



IMPRESS ENERGY LIMITED SECURITIES TRADING POLICY

1. Background

In order to preserve the reputation and integrity of the Company and senior management of Impress Energy Limited (the Company), the Directors' have implemented this policy as a guide to dealing in the Company's securities.

In summary this policy states that senior management or their associates should:

- not trade in the Company's securities while in possession of information not available to the market; and
- notify the Chairman and/or Company Secretary of their trading in the Company's securities.

2. Corporations Act Insider Trading Provisions

A person must not deal in the securities of the Company when in possession of information the person knows, or ought reasonably to know:

- is not generally available, including information the Company has not disclosed to the market; and
- might have a material effect on the price of those securities if it was generally available.

This prohibition extends to procuring another person to deal in those securities, extends to communicating the inside information to another person, if the person knows, or ought reasonably to know, that the other person would, or would be likely to deal in the securities of the Company or procure another person to deal in the securities of the Company.

The Corporations Act 2001 imposes severe penalties, both criminal and civil, on persons who conduct insider trading activities.

3. Confidentiality and Inside Information

A person in possession of inside information concerning the Company has a duty to keep the information confidential and must not communicate or disclose the information to any other person.

4. Senior Management

Senior management of the Company for the purposes of this policy is:

- the Chairman;
- the Board;
- the Chief Executive Officer or any other senior executives; and
- the Company Secretary.

This policy also applies to any employee who in the course of their employment may be exposed to inside information.

5. Associated Parties

Each member of senior management is responsible for ensuring that their associates, being immediate family, including spouse, children, parents, brothers and sisters, comply with the trading restrictions set out in this policy.

6. Trading Restrictions

The senior management of the Company may trade in the securities of the Company at any time as long as they are not in possession of price sensitive information. If any doubt, the relevant person must contact either the Chairman and/or Company Secretary to assess whether or not the person is in possession of price sensitive information prior to any trade in the securities of the Company.

7. Board Discretion

The Board of the Company has the absolute discretion to place a trading restriction on the senior management and their associates of the Company at any time during the year they deem necessary. Reasons for any trading restriction where this discretion is exercised should be included in the minutes of the meeting at which it occurs.

8. Notification of trading in the Company's Securities

Senior management or their associates are required to notify the Chairman and/or Company Secretary no more than one day after any dealings in the Company's securities in writing by providing the following information:

- name of security holder;
- date of trade;
- type of transaction;
- number of securities involved; and
- price per security.

The Company Secretary will then complete the required disclosure to the ASX.