

Generation Development Group Limited

Corporate Governance Statement FY 2025

Introduction

The Board of Directors (“Board”) and management of Generation Development Group Limited (“GDG” or the “Company”) recognise the importance of good corporate governance and are committed to maintaining high standards of corporate governance within GDG and its subsidiaries. GDG maintains a focus on governance uplift as part of its strategic plan.

This Statement:

- reports against the ASX Corporate Governance Principles and Recommendations, 4th edition (“ASX Corporate Governance Principles”) and the practices detailed in this Statement are current as at 27 August 2025; and
- has been approved by the Board.

Further information can be found in the Appendix 4G lodged with the ASX.

The following documents referred to in this Statement are located at www.gdgaustralia.com/corporate-governance :

- Constitution
- Board Charter
- Audit Committee Charter
- Remuneration and Nomination Committee Charter
- Diversity, Equity and Inclusion Policy
- Selection and Appointment of Non-Executive Directors Policy
- Continuous Disclosure Policy
- Anti-Bribery and Corruption Policy
- Code of Conduct
- Whistleblower Policy

Principle 1.

Lay solid foundations for management and oversight

Recommendation 1.1

A listed entity should have and disclose a board charter setting out:

- (a) the respective roles and responsibilities of its board and management; and**
- (b) those matters expressly reserved to the board and those delegated to management.**

The Board has clear policies and processes to delineate the respective functions, roles and responsibilities of the Board and the boards and senior management of the Group.

The Board has adopted a Board Charter that sets out the role, composition and responsibilities reserved by the Board and those specific to the Executive Chairman. The conduct of the Board is also governed by the Constitution of the Company. The Board has also adopted a Delegations Policy which formalises and discloses the authorities delegated from the Board to the Executive Chairman, Chief Financial Officer (“CFO”) and Chief Executive Officer (“CEO”) of GDG and the boards and senior management of subsidiaries.

Recommendation 1.2

A listed entity should:

- (a) undertake appropriate checks before appointing a director or senior executive or putting someone forward for election as a director; and**
- (b) provide securityholders with all material information in its possession relevant to a decision on whether or not to elect or re-elect a director.**

GDG undertakes appropriate background checks before the appointment of any director or senior executive. These checks include criminal record, bankruptcy, disqualified persons, education, character and reference checks.

GDG provides shareholders with all material information in its possession relevant to a decision to elect or re-elect a director. This includes biographical details, details of other directorships held, independence status and a statement by the Board as to whether it supports the candidate's election or re-election. Any material adverse information revealed by a background check would also be provided. These details are included in the Notice of Annual General Meeting sent to shareholders in relation to the items of business for the election or re-election of directors.

Recommendation 1.3

A listed entity should have a written agreement with each director and senior executive setting out the terms of their appointment.

GDG requires each director and senior executive to execute a formal written agreement setting out the terms of their appointment.

Recommendation 1.4

The company secretary of a listed entity should be accountable directly to the board, through the chair, on all matters to do with the proper functioning of the board.

The Company Secretary has been appointed to this position by a resolution of the Board. The Company Secretary oversees board and governance matters and is directly accountable to the Board on matters relating to the proper functioning of the Board.

Recommendation 1.5

A listed entity should:

- (a) have and disclose a diversity policy;**
- (b) through its board or a committee of the board set measurable objectives for achieving gender diversity in the composition of its board, senior executives and workforce generally; and**
- (c) disclose in relation to each reporting period:**
 - (1) the measurable objectives set for that period to achieve gender diversity;**
 - (2) the entity's progress towards achieving those objectives; and**
 - (3) either:**
 - (A) the respective proportions of men and women on the board, in senior executive positions and across the whole workforce (including how the entity has defined "senior executive" for these purposes); or**
 - (B) if the entity is a "relevant employer" under the Workplace Gender Equality Act, the entity's most recent "Gender Equality Indicators" as defined in and published under that Act.**

If the entity was in the S&P/ASX 300 index at the commencement of the reporting period, the measurable objectives for achieving gender diversity in the composition of its board should be to have not less than 30% of its directors of each gender within a specified period.

The Board has adopted a Diversity, Equity and Inclusion Policy.

The table below outlines the gender representation targets set in 2022 and the results as at 30 June 2025, noting that the targets did not take into consideration future business acquisitions:

| <i>Cohort</i> | <i>2025 Target</i> | <i>2025 Result</i> |
|---|----------------------------|--------------------|
| Directors of Generation Development Group and Generation Life | >35% female representation | 30% female |
| Executive, Senior Management & People Leader positions | >35% female representation | 26% female |
| Organisational gender diversity | >40% female representation | 40% female |

The Board remains committed to achieving greater gender representation across the business and has set the following new targets:

| <i>Cohort</i> | <i>2028 Target</i> |
|---|-----------------------------|
| Directors of Generation Development Group | =>40% female representation |
| Women in Leadership* | =>40% female representation |
| Organisation | =>45% female representation |

*Women in Leadership is defined to exclude Executive Assistants but includes the GDG CEO and direct reports of the GDG CEO, and subsidiary CEOs and direct reports of the subsidiary CEOs.

To achieve these targets, GDG will build a sustainable talent pipeline of women into leadership which includes the following:

- recruitment and talent pipeline
- leadership development and sponsorship
- accountability and governance
- flexible work and family support
- culture and inclusion
- external partnerships and signaling

Recommendation 1.6

A listed entity should:

- have and disclose a process for periodically evaluating the performance of the board, its committees and individual directors; and**
- disclose for each reporting period whether a performance evaluation has been undertaken in accordance with that process during or in respect of that period.**

The Board has adopted a Board and Committee Performance Evaluation Policy, a copy of which is available on the Company's website. This Policy outlines the process for evaluating the performance of the Board, its committees and individual directors.

A performance evaluation was not undertaken during the financial year, however an independent board performance evaluation will be undertaken during FY26.

Recommendation 1.7

A listed entity should:

- have and disclose a process for evaluating the performance of its senior executives at least once every reporting period; and**
- disclose for each reporting period whether a performance evaluation has been undertaken in accordance with that process during or in respect of that period.**

At the beginning of each performance year, senior executives agree performance scorecards which are aligned to the Board approved strategy. Each scorecard includes a mix of financial and non-financial key performance indicators at the individual and group level. Success against each indicator is assessed by the Executive Chair and the Board during and at the end of each performance having considered risk and behaviour standards.

Adopting this process, the performance of senior executives was evaluated during the financial year.

Principle 2.

Structure the Board to be effective and add value

Recommendation 2.1

The board of a listed entity should:

(a) have a nomination committee which:

- (1) has at least three members, a majority of whom are independent directors; and**
- (2) is chaired by an independent director,**

and disclose:

- (3) the charter of the committee;**
- (4) the members of the committee; and**
- (5) as at the end of each reporting period, the number of times the committee met throughout the period and the individual attendances of the members at those meetings.**

The Board has established a Remuneration and Nomination Committee which is an advisory committee established to assist the Board with fulfilling its corporate governance responsibilities with respect to specified nomination and remuneration matters.

The Remuneration and Nomination Charter specifies the composition and membership requirements being at least 2 non-executive directors. The Chair of the Committee must be an independent Director.

GDG's Remuneration and Nomination Committee comprises Christine Christian AO (independent non-executive director) as chair and Giselle Collins (independent non-executive director) as member.

Details of Christine Christian's and Giselle Collins' relevant qualifications and experience are as follows:

Christine Christian AO

- Bachelor of Arts
- Master of Business Administration
- Member Australian Institute of Company Directors
- Experienced Remuneration and Nomination Committee chair (formerly Humm Group Limited, SelfWealth Limited, Credit Clear Limited) and Remuneration and Nomination Committee member (formerly Auctus Investment Group Ltd, Powerlinx Inc., Victorian Managed Insurance Authority, Scottish Pacific Business Finance, Kirwood Capital Pty Ltd)
- Over 40 years' experience in financial services and banking

Giselle Collins

- Bachelor of Economics
- Graduate Diploma in Applied Finance and Investments
- Graduate Member of the Australian Institute of Company Directors
- Member of Chartered Accountants Australia and New Zealand
- Chartered Accountant
- Experienced Nomination and Remuneration Committee chair (formerly Peak Rare Earths Ltd) and Nomination Committee member (formerly Amplitude Energy Ltd).

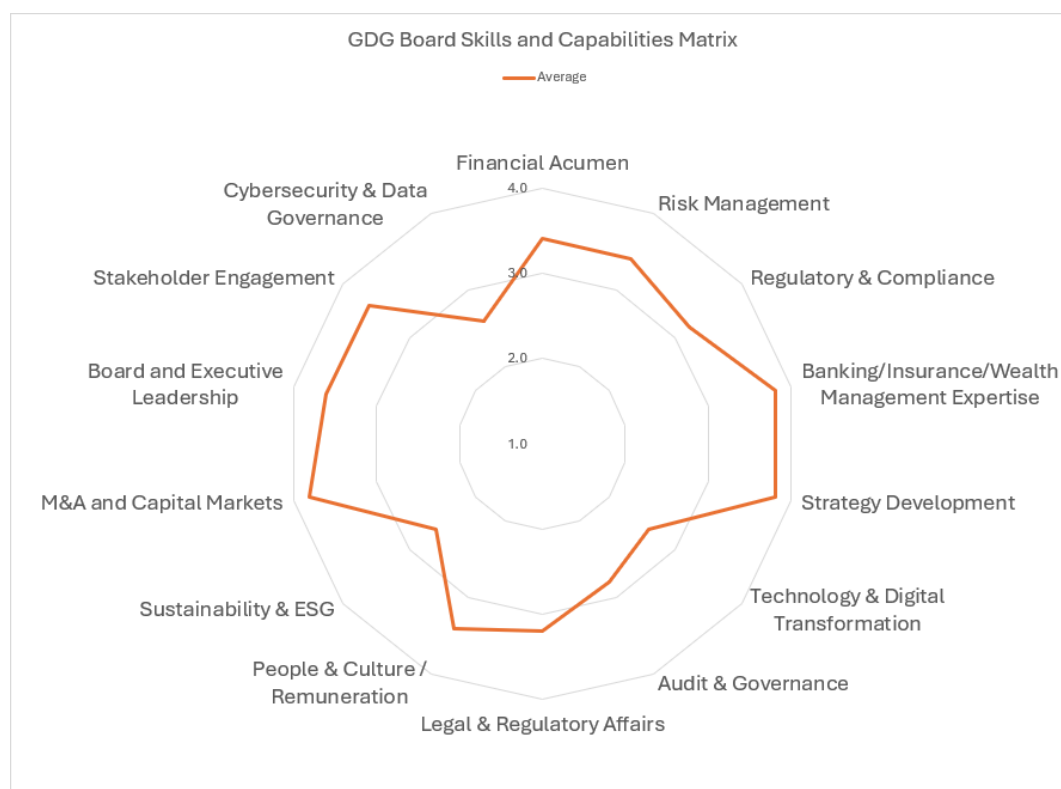
The Board will look to expanding the Remuneration and Nomination Committee as the size of the Board increases.

GDG's 2025 Annual Report discloses the number of times the committee met throughout FY25 and the individual attendances of the members at those meetings.

Recommendation 2.2

A listed entity should have and disclose a board skills matrix setting out the mix of skills that the board currently has or is looking to achieve in its membership.

The Board considers that collectively its directors have a level of skill, knowledge and experience that enables the Board to effectively discharge its responsibilities and duties. The mix of skills that the Board has in its membership is as follows:



| 1 – Limited / No Exposure | 2 – Basic Understanding | 3 - Proficient | 4 - Expert |
|--|---|--|--|
| Little or no experience; relies on others for insight. | Working knowledge; limited experience in practical application. | Solid experience; able to contribute effectively to discussions and decisions. | Deep experience and recognized authority in the area; able to provide guidance and leadership. |

Recommendation 2.3

A listed entity should disclose:

- the names of the directors considered by the board to be independent directors;
- if a director has an interest, position or relationship of the type described in Box 2.3 but the board is of the opinion that it does not compromise the independence of the director, the nature of the interest, position or relationship in question and an explanation of why the board is of that opinion; and
- the length of service of each director.

The Board has adopted the approach to assessing independence outlined in the ASX Corporate Governance Principles.

The Board comprises five directors as follows:

Rob Coombe

Executive Chairman

Rob is not regarded as independent as he is an executive of the Company. He has been a director and Chairman since July 2017.

Bill Bessemer

Non-Executive Director

Bill is not regarded as independent as he has been an associate of a substantial shareholder of the Company within the last 3 years. He was a director of the Group from 1999-2009 and more recently from February 2012 to the present time.

Giselle Collins

Independent Non-Executive Director

Giselle has been a director since 2021, having previously served as a director of Generation Life since 2018.

Christine Christian

Independent Non-Executive Director

Christine has been a director since 2024.

Peter Smith

Executive Director

Peter is not regarded as independent as he is an executive of the Company, being Executive Chairman of Evidentia Group. He has been a director since June 2025.

Recommendation 2.4

A majority of the board of a listed entity should be independent directors.

The majority of the Board are not independent directors (see 2.3 above). During FY25, there was an adequate and broad mix of skills and experience amongst the directors such that each was capable of acting in an independent manner and in the best interests of the Company and its shareholders.

During FY26, the Board is committed to exploring opportunities for increasing the number of independent directors and expanding the Board's mix of skills and experience.

Recommendation 2.5

The chair of the board of a listed entity should be an independent director and, in particular, should not be the same person as the CEO of the entity.

Mr Rob Coombe assumed the position of Executive Chairman on 1 January 2025, having previously held the position of Non-Executive Chairman since 1 July 2020 and Executive Chairman since 18 July 2027. He is not considered independent but assumed an executive role to reflect GDG's commitment to pursuing his growth strategy.

The role of Generation Development Group CEO has been held by Grant Hackett OAM since 1 January 2025.

The Board has appointed Giselle Collins as Lead Independent Director to facilitate decision making where the Executive Chair is conflicted and to otherwise enhance the independent functioning of the Board.

Recommendation 2.6

A listed entity should have a program for inducting new directors and for periodically reviewing whether there is a need for existing directors to undertake professional development to maintain the skills and knowledge needed to perform their role as directors effectively.

The Company does not presently have a formal induction or professional development program for directors, however intends to develop one during FY26.

The Board considers that the current directors are experienced and skilled and well-acquainted with GDG to perform their role effectively.

Principle 3.

Instil a culture of acting lawfully, ethically and responsibly

Recommendation 3.1

A listed entity should articulate and disclose its values.

GDG's vision is to be Australia's most admired financial services group, recognised for its performance, innovation and commitment to delivering exceptional outcomes for its customers.

Underpinning this vision are its core values of Clarity, Innovation and Integrity.

The following values have also been adopted by its subsidiaries:

- Evidentia Group – Client Obsession, Excellence, Agility, Enjoyment
- Generation Life – Optimism, Clarity, Forward Thinking, Innovation, Policyholder
- Lonsec – Client Focused, Innovation, Integrity, Independent Thinking, Collaboration

Recommendation 3.2

A listed entity should:

- (a) have and disclose a code of conduct for its directors, senior executives and employees; and**
- (b) ensure that the board or a committee of the board is informed of any material breaches of that code.**

The Board believes that the success of the Company will be enhanced by a strong ethical culture within the organisation. To this end, the Board has adopted a Code of Conduct.

Incidents of material non-compliance with the Code of Conduct are reported to the Board.

Recommendation 3.3

A listed entity should:

- (a) have and disclose a whistleblower policy; and**
- (b) ensure that the board or a committee of the board is informed of any material incidents reported under that policy.**

The Board has adopted a Whistleblower Policy.

The Board is informed of any material incidents reported under the Whistleblower Policy.

Recommendation 3.4

A listed entity should:

- (a) have and disclose an anti-bribery and corruption policy; and**
- (b) ensure that the board or a committee of the board is informed of any material breaches of that policy.**

The Board has adopted an Anti-Bribery and Corruption Policy.

The Board is informed of any material incidents reported under the Anti-Bribery and Corruption Policy.

Principle 4.

Safeguard the integrity of corporate reports

Recommendation 4.1

The board of a listed entity should:

- (a) have an audit committee which:**

- (1) has at least three members, all of whom are non-executive directors and a majority of whom are independent directors; and**
- (2) is chaired by an independent director, who is not the chair of the board,**

and disclose:

- (3) the charter of the committee;**
- (4) the relevant qualifications and experience of the members of the committee; and**
- (5) in relation to each reporting period, the number of times the committee met throughout the period and the individual attendances of the members at those meetings.**

The Audit Committee is responsible for verifying and safeguarding the integrity of corporate reporting. Rigorous processes were employed to ensure GDG's financial reports present a true and fair view and that its accounting methods are relevant, comprehensive and comply with applicable accounting rules and policies.

The Board is responsible for appointing the external auditor (having regard to recommendations made by the Audit Committee), subject to confirmation by shareholders at the Company's annual general meeting. In selecting an auditor, a selection and assessment process is implemented, which takes into account a number of key criteria, including audit approach and methodology, internal quality control procedures, resources, key personnel and cost. The Audit Committee will annually review the external auditor's performance and independence.

In line with current professional standards, the external auditor is required to rotate the Generation Development Group audit lead engagement partner at least once every 5 years.

The Company's Audit Committee comprises Giselle Collins (independent non-executive director) as chair and Christine Christian AO (independent non-executive director) and Bill Bessemer (non-executive director) as members. Their relevant qualifications and experience are as follows:

Giselle Collins

- Bachelor of Economics
- Graduate Diploma in Applied Finance and Investments
- Graduate Member of the Australian Institute of Company Directors
- Member of Chartered Accountants Australia and New Zealand
- Chartered Accountant
- Experienced Audit Committee chair (formerly Hotel Property Investments Ltd, Pacific Smiles Group Ltd, Peak Rare Earths Ltd and The Heart Research Institute)
- Formerly head of treasury and finance departments in various large corporates

Christine Christian AO

- Bachelor of Arts
- Master of Business Administration
- Member Australian Institute of Company Directors
- Experienced Audit Committee chair (formerly ME Bank Limited, Credit Clear Limited, Auctus Investment Group Limited, Victorian Managed Insurance Authority, Scottish Pacific Business Finance, La Trobe University) and Audit Committee member (formerly Humm Group Limited).
- Over 40 years' experience in financial services and banking

Bill Bessemer

- Master of Business Administration
- Bachelor of Economics
- Over 40 years' experience in banking and finance

GDG's 2025 Annual Report discloses the number of times the committee met throughout FY25 and the individual attendances of the members at those meetings.

Recommendation 4.2

The board of a listed entity should, before it approves the entity's financial statements for a financial period, receive from its CEO and CFO a declaration that, in their opinion, the financial records of the entity have been properly maintained and that the financial statements comply with the appropriate accounting standards and give a true and fair view of the financial position and performance of the entity and that the opinion has been formed on the basis of a sound system of risk management and internal control which is operating effectively.

Prior to approving the annual and interim financial statements, the Board receives a declaration from the CEO and CFO that in their opinion the financial records of the Company have been properly maintained and that the financial statements comply with the appropriate accounting standard and give a true and fair view of the financial position and performance of the Company and that the opinion has been formed on the basis of a sound system of risk management and internal control which is operating effectively.

Recommendation 4.3

A listed entity should disclose its process to verify the integrity of any periodic corporate report it releases to the market that is not audited or reviewed by an external auditor.

Where available, unaudited data used in reports released to the market is sourced from the same sources as those used to generate audited financial statements. These data sources are typically reviewed or audited by the auditors as part of their audit of the annual financial statements.

Principle 5.

Make timely and balanced disclosure**Recommendation 5.1**

A listed entity should have and disclose a written policy for complying with its continuous disclosure obligations under listing rule 3.1.

The Board has adopted a Continuous Disclosure Policy, a copy of which is available on the Company's website. This Policy reflects the Board's commitment to ensuring that information that is expected to have a material effect on the price or value of the Company's securities is immediately

notified to the ASX for dissemination to the market in accordance with the continuous disclosure requirements of the Corporations Act 2001 and ASX Listing Rules.

Recommendation 5.2

A listed entity should ensure that the board receives copies of all material market announcements promptly after they have been made.

Copies of all ASX announcements are provided to the Board immediately following release to the market.

Recommendation 5.3

A listed entity that gives a new and substantive investor or analyst presentation should release a copy of the presentation materials on the ASX Market Announcements Platform ahead of the presentation.

New and substantive investor and analyst presentations are released on the ASX Market Announcements Platform prior to the presentations being made.

Principle 6.

Respect the rights of shareholders

Recommendation 6.1

A listed entity should provide information about itself and its governance to investors via its website.

The Company maintains a website with a dedicated governance section.

Recommendation 6.2

A listed entity should have an investor relations program that facilitates effective two-way communication with investors.

GDG undertakes a scheduled program of regular Quarterly Update disclosures to the ASX on its business performance, in addition to the half year and full year disclosures. GDG hosts meetings, telephone calls and webcasts for institutional and retail investors and analysts to discuss those disclosures.

Advance notice of new and substantive investor and analyst briefings is provided via the ASX and copies of any presentations are also made available on the ASX and GDG websites. In all communications with investors and analysts, only publicly available information or information which is not price sensitive is discussed.

Recommendation 6.3

A listed entity should disclose how it facilitates and encourages participation at meetings of security holders.

The Company typically holds hybrid shareholder meetings as a means of facilitating greater shareholder participation in meetings.

Shareholders may ask questions about or make comments on the management of the Company ahead of any annual general meeting. These questions or comments will be addressed at the

meeting. Multiple questions on the one topic may be moderated or amalgamated together, and questions not able to be addressed at the meeting due to time constraints will be answered via email or by posting responses on the Company's website.

Recommendation 6.4

A listed entity should ensure that all substantive resolutions at a meeting of security holders are decided by a poll rather than by a show of hands

The Company has adopted the practice that all resolutions put to a general meeting of shareholders will be decided by poll rather than by a show of hands.

Recommendation 6.5

A listed entity should give security holders the option to receive communications from, and send communications to, the entity and its security registry electronically

Through the Company's share registry Automic Pty Ltd, shareholders may elect to receive certain communications electronically.

Principle 7.

Recognise and manage risk

Recommendation 7.1

The board of a listed entity should:

(a) have a committee or committees to oversee risk, each of which:

- (1) has at least three members, a majority of whom are independent directors; and**
- (2) is chaired by an independent director,**

and disclose:

- (3) the charter of the committee;**
- (4) the members of the committee; and**
- (5) as at the end of each reporting period, the number of times the committee met throughout the period and the individual attendances of the members at those meetings; or**

(b) If it does not have a risk committee or committees that satisfy (a) above, disclose that fact and the process it employs for overseeing the entity's risk management framework.

The Company does not presently have a Risk Committee. As the size of the Board and complexity of the business increases, consideration will be given to the establishment of a committee to oversee risk.

Each of Generation Life, Evidentia Group and Lonsec have their own established risk committees, supported by dedicated risk personnel and overseeing rigorous risk management frameworks and practices, which through their respective CEOs, report to GDG on material and emerging risks.

Recommendation 7.2

The board or a committee of the board should:

- (a) review the entity's risk management framework at least annually to satisfy itself that it continues to be sound and that the entity is operating with due regard to the risk appetite set by the board; and**
- (b) disclose, in relation to each reporting period, whether such a review has taken place.**

The Group's risk management framework is subject to continuous enhancement and the Board are satisfied that it continues to be sound.

In line with prudential standard requirements, Generation Life's risk management framework is reviewed by its internal auditor every year. A review was completed by the internal auditor during the period.

Recommendation 7.3

A listed entity should disclose:

- (a) if it has an internal audit function, how the function is structured and what role it performs; or**
- (b) if it does not have an internal audit function, that fact and the processes it employs for evaluating and continually improving the effectiveness of its governance, risk management and internal control processes.**

The Company itself does not have an internal audit function although Generation Life maintains an independent internal audit function. The role of internal auditor is fulfilled by RSM who reports directly to the Generation Life Audit Committee. The internal auditor provides services in accordance with an internal audit plan approved by the Generation Life Audit Committee each year.

Responsibility for governance, risk management and internal control processes rests at the subsidiary level and reporting to GDG on such matters is through the respective subsidiary CEOs.

Recommendation 7.4

A listed entity should disclose whether it has any material exposure to environmental or social risks and, if it does, how it manages or intends to manage those risks.

The Company's 2025 Annual Report includes its Environmental, Social and Governance ("ESG") Principles and outlines the material risks facing the Company and mitigation strategies.

The Board recognises the importance of ESG to the long-term sustainability of the Company's growth and to its shareholders. The Board holds the CEO and executive leadership team accountable by fulfilling its oversight responsibilities and by making recommendations on matters pertaining to culture, the environment, social impact and governance.

Principle 8.

Remunerate fairly and responsibly

Recommendation 8.1

The board of a listed entity should:

- (a) have a remuneration committee which:**
 - (1) has at least three members, a majority of whom are independent directors; and**
 - (2) is chaired by an independent director,**

and disclose:

- (3) the charter of the committee;**
- (4) the members of the committee; and**
- (5) as at the end of the reporting period, the number of times the committee met throughout the period and the individual attendances of the members at those meetings.**

The Board has established a Remuneration and Nomination Committee. Details of this Committee are outlined in the response to Recommendation 2.1 above.

Recommendation 8.2

A listed entity should separately disclose its policies and practices regarding the remuneration of non-executive directors and the remuneration of executive directors and other senior executives.

The Company distinguishes the structure of non-executive directors' remuneration from that of executive directors and senior executives. Non-executive directors are remunerated by way of fees in the form of cash, non-cash benefits and superannuation contributions. Typically, they do not receive options, bonus payments or shares from the Company. Non-executive directors do not normally participate in schemes designed solely for the remuneration of executives.

Executive directors and senior executives' packages generally comprise both a fixed and variable remuneration component comprising short term incentives (STI) and long term incentives (LTI).

The STI is paid in cash to eligible executives upon the achievement of financial and non-financial targets as determined by the Board.

In addition, executives who are able to influence the generation of shareholder wealth and have a direct impact on the Group's performance are eligible to participate in the LTI Plan, known as the GDG Performance Rights Plan, or the Loan Share Plan.

Under the GDG Performance Rights Plan, a performance right confers on the holder an entitlement, upon vesting and exercise, to the value of a fully paid ordinary share in the Company which may be settled in the form of a share or in cash at the discretion of the Board. Performance rights vest and exercise for nil consideration on satisfaction of vesting conditions, subject to the Board's discretion to determine otherwise in certain circumstances.

Under the Loan Share Plan, participants are granted an interest-free, limited recourse loan from the Company to acquire shares at their market value. Dividends paid on the shares are used to repay the loan, which must be repaid within 5.5 years from the date of grant. Shares will vest after 5 years subject to satisfaction of specified performance conditions, repayment of the loan and continued employment. Cessation of a participant's employment prior to the vesting date will result in the surrender of the shares, subject to certain exceptions in the case of redundancy.

A Remuneration Report, which sets out information about the remuneration of the Company's directors and key management personnel for the financial year is included in the Directors' Report in the 2025 Annual Report.

Recommendation 8.3

A listed entity which has an equity-based remuneration scheme should:

- (a) have a policy on whether participants are permitted to enter into transactions (whether through the use of derivatives or otherwise) which limit the economic risk of participating in the scheme; and**
- (b) disclose that policy or a summary of it.**

Under the GDG Performance Rights Plan, participants are restricted from entering into any arrangements which would have the effect of limiting their exposure to risk in relation to performance rights (vested or unvested).

Under the Loan Share Plan, no dealing in shares is permitted until the shares have vested.