

SINO GAS & ENERGY HOLDINGS LIMITED

SECURITIES TRADING POLICY

Sino Gas & Energy Holdings Limited (the **Company**, **Sino Gas** or **SGEH**) recognises the importance of integrity and fair dealing in Company securities.

The purpose of this Policy is to ensure directors, employees and other relevant persons do not abuse access to inside information about the Company or any other company. Ultimately, however, it is the responsibility of the person to ensure that none of his or her dealings could constitute insider trading.

In order to prevent any misunderstanding, the creation of any suspicion or potential loss of confidence regarding dealings in Company securities, the Company is committed to:

- a) ensuring that all Employees and Designated Contractors are aware of the legal restrictions on Dealing in the Company's securities;
- b) preventing Insider Trading occurring by its Employees and Designated Contractors;
- c) establishing mandatory requirements above that of the strict requirements of applicable law.

To achieve these commitments, the Company will prepare, maintain and enforce this Securities Trading Policy and [Securities Trading Procedures](#) which will;

- a) prohibit the conduct of dealing in Company securities or any other company's securities when in possession of Inside information;
- b) prohibit the communication of Inside information to another person;
- c) specify periods where no dealings of the Company's securities are permitted;
- d) discourage short-term trading;
- e) provide strict requirements for dealings involving hedging or margin lending arrangements;
- f) provide specific requirements applicable to senior Designated Personnel and directors; and
- g) ensure that all Employees and Designated Contractors are made aware of the specific requirements of this Policy and the related procedure.

Compliance with this policy and its related Securities Trading Procedure is a condition of employment. Breaches by Employees or Designated Contractors will result in disciplinary action, including dismissal if warranted in addition to potential civil or criminal liability.

These requirements imposed by this policy and related procedures are separate from and additional to, the legal prohibitions in the Corporations Act on insider trading.

Every Employee and Designated Contractor working for the Company has a responsibility to promote a culture whereby their actions and those of their colleagues are consistent with this Policy.