

To	Company Announcements Office	Facsimile	1300 135 638
Company	ASX Limited	Date	11 March 2025
From	Helen Hardy	Pages	6
Subject	Updated Dealing in Securities Policy		

In accordance with Listing Rule 12.10, Origin's updated Dealing in Securities Policy is attached.

Authorised for lodgement by:



Helen Hardy
Company Secretary
02 8345 5000

Dealing in Securities Policy

1. What is the objective of this Policy

This Policy sets out when you are prohibited from Dealing in Origin's Securities and the requirements for seeking clearance prior to Dealing.

The objective of this Policy is to prohibit Origin and its personnel from Dealing in the Securities of Origin or other companies in a way which breaches insider trading laws or harms Origin's reputation.

Capitalised terms used in this Policy are explained in Attachment 1.

2. Who this applies to

This Policy applies to all Origin Directors, employees and people working for Origin under a contract or consultancy agreement (**Origin Personnel**) who wish to Deal in Origin's Securities, or the Securities of a company that Origin does business with. This Policy also extends to Associates of Origin Personnel.

If you are unsure whether this Policy applies to you, another person connected to you or to any instrument you wish to Deal in, you should seek guidance from the Company Secretary.

3. Prohibition on Dealing

You must not Deal in, or procure others to Deal in Origin's Securities:

- at any time, if you possess Inside Information; or
- during a Closed Period, being:
 - from 1 July to the second trading day after the announcement of Origin's results for the financial year ended 30 June; and
 - from 1 January to the second trading day after the announcement of Origin's results for the half financial year ended 31 December; or
- where otherwise prohibited by Origin due to activity or knowledge within Origin at that time (an "Additional Prohibition"). To protect confidentiality, it is unlikely that there will be an announcement or similar release by Origin that an Additional Prohibition has been imposed. If you contact the Company Secretary to request permission to Deal in Origin Securities, you may be told on a confidential basis that a prohibition exists, but not told why or for how long it will last.

If you hold Origin Securities, you must recognise that a prohibition may apply at the time you wish to sell them, and Origin will have no responsibility to you.

4. How to Deal when there is no prohibition

If you are not prohibited from Dealing as set out in Section 3, you must comply with the prior written clearance requirement set out below before you can Deal. Any clearance given by Origin to Deal is not an endorsement of the proposed Dealing and you are responsible for your investment decisions and ensuring you comply with the law and this Policy. If you come to possess Inside Information after receiving clearance to Deal, you must not complete the trade.

Role	Clearance from
Directors	Chairman and the Company Secretary
ELT & ELT Direct Reports	Manager and the Company Secretary
All other employees	Manager

Any transaction should be completed within 2 business days of receiving clearance and must be consistent with the terms of that clearance.

Following a Dealing of Securities by a Director, confirmation of price and quantity must be provided to the Company Secretary to ensure that the notification obligations of the Director under the ASX Listing Rules and the Corporations Act are satisfied.

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5. Procuring Others to Deal

If you hold Inside Information, you are also prohibited from:

- Procuring Others to Deal in Origin Securities; or
- directly or indirectly communicating the information to another person who you believe is likely to Deal in, or Procure Others person to Deal in, Origin Securities.

6. Short-term Dealing

You must not Deal in Origin's Securities on a short-term or speculative basis. You must not acquire Origin's Securities with the intention of disposing or selling them within three months of acquisition, or enter into arrangements which result in short-term Dealing (such as margin loans) to minimise the perception of speculative trading.

This short-term Dealing rule does not apply to:

- Securities acquired as a result of the exercise of an option or similar rights under Origin's employee equity incentive schemes; or
- shares acquired under Origin's employee equity incentive schemes.

You must not engage in short-selling Origin Securities.

7. Margin lending and hedging arrangements

7.1 Margin lending

From the date of this Policy, you must not enter into margin lending arrangements using Origin Securities (either solely or as part of a portfolio) as security as a collateral against repayment of a loan, or enter into any other secured financing arrangements in respect of Origin Securities.

A sale of your Origin Securities by a third party outside your control (such as a margin lender) in a Closed Period or when you are otherwise prohibited by this Policy is a serious breach of this Policy and may result in dismissal.

7.2 Hedging

You must not Deal in instruments or other financial products which operate to limit the economic risk of any Securities issued to you under any equity incentive schemes provided by Origin while those holdings are subject to performance hurdles or are otherwise unvested.

Any sale, hedging arrangement or other Dealing involving those Securities after they have vested must be done in compliance with this Policy.

8. Permitted Dealings

8.1 The general exceptions

Subject to general insider trading laws, you may Deal in Origin's Securities at any time where:

- the transaction results in no change in the beneficial interest in the Securities;
- the transaction occurs via instruments in a scheme or other arrangement where the investment decisions are exercised by a third party;
- you have no control or influence with respect to trading decisions; or
- the transaction occurs under an offer to all or most of Origin's shareholders.

Examples of instances where the general exceptions may apply are set out in Attachment 1.

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8.2 Dealings during Closed Periods and Additional Prohibitions

Dealing in Origin Securities during a Closed Period or Additional Prohibitions will not be permitted.

9. Dealing in Securities of other companies

If you have Inside Information relating to other entities whether listed in Australia or any other jurisdiction, then the prohibition also applies to Dealing in Securities of that entity, including Procuring Others to Deal.

Examples of when this prohibition may arise are set out in Attachment 1.

10. Roles and Responsibilities

The roles and responsibilities in relation to this Policy are set out in the table below:

POSITION	RESPONSIBILITIES
Board (Policy Approver)	<ul style="list-style-type: none"> Approving any material change to this Policy. Receiving reports of any material breach of this Policy.
Company Secretary (Policy Owner)	<ul style="list-style-type: none"> Giving advice about Origin's insider trading obligations and this Policy. Approve training on this Policy. Making this Policy available on the Origin website and lodged with the ASX in accordance with the ASX Listing Rules, including any material amendments to it. In conjunction with the Chief Executive Officer, make decisions to impose (and subsequently lift) Additional Prohibitions. Receiving reports of breach, overseeing investigation and management of consequences, and reporting any material breach to the Board. Reviewing this Policy as needed, and at least every three years. Communicate the requirements of this Policy and arrange appropriate training.

11. Compliance

A breach of this Policy is a serious misconduct and may result in dismissal. Breach of insider trading laws may also expose you to civil or criminal legal liability and could result in imprisonment or significant penalties. If you suspect or know of a breach of this Policy, you are required to report the matter immediately to the Company Secretary.

12. Contacts & More Information

Document Owner	Company Secretary
Key Contact	Company Secretary
Effective from	11 March 2025
Next Review due	11 March 2028

Attachment 1 – Key Terms

KEY TERM	DEFINITION
Associates	<p>'Associate' means:</p> <ul style="list-style-type: none"> (a) unless paragraph (e) below applies, your spouse or de facto partner; (b) your dependent children or those of your partner or de facto partner; (c) a company, partnership or trust over which: <ul style="list-style-type: none"> (i) you have control or significant influence; or (ii) you and any of the persons in (a) or (b) above have control or significant influence; (d) any other person, including a nominee, with whom you act or propose to act in concert regarding any Dealing in Securities. <p>A person who is over the age of 18 and who acts or makes decisions in respect of Dealings in Securities completely independently of you, without any influence from or control by you, is not your associate.</p>
Dealing	<p>Dealings or arrangements to:</p> <ul style="list-style-type: none"> • buy or sell Securities or financial products issued or created over, or in respect of Securities; • subscribe for new Securities; • create a derivative over Securities; • enter into or close out of short-term trades (including short selling); • enter into or close out of margin loans through the acquisition or disposal of shares; or • enter into an agreement to do any of the above, <p>and Deal has a corresponding meaning.</p>
Generally Available	<p>Information is usually considered to be "generally available" if it:</p> <ul style="list-style-type: none"> • consists of readily observable matter; or • has been made known in a manner that would, or would be likely to, bring it to the attention of persons who commonly invest in any of the classes of Securities issued by Origin and a reasonable period for it to be disseminated among such persons has elapsed; or • it consists of deductions, conclusions or inferences made or drawn from other information that is generally available. <p>For example, information will be 'generally available' if it has been released to the stock exchanges, published in an Annual Report or prospectus or otherwise been made generally available to the public and a reasonable time has elapsed after the information has been disseminated in one of these ways.</p>
Inside Information	<p>Information that triggers the insider trading prohibitions in the Corporations Act. It is:</p> <ul style="list-style-type: none"> • information that is not Generally Available; and • that information may have a material effect on the price of Origin's Securities; • you know, or ought reasonably to know, that the information is not Generally Available and, if it were, it might have a material effect on the price or value of Origin's Securities.
Material Information	<p>Any information which a reasonable person would expect to have a material effect on the price or value of Origin's Securities. The Corporations Act says that a reasonable person would be taken to expect information to have a material effect on the price or value of Securities if the information would, or would be likely to, influence persons who commonly invest in Securities in deciding whether or not to subscribe for, or buy or sell, the Securities.</p> <p>Examples of matters which may require disclosure, if material, are set out below.</p>

KEY TERM	DEFINITION
Procuring Others	<p>Enticing, encouraging, persuading, causing or securing another person to do something. Procuring includes inciting, including or encouraging an act or omission.</p> <p>For example, you cannot ask or encourage family members to Deal in Origin Securities when you possess price sensitive information and you should not communicate price sensitive information to anyone, except to Origin Personnel or persons who need to know the information in the conduct of your duties for Origin and who you know to be bound by appropriate confidentiality undertakings.</p>
Securities	<ul style="list-style-type: none"> • ordinary shares; • preference or any other type of shares; • debentures; • options; • any financial product; • derivatives; and • notes, whether convertible or not.

Examples

Material Information: Examples of matters which may require disclosure, if Material Information, include the following:

- a transaction that will lead to a significant change in the nature or scale of the entity's activities;
- a material mineral or hydro-carbon discovery;
- a material acquisition or disposal;
- the granting or withdrawal of a material licence;
- the entry into, variation or termination of a material agreement;
- becoming a plaintiff or defendant in a material law suit;
- the fact that the entity's earnings will be materially different from market expectations;
- the appointment of a liquidator, administrator or receiver;
- the commission of an event of default under, or other event entitling a financier to terminate, a material financing facility;
- under subscriptions or over subscriptions to an issue of Securities;
- giving or receiving a notice of intention to make a takeover;
- the impact of new and expected legislation; and
- any rating applied by a rating agency to an entity or its Securities and any change to such a rating.

Permitted Dealings: Examples of permitted Dealings under the general exceptions include the following:

- transfers of Securities already held into a superannuation fund or other saving scheme in which you are the sole beneficiary;
- acquisition of Securities through a dividend reinvestment plan, share purchase plan, rights issue or under a disclosure document;
- disposal of Securities through the acceptance of a takeover offer or scheme or arrangement; or
- the exercise (but not any other Dealing of Securities following exercise) of options or a right under an employee equity incentive scheme.

Prohibition on Dealing in Securities of another entity: Examples where the prohibition on Dealing in securities of another entity may arise include the following:

- another entity may provide Material Information about itself to Origin in the course of a proposed transaction;
- another entity with whom Origin is Dealing may provide Material Information about a third entity;
- information concerning Origin or actions which may be taken by Origin (i.e. a planned transaction or strategic change) that could reasonably be expected to have an effect on a third party entity; and
- information regarding the outcome of exploration, appraisal or development activities being undertaken in a joint venture with a third party entity where this information has not been released to the market.