

# COMMUNICATIONS



Your communications are a reflection on Green Ocean\*. Ensure your communications are necessary and appropriate. Ensure you adhere to all rules and follow all guidelines. Failure to safeguard information can damage Green Ocean's\* reputation and its ability to conduct business effectively.

Inappropriate, inaccurate or careless communication can create serious reputation, liability and compliance risks for you and Green Ocean\*.

## BUSINESS COMMUNICATIONS

The Business Communications Standard sets the principles and the rules for all communication by Green Ocean\* staff within Green Ocean\* or with third parties. The Standard applies to every kind of correspondence including mail, electronic documents, instant messages, websites, social media tools, postings on the Green Ocean\*, paper documents, facsimile, voice and voice mail recordings.

### **Your Responsibility**

You must observe the Business Communications Standard. Failure to do so may damage the reputation of Green Ocean\*. Failure to comply with mandatory rules may result in disciplinary or legal action.

### The Principles

- In your business communications:
  - do not mislead;
  - do not write speculative opinions;
  - do not exaggerate;
  - do not engage in 'casual conversation' on sensitive or confidential matters; and
  - do not joke about serious matters.
- State which Green Ocean\* company the communication is coming from.
- Follow all relevant standards and guideline. In particular:
  - follow the Group Disclosure Standard when publicly disclosing information;
  - classify communications according to the Group Information Classification
- Electronic Communication and if required encrypt your correspondence;
  - remember that communications with a competitor can violate antitrust laws;
  - if you are handling personal data ensure you comply with Green Ocean\*'s Privacy Rules;
  - ensure that exports or imports of information to or from other countries are not prohibited and that appropriate licences have been obtained where required by law.

### Challenge Yourself

- Would you be comfortable if this communication appeared in the public domain?
- Would you be comfortable if this was used as evidence in legal proceedings?
- Is this communication lawful?
- Do you need to make this communication?
- What is the best way to communicate?

## PUBLIC DISCLOSURE

Any written or oral communication made publicly on behalf of Green Ocean\* is a public disclosure. Information disclosed must be true, accurate, consistent and not misleading.

### Your Responsibility

You must not make public disclosures about Green Ocean\*'s business activities if you are not authorised to do so. You must protect confidential information. If you are authorised to disclose information you must ensure it is true, accurate, consistent and not misleading.

Misleading the public can be a regulatory offence. Inaccurate and delayed information disclosure can damage Green Ocean\*'s reputation. Green Ocean\* and the individuals involved could face investigation, prosecution, suspension and fines.

### The Principles

- Ensure public disclosures are true, accurate, consistent and not misleading.
- Protect confidential information.
- Comply with the Disclosure Standard and only make public disclosures if you are authorised to do so.
- Report the loss or theft of Green Ocean\* information to your line manager or supervisor.
- Follow applicable procedures if you believe you hold price-sensitive information about Green Ocean\*.
- Comply with all applicable laws and regulations.

### Challenge Yourself

- Is your information true and accurate?
- Have you obtained clearance from media relations and investor relations professionals?
- Do you possess price-sensitive information?
- Have you told the whole story?