



Share Dealing Summary Policy

11 January 2024

Document Title:	Share Dealing Summary Policy
Description:	Summary of internal policy setting out Accsys' approach to share dealing
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1. Policy Statement

- 1.1 It is the policy of Accsys Technologies PLC ("the Company") and all of its subsidiary companies (together, the "Group") to conduct all its business in an honest and ethical manner. As the Company's shares are listed on LSE AIM and NYSE Euronext, the Group and its employees are subject to various securities law requirements, including the Market Abuse Regulation ("MAR").
- 1.2 Accsys operates a Share Dealing Policy ("the Share Dealing Policy" or "the policy"). This Share Dealing Summary Policy ("the Share Dealing Summary") is a summary of the key provisions of that policy.

2. Who is Covered by the Policy?

- 2.1 The Share Dealing Policy applies to directors, other persons discharging managerial responsibilities and employees with access to inside information (all are referred to as a "Restricted Person"). Restricted Persons will be notified by the Company Secretary when they are deemed to be an insider and will be required from that point to comply with the policy.
- 2.2 The policy also applies to persons closely associated ("PCA") with a person discharging managerial responsibilities. The policy sets out who will fall within the category of PCA.

3. What Is Insider Dealing?

- 3.1 Insider dealing is where an individual trades company shares on the basis of information about the Company that is not available in the public domain.
- 3.2 Inside information means information of a precise nature, which has not been made public, relating directly or indirectly, to the Company or any publicly traded or quoted shares or debt instruments of the Company, and which, if it were made public would be likely to have a significant effect on the price of the Company's shares.

4. When can Restricted Persons deal in Company shares?

- 4.1 A Restricted Person may only deal in Company shares when they have obtained clearance to deal. The policy sets out how a Restricted Person may apply for this, requirements associated with obtaining clearance and when it may be refused.

5. What is a Restricted Person's obligation in relation to PCAs or investment managers?

- 5.1 A Restricted Person must seek to prohibit dealing in Company shares by their PCAs or investment managers during a Closed Period (defined in the policy) and must ensure that, among other obligations set out in the policy, they inform the Company of their PCAs and that they keep the Company updated as the list changes.

6. Consequences of Non-Compliance

- 6.1 Failure by any Restricted Person to observe the requirements of the policy (and its underlying legal and regulatory requirements) may result in disciplinary action, which could include termination of employment/engagement with the Group. It could also constitute a civil and/or criminal offence.

7. Responsibility for the Success of the Policy

- 7.1 The Board of Directors, Company Secretary and any Restricted Persons are responsible for their compliance with the policy.
- 7.2 The Group's Senior Leadership Team is ultimately responsible for ensuring the policy is communicated to all relevant employees.