



## 1. PERSONS TO WHOM THIS POLICY APPLIES:

### 1.1 General Prohibitions

All Sonic group employees and officers, hereinafter described as “Sonic Employees” are bound by the policy in 2.1 below.

### 1.2 Designated Officer Prohibitions

- Directors of Sonic
- CEOs of Sonic subsidiaries
- Senior Finance and Corporate staff

These persons hereinafter described as “Designated Officers”, are bound by the policy in 2.2 below. (The current list of Designated Officers is attached to this policy).

## 2. POLICY

### 2.1 General Prohibitions

Sonic Employees are prohibited from buying or selling Sonic shares at any time if they are aware of any material price sensitive information that has not been made public. Sonic Employees are also prohibited from procuring others to trade when the Sonic Employees are precluded from trading. Sonic Employees are also required to use best endeavours to enforce confidentiality against external advisers.

The prohibitions described above also apply to trading in financial products issued or created over Sonic’s securities by third parties, and to trading in associated products and products such as options which operate to limit the economic risk of security holdings in Sonic.

Sonic Employees must not trade in the securities of any other entity if material, non public, market sensitive information on such entity comes to the attention of the Sonic Employee by virtue of their position within Sonic.

### 2.2 Designated Officer Prohibitions

In addition to the General Prohibitions above, Designated Officers are only permitted to trade in the period of eight weeks commencing on the business day after the public announcement of half year and year end results. Trading is also permitted in the two weeks following any Sonic announcement which gives specific market guidance regarding the next result due to be reported.

Exceptions to this rule may be granted by the Chairman (for other Directors) or by the Managing Director (for all other Designated Officers) in specific circumstances such as financial hardship, providing it is clear (to a reasonable person) that the Designated Officer is not in possession of material, non public, market sensitive information at that time.

The Managing Director and Finance Director are required to obtain approval from the Chairman of the Remuneration Committee before selling Sonic shares.

Designated Officers are also prohibited from entering into transactions in products which limit the economic risk of participating in unvested entitlements under any

equity based remuneration schemes. Designated Officers are required to commit to this by signing the Share Trading Policy and will forfeit their equity reward should they be found to be in breach.

### **2.3 Exclusion**

Nothing in the Policy restricts Sonic Employees from exercising options over unissued Sonic shares (including those granted under the Sonic Employee Option Plan). Trading of the subsequently issued shares is however subject to the Prohibitions above.

## **3. NOTIFICATIONS**

Should a Sonic Employee be in any doubt as to whether they possess material, non public, market sensitive information, they must not trade without first discussing the situation with the Company Secretary or Finance Director.

Following execution of any trading, all Designated Officers are required to provide details of the trades to the Company Secretary within 24 hours.

All Sonic share dealings by Directors must be promptly notified to the Australian Stock Exchange (ASX) by the Company Secretary. Directors are therefore required to complete an Appendix 3Y and forward to the Company Secretary within 24 hours of executing (i.e. before settlement) any trade.

## **4. ACKNOWLEDGEMENT**

Each Designated Officer will be required to sign a copy of the latest version of this policy from time to time as acknowledgement of awareness of the laws prohibiting "insider trading" and confirmation that they have read Sonic's policy.

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Designated Officer

NAME:  
TITLE:  
EMPLOYER:  
DATE: