



Corporate Governance Policy – Securities Trading – Executives

Freedom Nutritional Products Limited
ACN 002 814 235

Date: 28 May 2009

Freedom Nutritional Products Limited
ACN 002 814 235
(Company)

Corporate Governance Policy – Securities Trading – Executives

1. Introduction

- 1.1 This policy imposes constraints on senior executives of the Company dealing in securities of the Company.
- 1.2 The policy was updated by the Board on 28 May 2009. Schedule 1 lists the titles of the senior executives who are subject to this policy on the date that it is issued. Other executives of equivalent seniority are also subject to this policy. If any executive is in doubt as to whether he or she is subject to this policy, he or she should consult the Chairman or managing director.

2. Application

- 2.1 The policy applies only to senior executives of the Company other than the CEO. Directors and the CEO are subject to a separate policy in relation to trading in securities.

3. Dealing in Securities

- 3.1 Senior executives must not deal in securities of the Company unless:
 - (1) they have satisfied themselves that they are not in possession of any price sensitive information that is not generally available to the public;
 - (2) they have advised the Chairman or the CEO of their intention to do so;
 - (3) the Chairman or CEO has indicated that there is no impediment to them doing so.
- 3.2 The Chairman or CEO will generally allow senior executives to deal in securities of the Company as a matter of course (unless there is in

existence price sensitive information that has not been disclosed because of an ASX Listing Rule exception) other than in the following periods:

- (1) within the period of 1 month prior to the announcement of interim and final results of the Company; and
- (2) within the period of 2 weeks prior to the annual general meeting;

but only after waiting at least two hours after the relevant release so that the market has had time to absorb the information.

- 3.3 Permission to trade in the Company's securities during the periods referred to in 3.2 above must be obtained from the Chairman.
- 3.4 A senior executive must not at any time engage in short-term trading in securities of the Company.
- 3.5 A senior executive must not communicate price sensitive information to a person who may deal in securities of the Company.
- 3.6 In addition, a senior executive must not recommend or otherwise suggest to any person (including a spouse, relative, friend, trustee of a family trust or directors of a family company) the buying or selling of securities in the Company.
- 3.7 The above principles also apply to the following:
 - (1) trading in financial products issued or created over the Company's securities and associated products; and
 - (2) entering into transactions with securities (or any derivative thereof) in associated products which operate to limit the economic risk of any unvested entitlements under any equity based remuneration schemes offered by the Company.

4. Notification

- 4.1 Senior executives must notify the Company Secretary immediately on acquiring or disposing of a relevant interest in any securities in the Company.
- 4.2 Senior executives must monitor that external advisers who may receive price sensitive information are bound by confidentiality agreements or other enforceable confidentiality obligations.

5. Consultation

- 5.1 If a senior executive has any query about the application of this policy, he or she should consult the Chairman or CEO.

6. Penalties

- 6.1 A trade in any securities by a person who is in possession of price sensitive information not publicly available could contravene the *Corporations Act 2001* and expose the person to civil and criminal penalties.
- 6.2 A contravention of this policy by an executive may result in summary dismissal.

Schedule 1

Executives to whom this Policy applies

Company Secretary;

Chief Financial Officer;

Chief Operating Officer;

Financial Controller (and assistant);

Company Accountant (and assistant);

Accounts Administrator;

Assistant Accountant

General Manager;

Group Technical and Quality Manager,;

Business Unit Manager – Contract Beverage Packers Australia Pty Limited;

Business Unit Manager – Seafood division

Business Unit Manager – Freedom Foods

Business Unit Manager – A2 Dairy Products Australia Pty Limited

Strategic Development Director;