



Attn: Announcements Office
Australian Securities Exchange
Level 45, South Tower Rialto
525 Collins Street,
Melbourne 3000

23 December 2010

Dear Sir/Madam,

Re: Globe International Limited (“Globe”) Share Trading Policy

In accordance with ASX listing rule 12.9, attached is a copy of Globe’s Share Trading Policy.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Gerhard Correa", written over a horizontal line.

Gerhard Correa
Company Secretary

Globe International Limited

1 Fennell Street, Port Melbourne 3207, Australia

Tel: 61 3 8534 9999 Fax: 61 3 8534 9955

A C N 007 066 033



**GLOBE INTERNATIONAL LIMITED (“GLOBE”)
SHARE TRADING RULES (“RULES”)**

Restrictions on trading and closed periods

Globe directors and senior management including all key management personnel, (CEO, CFO, Presidents, Vice Presidents, Company Secretary and anyone else nominated by the board or CEO for this purpose) and their associates are prohibited from :

- (a) buying Globe securities in the 2 months prior to the half year and full year results announcements;
- (b) selling Globe securities at any time other than in the 30 days following each of the half year and full year results announcements and the annual general meeting. Anyone proposing to sell shares around the time when a price sensitive announcement is anticipated (e.g. a financial result or forecast announcement) should take care not to sell before, or on the day of, the announcement. The insider trading law requires that a reasonable time must elapse between the making of an announcement and any trading to allow the market time to adjust for the announcement; and
- (c) buying or selling Globe securities at any time when they are in possession of price sensitive information (i.e., information which is reasonably likely to affect the share price positively or negatively).

Rule (c) above simply reflects the insider trading law. Rules (a) and (b) specify the fixed “closed periods” where trading in Globe securities is prohibited. These are special rules applicable to Globe insiders to protect them, the company and all of Globe’s people from the adverse consequences of insider trading allegations, which can be very serious and detrimental to all concerned.

Those wishing to trade at any time must notify the Chairman (or, if the Chairman is not available, a disinterested director) prior to buying or selling Globe securities so as to allow an opportunity for an exchange of views about para (c) above. If there is disagreement about the application of para (c) the

proposed transaction may not occur without the unanimous approval of the disinterested directors.

All other employees are prohibited from trading at any time when they are in possession of price sensitive information as defined in Rule (c) above.

Upon settlement of any trades directors must notify the Company Secretary within 2 working days so that ASX can be notified, as required by law.

Breaches of these rules are potentially very damaging to the interests of any person concerned and the company as a whole. Consequently breaches will be viewed most seriously and may result in the termination of employment and report to the appropriate authorities.

The Company Secretary monitors the share register on a regular basis to ensure that the policy is being adhered to. Breaches of policy, if any, are reported to the Board for disciplinary action.

Trading in financial products

These rules also apply to all financial products issued or created over or in respect of Globe's securities.

Trading that is not subject to these rules

Globe contemplates that there may be some instances where certain trades due to their nature need to be excluded from the rules. Accordingly, trades that occur in the following instances are excluded from the rules:

- Where the trading does not result in any change to the beneficial interest in the securities;
- Where trading occurs via investments in a scheme or other arrangement where the investment decisions are exercised by a third party;
- Where the director or employee has no control or influence with regard to the trading decisions being made; and
- Where the trading occurs under an offer made to all or most of the holders of Globe securities

If in doubt as to whether a particular trade is excluded from these rules, please contact the Company Secretary for guidance.

Exceptional circumstances and procedure for clearance to trade during a closed period

Globe also recognizes that a director or a member of senior management who is not in possession of inside information in relation to Globe, may encounter severe financial hardship or other exceptional circumstances during a closed period. In such instances, such a person may sell Globe securities, including financial products issued or created over or in respect of Globe's securities during a closed period subject to obtaining prior written approval from the Chairman (or if the Chairman is not available from a disinterested director). Such approval must be obtained 48 hours prior to the trade being made. The form of such a written approval may include a facsimile transmission or an email.

The determination of whether a person is in severe financial hardship or encountering other exceptional circumstances will be made solely at the discretion of the Chairman (or if the Chairman is not available a disinterested director) having regard to the purpose of the listing rules.