



## Bettercoal Confidentiality Policy

Confidential information shall only be accessible to those who are authorised to have access to the information.

### Definition of Confidential Information

Confidential Information includes:

- personal information;
- commercially sensitive information as defined by the Bettercoal Anti-Trust Compliance Policy;
- confidential information gathered as part of Bettercoal Assessments;
- information submitted or gathered in connection with the investigation of a complaint;
- information covered by confidentiality agreements (such as Bettercoal Assessment Reports and Continuous Improvement Plans);
- personnel records of Bettercoal employees or any other information of a personal nature; and
- any other information that is provided in confidence, or would be reasonably considered to be confidential based on generally accepted ethical and business practice.

### Duties

All Directors, officers, employees, consultants and contractors who are in possession of Confidential Information shall ensure that they:

- are authorised to have access to the information; and
- take all reasonable actions to protect the security of the information, commensurate with the sensitivity of the information.

No person who is in possession of Confidential Information shall be subjected to pressure or intimidation to disclose the information to another party if they have reasonable grounds to believe that the other party is not authorised to receive the information. If a person acquires unauthorised access to Confidential Information, they shall take immediate steps to delete or destroy the information, prevent any continued access to it, and, where applicable, inform the provider of the information that it was received without authorisation and has been deleted or destroyed.

### Disciplinary Action

Any person who deliberately or negligently contravenes this policy may be subject to disciplinary action by Bettercoal.



## **End of membership and data retention**

Every Member, Associate and Participant, while they are such and after their membership comes to an end, will keep all material they come into contact with as a Bettercoal Member, Associate or Participant strictly confidential, save to the extent that disclosure of such material is required by law or by the requirements of any court of competent jurisdiction or the rules of any recognised stock exchange or relevant regulatory authority.