



## **MARKET COMMUNICATIONS POLICY**

### **1. INTRODUCTION**

The Board of Directors (Board) of Atlantic Ltd (Atlantic or Company) is responsible for adopting and monitoring the Company's Market Communications Policy (Policy).

### **2. COMMUNICATIONS WITH FINANCIAL MARKETS**

Atlantic recognises the importance of regular and proactive interaction with the market in order to ensure the Company's stakeholders remain fully informed about its activities. As well as market announcements, this interaction can be in the form of results briefings to stockbroking analysts and media, institutional investor briefings, one-on-one meetings with investors and presentations at industry conferences.

At all times in these interactions, Atlantic adheres to its guiding principles for market communications.

#### **2.1 Guiding Principles for Market Communications**

Atlantic applies the following guiding principles for market communications:

- Atlantic will not disclose price sensitive information to an external party except where that information has previously been disclosed to the market generally.
- Timely and accurate information must be provided equally to all shareholders and market participants.
- Information must be disseminated by channels prescribed by laws and other channels which Atlantic considers to be fair, timely and cost-efficient.

#### **2.2 Authorised Spokespersons in Respect of Market Communications**

The only Atlantic employees authorised to make any public statements to the market on behalf of, or attributable to, Atlantic are those who have the prior approval of the Managing Director.

The only employees authorised to speak on behalf of Atlantic in this context are:

- Managing Director; or
- the Managing Director's delegate.



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If any other employee receives a request for comment from an investor, analyst or the media in relation to any matter concerning Atlantic, they must advise that person that they are not authorised to speak on behalf of Atlantic and must refer enquiries to the Managing Director.

### **2.3 Communication of Disclosable Information**

All information disclosed to the ASX in compliance with this Policy will be placed promptly on Atlantic's website, following receipt of confirmation from the ASX.

Atlantic's website is [www.atlanticltd.com.au](http://www.atlanticltd.com.au)

The Board is provided with copies of all information disclosed to the ASX.

### **2.4 Shareholder Meetings**

Atlantic encourages and supports shareholder participation in general meetings. Mechanisms for enabling shareholder participation will be reviewed regularly to encourage the highest level of participation.

### **2.5 Analyst, Investor and Media Briefings**

From time to time, Atlantic conducts briefings for analyst, investor and media groups to discuss information that has been released to the market.

The following protocols apply:

- There will be no discussion of price sensitive information not already disclosed to the market generally.
- Questions raised in relation to price sensitive information not previously disclosed will not be answered.
- If price sensitive information is inadvertently released during the briefing, it will immediately be released to the ASX and be placed on Atlantic's website.
- All briefing and presentation materials will be disclosed to the market via the ASX and placed on Atlantic's website prior to commencement of the briefing.



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### **2.6 Analyst Reports**

Atlantic recognises the important role played by analysts in assisting the establishment of an efficient market with respect to Atlantic securities. However, Atlantic is not responsible for, and does not endorse, analysts' research reports on the Company.

When requested to do so, Atlantic may review analysts' research reports, but will confine its comments to material previously disclosed by Atlantic or material in the public domain.

Atlantic may comment on analysts' earnings estimates to the extent of:

- acknowledging the current market range of estimates;
- questioning an analyst's assumptions or sensitivities if the analyst's estimate is significantly at variance from current market range estimates; and
- advising factual errors where data is already in the public domain.

Forecast information will not be provided by Atlantic, unless it has already been disclosed to the market.