or joint venturers or others with which St Barbara is holding confidential business discussions).

If a St Barbara Personnel holds Inside Information about another company, they must not Deal in Securities of that company.

In addition, the Chairman, the Managing Director/CEO or the General Counsel and Company Secretary may give written notice at any time to any St Barbara Personnel advising them that, by virtue of their position, role, activities or information available to them, they are prohibited from Dealing in the Securities of another company for a period of time stated in the notice or until further notice. The fact that a such a written notice has been issued is to be treated by that St Barbara Personnel as strictly confidential to St Barbara.

4. Requirements for all St Barbara Personnel

4.1. Prohibition on Dealings during Blackout Periods

To avoid any inference of unfair or inappropriate behaviour on the part of St Barbara or any St Barbara Personnel, all St Barbara Personnel and their Connected Persons are prohibited from Dealing in St Barbara Securities during any Blackout Period.

The **Blackout Periods** are:

- a. 20 March until the end of the ASX trading session on the Business Day following the public release of St Barbara's March Quarterly Report in April;
- b. 20 June until the end of the ASX trading session on the Business Day following the public release of St Barbara's preliminary or final full year results in August;
- c. 20 September until the end of the ASX trading session on the Business Day following the public release of St Barbara's September Quarterly Report in October; and

- d. 20 December until the end of the ASX trading session on the Business Day following the public release of St Barbara's half year results in February.

In addition, the Board or the Managing Director / CEO (as its delegate) may determine in writing to all St Barbara Personnel that:

- a. any of the Blackout Periods referred to above may be extended (but not shortened); or
- b. a new Blackout Period should be introduced.

The fact that a Blackout Period has been extended or a new Blackout Period has been imposed, is strictly confidential to St Barbara.

A St Barbara Personnel may be granted an exemption to Deal in St Barbara Securities during a Blackout Period, in accordance with section 6.2.

4.2. Dealings outside of Blackout Periods

Outside of the Blackout Periods, St Barbara Personnel may only Deal in St Barbara Securities if they are not in possession of Inside Information.

A St Barbara Personnel who is not a Designated Employee is not required to seek any specific or written approval to Deal in St Barbara Securities, provided any such Dealing occurs outside of a Blackout Period and is otherwise in accordance with this Policy.

A St Barbara Personnel who is a Designated Employee must comply with the additional requirements in section 5 of this Policy.

It is noted that the fact that a Dealing occurred outside of a Blackout Period does not preclude a Dealing from breaching insider trading laws. A Dealing outside of a Blackout Period is still insider trading if the St Barbara Personnel was in possession of Inside Information at the relevant time.

It is the responsibility of St Barbara Personnel to determine whether or not they are in possession of Inside Information and a St Barbara Personnel should seek advice from the General Counsel and Company Secretary before any Dealing is undertaken if they are unsure.

4.3. Short Term Dealing

Short-term speculative trading in St Barbara's Securities does not promote market confidence in St Barbara. Accordingly, St Barbara Personnel must not Deal with the same St Barbara Securities within any 12 month period.

A St Barbara Personnel may be granted an exemption to Deal in St Barbara Securities within any 12 month period, in accordance with section 6.2 of this Policy.

4.4. Employee and Executive Share Schemes

All Dealings in St Barbara Securities acquired pursuant to any employee share scheme of St Barbara³ must only occur in accordance with this Policy and the rules of the relevant scheme, save that the restriction on short term Dealing in section 4.3 above does not apply to St Barbara Securities granted to St Barbara Personnel as part of their remuneration which have vested in that St Barbara Personnel in accordance with the terms of the relevant scheme.

4.5. Obligation for St Barbara Personnel to manage own arrangements

It is the responsibility of each St Barbara Personnel to ensure that any arrangement or transaction that they, or any Connected Person, enters into complies with this Policy.

For example, any instruction given by a St Barbara Personnel or any Connected Person which could result in a Dealing in St Barbara Securities (such as a buy or sell order or a stop loss order) must be expressly cancelled:

- a. prior to the commencement of the next Blackout Period,
- b. immediately upon that St Barbara Personnel becoming aware of Inside Information; or
- c. in the case of a Designated Employee or their Connected Persons, prior to the expiry of the relevant period specified in the Clearance Notice for the Dealing,

so as to avoid any inadvertent trading in contravention of this Policy.

³ Include the St Barbara Limited Employee Share Plan, St Barbara Limited Performance Rights Plan, St Barbara Limited Non-Executive Director Share Plan and St Barbara Limited Short Term Incentive Share Scheme.

5. Additional Requirements for Designated Employees

5.1. Prior clearance required for Designated Employees and their Connected Persons

A Designated Employee and their Connected Persons must not Deal in St Barbara Securities (including outside of a Blackout Period and whether or not the Dealing is excluded under section 6 below) unless the Designated Employee has obtained a written notice authorising them to do so (**Clearance Notice**).

To obtain a Clearance Notice, a Designated Employee must submit a request (in the form of the attached Form A) to, and obtain the approval of, the persons specified in the table below.

Role of Designated Employee	Approvers
Director of St Barbara	Both the Chairman and the General Counsel and Company Secretary
Chairman of St Barbara	Both the Chairman of the Audit Committee and the Managing Director/CEO
All other Designated Employees	Both the Managing Director/CEO and the General Counsel and Company Secretary

A Clearance Notice may be given or refused by the persons listed in the table above, in their absolute discretion, without the need to provide reasons. Any Clearance Notice issued under this Policy may be withdrawn if St Barbara becomes aware of new information or if there is a change in circumstances.

If a Designated Employee is issued with a Clearance Notice, the Dealing may only occur within 5 Business Days of the date of the Clearance Notice (or such other period as may be specified in the Clearance Notice).

Immediately following a Designated Person or one of their Connected Persons Dealing in St Barbara Securities (and in any event within 3 days of the Dealing taking place), the Designated Employee must give the General Counsel and Company Secretary a notice in writing outlining the details of the Dealing (in the form of the attached Form B) and must provide such other details and information in relation to the Dealing as the General Counsel and Company Secretary may request from time to time.

It is noted that the fact that a Clearance Notice is issued with respect to a Dealing does not preclude that Dealing from breaching insider trading provisions. A Designated Employee must not Deal in St Barbara Securities if they are in possession of Inside Information.

5.2. Dealings by Directors

Any Dealings by Directors of St Barbara or any of their associates (as that term is defined in the Corporations Act) must be disclosed to the Australian Stock Exchange (**ASX**) as required by Listing Rule 3.19A of the ASX Listing Rules.

6. Exceptions to this Policy

6.1. General Exceptions

The following types of Dealings are excluded from the operation of this Policy and may be undertaken by St Barbara Personnel and their Connected Persons at any time, without prior written clearance, subject to the general prohibition against insider trading in section 3 of this Policy:

- transfers of St Barbara Securities between St Barbara Personnel and their respective Connected Persons (or among Connected Persons);
- transfers of St Barbara Securities already held by a St Barbara Personnel into a superannuation fund or other saving scheme in which that St Barbara Personnel or a Connected Person is a beneficiary;
- an investment in, or trading in units of, a fund or other scheme (other than a scheme only investing in St Barbara Securities) where the assets of the fund or other scheme are invested at the discretion of a third party who is not a Connected Person or a St Barbara Personnel;
- where a St Barbara Personnel or Connected Person is a trustee, trading in St Barbara Securities by that trust, provided neither the St Barbara Personnel nor any Connected Person is a beneficiary of the trust and the decision to trade was taken by the other trustees or by the investment managers independently of the St Barbara Personnel and their Connected Persons;
- undertakings to accept, or the acceptance of, a takeover offer, and disposals of St Barbara Securities pursuant to a scheme of arrangement;
- disposals of rights under a pro rata offer;

- g. acquisitions of St Barbara Securities under a pro rata issue (i.e., on exercise of rights), and allowing rights acquired under a pro rata issue to lapse;
- h. acquisitions under a security purchase plan offered by St Barbara or a dividend reinvestment plan where the person does not commence or amend participation during a prohibited period and the plan does not permit withdrawal during a prohibited period;
- i. disposals of St Barbara Securities under an equal access buy-back;
- j. subject to the St Barbara Personnel or Connected Person having complied with section 7.2 of this Policy, a disposal of St Barbara Securities by a secured lender without the permission or authority of the St Barbara Personnel or Connected Person at the time that is the result of that lender exercising its rights under a lending arrangement;
- k. the exercise (but not the sale of St Barbara Securities following exercise) of an option or vesting of a right under an employee incentive scheme; and
- l. trading under a non-discretionary trading plan (but which does not include sales under stop/loss orders) for which prior written clearance has been provided in accordance with procedures set out in this Policy and where:
 - i. the St Barbara Personnel or Connected Person (as the case may be) did not enter into the plan or amend their participation during a Blackout Period;
 - ii. the trading plan does not permit the St Barbara Personnel or Connected Person to exercise any influence or discretion over how, when, or whether to trade.

No St Barbara Personnel or Connected Person may cancel their participation in such a trading plan during a Blackout Period other than in Exceptional Circumstances with prior clearance under Section 6.2 of this Policy.

6.2. Exceptional Circumstances

In Exceptional Circumstances, a St Barbara Personnel who is not in possession of Inside Information may be permitted to sell or otherwise dispose of (but not purchase) St Barbara Securities, or to convert convertible St Barbara Securities (including options and rights acquired under an employee share scheme), during a Blackout Period, or within the 12 month period referred to in section 4.3.

Exceptional Circumstances include where the St Barbara Personnel:

- a. is in severe financial hardship; or
- b. is required by a court order or some other overriding legal or regulator requirement to sell or dispose of St Barbara Securities.

Whether Exceptional Circumstances exist is determined by the Managing Director / CEO in their sole and absolute discretion, without the need to provide reasons⁴ All such determinations will be based on the circumstances of each case, but as a general rule the proposed sale or disposal of St Barbara Securities must be assessed as the only reasonable course of action available. By way of guidance, a general tax liability, a tax liability relating to St Barbara Securities received under an employee incentive scheme or an obligation to sell under a collateralisation arrangement will not constitute Exceptional Circumstances.

An approval to Deal in Exceptional Circumstances may be withdrawn if St Barbara becomes aware of new information or if there is a change in circumstances.

7. Derivatives, Hedging and Collateralisation of St Barbara Securities

7.1. Derivative Products and Hedging

The use of derivative products such as caps, collars, warrants, options and hedging in relation to St Barbara Securities can circumvent the intent of this Policy, mislead the public concerning the underlying holdings of St Barbara Securities by St Barbara Personnel, and undermine public confidence in St Barbara's approach to Dealings by its directors, executives and employees.

As a consequence, the use by any St Barbara Personnel of any derivative product or hedging in relation to St Barbara Securities designed to limit the economic risk of that St Barbara Personnel is prohibited.⁵

Designated Employees may also be subject to a statutory prohibition in section 206J of the Corporations Act, which

⁴ If the affected St Barbara Personnel is the Managing Director / CEO, whether Exceptional Circumstances exist will be determined by the Board in its sole and absolute discretion.

⁵ This prohibition does not extend to exchange traded options in St Barbara Securities which are acquired, disposed of and reported, provided that the effect of those exchange traded options does not limit or reduce the economic risk of that St Barbara Personnel.

prohibits a member of key management personnel of St Barbara and their closely related parties from entering into an arrangement which would have the effect of limiting exposure of the member to risk relating to an element of the member's remuneration that:

- a. has not vested in the member; or
- b. has vested in the member but remains subject to a holding lock.

7.2. Collateralisation and Margin Loans

Any St Barbara Personnel who proposes to use their St Barbara Securities as collateral or enter into a margin loan in relation to their St Barbara Securities, must provide a copy of this Policy to the lender before providing the St Barbara Securities as collateral or entering into the margin loan.

In addition, a Designated Employee is not permitted to use their St Barbara Securities as collateral or to enter into a margin loan or similar arrangement in relation to them, without:

- a. obtaining confirmation from the lender or holder of the collateral that the St Barbara Securities will not be sold or disposed of by it in contravention of the Designated Employee's obligations under this Policy; and
- b. seeking and obtaining, in writing, formal clearance in accordance with section 5.1 prior to entering into that collateralisation, margin loan or arrangement.

7.3. Short Selling

Short Selling is where a person borrows a security and sells it in the hope that they will be able to buy the security back at a lower price in the future and close out their short position at a profit. Engaging in Short Selling sends a negative message to the market about the level of confidence that a person has in the prospects of the entity. Short Selling may also mislead the public about the underlying holdings of St Barbara Securities by St Barbara Personnel and undermine public confidence in St Barbara's approach to Dealings in Securities by its directors, executives and employees.

As a consequence, Short Selling by any St Barbara Personnel in relation to St Barbara Securities is prohibited.

8. Register of Dealings

The General Counsel and Company Secretary will maintain a register and copy of:

- a. all requests for approval to Deal in St Barbara Securities submitted by Designated Employees;
- b. all Clearance Notices, including the number of days within which any Dealing should occur;
- c. details of all Dealings in St Barbara Securities made by any Designated Employee; and
- d. details of all approvals for St Barbara Personnel to Deal in St Barbara Securities in Exceptional Circumstances.

9. Consequences of Breach

Any suggestion that a person connected with St Barbara has breached the insider trading prohibition could have a significant impact on their personal reputation (and the reputation of their Connected Persons), and on St Barbara's standing with investors. The purpose of this Policy is not only to minimise the risk of insider trading but also to avoid the appearance of insider trading and the significant reputational damage it may cause.

A breach of this Policy by any St Barbara Personnel or Connected Person will be regarded by St Barbara as serious misconduct and any such breach will be investigated and may lead to disciplinary action, up to and including dismissal for an employee, or termination of contract for a contractor or agent.

St Barbara may also refer any suspected or actual breaches of this Policy to regulatory and law enforcement authorities.

10. Further Guidance

If a St Barbara Personnel is in any doubt regarding a proposed Dealing in St Barbara Securities, or those of another entity, or the impact of this Policy generally, they should contact the General Counsel and Company Secretary.

The General Counsel and Company Secretary shall be responsible for assessing and monitoring compliance with this Policy and reporting to the Managing Director/CEO and the Board, as required, in relation to it.

The General Counsel and Company Secretary shall also be the company officer responsible for the communication of this Policy to employees and the implementation of an awareness program among employees in relation to it.

Securities Dealing Policy

Form A – Request to Deal in St Barbara Securities

As required by clause 5.1 of the Securities Dealing Policy, I, hereby request clearance to deal in the following St Barbara Securities:

CLASS OF ST BARBARA SECURITIES Ordinary shares Senior Secured Notes Other

NUMBER OF SECURITIES

REGISTERED IN THE NAME OF
(Insert full name. If not you, please state the person's connection to you.)

NATURE OF INTEREST
(Insert specific details, for example personally, joint holding or as trustee.)

NATURE OF TRANSACTION
(Insert specific details, for example sale of shares.)

EXCEPTIONAL CIRCUMSTANCES
(If applicable insert specific details about the reason for needing to deal in St Barbara Securities during a prohibited period.)

I confirm that I do not possess any unpublished price-sensitive Inside Information in relation to St Barbara Securities. If this changes before the deal is transacted, I undertake not to proceed.

I also undertake to notify you in writing, in accordance with Part B of this form, within 3 days after the transaction takes place.

Signed Date

CLEARANCE NOTICE

I acknowledge:

1. the confirmations given above by the Designated Employee; and
2. that the proposed trade described above does not fall within a Black Out Period.

This clearance notice expires at 5:00pm Melbourne time on, being five (5) business days following this acknowledgment.

Name.....SignedDate

Name.....SignedDate

This signed and completed form must be sent to the General Counsel and Company Secretary of St Barbara Limited:

By post: The Company Secretary
 St Barbara Limited
 Level 19, 58 Mounts Bay Road
 Perth WA 6000

By email: Company.Secretary@stbarbara.com.au

Securities Dealing Policy

Form A – Request to Deal in St Barbara Securities

Request to Deal in St Barbara Securities Compliance Worksheet

This Worksheet is designed to assist individuals in deciding whether to request a Request to Deal in St Barbara securities pursuant to the Securities Dealing Policy.

Under insider trading laws, “inside information” is information that is not generally available and if the information were generally available, a reasonable person would expect it to have a material effect on the price or value of the relevant St Barbara securities (including shares, derivatives or debt, s1042A of the *Corporations Act*).

Note that the concept of materiality for continuous disclosure purposes is different to materiality for the insider trading purposes. For insider trading laws, a reasonable person would be taken to expect information to have a “material effect” on the price or value of the relevant St Barbara securities if the information would, or would be likely to, influence persons who commonly invest in securities in deciding whether or not to acquire or dispose of those securities (s1042D of the *Corporations Act*).

If there is a “yes” answer to any of the questions below then you should not request a Request to Deal in St Barbara securities pursuant to the Securities Dealing Policy unless you seek legal advice first.

Question	Yes/No (applicant)
Are you aware of any of the following types of material information which is not publicly available:	
(a) information regarding a material increase or decrease in St Barbara’s financial performance from previous results or forecasts	
(b) a proposed material business or asset acquisition, sale/divestment or joint venture	
(c) material exploration results	
(d) the damage or destruction of a material operation of the company	
(e) proposed material legal proceedings to be initiated by or against any member of the St Barbara Group of companies	
(f) regulatory action or investigations undertaken by a government authority	
(g) the launch of a material new business	
(h) a proposal to undertake a new issue of shares or major change in financing	
(i) Are you on an insider register for any projects? If so, are you satisfied that the current project information does not qualify as ‘inside information’?	

Please note this checklist is not exhaustive and you should consider what other information might be considered material. Individuals are personally responsible for ensuring that they comply with all applicable insider trading laws even if approval is granted pursuant to the Securities Dealing Policy.

Securities Dealing Policy

Form B – Notice of Dealing in St Barbara Securities

This form must be submitted within 3 days after the transaction takes place

In fulfilment of my obligations under the Securities Trading Policy, I
hereby give notice of the following dealing in St Barbara Securities:

CLASS OF ST BARBARA SECURITIES Ordinary shares Senior Secured Notes Other

NUMBER OF SECURITIES

REGISTERED IN THE NAME OF
(Insert full name. If not you, please state the person's connection to you.)

NATURE OF INTEREST
(Insert specific details, for example personally, joint holding or as trustee.)

NATURE OF TRANSACTION
(Insert specific details, for example sale of shares.)

DATE OF TRANSACTION / /
(insert date shares were traded)

PRICE OR OTHER CONSIDERATION (per share) \$ _____

Signed Date

This signed and completed form must be sent to the General Counsel and Company Secretary, St Barbara Limited:

By post: The Company Secretary
 St Barbara Limited
 Level 19, 58 Mounts Bay Road
 Perth WA 6000

By email: Company.Secretary@stbarbara.com.au