

# Gamma Group Share Dealing Policy

Gamma Communications plc (“Gamma”)

## Introduction

Gamma is a public company which has been admitted to trading on the AIM market of the London Stock Exchange. As such it is subject to stock exchange regulations.

All citizens are subject to the insider trading laws in their jurisdiction, for instance the Market Abuse Regulation (MAR) in both the UK and EU; and at times certain employees may have access to inside information.

As this policy is based on a legal template some of the structure differs from our other public facing policy.

## Aims and Goals

This policy has been designed to ensure that you do not misuse, or place yourself under suspicion of misusing, information about the Group which you have, and which is not public.

## Scope

This policy applies to all directors and employees of Gamma Communications plc (the Company) and its subsidiaries.

## Policy statements

1. You must not **deal** in any **securities** of the **Group** if you are in possession of **inside information** about the **Group**. You must also not recommend or encourage someone else to deal in the **Group’s securities** at that time – even if you will not profit from such **dealing**.
2. You must not disclose any confidential information about the **Group** (including any **inside information**) except where you are required to do so as part of your employment or duties. This means that you should not share the **Group’s** confidential information with family, friends or business acquaintances.
3. You may, from time to time, be given access to **inside information** about another group of companies (for example, one of the **Group’s customers** or suppliers). You must not **deal** in the **securities** of that group of companies at those times.
4. The Group operates a Dealing Code which applies to the **Company’s directors** and to employees who are able to access restricted information about the **Group** (for example, employees who are involved in the preparation of the **Group’s** financial reports and those working on other sensitive matters). You will be told if you are required to comply with the Dealing Code. Directors and employees who are required to comply with the Dealing Code must also comply with this policy.
5. Failure to comply with this policy may result in internal disciplinary action. It may also mean that you have committed a civil and/or criminal offence.

## Roles and Responsibilities

- The Company Secretary is responsible for the management of the Dealing Code.

- Those who receive inside information are responsible for ensuring they adopt the behaviours in this policy. If you have any questions about this policy, or if you are not sure whether you can **deal** in securities at any particular time, please contact the Company Secretary.
- Employees who have access to inside information, either directly or through inference, are required to comply with the Gamma Dealing Code.

## Governance and Reporting

Under MAR, the Company Secretary is required to maintain lists of the names and personal details of anyone who has access to, or may have access to, actual or potential inside information or potential inside information in advance of the publication of financial results (the "Restricted list" or "Project lists"). Information contained in these lists must be kept up to date and provided to the Financial Conduct Authority on request.

## Adoption

Failure to adopt the behaviours outlined in this policy may result in disciplinary action. It may also mean that you have committed a civil and/or criminal offence.

If you have any questions about this policy, or if you are not sure whether you can deal in securities at any time, please contact the Company Secretary.

## Glossary

Term / Abbreviation	Description
Deal / Dealing	Deal and dealing covers any type of transaction in a company's securities, including purchases, sales, the exercise of options and using securities as collateral for a loan.
Group	Group means the Company and its subsidiaries
Inside information	Inside information is information about a company or its securities which is not publicly available, which is likely to have a non-trivial effect on the price of such securities and which an investor would be likely to use as part of the basis of his or her investment decision
Securities	Securities are any publicly traded or quoted shares or debt instruments, and any linked derivatives or financial instruments. This would include shares, depositary receipts, options, and bonds

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