



## PORT OF TAURANGA LIMITED

### CONTINUOUS DISCLOSURE AND COMMUNICATION POLICY

#### **1 Background**

Port of Tauranga Limited (POTL) is committed to providing timely and accurate information to all shareholders and market participants.

POTL is committed to adhering to the continuous disclosure obligations pursuant to the NZX Listing Rules and the Financial Markets Conduct Act 2013.

#### **2 Continuous Disclosure**

POTL will notify the market immediately by announcing to the NZX, any material information upon becoming aware of that information, unless such disclosure is not required by the NZX Listing Rules.

“Material Information” is any information that a reasonable person would expect, if it were generally available to the market, to have a material effect on the price of POTL's quoted securities.

#### **3 Responsibilities**

##### **Board of Directors**

Where practicable, the Board will be responsible for making the final decision as to whether or not Material Information requires disclosure to NZX and approving the form of market release (and whether to apply for a trading halt while a market release is prepared).

Where time constraints and the obligation to disclose immediately prevent a decision by the Board, any three of the Chief Executive, Chief Financial Officer, the Chair, and the Chair of the Audit Committee shall decide whether or not the Material Information requires disclosure to NZX and approve the form of market release (and whether to apply for a trading halt while a market release is prepared).

The Board will, as an agenda item at each Board meeting, confirm that there is no Material Information which requires disclosure.

### **Chief Executive**

The Chief Executive along with Chief Financial Officer will, in the first instance, determine whether the information is, or may be, material. Information which is or may be Material Information will be reported to the Board.

### **Chief Financial Officer**

The Chief Financial Officer is responsible for ensuring the timely release of information to the NZX.

### **Employees**

All employees of POTL are responsible for reporting immediately to the Chief Executive and Chief Financial Officer any information that they consider to be or likely to be Material Information.

## **4 Framework**

To apply this policy, POTL has established the following key elements: all Material Information will be lodged immediately with NZX and also published on POTL's website and further, through broadcast emails and news agencies.

The following information is available on POTL's website ([www.port-tauranga.co.nz](http://www.port-tauranga.co.nz)):

- Company Constitutions, Board and Committee Charters and key Company Policies;
- press releases;
- financial information; and
- copies of announcements and presentations made to analysts and the public.

## **5 Electronic Communication**

Shareholders can elect to receive an electronic copy or hard copy of POTL's Annual / Interim Report.

POTL encourages shareholders to support its commitment to the environment by electing to receive the Integrated Annual Report / Interim Report / Market Update electronically.

## **6 Analyst/Investor Meetings**

POTL will conduct two scheduled briefing sessions each year on the day after annual and interim results have been announced.

The meetings will include POTL's Chair, Chief Executive and Chief Financial Officer.

All communications with market analysts or shareholders shall be conducted, where possible, by the Chief Executive and Chief Financial Officer.

One-on-one discussion with analysts and investors are an important part of a pro-active investor relations programme. These discussions are opportunities to provide background to previously disclosed information.

## **7 False Market, Market Speculation and Rumours**

In certain circumstances POTL may find it necessary to comment on media speculation.

POTL must not comment on media speculation and rumours, unless there are factual errors that could have a material effect on the share price.

All communication with the media should be through the Chair or Chief Executive, or Senior Executive authorised by the Chief Executive to speak.

POTL will release Material Information to the NZX to the extent necessary to prevent the development or subsistence of a false market for POTL's quoted financial products (i.e. a market which is materially influenced by false or misleading information), where required.

## **8 Share Registry and Contact Details**

Shareholders who require information or changes to their shareholding, should contact POTL's share registry, Link Market Services Limited, contact details as follows:

Email: enquiries@linkmarketservices.co.nz

Phone: 09 375 5998

Address: PO Box 91976  
Victoria Street West  
Auckland 1142

## **9 Review**

The Board has approved this policy and will regularly review the policy.