



## COMMUNICATIONS POLICY

### 1. Introduction

- 1.1 Clean Seas Tuna Limited (“Clean Seas Tuna” or the “Company”) places considerable importance on effective communication with its shareholders, market participants, customers, employees, suppliers, financiers, creditors, other stakeholders and the wider community.
- 1.2 This Communications Policy outlines Clean Seas Tuna’s broader approach and commitment to communication. It describes the methods by which the Company communicates with its shareholders and other stakeholders, with the objective of providing them ready access to balanced, timely and understandable information about the Company.
- 1.3 It is anticipated that this Policy will be revised from time to time as best practice develops in Australia and in the major markets in which the Company operates.

### 2. Purpose

- 2.1 The purpose of this Policy is to:
  - a) reinforce Clean Seas Tuna’s commitment to the continuous disclosure obligations imposed by law and to describe the processes implemented to ensure that compliance;
  - b) outline the manner in which the Company provides all shareholders and market participants with equal and timely access to material information about the Company in a balanced and understandable way; and to
  - c) outline the mechanisms the Company uses to communicate effectively with its shareholders and to make it easy for them to communicate with the Company and to participate in general meetings.

### 3. Continuous Disclosure

- 3.1 Communication is central to investor confidence.
- 3.2 Clean Seas Tuna will provide full and timely information about the Company’s activities in compliance with the continuous disclosure obligations contained in applicable Australian Securities Exchange (ASX) Listing Rules and the Corporations Act in Australia to ensure that trading in its shares takes place in an efficient, competitive and informed market.
- 3.3 To achieve this Clean Seas Tuna has established policies and procedures which place accountability at a senior management level.
- 3.4 The key policy is the Company’s Continuous Disclosure Policy which is accessible on the Company’s website.

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## 4. Continuous Disclosure Policy

- 4.1 The Continuous Disclosure Policy requires Clean Seas Tuna to immediately inform the market of any information, disclosure or major development related to the business of Clean Seas Tuna which a reasonable person would expect to have a material effect on the price or value of its securities.
- 4.2 Clean Seas Tuna will do this by announcing the relevant information to the ASX.
- 4.3 If the information falls within the scope of the exemption contained in the ASX Listing Rules, the Company may not disclose the information.
- 4.4 The Board has appointed Authorised Spokespersons responsible for:
- a) receiving and reviewing information;
  - b) determining what information must be disclosed; and
  - c) ensuring that Clean Seas Tuna complies with its disclosure obligations.
- 4.5 The Authorised Spokespersons are the:
- a) Chairman;
  - b) Chief Executive Officer; and
  - c) Company Secretary.
- 4.6 Protocols are in place, pursuant to the Continuous Disclosure Policy, to ensure that material information is promptly reported to the Authorised Spokespersons, who will then determine whether the information will be disclosed.
- 4.7 In particular, the Company Secretary has overall administrative responsibility for reviewing all information forwarded pursuant to the Continuous Disclosure Policy and for making a recommendation to the Chairman or Chief Executive Officer on whether it is material information that must be disclosed to the ASX and/or falls within the scope of the exemption contained in the ASX Listing Rules.
- 4.8 Clean Seas Tuna's Continuous Disclosure Policy is available on the Company's website [www.Clean Seas Tuna.com.au](http://www.CleanSeasTuna.com.au).

## 5. Communications with the Australian Securities Exchange

- 5.1 All communication with the ASX will be in accordance with the ASX Listing Rules.
- 5.2 The Company Secretary is responsible for communications with the ASX and for ensuring that such information is not released to any person until the ASX has confirmed its release to the market.
- 5.3 Information communicated to the ASX will also be placed on the Company's website [www.Clean Seas Tuna.com.au](http://www.CleanSeasTuna.com.au).

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5.4 The insider trading rules are an important adjunct to the continuous disclosure regime in ensuring that shareholders are given fair access to material information regarding securities. Clean Seas Tuna seeks to limit the opportunity for insider trading in its own securities through its continuous disclosure policies and the dealing rules embodied in the Company's Securities Trading Policy applying to its employees and Directors.

## 6. Communication with Shareholders and the Market

6.1 The Communications Policy is designed to ensure that the Company:

- a) provides timely and accurate information equally to all shareholders and market participants regarding Clean Seas Tuna including its financial situation, performance, ownership, strategies, activities and governance; and
- b) adopts channels for disseminating information that are fair, timely and cost-efficient.

6.2 The specific processes Clean Seas Tuna has adopted to implement these goals, in addition to those contained in the Continuous Disclosure Policy, are outlined below.

### 6.3 Company Meetings

- a) The annual general meeting and other general meetings of the Company are the primary forum for communication by the Company with its shareholders and for shareholder participation. These meetings represent an excellent opportunity for the Company to provide information to its shareholders. The Company encourages attendance at, and participation in, general meetings.
- b) The Company typically holds its annual general meeting in November of each year.
- c) The notice of meeting for general meetings is sent to shareholders with an explanatory memorandum providing information to shareholders to help them decide how they should vote on each item of business.
- d) The form and content of the notices of general meeting will comply with the Corporations Act 2001 and any applicable ASX listing rules and guidelines which the Board has adopted. These provide clear procedures which the Company will follow to ensure that shareholders have the opportunity to attend and vote in a fully informed manner on the matters to be considered at general meetings.
- e) A full copy of the notice of meeting and proxy form is posted on Clean Seas Tuna's website and lodged with the ASX.
- f) At each general meeting, the Chairman will allow a reasonable opportunity for members to ask questions of the Board.
- g) The proceedings of general meetings, including any formal addresses delivered, are made available for viewing on Clean Seas Tuna's website.
- h) Clean Seas Tuna requires that its auditor attend each annual general meeting so as to be available to answer any shareholder questions about the conduct of the audit and the preparation and content of the auditor's reports.

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**6.4 Information on the Website**

- a) Clean Seas Tuna's website is one of the cornerstones of the Company's Communications Policy with shareholders and the market.
- b) The Company's website has been designed to enable information to be accessed in a clear and user friendly manner.
- c) The following will be available on the Company's website:
  - Key governance documents including Clean Seas Tuna's codes, policies and charters. In order to ensure high standards of corporate governance Clean Seas Tuna has adopted a range of codes, charters and policies which ensure that the Company conducts itself in accordance with high ethical corporate standards. These codes, policies and charters are available on the website in the investor information section;
  - All announcements made to the market and releases to the ASX which are posted as soon as practicable after the ASX confirms receipt of that information;
  - Copies of any presentations to shareholders, institutional investors, brokers and analysts;
  - Any media or other releases;
  - All notices of meetings and explanatory material;
  - A copy of the Company's most recent annual reports;
  - Dividend information;
  - Calendar of events;
  - Company profile information and contact details, including for the share registry; and
  - Any other relevant information concerning non-confidential activities of the Company including business developments
- d) Clean Seas Tuna's website address is [www.Clean Seas Tuna.com.au](http://www.Clean Seas Tuna.com.au).

**6.5 Investor and Analyst Briefings**

- a) Clean Seas Tuna recognises the importance of the relationship between Clean Seas Tuna and its institutional investors, brokers and analysts.
- b) Clean Seas Tuna therefore may conduct briefings to these groups from time to time.
- c) This may, include, but is not limited to, briefings at and presentations to such forums as:
  - one-on-one meetings and small group meetings with shareholders and the investment community;
  - group briefings with shareholders and the investment community;

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- roadshows, normally coinciding with the release of half yearly and yearly results; and
  - broker sponsored investor conferences and other external stakeholder presentations.
- d) Clean Seas Tuna refrains from providing briefings to analysts and institutional investors leading up to the release of half yearly and yearly results. A blackout period of 30 days prior to the release of half yearly and yearly results will be imposed whereby Clean Seas Tuna will not provide direct or indirect briefings to analysts.
- e) In any event, where briefings occur, the following protocols will apply:
- material information which is required to be disclosed pursuant to the Continuous Disclosure Policy will not be disclosed at these briefings unless it has been previously, or is simultaneously, released to the market;
  - if material non-publicly available information is inadvertently discussed or released during any briefing, the Company will immediately release it to the market via the ASX and place it on the Clean Seas Tuna website;
  - questions at briefings that deal with material information that has not previously been disclosed will not be answered; and
  - Clean Seas Tuna will lodge a copy of any presentation material with ASX prior to the start of the briefing and then post on the Clean Seas Tuna website.
- f) A summary record of all meetings and briefings with investors and analysts is kept, including a record of those present, time and venue of the meeting and confirmation that no new material information was disclosed in each case, is maintained for internal reference only.
- g) A more comprehensive overview of the Company’s protocols with respect to these types of briefings is contained within the Company’s Continuous Disclosure Policy.

**6.6 Calendar**

- a) Clean Seas Tuna follows a calendar of regular disclosure to the market on its financial and operational results.
- b) The calendar, which is posted on the website, includes dates for the release of half year and full year results, dividends, other financial information, and scheduled market briefings.

**7. Communication with Customers**

7.1 The Company will ensure that customers:

- a) are informed of the relevant activities of the Company; and
- b) the Company receives regular input from them to ensure that it is fully responsive to their needs.

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## 8. Communication with Employees

- 8.1 Clean Seas Tuna recognises that its employees are central to the Company’s success.
- 8.2 In order to enable staff to fulfill their role to the high standards required and to promote employee satisfaction, Clean Seas Tuna must ensure effective communication. Effective communication with employees starts with their direct manager and with accessibility to senior management. Informal communication forms an important part of the process.
- 8.3 In addition, the Company has adopted the following formal approaches to ensure that employees are informed of the activities of the Company.

### a) Employee Briefings

- Clean Seas Tuna will from time to time conduct employee briefings to ensure that all staff are aware of activities within the Company.
- These briefings are generally conducted by the Chief Executive Officer or an appropriate senior manager.

### b) Electronic Communication

- Clean Seas Tuna’s email system allows staff to communicate simply and easily with each other and with management.
- All staff have access to this system and are encouraged to use it to improve the flow of information and communication generally.
- The Company will use email to ensure a continued flow of the information and to communicate effectively with staff.
- Staff should feel free to communicate with any member of management by email.

### c) Website

- The Company's website is an important communication tool for employees. It contains a range of information which relates to employees including relevant policies and codes, media and market announcements and presentations to shareholders and institutional investors.
- Employees are encouraged to view the website on a regular basis so that they can keep up to date with information concerning the Company.

## 9. Communications with Other Stakeholders

- 9.1 The Company is committed to ensuring that all stakeholders regularly receive information about the Company and its activities.
- 9.2 While individual briefings may be held with key stakeholders such as financiers, the principal means of ensuring that the stakeholders to have access to information will be through the Company's website.

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## 10. Clear Communication

10.1 Clean Seas Tuna is committed to ensuring that all its communications are in plain, easily understood language. It will aim to ensure that all its stakeholders can find the information they need, read it, understand it, and use it in a useful and practical way.

## 11. Shareholder and Investor Queries

11.1 Shareholders with enquiries relating to their holding of Clean Seas Tuna shares can contact the share registry which provides a toll free call centre to deal with all such enquiries.

11.2 Shareholders may also access their holding information, dividend details and change information relating to their holding through the registry website which is also accessible through Clean Seas Tuna's website.

11.3 Contact details for the share registry and Investor Relations including email, telephone and facsimile contacts are provided on the Clean Seas Tuna website and in the Annual and Half Year reports to shareholders.

11.4 Clean Seas Tuna is committed to responding to all shareholder and investor queries in a timely manner.

## 12. Social Media or Social Networking

12.1 Clean Seas Tuna does not communicate with individuals in their capacity as shareholders or investors using social media or social networking technologies.

## 13. Review of Policy

13.1 This Policy is subject to regular review by the Board and will be amended (as appropriate) to reflect current best practice in communications with shareholders and other stakeholders

13.2 The Policy may be amended by resolution of the Board.

## 14. Disclosure

14.1 The Board will make appropriate disclosure to shareholders in Clean Seas Tuna's Annual Financial Report of the key aspects of this Policy, including explaining any departure from the best practice recommendations set out in the Australian Securities Exchange Corporate Governance Council's Corporate Governance Principles and Recommendations.

14.2 This Policy is publicly available on the Company's website and may be accessed within the "Investor Information" section.

## 15. Who to Contact

15.1 Any questions relating to the interpretation of this Policy should be forwarded to the Company Secretary.

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**This Policy was approved by the Clean Seas Tuna Board on 22/05/2012.**

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