

## 0088 CONFIDENTIALITY POLICY

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SPARQ Solutions Pty Ltd (“SPARQ Solutions”) is committed to establishing and maintaining a comprehensive and effective information confidentiality framework that takes all reasonable precautions to protect information. An effective confidentiality framework is necessary to meet the expectations of clients and shareholders that SPARQ Solutions directors, management and staff understand confidentiality requirements and are appropriately managing the risks associated with the improper disclosure of confidential information.

1. In accordance with the SPARQ Solutions Shareholders Deed, ‘Confidential Information’ means: “all information that is made available to, or obtained by, a party in relation to SPARQ Solutions, the business carried on by SPARQ Solutions or the affairs of a Shareholder or a related body corporate of any of them, and that is not a matter of public knowledge.”
2. Confidential information will only be disclosed in limited situations when there is an overriding duty to disclose. Eg. a legal or judicial process.
3. Staff must not discuss the affairs of SPARQ Solutions or its clients or any other information gained through their work with SPARQ Solutions with any person outside SPARQ Solutions, except for the appropriate officials of the client itself and specific third parties that the client has approved in writing.
4. Staff must not discuss the affairs of SPARQ Solutions or its clients with members of the press or other news media. Only the CEO or his appointed spokesperson will comment where considered necessary.
5. Documents are to be handled in accordance with the following information classification guideline: ‘Any document containing a company logo(s) may be assumed ‘In Confidence’ for that (those) entity(s) only unless a releasability clause is attached.’

If documents are considered ‘Highly Confidential’ this must be clearly stated on the face of the document.

6. Guidelines will be established to safeguard all files and confidential papers (both in manual and electronic form) so that they are not available to unauthorised persons, including in public places and on public transportation as well as in SPARQ Solutions own offices, and when papers or other media are sent for destruction. Eg. third party contracts.
7. Where necessary appropriate segregation of duties will be maintained to protect confidentiality.
8. Additional director guidelines on confidentiality will be established.
9. Training will be provided to inform all staff of their duty of confidentiality and confidentiality procedures.
10. An incidents handling procedure will be developed and a program of regular review and reporting to ensure that the highest possible standards are maintained throughout the organisation. This will include reviewing access controls to information and addressing any suspected process weaknesses.
11. The SPARQ Solutions Commercial Manager will be responsible for the distribution and maintenance of this policy.