



## **Dealings in Company Securities**

### **Philosophy**

The Board encourages its employees to invest in Neon but places restrictions on buying and selling shares in the Company if that employee may be in possession of Price Sensitive Information. Directors, Key Management Personnel and employees are restricted from trading shares in the Company and Directors are discouraged from buying or selling shares without first consulting and seeking approval from the Chairman.

Price Sensitive Information is information that:

- is not generally available; and
- if it were generally available, it would, or would be likely to influence investors in deciding whether to buy Neon's shares.

### **Procedures and Guidelines**

If any Director, Key Management Personnel or employee possesses Price Sensitive Information, the person must not:

- trade in Neon securities;
- advise others or procure others to trade in Neon securities; or
- pass on the inside information to others including colleagues, family or friends – knowing (or where the Key Management Personnel, employee or Director should have reasonable known) that the other persons will use that information to trade in, or procure someone else to trade in Neon securities.

This prohibition applies regardless of how the Key Management Personnel, employee or Director learns the information.

Key Management Personnel, Directors and employees are restricted from buying or selling Neon shares, or shares in any of the Company's partners, irrespective whether they are listed or not, during price sensitive activities, which include but are not limited to:

- During the drilling or testing of a well that may have a material impact on the price of Neon shares. The restriction applies from 48 hours prior to the anticipated intersection of a potentially productive reservoir, or 48 hours prior to the testing of a potentially productive zone, and will continue to apply until 48 hours after an announcement on the drilling or test results have been made publicly available.
- Two weeks prior to the release of any financial data, including annual, half yearly and quarterly reports and applies for 48 hours after the release of the relevant report. The same restriction applies following an announcement of a material event relating to the Company's business and operations.

Key Management Personnel and Employees should check with the Company Secretary before buying any of the Company's securities and Directors/Key Management Personnel are encouraged to consult with the Chairman prior to buying or selling any securities in the Company.

In addition to the above, Directors must notify the Company Secretary as soon as practicable, but not later than 5 business days after they have bought or sold the Company's securities or exercised options. In accordance with the provisions of the Corporations Act and the Listing rules of ASX, the Company on behalf of the Directors must advise ASX of any transactions conducted by them in the securities of the Company.

Breaches of this policy will be subject to disciplinary action, which may include termination of employment.

It is acknowledged that, with the approval of the Chairman, a person not in possession of inside information may be given permission to sell securities during a prohibited period where the person is in severe financial hardship or there are other exceptional circumstances.

This Policy does not contain an exhaustive analysis of the restrictions imposed on, and the very serious legal ramifications of, insider trading. Directors, officers and employees who wish to obtain further advice in this matter, are encouraged to contact the company secretary.

This Policy also applies to the Company's related entities.