

Confidential Information Protocol

Purpose

The Gas Industry Co (“the Company”) values openness and transparency and as a general principle it does not encourage the seeking of confidential information from industry participants.

It is recognised however that in some circumstances the Company (either through its directors or employees) may receive confidential information as part of its policy development process.

This protocol sets out the Company’s policy in relation to the receipt of information, how the Company will deal with any confidential information it receives and how it will ensure, to the extent possible, that the confidential status of such information is preserved.

Application

This protocol applies to directors, employees and contractors of the Gas Industry Co.

Policies

1. General Information Policy
 - 1.1 The general policy of the Company is that it seeks for all information received from industry participants to be utilised in an open, accessible and transparent manner.
 - 1.2 Employees and directors should discourage the provision of confidential information by industry participants whilst recognising that there may be circumstances where the provision of such information is appropriate.
 - 1.3 Employees or directors must not accept any information if it is given or with the proviso that it cannot be provided to other appropriate Company employees.
 - 1.4 Where any information is provided to the Company, the recipient should assess whether or not it might be commercially sensitive. If unsure, the recipient should confirm the commercial status of the information with the provider.
2. Confidential Information Policy
 - 2.1 Where confidential information has been provided to the Company, the recipient of the information shall discuss the confidential status of the information with the provider including the reason for its confidential status and the risks arising to the provider from the disclosure of the information to third parties. Where the Company wishes to disclose the confidential information (rather than merely the existence of the information) to Company’s Board, it will discuss this with the provider prior to doing so.

- 2.2 Confidential information provided to the Company will not be provided to third parties without the express written consent of the provider or as required by law.
- 2.3 Employees and directors must ensure that any commercially sensitive information is marked as such, the reason it is sensitive recorded, and ensure that it remains marked when it is reproduced (or extracts of it reproduced) in subsequent analyses and documentation. The commercially sensitive information must be highlighted in bold and marked in parenthesis.
- 2.4 Where an employee or director is concerned regarding the confidential status of information or is unsure of the correct process to follow in relation to that information, the person should consult with the Chief Executive or Senior Legal Advisor.
- 2.5 Any significant concerns raised by industry participants on the disclosure of confidential information or on the application of this protocol should be referred to the Chief Executive.