

AtCor Medical Holdings Limited Share Trading Policy

Updated - 24 September 2009

Policy

Shares in AtCor Medical Holdings Limited (AtCor) shall only be traded within the following three windows during the year. Exceptions may be granted by the Board by application to the Remuneration Committee, who will make their recommendation to the full Board for approval.

Trading windows

- 30 days following the release to Australian Stock Exchange (ASX) of half year financial results;
- 30 days following the release to ASX of full year financial results; and
- 30 days following the Annual General Meeting (AGM).

In the event that information becomes known to personnel covered by this policy during these windows, which is not in the public domain and would be reasonably expected to affect the value of AtCor or shares, then the trading window will close until such time as the information is released to the public.

Who is covered

The following personnel are subject to this policy:

- Directors;
- Key Management Personnel (as defined by Corporations Act 2001 and appropriate accounting standards);
- Other managers and staff that may reasonably be expected to have access to information that has the potential to influence the company value or share price.

Other Restrictions

Directors and other personnel are not to trade in financial instruments against AtCor shares including, but not limited to:

- Margin loans;
- Listed put or call options or equivalent;
- Stop-loss contracts.

Procedure for trading

Personnel covered by this policy should advise the Company Secretary of their intention to trade securities. This will allow the Company Secretary the opportunity to assess whether the trading window is still open.

Directors must also advise the Company Secretary of actual trades within 5 business days of the trade being concluded so appropriate notifications can be made to ASX (via Appendix 3X, 3Y & 3Z).