

Summary of Staff Trading Policy

1. Introduction

Challenger Financial Services Group Limited ('Challenger') is a listed company operating within the financial services sector. Challenger has developed a Staff Trading Policy ('STP') that establishes principles and procedures governing personal trading. Personal trading is to be conducted lawfully and in a manner that avoids insider trading and appropriately manages any conflict of interest.

2. Application of the Policy

Challenger's STP applies to all Challenger Group directors, officers and employees ('Staff'). It sets out Challenger's policy in respect of personal trading in the shares of Challenger and its associated listed entities ('Challenger shares'), as well as personal trading in securities generally.

3. Staff Trading in Challenger Shares

There are blackout periods during the year, in the lead up to half and full year financial reporting, during which Staff are not permitted to trade in Challenger shares. At other times, Staff may apply for approval to trade Challenger shares. Group Company Secretary notifies Staff of blackout periods. The Board of Challenger reserves the right to vary the timing of and impose additional blackout periods.

Challenger Staff must not trade in Challenger Shares for short term gain.

Challenger prohibits margin lending over Challenger Securities other than as approved by the Group Board.

Staff are prohibited from holding net short positions in Challenger shares.

Challenger shares may be granted to Staff as part of their remuneration. These grants are subject to the satisfaction of various time and or performance hurdles to ensure alignment of Staff rewards with Challenger objectives and performance. Challenger prohibits Staff from using derivatives in respect of unvested Challenger shares.

Staff are permitted, within limited circumstances, to use derivatives in relation to vested Challenger shares provided their use is lawful and complies with the specific trading rules within the STP.

4. Dealings in Securities Generally

The STP also sets out procedures for personal trading in securities where the issuer is not a member of the Challenger Group. Pre approval is required for Staff who by virtue of their role have access or may be able to access information about Challenger's trading or intended trading positions.

5. Exceptional Circumstances

The STP sets out the process for dealing with exceptional circumstances such as when a trade would otherwise be in breach of the STP however the staff member believes the trade should be approved taking account of the specific circumstances.