

Powerhouse Ventures Limited (PVL)

ASX-SECURITIES DEALING POLICY

INTRODUCTION

Purpose

This policy sets out rules governing personal dealing in financial products by employees, contractors, and directors of Powerhouse Ventures Limited and its subsidiaries ("PVL Group") to ensure compliance with legal obligations, avoid actual or perceived conflicts of interest, and maintain the integrity of PVL Group's operations.

Scope

This policy applies to all staff of the PVL Group, including permanent, part-time, and temporary employees, and any consultants and contractors who have or may have access to confidential or price-sensitive information (each an "employee").

Core Principles

Client Priority

Client orders must always take priority over personal trading. No employee may trade in a way that disadvantages a client or takes advantage of client information.

Conflicts of Interest

Personal trading must not occur where it could give rise to a conflict with the interests of clients or the PVL Group, including the misuse of confidential or inside information.

Inside Information

Personal trading must not occur in respect of any securities where an individual is or may be in possession of information which may be non-public, price sensitive information. This includes circumstances where the individual has received the information in the course of their work with PVL Group, has been wall crossed in respect of a transaction or in circumstances where they have come into possession of the information inadvertently.

Pre-Trade Approval Requirements

Trades Requiring Pre-Approval

All personal trades in financial products or securities of or referable to individual ASX-listed entities outside the ASX200 require written pre-approval from the Corporate team.

Validity of Approval

Pre-approval is valid for 48 hours from the time of approval. If the trade has not been executed within that window, a new approval must be sought.

How to Request Approval

Requests must be made by email or via the designated internal form and must include:

- Name of the security
- Intended buy/sell direction
- Volume and intended timing
- Confirmation that the person does not hold inside information

Execution of Trades

Approved Broker Requirement

All personal dealing must be executed through a recognised securities dealer or platform capable of providing quarterly transaction reports.

Reporting to Corporate

Each employee must ensure that their broker sends a quarterly report of all trading activity directly to the Corporate team, no later than 10 business days after quarter-end.

Record Keeping and Compliance

- The Corporate team will maintain a register of all pre-approvals and trading reports.
- Non-compliance may result in disciplinary action, including termination.

Questions

Any questions about this policy should be directed to the Head of Corporate or the Compliance Officer.