

Dealing in Securities Policy

Directors, employees and contractors of Atlantic Gold (the Company) are encouraged to become shareholders. However, there are severe penalties for dealing in securities on the basis of inside information.

In addition the Listing Rules of the Australian Securities Exchange (ASX) require the company to advise any changes in the notifiable interest of a director in the Company.

This document summarises the law relating to insider trading and sets out Atlantic Gold's policy on directors and staff buying or selling securities of the Company.

Who this policy applies to

This policy applies to all Directors of Atlantic Gold and those employees and contractors who have been notified that this policy applies to them. This policy also applies to associates, which for this policy includes:

- any family member;
- any company in which such person has a substantial shareholding;
- any private trust of which such person is a beneficiary; or
- any person or company with whom the person has an arrangement which would entitle the person to control, or influence substantially, the exercise of any voting power of shares in any of the relevant companies.

Disclosure of directors' interests

The Company must tell the ASX the notifiable interests of a director on the date the director is appointed and the date that the director ceases to be a director, as well as any change to the notifiable interests of a director.

Each director will be required to undertake in writing to disclose to the Company all the information required to enable it to comply with the ASX Listing Rules relating to notifiable interests.

Insider trading

Any person who possesses inside information is prohibited by the *Corporations Act 2001* from using that information to deal in securities, either for personal gain or for the gain of any other person.

Inside information is information that is not generally available but, if the information were generally available, a reasonable person would expect to have a material effect on either the price or value of the applicable securities.

Breach of insider trading laws may subject a person or organisation to:

- Criminal liability for which penalties include heavy fines and imprisonment; and/or
- civil liability for any loss suffered by another party as a result of illegal trading practices.

Blackout periods

This policy prohibits the dealing in any security of Atlantic Gold during prohibited periods which include:

- the periods commencing 31 December, 30 June, 31 March and 30 September and ending 24 hours after the receipt by the Australian Securities Exchange (ASX) of the Company financial report for the relevant year, half year or quarter; and
- such other periods as may be determined by the Directors when considering matters which are subject to Listing Rule 3.1A, and advised to Directors and those employees and contractors who are included in this policy.

Dealing in Atlantic Gold securities is also prohibited while in the possession of inside information.

This policy does not apply to dealing in the securities of Atlantic Gold as a result of participation in an offer to all shareholders such as a share purchase plan, rights issue or takeover plan approved by the Directors.

Clearance to deal in securities

Directors who wish to trade in Atlantic Gold securities must obtain clearance from the Chairman and chief executive officer (CEO) by making a written request at least 5 business days prior to the proposed date of trade and confirm that the trading has occurred within 2 business days after the date of trade.

The Chairman must obtain clearance from the full Board by making a written request at least 5 business days prior to the proposed date of trade to the Company Secretary or CEO and confirm that the trading has occurred within 2 business days after the date of trade.

Employees or contractors to whom this policy applies and who wish to trade in Company securities must obtain clearance from the Company Secretary or CEO by making a written request at least 5 business days prior to the proposed date of trade and confirm that the trading has occurred within 2 business days after the date of trade.

Clearance to deal in securities during a prohibited period may be granted in exceptional circumstances which include severe financial hardship, in compliance with a court order or a transfer to a related party.