

Sensitive Information – NZ Shareholders Association

POLICY PRINCIPLES GOVERNING THE RECEIPT OF SENSITIVE INFORMATION WITHIN NZSA

NZSA staff regularly meet with third parties, including listed entities, and may sometimes receive information that is not yet known to the market.

Objectives

The aims of this Policy are:

1. To ensure that NZSA does not inadvertently release material information to the market.
2. To ensure that NZSA staff are not able to personally benefit from the receipt of sensitive information.

Policy Statement

1. The scope of this policy includes all conversations held with third parties, subsequent documentation or notes associated with these conversations and all information stored within NZSA systems, including SharePoint.
2. All information related to NZSA activities is deemed to be owned by NZSA.

Third Party Conversations

3. All conversations with third parties should be documented / summarised within the Stakeholder Relationship Management tool on SharePoint. This is a means of recording that a conversation occurred and its approximate content.
4. During a conversation, where it is not clear as to whether information is market sensitive, NZSA staff should clarify this within the meeting.
5. Where information is regarded as sensitive or confidential, NZSA must not disclose this through its communications with members or through external communications (including social media).
6. Any NZSA staff or board member who has received specific **market-sensitive** information is regarded as an 'insider', and cannot act on that information until it is released via the NZX Market Announcements service and/or a "cleansing notice" is issued.

7. Any NZSA staff or board member who has met representatives of an issuer and received **general information** cannot trade in relevant securities for a period of 7 days unless prior specific approval is sought and obtained from the NZSA Chair.

Records Management

8. SharePoint acts as the master source for NZSA records and documentation, both internal and external. All documents, files and records should be stored on SharePoint.
9. Access to specific folders within SharePoint should be approved by the CEO, on the basis that information is required by an individual to perform specified tasks.
10. The CEO is expected to ensure effective security and backup of all NZSA information.

Definitions

Third Party: An individual or group that is not an employee, contractor or on the Board of NZSA. Third parties may include representatives from NZSA corporate, supporter or individual members.

Adopted by the National Board at the June 2023 National Board meeting.