

## SHARE TRANSACTION POLICY

The Board of Accordant Group Ltd has adopted the following policy which applies to all Accordant Group Ltd Directors and its employees.

### GENERAL PRINCIPLE

If you possess information relating to Accordant Group Ltd which is not generally available and which, if it were available, could have a material effect on the price or value of Accordant Group Ltd shares (that is, information which is “price sensitive”), you must not:

- buy, sell or otherwise deal in Accordant Group Ltd shares;
- advise, procure or encourage another person to buy, sell or otherwise deal in Accordant Group Ltd shares; or
- pass on the information to another person that you know, or ought reasonably to know, may use the information to deal or procure a dealing, unless and until that information has been made public by Accordant Group Ltd.

Information will be regarded as being price sensitive if it would, or would be likely to, influence a reasonable person who commonly invests in securities or other traded financial products in deciding whether or not to deal in the Accordant Group Ltd shares.

If you are in possession of non-public price sensitive information relating to Accordant Group Ltd, you must maintain the confidential nature of that information and not communicate that information to third parties (including external advisers) unless otherwise authorised by Accordant Group Ltd.

### PERMITTED TRADING “WINDOWS”

Subject to the general principle above, Directors and employees must confine any dealings in Accordant Group Ltd shares to a “window” of thirty (30) days following our interim profit announcements and 6 weeks from the annual profit announcements.

If there are:

- exceptional circumstances; and
- the person concerned declares that they do not possess any non-public price sensitive information, then approval may be given by the board of Directors at their discretion to allow Directors and Employees to deal outside a trading “window”.

Any such approval must be obtained in advance.

A dealing for which approval is given remains subject to the notice requirements of paragraph 3.

**NOTICE TO GM Corporate Services**

Notwithstanding the exceptions described above relating to trading “windows”, all employees must:

- obtain the prior approval of the GM Corporate Services in advance of any proposed dealings in Accordant Group Ltd shares by lodging the attached “Notice of Intention to Buy/Sell Shares in Accordant Group Ltd” and;
- inform the GM Corporate Services when the dealing in Accordant Group Ltd shares has occurred, including the number of shares involved and the relevant parties to the dealing by lodging the attached “Notice of Sale of Shares in Accordant Group Ltd”.

Notification may be made by email.

**CONTACT**

If you are unsure as to whether or not you possess price sensitive information, are permitted to deal in your Accordant Group Ltd shares and/or are permitted to communicate information to anyone, please contact the GM Corporate Services for advice.

**APPROVED BY THE BOARD OF ACCORDANT GROUP LTD**

ACCORDANT GROUP LIMITED

NOTICE OF INTENTION TO BUY OR SELL SECURITIES

I, \_\_\_\_\_

(Name of Director/Employee)

\_\_\_\_\_

(Address)

Request that Accordant Group Limited consents to the sale/purchase of the securities set out below. The following information is provided for the purpose of the Insider Trading (Approved Procedure for Company Officers) Notice 1996:

1. Office or position held in Accordant Group Limited:

\_\_\_\_\_

2. Classes of Securities that are the subject to the proposed transaction: Ordinary shares
3. Number of Securities that are subject to the proposed transaction: \_\_\_\_\_
4. Type of transaction: Sale/Purchase
5. The likely date of the transaction: \_\_\_\_\_
6. I confirm that the decision to buy or sell the securities has not been made on the basis of inside information.
7. I confirm that I do not intend to sell the securities within six months of purchase (if the proposed transaction is a sale this can be deleted).
8. I believe the transaction will be at a fair value.

Dated this \_\_\_\_\_ day of \_\_\_\_\_ 20\_\_\_\_

SIGNED by

\_\_\_\_\_

as Director/Employee

\_\_\_\_\_

Signature

**ACCORDANT GROUP LIMITED**

**CONSENT TO SALE OR PURCHASE OF SECURITIES TO:**

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(Name and address of Director/Employee)

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In response to your Notice of Intention to Buy or Sell Securities dated \_\_\_\_\_,

Accordant Group Limited consents to the proposed transaction. This consent is given pursuant to the Insider Trading (Approved Procedure for Company Officers) Notice 1996

Dated this \_\_\_\_\_ day of \_\_\_\_\_ 20.

SIGNED on behalf of Accordant Group Limited \_\_\_\_\_ (Commercial Director/CFO)