

- Majedie has employed a gatekeeper methodology for the receipt of inside information, or potentially inside information, including market soundings.
Inside information may only be conveyed to Majedie if it is being carried out in the normal course of employment, profession or duties in compliance with the Market Abuse Regulation.
- A market sounding is defined as a communication of information, before the announcement of a transaction, aiming to gauge the interest of potential investors in a transaction.
- A Majedie employee is wall crossed when a broker, counterparty, company, or other entity (discloser) provides them with information regarding a transaction or other event that includes inside information or otherwise meets the market sounding definition.
- The Majedie compliance team is the established central point of contact to receive, analyse and process information that meets the definition above.
- All brokers and counterparties must contact the Majedie compliance team when they wish to wall cross a Majedie employee. Majedie expects the disclosing market participant to contact Majedie once any inside information conveyed to us ceases to be inside information.
- Brokers and counterparties should not engage directly with any other Majedie employees leading to them being wall crossed, until they have received permission from the Majedie compliance team.

The compliance team can be contacted at: compliance@majedie.com
or by phone on: 020 7618 3953

Majedie may record the telephone lines of individuals who are likely to receive inside information.

For a market sounding, the following information should be disclosed to the compliance team:

Security name & identifier:
Sector:
Proposed transaction:
Value/price:
Discloser – mandated or not:
Discloser – firm/broker:
Discloser – contact name:
Length of time of restriction:

Queries should be directed to the Majedie compliance team.