



## OCEANIA CAPITAL PARTNERS LIMITED

ABN 52 111 554 360

### External Communications Policy

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**First approved – 15 June 2005**

**Updated June 2007**

**Updated October 2009**

**Updated April 2013**

**Updated September 2014**

1. OCP has established a process for ensuring compliance with laws, regulations and other requirements (including Australian and International Accounting Standards, Corporations Act and Australian Securities Exchange Listing Rules) relating to the external reporting of financial and non-financial information. This process has the following components:
  - An identified Compliance Manager, specifically accountable for monitoring the compliance. For the time being, the Compliance Manager function will be provided by the Company Secretary
  - An annual timetable of compliance events, which is monitored by the Compliance Officer
  - A checklist of compliance requirements associated with a new or amended transaction, which is to be monitored by the OCP team leader for each transaction
  - A culture of compliance which encourages each OCP employee to be mindful of compliance requirements
2. A process has been established to capture issues for the purposes of continuous reporting to the ASX.
3. All documents and reports to be issued to regulators (other than those which are procedural in nature) are to be issued only after approval to do so is provided by the Executive Director. Any such report which has the potential to reflect adversely on OCP or its subsidiaries also requires the approval of the Chairman of OCP prior to submission.

4. Financial and non-financial information in documents (both public and internal) is not to conflict inappropriately with the Group's financial statements and related internal documents.
5. All public information releases, including those to the ASX, the media and investors, are to be issued only after approval to do so is provided by an Executive Director. Any such release which has the potential to reflect adversely on OCP or its subsidiaries also requires the approval of the Chairman of OCP prior to release.
6. Reports and forecasts on OCP prepared by external analysts are to be monitored. Where they are inaccurate, reasonable steps are to be taken to rectify the inaccuracies. These steps are not to include a selective briefing of the analyst(s) which would breach ASX Listing Rules.
7. Neither management nor the Board shall provide specific or general financial product advice to retail or wholesale investors at any time unless specifically authorised or licenced to do so.

## **Compliance**

It is the accountability of the Company Secretary to apply this Policy at all times and to bring any exceptions to this Policy to the attention of the Board. Specific compliance steps are noted above for policy items 1, 2 and 3. Other than this, reporting to Board on this Policy will be as follows:

- Any breaches of Policy will be reported to the Board meeting immediately following the breach;
- The Company Secretary will report to the Board meeting in May of each year on overall compliance with this Policy;
- An External Reporting Pack will be distributed at each meeting of the Board. This pack will include:
  - Copies of all releases to the ASX, reports to regulators (other than those of a procedural nature), media releases, investor presentations and other public documents issued since the last Board meeting; and
  - A listing of all major up-to-date profit forecasts for OCP issued by analysts to the extent that they are available to OCP.