BNK Banking Corporation Limited
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ASX Release, 27 November 2026

UPDATED SECURITIES TRADING POLICY

In accordance with ASX Listing Rule 12.10, BNK Banking Corporation Limited (ASX: **BBC**) ("**BNK**" or the "**Company**") releases its updated Securities Trading Policy effective 25 November 2026. The updated Policy is also available on the Company's website.

This announcement has been authorised for release by the Company Secretary on behalf of the Board.

ENDS

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About BNK

BNK Banking Corporation Limited (ASX: BBC) was founded in 1982 as Goldfields Credit Union. BNK is a branchless bank offering a focused range of deposit and lending products through a national broker network, key aggregator partnerships and expanding digital channels. BNK operates two brands: Goldfields Money and Better Choice Home Loans. Find out more: https://bnk.com.au/



Securities Trading Policy

As at
Nov 2026

Securities Trading Policy

Introduction

1. The purpose of this Policy is to:

(a) explain the types of conduct when dealing in securities that are prohibited under the Corporations Act 2001 (Cwlth) (Corporations Act). Such prohibitions apply to all directors, key management personnel, employees and contractors of BNK Banking Corporation Limited (the Company) and its related bodies corporate as defined in the Corporations Act (collectively the Group); and

(b) establish a best practice procedure for buying and selling securities that protects the Group and its directors and employees against the misuse of unpublished information which could materially affect the value of securities.

2. The Group aims to achieve the highest possible standards of corporate conduct and governance. The board of directors of the Group (the Board) considers that compliance with this Policy is essential to ensure that the highest standards of conduct are being met by all directors and employees.

3. Any non-compliance with this Policy will be regarded as serious misconduct which may entitle the Group to take corrective disciplinary action.

4. For the purposes of this Policy, Listing Rules means the Listing Rules of ASX Limited.

Attachment 1 describes how the insider trading rules apply and contains definitions of the key terms used in this Policy.

Persons to whom this Policy applies

5. This Policy applies to:

(a) all directors and officers of the Group (including the Chief Executive Officer/Managing Director).

(b) all key management personnel (as such term is defined in Accounting Standard AASB 124 Related Party Disclosure) (Key Management Personnel).

(c) their associates (as defined in the Corporations Act; and

(d) all Group employees including contractors notified that this policy applies to them.

In this Policy, the persons listed above will be collectively referred to as Relevant Persons.

Restrictions on dealing in securities

6. No trading when in possession of inside information.

A Relevant Person must not deal in the Group's securities where:

(a) they are in possession of price sensitive or 'inside' information; or

(b) the Group is in possession of price sensitive or 'inside' information and has notified Relevant Persons that they must not deal in securities (either for a specified period, or until the Group gives further notice).

Attachment 1 sets out further guidance as to what constitutes 'inside' or price sensitive information.

7. Other prohibited dealings

7.1 No short-term trading – buying and selling securities within a 3-month period.

Relevant Persons must not deal in the Group's securities on a short-term trading basis. Short-term trading includes buying and selling securities within a 3-month period, and entering other short-term dealings (for example, forward contracts).

7.2 Closed periods

Relevant Persons must not deal in the Group's securities during the following periods:

(a) the period from the close of trading one week prior to 30 June each year until 10:00am on the next trading day after the announcement to the ASX of the full year results or the annual report.

(b) the period from the close of trading one week prior to 31 December each year until 10:00am on the next trading day after the announcement to the ASX of half- yearly results.

(c) the period from the close of trading one week prior to 31 March and 30 September each year until 10:00am on the next trading day after the announcement to the ASX of the Quarterly Trading update.

(d) any other period that the Board may impose.

7.3 Exceptional circumstances

In exceptional circumstances, the Board (in the case of directors and Key Management Personnel) or Chief Executive Officer/Managing Director (in the case of other Relevant Persons) may waive compliance with the provisions of paragraph 7.1 or 7.2, by giving notice in writing to affected Relevant Persons.

Relevant Persons seeking a waiver under this clause must apply in writing to the Board or Chief Executive Officer/Managing Director (as relevant) setting out the circumstances of the proposed dealing and the reason the waiver is requested.

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Exceptional circumstances for these purposes include severe financial hardship or compulsion by court order.

Unless otherwise specified in the notice, any dealing permitted under this paragraph 7.3 must comply with the other sections of this Policy (to the extent applicable).

8. Permitted dealings

Where paragraphs 6 and 7 do not apply, Relevant Persons may deal in the Company's securities subject to the notification and approval requirements set out below.

8.1 Board of Directors, CEO, ELT and Relevant Persons

(a) Advance notification is required ahead of any dealings with completion of the relevant Authorisation Form (see Attachment 2).

(b) Trading by a Director other than the Chairperson needs to be authorised by the Chairperson or in their absence one other director and the CEO.

(c) Trading by the Chairperson needs to be authorised by one other director and the CEO or by two other directors.

(d) Trading by the CEO needs to be authorised by the Chairperson or in their absence two other directors.

(e) Trading by the CFO needs to be authorised by the CEO.

(f) Trading by any member of the ELT excluding the CEO and CFO needs to be authorised by the CEO and the CFO.

(g) Trading by all other Relevant Persons needs to be authorised by an ELT member and the CFO, or in the CFO's absence, an ELT member and the CEO.

8.2 Approval

(a) It is intended that a request for approval to trade will be answered within 2 business days.

(b) No approval is required in connection with participation in any dividend reinvestment plan operated by the Company and other corporate actions open to all shareholders in the relevant class, although the insider trading prohibition under paragraph 6 will still apply (see also Attachment 1).

(c) On provision of notification or receipt of approval, Relevant Persons may undertake the proposed dealing.

(d) Relevant Persons must notify the Company Secretary of the approval to trade and provide any information reasonably requested by the Company Secretary to enable the Company's internal records and registers to be updated and any required disclosures to be made.

9. Margin lending arrangements

Margin Lending arrangements are not permitted for relevant Persons.

BNK will not provide loans to employees (or other parties) to finance the purchase of BNK shares.

10. Employee, executive and director share plans

Relevant Persons are not required to seek consent or provide notification in connection with participating in an employee share plan operated by the Company (e.g. applying for an allocation of securities under an employee share offer or exercising vested rights or options under an employee share plan). However, such dealings are still subject to paragraph 6, 7 & 8 of this Policy where applicable. Where securities in the Company granted under an employee share plan cease to be held under the terms of that plan, any dealings in those securities must only occur in accordance with this Policy (including paragraph 8).

11. Hedging of company securities

Hedging includes entering into transactions in financial products that operate to limit the economic risk associated with holding Company securities.

Hedging of Company securities by a Relevant Person is not permitted.

12. Short Selling of Securities

Short selling of Securities of the Company by a Relevant Person is not permitted.

13. Compliance with Financial Sector (Shareholdings) Act 1998 (FSSA)

Relevant Persons must ensure that in complying with this policy, at all times they must comply with the provisions of the FSSA and must inform the Chairman immediately if any breach has occurred.

14. Exclusions

Paragraphs 7 and 8 of this policy do not apply to certain passive trades, including:

(a) transfers of securities already held into a superannuation fund or other saving scheme which the Relevant Person is a beneficiary.

(b) trading under an offer or invitation made to all or most security holders, such as a rights issue, share purchase plan or dividend reinvestment plan.

(c) undertakings to accept, or the acceptance of, takeover offers.

(d) trading under a pre-approved non-discretionary trading plan; and

(e) margin calls.

Securities in other companies

15. While in general employees are free to deal in securities in other listed companies, the prohibited conduct under the Corporations Act includes dealings not only in the Company's securities but also in those of other listed companies with which the Company may be dealing (including the Group's customers, contractors or business partners) where an employee possesses 'inside information' in relation to that other company.

16. If a Relevant Person is aware of information that is not generally available but which, if it were generally available, a reasonable person would expect to have a material effect on the price or value of a security, the Relevant Person should not deal in the securities of the companies that it affects.

17. Relevant Persons may come into possession of 'inside information' where they are directly involved in client relationship management or negotiating contracts. For example, where the Relevant Person is aware that the Group is about to sign a major agreement with another company, the Relevant Person should not buy securities in either the Company or the other company.

Who to contact

18. Any employee who has queries about this Policy should contact the Company Secretary, Chief Financial Officer or Chief Risk Officer.

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Summary – Standard Closed Periods

Standard Closed Trading Periods			
Event	**Reporting Date**	**Closure Commences**	**Closure Concludes**
Quarter 1 Trading Update	30th September	1 week prior to Reporting Date	10am Day AFTER ASX announcement
Half Year Financial Report	31st December	1 week prior to Reporting Date	10am Day AFTER ASX announcement
Quarter 3 Trading Update	31st March	1 week prior to Reporting Date	10am Day AFTER ASX announcement
Full Year Financial Report	30th June	1 week prior to Reporting Date	10am Day AFTER ASX announcement

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ATTACHMENT 1:

How the insider trading rules apply

1. Summary of prohibited conduct

The Corporations Act prohibits 'insider trading'. Under the Corporations Act, a person is prohibited from dealing in securities where:

(a) the person possesses information which is not generally available to the public;

(b) that information may have a material effect on the price of securities of the relevant entity; and

(c) the person knows 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 of securities.

Additionally, a person with inside information must not procure another person to deal in the Company's securities or communicate the information (directly or indirectly) to another person whom the person believes may deal (or procure someone else to deal) in the Company's securities.

The key concepts are discussed in more detail in paragraph 2 of this Attachment 1.

2. Relevant terms

2.1 Securities

The definition of securities in the Corporations Act is very broad. Securities include:

(a) ordinary shares.

(b) preference shares.

(c) options.

(d) debentures; and

(e) convertible notes.

It also extends to financial products relating to securities issued by the Company (for example, warrants and other derivative products), whether or not the financial products are created by the Company or by third parties.

2.2 Dealing in securities

Dealing in securities is a broad concept and covers more than simply buying or selling securities. It extends to exercising options over securities and entering agreements to buy or sell securities.

Under this Policy and the law, the prohibition on dealing means that Relevant Persons are not permitted to:

(a) buy or sell; or

(b) enter into an agreement to subscribe for, buy or sell securities, where they possess information that is not generally available and which a reasonable person would expect to have a material effect on the price or value of those securities.

If a Relevant Person possesses price sensitive information that is not generally available, the Relevant Person is also prohibited from:

(c) procuring any other person to deal in those securities; or

(d) directly or indirectly communicating the information to another person whom the Relevant Person believes is likely to deal in, or procure another person to deal in, those securities.

Procuring means enticing, encouraging, persuading, causing or securing another person to do or not to do something.

Procuring also includes inciting, inducing or encouraging an act or omission. For example, a Relevant Person cannot ask or encourage anyone, including family members, friends, associates or others, to deal in securities when the Relevant Person possesses price sensitive information, and Relevant Persons should not communicate price sensitive information.

If a Relevant Person accidentally gives somebody 'inside information' when he or she should not have, the Relevant Person must immediately tell that person that it is 'inside information' and warn them against trading in the Company's securities, getting others to trade in the Company's securities, or communicating the information to others.

2.3 Price sensitive or 'Inside' Information

Information is 'inside' or 'price sensitive' if it is not generally available, but which, if it were generally available, a reasonable person would expect to have a material effect (upwards or downwards) on the price or value of a security. For the purposes of the insider trading provisions of the Corporations Act, information is defined broadly and includes matters of supposition and other matters which are insufficiently definite to warrant being made known to the public. It also includes matters relating to the intentions of a person.

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2.4 Information that is generally available

Information is 'generally available' if it:

(a) consists of readily observable matter;

(b) 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 the Company and since it was made known, a reasonable period for it to be disseminated among those persons has elapsed. That is, information will be 'generally available' if it has been released to ASX or published in an annual report or prospectus or similar document and a reasonable period of

time has elapsed after the information has been disseminated in one of these ways; or

(c) consists of deductions, conclusions or inferences made or drawn from information referred to in paragraph 2.4(a) of this Attachment 1 or information made known as mentioned in paragraph 2.4(b) of this Attachment 1, or both.

2.5 Material effect on the price of securities

Under the Corporations Act, information is likely to have a material effect on the price or value of securities of a company if the information would, or would be likely to, influence persons who commonly invest in securities in deciding whether or not to subscribe for, buy or sell those securities.

It is not possible to list all information that may be material. However, the following types of information would be likely to be considered to have a material effect on the price of the Company's securities:

- sales figures.
- profit forecasts.
- unpublished announcements or knowledge of possible regulatory investigation.
- liquidity and cashflow.
- proposed changes in the Company's capital structure, including issues of securities, rights issues and buybacks.
- borrowings.
- major asset purchases and sales.
- impending mergers, acquisitions, reconstructions, takeovers.
- significant litigation.
- significant changes in operations.
- significant changes in industry.
- new products/services and technology.
- proposed dividends.
- management restructuring or Board changes.
- new contracts or customers.

3. Consequences of breach

Breaches of the insider trading laws have serious consequences for both the Relevant Person concerned and the Company. A person who commits a breach of the insider trading provisions could be subject to criminal liability (substantial fines or imprisonment or both may be imposed) or civil liability (substantial fines may be imposed) under Australian law. A person who contravenes or is involved in a contravention of these provisions may also be liable to compensate any person who suffers loss or damage resulting from the conduct. In addition, an actual or suspected breach of the insider trading laws may also give rise to adverse public scrutiny and media comments.

It is therefore important that Relevant Persons adhere to this Policy at all times.

Any person who is suspected of breaching this Policy may be suspended from attending the workplace on full pay pending the outcome of investigations into the alleged breach.

Any person who is proven to have breached this Policy could face disciplinary action (including forfeiture of securities and/or suspension or termination of employment).

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ATTACHMENT 2: (Example form) Actual form to be obtained from Company Secretary

SHARE TRADE REQUEST & PRE-AUTHORISATION

Name	
Date	

Registered Holder of Shares
(account name in whom shares will be or are held)

1 _____
2 _____
3 _____

Buy	**Sell**

(circle transaction type)

Proposed # of shares
(estimate if exact price uncertain)

I confirm I am not aware of any inside information as defined under the Corporations Act and that I have read and understood the Securities Trading Policy

Signed	

Approval

Signed

Name
Date