



ASX ANNOUNCEMENT

22 SEPTEMBER 2026

UPDATED SECURITIES TRADING POLICY

Forte Energy Limited (ASX: FEL) (**Forte** or the **Company**) advises, in accordance with Listing Rule 12.10, that following a review of its corporate governance policies, an amended Securities Trading Policy ('the Policy') has been adopted by the Board.

The Policy is attached and is also available on the Company's website at:

<https://forteenergy.com.au/corporate-governance/>

This announcement has been authorised for release by the Forte Energy Board of Directors.

Dougal Ferguson

Non-Executive Chairman

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Securities Trading Policy

Forte Energy Limited (ACN 137 387 350)

Adopted by the Board on 21 September 2026

Forte Energy Limited Securities Trading Policy

1 Purpose

- (a) The *Corporations Act 2001* (Cth) (**Corporations Act**) prohibits the trading in shares, options, debentures (including convertible notes) and other securities (**securities**) of a company by any person who is in possession of price sensitive information regarding that company that is not generally available. The Corporations Act:
 - (i) imposes substantial penalties on persons who breach those provisions; and
 - (ii) applies to the extent of any inconsistency between it and this policy.
- (b) This policy regulates dealings by directors and certain officers of Forte Energy Limited (ACN 137 387 350) (**Forte** or the **Company**) and other designated persons, in securities in Forte about which they acquire Inside Information through their position or dealings with Forte.
- (c) This policy is not designed to prohibit Forte Persons from investing in Forte securities but does recognise that there may be times when directors, officers or certain employees cannot or should not invest in Forte securities.
- (d) Forte has adopted this Securities Trading Policy in order to comply with ASX Listing Rule 12.9.

2 Definitions

For the purposes of this policy:

- (a) “**Blackout Period**” has the meaning given in section 4.1 of this policy;
- (b) “**Board**” means the board of directors of the Company from time to time;
- (c) “**Company Secretary**” means the secretary of the Company from time to time;
- (d) “**Directors and Senior Management**” means each director of Forte, the Managing Director or Chief Executive Officer (as applicable), the Chief Financial Officer, and Company Secretary, Key Management Personnel and persons as the Board decides from time to time;
- (e) “**Inside Information**” has the meaning given in section 3.2 of this policy;
- (f) “**Key Management Personnel**” has the meaning given in the ASX Listing Rules; and
- (g) “**Forte Person**” means:
 - (i) all Directors and Senior Management and any other person designated a Forte Person by the Board in writing; and
 - (ii) also includes:

- (A) a company or trust controlled by any of the persons referred to in sub-paragraph (i) above; and
- (B) for the purposes of section 4 only, a spouse (including a de facto spouse), child (including a step-child or adopted child), a close relative, a person financially dependent on or acting in concert with any of the persons referred to in sub-paragraph (i) above.

3 Insider trading

3.1 General prohibition on insider trading

- (a) No Forte Person may, while in possession of Inside Information concerning Forte, in breach of the Corporations Act:
 - (i) buy or sell any Forte securities at any time;
 - (ii) procure another person to deal in Forte securities in any way; or
 - (iii) pass on any Inside Information to another person for that person's own personal gain by dealing in Forte securities in any way.
- (b) All Forte Persons are prohibited from dealing in the securities of outside companies about which they acquire Inside Information through their position with Forte.
- (c) The requirements imposed by this policy are in addition to any legal prohibitions on insider trading. Trading in Forte securities is prohibited at any time by a director or a Forte Person if that person possesses Inside Information.

3.2 Inside Information

A Forte Person is responsible for assessing whether they possess “**Inside Information**”. This occurs where:

- (a) the person possesses information that is not generally available to the public and, if the information were generally available, a reasonable person would expect it to have a material effect on the price or value of Forte's securities (or a decision whether or not to trade in them); and
- (b) the person knows, or ought reasonably to know, that the information is not generally available and, if it were generally available, a reasonable person would expect it to have a material effect on the price or value of Forte's securities.

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 a person who commonly invests in securities to either deal or not deal in securities in any way. Inside Information in relation to the securities of outside companies has the same meaning for the purposes of this policy, except that references to “Forte's securities” should be read as references to the securities of the outside company.

4 Restrictions on trading in Blackout Periods

4.1 Blackout Periods

- (a) Forte Persons, subject to sections 4.3(d) and 6, may not buy or sell Forte securities during a Blackout Period.
- (b) “**Blackout Periods**” are times when Forte Persons must not deal in the Company's securities.

The following are mandated Blackout Periods:

- (i) the period five (5) business days prior to, and 24 hours after the release of the Company's quarterly report;
- (ii) the period two weeks prior to, and 24 hours after the release of the Company's Interim and Annual Financial Report;
- (iii) the 24 hours prior to the release of price sensitive information to the market;
- (iv) the two weeks prior to, and the 24 hours after, the holding of the Annual General Meeting or any other General Meeting; and
- (v) any other period that the Board specifies from time to time.

During Blackout Periods, Forte Persons must not deal in any of the Company's financial products or securities, or in any securities related to them.

4.2 Ad-hoc restrictions

The Board may impose, without notice and in its sole and absolute discretion, additional restrictions on trading in Forte's securities by any or all Forte Persons, and also by any other staff member(s) (who are not otherwise designated as “Forte Persons”) as Forte considers appropriate. For the avoidance of doubt, Forte may impose ad-hoc restrictions under this section 4.2 even where the proposed trade would otherwise take place outside a Blackout Period provided for in this policy. Any restriction communicated by Forte to any or all Forte Persons (or other staff members) under this section 4.2 must be kept strictly confidential.

4.3 Procedure for authorisation

- (a) Forte Persons must:
 - (i) prior to dealing in Forte securities outside a Blackout Period or where paragraph 5 requires the person to obtain a consent under this paragraph 4.3, notify the relevant person in paragraph 4.3(c) (the **Authorising Officer**) of their proposed dealing and obtain consent from the Authorising Officer; and
 - (ii) confirm to the Authorising Officer that they are not in possession of any Inside Information; and

- (iii) after dealing with the Forte securities, provide the Authorising Officer with a transaction confirmation.
- (b) For the avoidance of doubt, the Forte Person seeking authorisation cannot be their own Authorising Officer.
- (c) The relevant Authorising Officer for a Forte Person will be as follows, unless otherwise determined by the Board from time to time:

Forte Person seeking authorisation	Authorising Officer
Chair of the Board	Chair of Audit & Risk Committee or in their absence an Independent Director
Other directors, Company Secretary and any other Key Management Personnel	The Chair of the Board or, in his/her absence and Independent Director
Any other Forte Person	The Company Secretary or, in his/her absence, any Director

- (d) Any decision to grant or refuse consent by the Authorising Officer:
 - (i) may be made in the Authorising Officer's absolute discretion, without giving any reasons;
 - (ii) can be withdrawn (if consent has been given) if new information comes to light or there is a change in circumstances;
 - (iii) is final and binding on the Forte Person seeking consent; and
 - (iv) must be kept strictly confidential by the Forte Person and not disclosed to any other person.
- (e) Any form of consent, authorisation or clearance by the Authorising Officer is not an endorsement to trade. The Forte Person dealing with securities or doing the trading is individually responsible for their investment decisions and their compliance with insider trading laws. Before trading, each Forte Person must carefully consider whether they are in possession of any Inside Information that might preclude them from trading at that time. If the Forte Person is in any doubt, they should not trade.
- (f) If a Forte Person comes into possession of Inside Information after receiving a consent, they must not trade despite having received the consent.

4.4 Exceptional circumstances

- (a) In exceptional circumstances the Authorising Officer, has discretion to approve dealings in Forte securities during a Blackout Period, or other dealings that would otherwise be prohibited by this policy. Any approval given under this section 4.4(a), must be provided by electronic delivery via email. The notification requirements still apply.

- (b) What constitutes “exceptional circumstances” will be assessed on a case-by-case basis within the absolute discretion of the Board, and may include, without limitation, severe financial hardship or a requirement to comply with a court order or court enforceable undertaking.

4.5 Company secretary to maintain records

The Company Secretary will maintain a copy of:

- (a) all requests for an approval to deal in Forte’s securities submitted by a Forte Person; and
- (b) details of all dealings in Forte’s securities made by a Forte Person.

5 Other restrictions

5.1 No speculative trading

Under no circumstances should Forte Persons engage in short-term or speculative trading in Forte securities. This prohibition includes short term direct dealing in Forte securities as well as transactions in the derivative markets, involving exchange traded options, share warrants, contracts for difference, and other similar instruments, which are short term or speculative.

5.2 No protection arrangements

- (a) The entering into of all types of “protection arrangements” for any Forte securities (or Forte products in the derivatives markets):
 - (i) is prohibited at any time in respect of any Forte securities which are unvested or subject to a holding lock; and
 - (ii) otherwise, requires consent under paragraph 4.2.
- (b) For the avoidance of doubt and without limiting the generality of this policy, entering into protection arrangements includes entering into transactions which:
 - (i) amount to “short selling” of securities beyond the Forte Person’s holding of securities;
 - (ii) operate to limit the economic risk of any Forte Person’s security holding (e.g. hedging arrangements) including Forte’s securities held beneficially (for example, in trust or under any Forte incentive plan) on that Forte Person’s behalf; or
 - (iii) otherwise enable a Forte Person to profit from a decrease in the market price of securities.

5.3 No granting of security over Forte securities or entering into margin lending arrangements

- (a) Forte Persons may not at any time, directly or indirectly, grant any form of security (whether by way of charge, mortgage, pledge or otherwise) over any Forte

securities which are unvested or subject to a holding lock, to secure any obligation of that Forte Person or any third party or enter into any margin lending arrangement involving Forte securities.

- (b) Unless paragraph (a) applies, Forte Persons may, directly or indirectly, grant any form of security (whether by way of charge, mortgage, pledge or otherwise) over any Forte securities, to secure any obligation of that Forte Person or any third party or enter into any margin lending arrangement involving Forte securities, with consent under paragraph 4.3.

6 Exemptions

- (a) Forte Persons may at any time:
 - (i) trade Forte securities where the trading does not result in a change of beneficial interest in the securities;
 - (ii) acquire securities under any director or employee security plan or through the exercise of options or performance rights under an option or performance rights plan or acquire, or agree to acquire, options or performance rights under an option or performance rights plan. However, any dealing in those securities remains subject to this policy and the provisions of the Corporations Act;
 - (iii) transfer Forte securities already held into a self-managed superannuation fund or other saving scheme in which the restricted person is a beneficiary;
 - (iv) acquire Forte's ordinary shares by conversion of securities giving a right of conversion to Forte's ordinary shares;
 - (v) acquire Forte's securities under a bonus issue made to all holders of securities of the same class;
 - (vi) undertake to accept, or accept, a takeover offer;
 - (vii) invest in, or trade in units of, a fund or other scheme (other than a scheme only investing in the securities of Forte) where the assets of the fund or other scheme are invested at the discretion of a third party;
 - (viii) a disposal of Forte securities that is the result of a secured lender exercising their rights under a loan or security agreement;
 - (ix) where a restricted person is a trustee, trade in the securities managed by that trust provided the restricted 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 restricted person; or
 - (x) trade 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 or an equal access buy-back, where the plan that determines the timing and structure of the offer has been approved by the Board. This includes deciding 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.

- (b) If a Forte Person undertakes any of the actions described in paragraph (a), that Forte Person must advise the relevant Authorising Officer (as set out in section 4.3(c)).

7 ASX Notifications

- (a) Forte must notify ASX within 5 business days after any change to a director's relevant interest in Forte securities or a related body corporate of Forte, including whether the change occurred inside a Blackout Period and, if so, whether prior written clearance was provided.
- (b) To enable Forte to comply with the obligation set out in paragraph (a), a director must immediately (and no later than 3 business days after any relevant event) notify the Company Secretary in writing of the requisite information for the Company Secretary to make the necessary notifications to the Australian Securities and Investments Commission and ASX as required under the Corporations Act and ASX Listing Rules.
- (c) If Forte makes a material change to this trading policy, the amended trading policy will be provided to the ASX for release to the market within 5 business days of the material changes taking effect.

8 General

- (a) A breach of this policy will be regarded seriously and may lead to disciplinary action, including dismissal.
- (b) This policy will be made available on the Forte website.
- (c) If you require any further information or assistance or are uncertain about the application of the law or this trading policy in any situation, please contact the Company Secretary.

9 Reviews and changes to the Securities Trading Policy

- (a) The Board will review this policy periodically to ensure that it is operating effectively and whether any changes are required.
- (b) The Board may change this policy from time to time by resolution.