

PURPOSE

Ashburton Assurance Australasia's ("Ashburton") confidentiality policy refers to the disclosure of important information that the company may hold. During the course of everyday business, employees will unavoidably receive and handle personal and private information about clients, partners and the company. This policy is designed to set the rules that will protect this information from exposure.

SCOPE

This policy affects all employees, contractors and others that may have access to confidential information such as board members, technical experts and committee members.

POLICY ELEMENTS

Information that Ashburton considers confidential and proprietary is undisclosed, valuable, expensive and / or easily replicated. More specifically, information that is classified as confidential includes:

- Customer lists (existing and prospective)
- Data of Customers, Contractors and Vendors
- Trade Secrets
- Private deals
- Unpublished financial information
- Processes, methods and know-how
- Pricing / marketing and other undisclosed strategies or tactics
- Unpublished goals, forecasts or initiatives that are marked as confidential
- Data entrusted to Ashburton by external parties
- Documents, processes and other elements of Ashburton's systems
- Any other knowledge of confidential information acquired by employees during their employment

All of these types of information must be protected for different reasons – some may be legally binding (e.g. sensitive data) and some constitute the backbone of the business and give it a competitive advantage (e.g. business processes). The disclosure of some kinds of information may expose the company to increased risk such as specific trade secrets, while for others the result could be the loss of important partners or reputation.

In the course of their engagement employees and contractors will have various levels of authorised access to confidential information so as to conduct their business. When they do so the following rules strictly apply:

- No amount of information will be disseminated to anyone outside of the organisation,
- The disclosure of information inside the organisation will be limited to those with authorised access and legitimate reason to acquire the information
- The information will not be used for the personal benefit or profit of the employee or any other except for the Ashburton.
- The employee / contractor will have access only to the amount and type of information required for the completion of the responsibilities and no more,
- When perusing and sharing information through electronic means, all precautionary safety measures must be in effect

- Unauthorised replication of information is prohibited,
- Upon separation of engagement, employees and contractors will ensure that all confidential information must be returned or deleted from the employee's or contractors electronic devices.

Ashburton will take measures to ensure that confidential information is well protected. Those measures include but are not limited to:

- Paper documents will be safely stored and locked,
- Authorised of access will be carefully controlled by senior management
- Employees and contracts will sign a confidentiality agreement with Ashburton as part of the terms of their engagement with us to provide the services.

Confidential information as described above may occasionally have to be disclosed for legitimate reasons, e.g. upon request of a regulatory body, accreditation agency, or for business purposes. In such cases with the consent of the parties involved only the relevant confidential information will be disclosed and no more.

DISCIPLINARY CONSEQUENCES

Ashburton places great importance in this policy. Any non-conformity will bring about disciplinary and possibly legal action. Ashburton is prepared to terminate an engagement with employees or contractors who wilfully or regularly breach the confidentiality policy and or agreement for personal profit. Serious offences such as theft of information, disclosure of sensitive data etc. will be grounds for immediate for – cause investigations for dismissal and may also involve legal consequences.

Any unintentional breach of this policy will be thoroughly investigated and will managed appropriately depending on the magnitude and seriousness of the breach.

This policy is binding even after separation of employment.

Keith Jones

Managing Director

October 2016