

**IMAGION BIOSYSTEMS LIMITED**

ASX: IBX

18 December 2025

**Updated Securities Trading Policy**

Imagion Biosystems (ASX: IBX) (**Company** or **Imagion**), a company dedicated to improving healthcare outcomes through the early detection of cancer utilising its proprietary MagSense® imaging technology, advises that, in accordance with ASX Listing Rule 12.10, the Company has updated its Securities Trading Policy.

A copy of the updated Securities Trading Policy is attached and also available on Imagion's website at <https://investor.imagionbiosystems.com/team>.

**Authorisation & Additional Information**

This announcement was authorised by the Board of Imagion Biosystems Limited.

— ENDS —

**About Imagion Biosystems**

Imagion Biosystems is developing a new non-radioactive and precision diagnostic molecular imaging technology. Combining biotechnology and nanotechnology, the Company aims to detect cancer and other diseases earlier and with higher specificity than is currently possible. For more information, visit <https://imagionbiosystems.com/investor-hub/>

**Executive Chairman Contact Details**

Bob Proulx

[investor@imagionbio.com](mailto:investor@imagionbio.com)

AU: +61 3 9692 7222

**Media Enquiries & Investor Relations:**

Erich Boileau, Boileau &amp; Co.

[imagionbio@boileau.co](mailto:imagionbio@boileau.co)

US : +1 (616) 786-4461

**Imagion Biosystems Limited**ASX: **IBX** ACN 616 305 027

Suite 2, Level 11 385 Bourke Street Melbourne VIC 3000

<http://www.imagionbiosystems.com/> | [investor@imagionbio.com](mailto:investor@imagionbio.com)



## Securities Trading Policy

### 1. Introduction

- 1.1. Imagination Biosystems Limited (the "**Company**") is committed to ensuring that public confidence is maintained in the Company, its people and the trading of its securities. This Securities Trading Policy (the "**Policy**") sets out the Company's trading policy on buying and selling securities of the Company including shares, options, derivatives, managed investment products, superannuation products and any other financial products of the Company that are able to be traded on a financial market ("**Company's Securities**").

### 2. Application

- 2.1. This policy applies as follows:
- (a) part 3 (insider trading laws) and part 8 (confidentiality) apply to everyone (including all directors, officers, contractors, family and associates);
  - (b) parts 4 to 6 (trading policy) apply to all directors and officers of the Company and any controlled entities ("**Group**") and any other persons designated by the board of directors ("**Board**") from time to time (each a "**Designated Person**"); and
  - (c) paragraph 4.7 ("**Associates**") applies our trading policy to the family and associates of Designated Persons as specified in that paragraph.

### 3. Insider trading prohibitions under the Corporations Act

#### 3.1. Prohibitions

- 3.1.1. Under the *Corporations Act 2001* (Cth) ("**Corporations Act**"), if you have Inside Information (as defined in paragraph 3.3 below) relating to the Company it is illegal for you to:
- (a) deal in (that is, apply for, acquire or dispose of) the Company's Securities or enter into an agreement to do so;
  - (b) procure another person to apply for, acquire or dispose of the Company's Securities or enter into an agreement to do so; or
  - (c) directly or indirectly communicate, or cause to be communicated, that information to any other person if you know, or ought reasonably to know, that the person would or would be likely to use the information to engage in the activities specified in paragraphs (a) or (b) above.
- 3.1.2. The prohibitions also apply to the application for, grant, exercise or transfer of an option over the Company's Securities, and to the securities of other entities if you possess Inside Information about those entities.

- 3.1.3. It does not matter how or in what capacity you become aware of the Inside Information. It does not have to be obtained from the Company to constitute Inside Information. You cannot avoid the insider trading prohibition by arranging for a member of your family or a friend to deal in the Company's Securities nor may you give "tips" concerning Inside Information relating to the Company to others.

### 3.2. **Consequences of insider trading**

- 3.2.1. This offence, called "**insider trading**", can subject you to:

- (a) criminal liability including large fines and/or imprisonment (or both);
- (b) a civil penalty (fine) of up to hundreds of thousands of dollars; and
- (c) civil liability, which may include being sued for any loss suffered as a result of illegal trading.

### 3.3. **Inside Information**

- 3.3.1. "**Inside Information**" is information relating to the Company which is not generally available but, if the information were generally available, would be likely to have a material effect on the price or value of the Company's Securities. Inside Information can include matters of speculation or supposition and matters relating to intentions or likely intentions of a person.

- 3.3.2. Information is regarded as being likely to have a material effect if it would, or would be likely to, influence persons who commonly invest in securities or other traded financial products in deciding whether or not to deal in the Company's Securities.

- 3.3.3. Examples of Inside Information could be:

- (a) the financial performance of the Company against its budget;
- (b) changes in the Company actual or anticipated financial condition or business performance;
- (c) changes in the capital structure of the Company, including proposals to raise additional equity or borrowings;
- (d) proposed changes in the nature of the business of the Company;
- (e) changes to the Board or significant changes in key management personnel;
- (f) an undisclosed significant change in the Company's market share;
- (g) likely or actual entry into, or loss of, a material contract;
- (h) material acquisitions or sales of assets by the Company;
- (i) proposed dividend or other distribution or a change in dividend policy; or
- (j) a material claim against the Company or other unexpected liability.

- 3.3.4. Insider trading is prohibited at all times.

- 3.3.5. If you possess Inside Information, you must not buy or sell Company Securities, advise or get others to do so or pass on the Inside Information to others. This prohibition applies regardless of how you learn the information.

- 3.3.6. The prohibition on insider trading applies not only to information concerning Company Securities. If a person has Inside Information in relation to securities of another company, that person must not deal in those securities.

#### 3.4. **When if information generally available?**

- 3.4.1. Information is generally available if:

- (a) it consists of readily observable matter or deductions;
- (b) it has been brought to the attention of investors through an announcement to ASX Limited (“**ASX**”) or otherwise similarly brought to the attention of investors who commonly invest in securities, and a reasonable period has elapsed since it was announced or brought to investors' attention; or
- (c) it consists of deductions, conclusions or inferences made or drawn from information referred to in paragraphs (a) or (b) above.

- 3.4.2. Examples of possible readily observable matters are:

- (a) a change in legislation which will affect the Company's ability to make certain types of investments or conduct certain activities; or
- (b) a severe downturn in global securities markets.

#### 3.5. **Penalties**

- 3.5.1. Breach of the insider trading laws may subject you to:

- (a) criminal liability – penalties include heavy fines and imprisonment;
- (b) civil liability – you can be sued by another party or the Company for any loss suffered as a result of illegal trading activities; and
- (c) civil penalty provisions – the Australian Securities and Investment Commission (“**ASIC**”) may seek civil penalties against you and may even seek a court order that you be disqualified from managing a corporation.

- 3.5.2. Breach of the law, this policy, or both, will also be regarded by the Company as serious misconduct which may lead to disciplinary action or dismissal.

### 4. **No dealing in Prohibited Periods**

#### 4.1. **Prohibited Periods**

- 4.1.1. Designated Persons must not deal in the Company's Securities during the following prohibited periods (except in accordance with this Policy):

- (a) the following closed periods:
  - (i) from the day of the half year end (or if that day is not a trading day, the previous trading day) to the close of trading on the business day after the Company's half yearly results are announced to ASX;
  - (ii) from the day after the financial year end (or if the day is not a trading day, the previous trading day) to the close of trading on the business day after the Company's annual results are announced to ASX;

- (iii) from 28 days before, to the close of trading on the business day after, the Company's annual general meeting;
- (iv) from 28 days before a prospectus or similar disclosure document is lodged by the Company with ASX; and
- (v) any extension to a closed period, and any additional period, as specified by the Board of Directors,

(each a "**Prohibited Period**").

- 4.1.2. Designated Persons may deal in the Company's Securities at other times subject to complying with insider trading prohibitions (see part 2 above) and the requirements of this policy.

#### 4.2. **Prior notification**

- 4.2.1. If a Designated Person proposes to deal in the Company's Securities (including entering into an agreement to deal) at any time they must first give:

- (a) written notice of their intention to the Notification Officer below:
  - (i) Chairman of the Board for all directors and alternate directors of the Company (other than the chairman of the Board) and the Company Secretary;
  - (ii) Board of Directors for the Chairman of the Board; and
  - (iii) Company Secretary for all other Designated Persons ("**Notification Officer**"); and
- (b) confirmation that you are not in possession of Inside Information.

- 4.2.2. The relevant Notification Officer may appoint a delegate to act on his or her behalf in the case of temporary absence.

#### 4.3. **Confirmation**

- 4.3.1. Before dealing in the Company's Securities, the Designated Person must receive a confirmation signed by the Notification Officer.
- 4.3.2. A confirmation expires five days from its date, unless it specifies a different expiry date.
- 4.3.3. A confirmation confirms that the proposed dealing by the Designated Person is within the terms of the trading policy but does not otherwise constitute approval or endorsement by the Company or the Notification Officer for the proposed dealing. Even if a confirmation is granted, a Designated Person remains personally responsible for assessing whether the insider trading prohibitions or other legal restrictions apply to them.

#### 4.4. **Notification of dealing**

- 4.4.1. In addition to providing advance notice under paragraph 4.2, Designated Persons must confirm in writing to the relevant Notification Officer, within three business days from when the dealing in the Company's Securities has occurred, the number of the Company's Securities affected and the relevant parties to the dealing.

#### **4.5. Register**

- 4.5.1. A register of notifications and clearances is to be kept by the Notification Officer.
- 4.5.2. A register of Designated Persons interests in the Company's Securities is to be kept by the Notification Officer.

#### **4.6. Securities of other entities**

- 4.6.1. The Chairman may extend this policy by specifying that Designated Persons are also restricted from dealing in the securities of other specified entities with which the Company may have a close relationship.

#### **4.7. Associates**

- 4.7.1. This policy also applies to associates of Designated Persons, except for paragraphs 4.2 to 4.4 regarding prior notification, confirmation and notification of dealing. A Designated Person must communicate on behalf of their associate with the Notification Officer for the purposes of this policy.
- 4.7.2. "Associates" of a Designated Person includes their family members, trusts, companies, nominees and other persons over whom a Designated Person has, or may be expected to have, investment control or influence. If you are in doubt as to whether a person is an associate, you should contact the Company Secretary who will make a determination on the issue.

### **5. Exceptional circumstances**

- 5.1.1. A Designated Person may request, and the Notification Officer may grant, prior approval for the Designated Person to:
  - (a) deal in the Company's Securities during a Prohibited Period; or
  - (b) dispose of the Company's Securities even if otherwise prohibited under part 7, provided there are exceptional circumstances and insider trading laws are not breached.
- 5.1.2. Exceptional circumstances may include:
  - (a) severe financial hardship (for example, a pressing financial commitment that cannot be satisfied otherwise than by selling the relevant the Company's Securities);
  - (b) requirements under a court order or court enforceable undertakings or other legal or regulatory requirements; or
  - (c) other exceptional circumstances as determined by the Chairman (or the Board of Directors where the Chairman is involved).
- 5.1.3. The Designated Person seeking approval must submit a written request (Annexure 1) to the Notification Officer, including:
  - (a) the proposed dealing;
  - (b) the exceptional circumstances justifying it; and

- (c) supporting evidence that the dealing represents the most reasonable course of action and that the person does not possess Inside Information.
- 5.1.4. The Notification Officer may grant or refuse approval at their discretion, without providing reasons.
- 5.1.5. If the Notification Officer has any doubt in making a determination of exceptional circumstances, they should exercise discretion with caution. Approval may be withdrawn if new circumstances arise.
- 5.1.6. Approved dealings will be notified in writing (including via email) and valid for a maximum of five (5) business days.
- 5.1.7. If approval is refused, the Designated Person must maintain confidentiality.
- 5.1.8. The requirements of paragraphs 4.2 to 4.4 must be complied with regarding prior notification, confirmation and notification of dealing.

## 6. Permitted dealings

- 6.1.1. The following types of dealing are excluded from the operation of part 3 of this policy and may be undertaken at any time without requiring prior notification, approval or confirmation of dealing, subject to the insider trading prohibitions:
  - (a) **(superannuation)** transfers of securities which are already held in a superannuation fund in which the Designated Person is a beneficiary;
  - (b) **(third parties)** an investment in, or trading in units of, a fund or other scheme (other than a scheme only investing in the Company's Securities) where the assets of the fund or other scheme are invested at the discretion of a third party;
  - (c) **(other trustees)** where a Designated Person is a trustee, trading in the Company's Securities by the respective trust provided the Designated Person is not a beneficiary of the trust and any decision to trade during a Prohibited Period is taken by the other trustees or by the investment managers independently of the Designated Person;
  - (d) **(takeover)** undertakings to accept, or the acceptance of, a takeover offer;
  - (e) **(rights offers, SPPs, DRPs and buy-backs)** trading under an offer or invitation made to all or most of the security holders, such as a rights issue, a security purchase plan, a dividend or distribution reinvestment plan and an equal access buy-back, where the plan that determines the timing and structure of the offer has been approved by the Company's Board. This includes decisions relating to whether or not to take up the entitlements and the sale of entitlements required to provide for the take up of the balance of entitlements under a renounceable pro rata issue;
  - (f) **(lender disposal)** a disposal of the Company's Securities that is the result of a secured lender exercising their rights, however, this does not extend to disposal under a margin lending agreement where such agreements are prohibited by this policy;
  - (g) **(trading plan)** trading under a non-discretionary trading plan for which prior written clearance has been provided in accordance with procedures set out in this policy and where:

- (i) the Designated Person did not enter into the plan or amend the plan during a Prohibited Period; and
  - (ii) the trading plan does not permit the Designated Person to exercise any influence or discretion over how, when, or whether to trade,
- however, this policy does not allow the Designated Person to cancel the trading plan or cancel or otherwise vary the terms of this participation in the trading plan during a Prohibited Period other than in exceptional circumstances;
- (h) **(dividend reinvestment plan)** acquiring the Company's Securities under the terms of the Company's dividend reinvestment plan;
  - (i) **(bonus issues)** acquiring the Company's Securities under a bonus issue made all holders of the Company's Securities of the same class;
  - (j) **(no change in beneficial interest)** trading the Company's Securities where the trading results in no change in beneficial interest in the Company's Securities. However, the requirements of paragraphs 3.2 to 3.4 must be complied with;
  - (k) **(transfer to SMSF)** transferring the Company's Securities already held into a self-managed superannuation fund in which the Designated Person is a beneficiary; and
  - (l) **(subscription under disclosure document)** subscribing for the Company's Securities under a disclosure document.

## 7. Further restrictions

### 7.1. No margin lending

- 7.1.1. Designated Persons are not permitted to enter into margin lending arrangements in relation to the Company's Securities. This is on the grounds that the terms may require the Company's Securities to be sold during a Prohibited Period or when the Designated Person possesses inside information.
- 7.1.2. This restriction does not extend to other funding arrangements where the Company's Securities may be included as security. Designated Persons should consult the Company Secretary if they are uncertain as to whether an arrangement should be classified as a margin lending arrangement.

### 7.2. No short term or speculative trading

- 7.2.1. The Company encourages Designated Persons to be long-term investors in the Company.
- 7.2.2. Designated Persons must not engage in short term or speculative trading in the Company's Securities or in financial products associated with the Company's Securities. Short term means in less than a 12-month period.
- 7.2.3. Designated Persons are not permitted to engage in short selling of the Company's Securities.

### 7.3. No hedging

- 7.3.1. Subject to law, Designated Persons must not:



- (a) enter into transactions or arrangements with anyone which could have the effect of limiting their exposure to risk relating to an element of their remuneration that:
  - (i) has not vested; or
  - (ii) has vested but remains subject to a holding lock; or
- (b) deal at any time in financial products associated with the Company's Securities, except for the type of dealing permitted by law or under part 5.

#### **7.4. Meaning of financial products**

- 7.4.1. For the purposes of this part, financial products includes derivatives, options, warrants, futures, forward contracts, swaps and contracts for difference issued or created over or associated with the Company's Securities by third parties.

### **8. Confidential Information**

- 8.1. You must treat all sensitive, non-public information ("**Confidential Information**") about the Company as confidential and belonging to the Company.
- 8.2. You must not disclose Confidential Information to others (including family members, relatives, business or social acquaintances) except as authorised or legally required.
- 8.3. You must avoid inadvertent or indirect disclosure of Confidential Information. Even within the Company, Confidential Information should be distributed to or discussed with others only on a need-to-know basis, and those people must be told that the information is confidential.
- 8.4. Be careful that your conversations are not overheard in elevators, aeroplanes or other public places.
- 8.5. Do not leave Confidential Information on conference tables, desks or otherwise unguarded.
- 8.6. Take whatever steps are reasonably necessary to keep Confidential Information from being disclosed, except as authorised or legally required.

### **9. Further Assistance**

- 9.1. If you do not understand any aspect of this trading policy, or are uncertain whether it applies to you or your family or associates, please contact the Company Secretary. You may wish to obtain your own legal or financial advice before dealing in the Company's Securities.

### **10. Review**

- 10.1. The Board will review this Policy at least once every two years (or earlier if required) to determine its adequacy for current circumstances and make any appropriate amendments.
- 10.2. This Policy may be amended by resolution of the Board.
- 10.3. This Policy is available on the Company's website within a reasonable time after any such updates or amendments have been approved.

## 11. Annexure 1: Trading Request Form (Illustrative Only)

From: \_\_\_\_\_ (print staff member's name)

Position: \_\_\_\_\_ (print job title)

To: Melanie Leydin, Company Secretary  
Imagion Biosystems Limited

### TRADING OF COMPANY SECURITIES AND/OR SECURITIES IN A BLACKLISTED TRADING COMPANY

In accordance with the Imagion Biosystems Limited ("**Company**") Securities Trading Policy, I give notice to you that I am proposing to deal with securities in the Company ('Company Securities') in the following manner (tick one):

- ☐ buy Company Securities
- ☐ sell Company Securities
- ☐ transfer Company Securities vested under an equity incentive plan to me
- ☐ transfer Company Securities to a related party (eg family company, trust or superannuation fund)
- ☐ exercise options over Company Securities
- ☐ utilise derivatives and enter a hedging transaction
- ☐ trade in blacklisted trading companies

The number of securities that I propose to deal with is up to \_\_\_\_\_ (number).

The transaction will be carried out on-market/off-market (delete one).

The transaction is proposed to be carried out in the \_\_\_\_ (number no more than 5) business days between \_\_\_\_\_ (date) and \_\_\_\_\_ (date).

I confirm that I have no inside information and will comply with the Company's securities trading policy in relation to my dealing.

I agree to notify the Company Secretary of the results of this action within 2 business days of the action.

Please confirm that I am cleared to deal in Company Securities in the manner set out above.

Signed: ..... (by staff member requesting clearance)

Date signed: \_\_\_\_\_

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We/I confirm that subject to you not gaining any Inside Information, you are authorised to deal in securities as mentioned above, for the 5 business days following the approval date below.

Name: ..... ..

Designation:      ☐                      ☐                      ☐                      ☐

*(select as appropriate in accordance with Clause 8.1 of the Securities Trading Policy)*

Chairman of the Board	Representative of Board of Directors	CEO	CFO
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Date: ..... ..