

ALIEN METALS LTD

SHARE DEALING POLICY AND PROCEDURE

Introduction

The Company is required to have in place a code of conduct for dealing in its securities. In normal circumstances, following this procedure will protect you against accusations of insider dealing or market abuse.

It is a criminal offence in the UK to deal in a company's securities when you are in possession of **Inside Information**: information of a precise nature which is not generally available, and which would, if generally available, be likely to have a significant effect on the price of a company's shares (or other qualifying investments).

Failure to comply with this policy may be deemed gross misconduct, could lead to your dismissal and in some cases could constitute a criminal offence.

Who does this policy and procedure apply to?

All directors and employees of the Company are required to comply with this policy and procedure. Each director or **PDMM** (being any senior executive who has regular access to Inside Information relating directly or indirectly to the Company and power to take managerial decisions affecting its future developments and business prospects) must ensure their Closely Associated Persons (**CAPs**) which is essentially the new term for connected persons, understand the rules and are periodically reminded of them.

Your CAPs will, broadly-speaking, include:

- Your spouse or civil partner, and any children you are responsible for, under the age of 18
- Blood relatives you currently live with, and who you have lived with for at least one year
- Any company in which you, or one of your other connected persons, have an interest in at least 20% of (whether by shares or control);
- A trustee of a trust of which you or any of your connected persons is a beneficiary
- Any entity you have significant influence or control over

If you are uncertain about who is deemed a CAP, please contact the Company Secretary.

What are the rules?

No-one to whom this policy and procedure applies may deal in the securities of the Company whilst they are in possession of Inside Information or ordinarily, in a **close period**, being the 30 days prior to the publication of year-end financial results and the 30 days prior to the publication of any interim financial results.

Each director and PDMM must take reasonable steps to prevent any dealings by or on behalf of each of their CAPs in any securities of the Company on considerations of a short term nature (typically considered to mean a period less than one year).

You and your CAPs (if any) must have prior permission to deal in the Company's securities, debt instruments or any derivative financial instruments of any of them, and must have conducted the dealing and notified the Company of each transaction within two business days of permission being granted. You must also notify the Company within the same timeframe if you did not act on any consent granted.

You or your CAP (as applicable) must also notify the Financial Conduct Authority no later than three days of the transaction taking place.

The Company will announce all transactions by directors, PDMRs and CAPs as soon as possible following notification and in any case, no later than the third business day of the transaction having occurred.

If Inside Information exists within the Company or if the Company is in a Close Period, you will ordinarily be declined permission to deal notwithstanding any exemptions permissible under the AIM Rules or Market Abuse Regulation.

What is the procedure?

1. Request clearance to deal from the person stated below (see the Request for Clearance to Deal form set out in Appendix A):

Dealing by	Clearance to be obtained from
Chairman	CEO or in his absence, the Company Secretary
Chief Executive	Chairman or in his absence, the Company Secretary
Company Secretary	Chairman or CEO
Other directors/employees	Company Secretary or in his absence, the CEO or Chairman

2. Clearance application considered and given or denied as soon as practicable, and in any event, no later than within five business days
3. If clearance is given, dealing and details of the transaction must be provided to the Company (to the Company Secretary, or in his absence, the Chairman or Chief Executive), within two business days. If you do not complete the transaction, you must still notify the Company within two business days. See appendix B for a dealing notification form.
4. Directors, PDMRs and CAPs must notify the FCA with three days of the date of the transaction using the designated form which should be available to download from the FCA website at: <http://www.fca.org.uk/static/documents/forms/pdmr-notification-form.pdf>. If it is unavailable or you are in any doubt about how to complete it, please consult the Company Secretary or in his absence, the Chairman or Chief Executive, who may put you in contact with the Company's Nominated Advisor.
5. In the case of directors, PDMRS, and their CAPs, each transaction will be announced to the stock market as soon as possible upon receipt of notice.

APPENDIX A
REQUEST FOR CONSENT TO DEAL IN THE SECURITIES OF ALIEN METALS LTD

Name	
Job Title	

I request authority to carry out the transaction(s) as set out below:

Nature of transaction (e.g. buy/sell/exercise option)	Number of securities	Capacity (e.g. on behalf of self, spouse, child etc.)

I hereby confirm that to my best knowledge and belief I am not in possession of any Inside Information which may affect the decision as to whether the dealing should be permitted or not.

I hereby confirm that I will keep this application for clearance and the fact I have made it, confidential.

I hereby confirm that once I receive clearance, I understand my dealing must be completed within two business days (excluding the date of authorisation) and that I understand it must in no circumstances be undertaken in a close period.

Signature	
Date	

Authorisation to deal (to be completed by authoriser)

Date of Authorisation	
Signature	
Name of Authoriser	
Position of Authoriser	

**APPENDIX B
DEALING NOTIFICATION FORM**

Name	
Job Title	

Date of transaction	Nature of transaction (e.g. buy/sell/exercise option)	Number of securities	Currency	Price per security	Capacity (e.g. on behalf of self, spouse, child etc.)

Signature	
Date	