



SHAREHOLDERS COMMUNICATIONS POLICY

VERSION 1

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BANK OF SOUTH PACIFIC LIMITED SHAREHOLDER COMMUNICATIONS POLICY

OUR COMMITMENT

Bank of South Pacific Ltd's Code of Conduct requires BSP and its employees to act with high standards of honesty, integrity, fairness and equity in all aspects of their employment with BSP.

With this in mind, BSP commits to dealing fairly, transparently and openly with both current and prospective shareholders using available channels and technologies to reach widely and communicate promptly. BSP commits to facilitating participation in shareholder meetings and dealing promptly with shareholder enquiries.

Our shareholder communication policy is built around compliance with disclosure obligations and aspiring to be at the forefront of best practice in disclosure. Our framework for communicating with shareholders is to concisely and accurately communicate:

- our strategy.
- how we implement that strategy; and
- the financial results consequent upon our strategy and its implementation.

CONTINUOUS DISCLOSURE

The continuous disclosure regime is fundamental to the rights of shareholders to receive information concerning their securities. The most important aspect of BSP's shareholder communication policy is to comply with the continuous disclosure regime and implement best practice disclosure policy.

Market announcements are posted to BSP's website immediately after release to the market. All market announcements made by BSP since its listing in August 2003 are currently available on our website.

Where BSP provides financial results briefings to analysts or media, these briefings are webcast as soon as possible after the event. In any event no material information, which has not been previously released to the market, is covered in such briefings. The material upon which the briefing is based (such as slides or presentations) is released to the market prior to the briefing.

BSP will not engage in "black-listing" of analysts or commentators based on their reporting of BSP.

INSIDER TRADING

The insider trading rules are important adjuncts to the continuous disclosure regime in ensuring that shareholders are given fair access to material information regarding securities. BSP seeks to limit the opportunity for insider trading in its own securities through its continuous disclosure policies and the dealing rules applying to its employees and directors.

FINANCIAL REPORTING

Transparent and prompt financial reporting is key element of listed company disclosure. BSP reports and produces half yearly and yearly financial reports and an annual report in accordance with the Company's Act and listing rules. BSP aims to report promptly, comply with all applicable laws, listing rules and accounting standards in its financial reporting and to report in a way, which is easy to understand and conveys the materiality of the matters discussed.

BSP publishes its half yearly and full year results announcements on its website.

BSP also aims to articulate the business environment in which it operates through reports, correspondence and public forums on a regular basis. Identifying current trends and changes in BSP's operating environment is also important and this is done in the reports referred to above.

OTHER INFORMATION ABOUT BSP

BSP makes non-material announcements about itself from time to time via media releases and other forums and makes available information of interest to shareholders and other stakeholders. These are available on BSP website.

SHAREHOLDER MEETINGS

Shareholder meetings are an opportunity for shareholders and other guests to hear from and question the board and management of BSP. The Chairman and Managing Director make presentations separately before attending to voting on resolutions and general business. The chair of the meeting, usually the chairman, is responsible for the conduct of the meeting.

BSP's auditor attends its annual general meeting and is available to answer any questions regarding the conduct of any issues arising from BSP's audit.

BSP accepts nominations for the board of BSP that are made to the Company Secretary in accordance with the listing rules and BSP's constitution. BSP conducts annual and extraordinary general meetings in accordance with the Companies Act, the Listing Rules, and BSP's constitution.

BSP drafts notices and proxy forms to maximise the ability of readers to understand and vote on the issues presented.

CORRESPONDENCE AND REPORTS TO SHAREHOLDERS

BSP corresponds periodically with all shareholders to update them on the company's activities and progress. The correspondence is signed by the Chairman and may at times accompany dividend payment advice or cheques.

GENERAL INTERACTION WITH SHAREHOLDERS

BSP deals with shareholder enquiries promptly and courteously.

SHAREHOLDERS PRIVACY

BSP recognises that privacy is important and will not disclose registered shareholder details unless required by law. Shareholders details will only be used in accordance with applicable privacy laws.