

Anchor Resources Limited
Securities Trading Policy and Guidelines
30 December 2010



<p>INTRODUCTION & PURPOSE</p>	<p>The purpose of this Policy is to:</p> <ol style="list-style-type: none"> a. provide a brief summary of the law on insider trading, and other relevant laws; b. set out the restrictions on dealing in securities by people who work for, or are associated with, Anchor Resources Limited ('Anchor'); and c. assist in maintaining market confidence in the integrity of dealings with Anchor securities. <p>If you do not understand any part of this policy or the summary of the law, or how it applies to you, you should raise the matter with the Company Secretary or the Managing Director before dealing with any Anchor securities.</p>
<p>POLICY STATEMENT</p>	<p>Whenever you have inside information which may affect the value of securities, you must not:</p> <ol style="list-style-type: none"> a. deal in those securities; or b. communicate the information to anyone else. <p>This prohibition applies regardless of how you learned the inside information. It applies not only to Anchor securities, but also securities of other companies.</p> <p>"Inside Information", "Securities" and "Dealing" are defined below.</p>
<p>PERSONS COVERED BY THIS POLICY</p>	<p>This policy applies to all:</p> <ol style="list-style-type: none"> a. executive and non-executive Directors; b. full-time, part-time and casual employees; c. contractors, consultants and advisors; d. all option holders (where options were issued under the Company's Employee Share Option Plan). <p>of Anchor and its associated companies (the 'AHR Group').</p> <p>The restrictions on dealings by an employee or Director are equally applicable to any dealings by:</p> <ol style="list-style-type: none"> a. their spouses or de facto spouses; and/or b. on behalf of any dependent under 18 years of age; and c. any other dealing in which, for the purposes of the Corporations Act, the Director or employee is to be treated as interested. (For example, if an employee or Director is a trustee of a trust and is also a beneficiary of the trust, the employee or Director must not purchase or procure the purchase of Anchor securities on behalf of the trust).
<p>SECURITIES COVERED BY THIS POLICY</p>	<p>This policy applies to the following securities:</p> <ol style="list-style-type: none"> a. Anchor shares;

Anchor Resources Limited
Securities Trading Policy and Guidelines
30 December 2010



	<ul style="list-style-type: none"> b. any other securities which may be issued by Anchor, such as options; c. derivatives (such as exchange traded options and warrants) and other financial products issued by third parties in relation to Anchor shares, debentures and options; and d. securities of any other company or entity that may be affected by inside information (such as another party involved in a joint venture or corporate transaction with the AHR Group or an Anchor contractor or shareholder).
<p>WHAT IS DEALING (for the purposes of this policy)?</p>	<p>Dealing in securities includes:</p> <ul style="list-style-type: none"> a. trading in securities (i.e. subscribing for, buying, selling or entering into an agreement to do any of those transactions); and b. advising, procuring or encouraging any other person (including a family member, friend, associate, colleague, broker, financial planner, investment advisor, family company or trust) to trade in securities.
<p>DEFINITION OF INSIDER TRADING</p>	<p>Insider trading is committed if you:</p> <ul style="list-style-type: none"> a. deal in Anchor securities or securities of another entity while you have inside information; or b. advise or procure another person to trade in the Company's securities; or c. communicate inside information to anyone else – including colleagues, family or friends – knowing (or where you should have reasonably known) that the other person will use that information to trade in, or procure someone else to deal in, securities. <p>This offence called “insider trading” can subject you to criminal liability including large fines and/or imprisonment, and civil liability, which may include being sued by another party or Anchor, for any loss suffered as a result of illegal trading.</p>
<p>WHAT IS INSIDE INFORMATION (for the purposes of this policy)?</p>	<p>Inside information is information that:</p> <ul style="list-style-type: none"> a. is not generally available; and b. if it were generally available, it would – or would be likely to – influence investors in deciding whether to buy or sell the Company's securities. <p>It does not matter how you come to know the inside information (including whether you learn it in the course of carrying out your responsibilities or in passing in the corridor or in a lift or at a dinner party).</p> <p>The financial impact of the information is important, but strategic</p>

Anchor Resources Limited
Securities Trading Policy and Guidelines
30 December 2010



	and other implications can be equally important in determining whether information is inside information. The definition of information is broad enough to include rumours, matters of supposition, intentions of a person (including Anchor) and information which is insufficiently definite to warrant disclosure to the public.
WHAT ARE SOME EXAMPLES OF INSIDE INFORMATION?	<p>The following list is illustrative only. Inside information could include:</p> <ul style="list-style-type: none"> • the financial performance of the AHR Group against its budget; • a possible change in the strategic direction of the AHR Group; • a possible acquisition or sale of any assets or company by the AHR Group; • a possible change in the Company's capital structure; • a proposed dividend; • senior management changes; or • any possible claim against the AHR Group or other unexpected liability.
SECURITIES OF OTHER COMPANIES	<p>In the course of your duties as an employee, Director, advisor, consultant or contractor of Anchor or the AHR Group, you may obtain inside information in relation to another company. For example:</p> <ul style="list-style-type: none"> • in the course of negotiating a transaction with Anchor, another company might provide confidential information about itself. • in the course of negotiating a transaction with Anchor, another company might provide confidential information about a third party; or • information concerning a proposed transaction or other action by Anchor might have a material affect on a third party. <p>The prohibition on insider trading applies not only to information concerning Anchor securities. If a person has inside information in relation to securities of another company, that person must not deal in those securities.</p>
ADDITIONAL TRADING RESTRICTIONS (applying to "Restricted Persons")	<p>Additional restrictions on trading the Company's securities applies to the following people in the AHR Group ("Restricted Persons"):</p> <ol style="list-style-type: none"> a. executive and non-executive Directors; b. full-time, part-time and casual employees; c. contractors, consultants and advisors; d. all option holders (where options were issued under the Company's Employee Share Option Plan).
REASONS FOR THE ADDITIONAL TRADING	Restricted Persons are in positions where it may be assumed that they have inside information (even if they have no actual inside

Anchor Resources Limited
Securities Trading Policy and Guidelines
30 December 2010



<p>RESTRICTIONS</p>	<p>information at the time).</p> <p>This policy is designed to avoid the possibility of misconceptions or misunderstanding arising.</p>
<p>WHEN IS TRADING BY RESTRICTED PERSONS PERMITTED?</p>	<p>Subject to the terms and rules attaching to Anchor employee share option plans, you can deal in Anchor at any time:</p> <ul style="list-style-type: none"> a. other than during a prescribed “closed period”; b. provided you do not have inside information; and c. provided you are not involved in short term speculative dealing. <p>Restricted Persons are only permitted to trade the Company’s securities during any other period if they have complied with the notification requirements (before and after trading) as set out below.</p>
<p>WHAT ARE THE “CLOSED PERIODS”?</p>	<p>Restricted Persons are not permitted to deal in Anchor securities during the following “closed periods”.</p> <ul style="list-style-type: none"> a. one month immediately prior to release of Anchor’ half yearly results until the close of business on the second working day after its release; b. 14 days immediately prior to the release of each Anchor quarterly activities report until the close of business on the second working day after its release. (In the case of the quarter ending on the last day of Anchor’s financial year, the closed period ceases on the close of business on the second working day after which Anchor releases its annual financial results; c. 14 days immediately prior to Anchor Annual General Meeting; and d. any other period determined by the directors to be a closed period. <p>Notice of commencement and closure of the blackout periods can be confirmed with the Company Secretary.</p> <p>A “closed period” may be extended or shortened at any time by direction of the Managing Director or Chairman. Notices of such changes will be specified to Restricted Persons by email, and become effective immediately.</p>
<p>REQUIREMENTS BEFORE TRADING</p>	<p>Before trading in the Company’s securities Restricted Persons must:</p> <ul style="list-style-type: none"> a. notify the Chairman (or in his absence the Managing Director) of their intention to trade in securities; b. confirm that they do not hold inside information; and c. confirm that there is no known reason to preclude the trading in the Company’s securities. <p>The notification requirement is only valid for the period of its</p>

Anchor Resources Limited
Securities Trading Policy and Guidelines
30 December 2010



	operation, being the date of notification until the earlier of 10 business days after notification, the start of a closed period, or the date the person becomes aware of inside information.
REQUIREMENTS AFTER TRADING	Once a Restricted person has completed a trade in the Company's securities, the Chairman and Company Secretary must be: <ul style="list-style-type: none"> a. advised that the trade has been completed; b. in the case of Directors of the Company, provided with sufficient information to enable the Company to comply with the requirements to notify a change of interests to the ASX. (Please refer to standard notification template – "Director's Declaration of Securities Trading" – attached to this policy).
CLOSED PERIOD TRADING REQUESTS	Restricted Persons are prohibited from trading in the Company's securities during the closed periods, however if a legitimate requirement arises to sell securities or to exercise options, then exceptions may be considered at the discretion of the Chairman. Any such request must include written confirmation by the Director or employee that he or she does not hold any inside information. In the case of the Chairman, any notification required must be made to the Board through the Company Secretary.
DO I HAVE ANY OTHER OBLIGATIONS TO ANCHOR?	In addition to the above, you also have a duty of confidentiality to the Company. You must not reveal any confidential information concerning the Company, use that information in any way which may injure or cause loss to the Company, or use that confidential information to gain an advantage for yourself.
BREACHES OF POLICY	Strict compliance with this policy is a condition of employment. Breaches of this policy will be subject to disciplinary action, which may include termination of employment.
APPLICATION OF POLICY	To the extent of any inconsistency with any previous policy or rules relating to this subject matter, this policy prevails over them.