



Western Coal

Western Coal Corp. Disclosure Policy

PART A – OBJECTIVE

The objective of this Disclosure Policy is to ensure that public communications with respect to Western Coal Corp. (“WCC”) are informative, timely, factual, accurate and disclosed in accordance with applicable legal and regulatory requirements, by establishing appropriate disclosure controls and ensuring that persons covered by this Disclosure Policy understand and comply with the Disclosure Policy. It covers all methods and forms of communication by or on behalf of WCC, including written, oral and electronic communications, whether or not filed with securities regulators.

The goals of this Disclosure Policy are to promote consistent disclosure practices, to ensure that material information is identified and disclosed within time periods specified under applicable securities legislation, to raise awareness of WCC’s approach to disclosure among its directors, officers and other employees and to ensure that disclosure controls are developed, documented, monitored and amended from time to time.

The Disclosure Policy is intended to reflect current legal requirements applicable to WCC and appropriate best practices as they have evolved from time to time.

PART B - PERSONS COVERED BY THIS POLICY

The Disclosure Policy applies to all directors, officers and other employees of WCC. Each of them is responsible for ensuring that they do not disclose material information or material facts about WCC that have not previously been generally disclosed to anyone who is not a director, officer or employee of WCC (including family members).

PART C - COMMUNICATIONS COVERED BY THIS POLICY

The Disclosure Policy applies to all methods and forms of communication by WCC, including disclosures in Core Documents, Corporate Documents and Public Oral Statements, as defined in Appendix 1.

PART D - DISCLOSURE COMMITTEE

WCC shall have a Disclosure Committee consisting of the persons holding the following or comparable positions:

- General Counsel and Secretary – Chairperson of the Disclosure Committee
- President & Chief Executive Officer

- Chief Financial Officer – his or her delegate shall act as Secretary of the Disclosure Committee
- Chief Operating Officer

The following persons will be members of the Disclosure Committee only to the extent that the disclosure is relevant to their respective area of responsibility.

- Vice President, Operations
- Vice President, Environmental and Regulatory Affairs
- Vice President, Marketing and Business Development

The Chief Executive Officer (the “CEO”) or his or her delegate may appoint or remove a member of the Disclosure Committee at any time. The intention is that the composition of the Disclosure Committee should include representatives of the main business units of WCC and key management oversight functions.

The Disclosure Committee’s responsibilities include:

- implementing, administering, reviewing, evaluating and recommending changes to this Disclosure Policy;
- assessing the materiality of information regarding WCC and deciding whether it should be publicly released and/or filed with securities regulators;
- pre-approving Core Documents and, where submitted to it for approval, other Corporate Documents and Public Oral Statements (as permitted by the Disclosure Policy on a delegated basis); and
- reporting to the CEO, the Chief Financial Officer (the “CFO”) and the Audit Committee (on an annual basis) on these and related matters.

The Chair of the Disclosure Committee shall arrange meetings to review and comment on Core Documents. The appropriate Vice President shall be responsible for ensuring that Corporate Documents and Public Oral Statements are issued in compliance with this Disclosure Policy. In the event that new or previously non-public information concerning WCC is identified that may be material information, each member of the Disclosure Committee is responsible, if they believe it is appropriate, for attempting to advise the other members and consider whether a press release or material change report is required.

Although formal meetings are preferred, it shall not be necessary for the Disclosure Committee to hold formal meetings or to obtain the consent of a specified number of its members before making any decision. However, to the extent practical or appropriate in the circumstances, decisions of the Disclosure Committee will involve consultation with the members then available and minutes of any meeting or decision shall be maintained by General Counsel.

PART E – SPOKESPERSONS

1. Individuals Who Are Authorized to Speak on Behalf of WCC

For purposes of this Policy, the Chief Executive Officer and President (primary) and the CFO/Corporate Secretary (backup) have been designated as the Disclosure Officers. The names

of these individuals shall be given to the market surveillance divisions of the Exchanges as Company contacts.

Generally, the Disclosure Officer is the only individual authorized to communicate with analysts, the news media and investors about information concerning the Company. If it is appropriate for another Employee to discuss information about the Company, the Employee should, if possible, first advise the Disclosure Officer of the nature of the information to be discussed and, afterwards, advise the Disclosure Officer of what actually was discussed. Employees are prohibited from communicating Undisclosed Material Information about the Company unless they have prior permission from the Disclosure Officer, which permission shall not be given unless:

- (a) the information has been publicly disclosed; or
- (b) if it has been determined that the information is to be kept confidential pursuant to Part II of this policy, all rules and procedures under Part II hereof to maintain confidentiality have been complied with.

In addition, if any Employee becomes aware of any information which may constitute Material Information with respect to the Company, the Employee must advise the Disclosure Officer as soon possible.

PART F - DISCLOSURE OF MATERIAL INFORMATION

1. Responsibility to Advise Disclosure Committee of Potential Material Information

In the event that a director, officer or employee of WCC becomes aware of a new or pending development, circumstance or information that may constitute a material fact or material change must immediately advise either (i) a member of the Disclosure Committee; or (ii) their manager, who therefore becomes similarly responsible under this Policy to disclose it to their manager (see Appendix 2 for a discussion of what constitutes a material fact or material change). If there is any doubt whether any particular information is material information, a member of the Disclosure Committee is to be consulted. In the event that the information is deemed material, the Disclosure Committee will determine the appropriate release of such information in accordance with Part D. If, however, a matter is known only to the Directors or any member of management who is a Vice President or holds a more senior position, they shall be responsible for ensuring that the Disclosure Policy is complied with.

2. Ensuring Material Information is disclosed to Senior Management

There are four principal means by which WCC' senior management ensures that all material information is disclosed to them and that evidence that WCC's senior management has considered whether disclosure is required is maintained in WCC's files: (i) regular meetings with all business/corporate groups, including through weekly Management meetings. The Corporate Secretary is responsible for maintaining copies of the agenda for all Management meetings, together with copies of all materials submitted; (ii) as a result of the due diligence process that is undertaken within WCC in order for the CFO to provide our banks with a quarterly certificate confirming that there has been no breach of WCC's Credit Agreements. The CFO is responsible

for maintaining copies of this due diligence; (iii) as part of the due diligence process that is undertaken within WCC in order for the CEO and CFO to certify quarterly and annually that WCC's MD&A, financial statements, and annual information form, as applicable, do not contain a misrepresentation and file such certification with the securities regulatory authorities in the jurisdictions in which WCC is a "reporting issuer". The CFO is responsible for maintaining copies of this due diligence; and (iv) WCC's disclosure controls (the "Disclosure Controls"), which are the system of processes and controls maintained by Finance that WCC implements to provide reasonable assurance that: (A) its Core Documents do not contain any misrepresentation; and (B) the Disclosure Committee is in the ordinary course advised of all material information and any facts relevant to ensuring that its Core Documents do not contain any misrepresentation (see Appendix 2 for a discussion of what constitutes material information). The CFO is responsible for maintaining the Disclosure Controls for evaluating these Disclosure Controls annually. Disclosure controls are distinct from the internal controls over financial reporting intended to provide reasonable assurance that the financial statements are fairly presented. Disclosure controls encompass the procedures that ensure WCC meets its continuous disclosure obligations, including that all significant reportable events are reflected in the financial statements at their appropriate values and that the MD&A and financial statements are complete and accurate.

3. Approvals Before Public Disclosure

The Disclosure Committee shall meet to review and approve Core Documents and news releases with respect thereto before they are released publicly. Each Core Document, other than a material change report, that is proposed to be issued by WCC must also be reviewed and approved by the Board, or an appropriate committee of the Board, before being released publicly.

Each other Corporate Document and each Public Oral Statement must be reviewed and approved by the Corporate Secretary, or the Vice President or more senior officer responsible for the employee who prepared the Corporate Document or will be giving the Public Oral Statement, before the Corporate Document or Public Oral Statement is released publicly. If the reviewing person determines it is necessary or desirable to do so, he or she may submit the Corporate Document or Public Oral Statement to the Disclosure Committee for review and approval.

In all cases, if a Corporate Document or Public Oral Statement is being released publicly and contains financial information, the person or persons conducting the review and providing their approval must consider whether the financial information contains material non-public information, has been accurately extracted or derived from WCC's financial statements, remains current and is presented with the appropriate context.

The Audit Committee must approve the issuance of WCC's quarterly and annual financial statements, MD&A or any news releases containing financial information and ensure that WCC complies with the applicable regulations as determined by the securities regulatory authorities in the jurisdictions in which WCC is a "reporting issuer".

4. Disclosure of Material Changes

The Disclosure Committee has the responsibility for ensuring that the CEO and/or CFO are aware of all material changes and material facts. The CEO and CFO are each responsible for ensuring that all material changes concerning WCC are generally disclosed immediately upon their occurrence and that material facts and material changes which are not generally disclosed are treated on a confidential basis and disclosed only in the necessary course of business or otherwise in accordance with applicable securities laws in the jurisdictions in which WCC is a “reporting issuer”.

The CEO and/or CFO shall ensure that the Corporate Secretary reports all material changes concerning WCC in a material change report filed with the securities regulators as soon as practical and in any event no later than 10 days after the material change occurs.

5. Method of Disclosure – Generally Disclosed

WCC will generally disclose material information in a manner calculated to result in broad dissemination to the public (i.e. through the dissemination of a news release) and the term “generally disclosed” in the Disclosure Policy means information disseminated in this manner.

6. Confidential Disclosure of Material Changes

If the Disclosure Committee is of the opinion that the issuance of a news release announcing a material change would be unduly detrimental to WCC’s interests (for example, if the release of the information would prejudice negotiations related to a possible transaction), the Disclosure Committee may authorize and approve the filing of a confidential material change report in accordance with applicable securities laws. In such circumstances, the Disclosure Committee will keep the information confidential until such time as the information is generally disclosed and will periodically (at least every 10 days) review its decision to keep the information confidential.

7. News Releases

In addition to being approved as described above, a news release should generally (i) be factual and balanced and must include any information the omission of which would make the news release misleading; (ii) ensure that unfavourable information must be disclosed as promptly and completely as favourable information; (iii) contain sufficient detail to enable the media and investors to understand the substance and importance of the information being disclosed; and (iv) contain the name and contact information of Spokespersons from whom further information may be obtained.

WCC’s Finance group is responsible for reviewing all news releases containing financial information and for reviewing all other news releases.

WCC will issue a news release with its annual or interim financial statements immediately following Board (or its delegates) approval of the statements and will concurrently file the financial statements with applicable securities regulators.

News releases that contain material information will be disseminated through an approved news wire service that provides simultaneous national and/or international distribution. Such news releases will be transmitted to all relevant regulatory bodies, major business wires, national financial media and the local media.

News releases will be posted on WCC's Website immediately after release over the news wire and will simultaneously be transmitted via email within WCC.

8. Correcting Errors

If the Disclosure Committee determines that a Corporate Document or a Public Oral Statement issued or made by WCC contains a misrepresentation or is in a material respect misleading or untrue, or there has been a failure by WCC to make timely disclosure, the Disclosure Committee must take immediate steps to generally disclose correcting information or the material change, and immediately advise the Audit Committee.

9. Quiet Periods

Each period: (i) beginning on the last day of each fiscal quarter and each fiscal year; and (ii) ending when the earnings for that fiscal quarter or fiscal year have been generally disclosed by way of a news release; must be a "quiet period" during which WCC must not comment upon the financial results of WCC for the current fiscal quarter or current fiscal year. However, during a quiet period, WCC may respond to unsolicited inquiries about information that is not material or that has previously been generally disclosed.

10. Disclosure Record

The CFO or his designate must retain, for at least five years, an up-to-date record (the "Disclosure Record") containing all minutes of meetings of the Disclosure Committee, all Core Documents and copies of the due diligence that is conducted to support quarterly, and annual certifications executed by the CFO and delivered to WCC's banks and to applicable securities regulatory authorities, together with such other information as he or she deems material. Public Affairs retains, for at least five years, a copy of all major speeches given by senior management at WCC.

11. Reporting to the Audit Committee

The Chair of the Disclosure Committee must report promptly to the Audit Committee from time to time any significant issues arising under the Disclosure Policy (such report to be made at the time such issues arise), including any circumstances where:

- (a) there may have been a misrepresentation in a Corporate Document or Public Oral Statement;
- (b) there may have been a failure to make timely disclosure when required under applicable securities law;
- (c) there has been selective disclosure of undisclosed material information; or

(d) securities regulators have asked questions about or inquired into WCC's disclosure practices or whether any Corporate Document or Public Oral Statement may have contained a misrepresentation or was, in any material respect, misleading or untrue or whether WCC has failed to make timely disclosure when required.

The Disclosure Committee must report to the Audit Committee, at least annually, as to the effectiveness of and compliance with the Disclosure Policy and must advise the Audit Committee of any significant breach of the Disclosure Policy and of all circumstances of the nature referred to above.

PART G - AVOIDING SELECTIVE DISCLOSURE

1. Selective Disclosure

Selective disclosure occurs when undisclosed material information is communicated to particular persons such as analysts, investment dealers or other third parties, and is not generally disclosed to the public. Selective disclosure of material information which has not been generally disclosed is not permitted.

2. News Conferences, Industry Conferences, On-Line and other Conferences

If WCC intends to announce material information at a news conference, conference call, analyst meeting or other venue, the announcement must be preceded by a news release.

When participating in news conferences, analysts' conferences, private meetings with analysts, industry conferences and on-line conferences and in any other circumstances where a Public Oral Statement may be made, Spokespersons must take care to disclose only information that is not material information or that is material information which has been generally disclosed.

3. Necessary Course of Business

Material information which has not been generally disclosed may be disclosed to directors, officers and other employees of WCC and to third parties only if disclosure is in the necessary course of WCC's business.

Disclosure to credit rating agencies of material information which has not been generally disclosed will generally be considered to be in the necessary course of WCC's business (any such disclosure must, however, be pre-approved by a member of the Disclosure Committee and any written materials provided to the credit rating agencies must be recorded in the Disclosure Record). Disclosure of such information to market professionals and institutional investors would generally not be in the necessary course of WCC's business and disclosure to analysts and members of the press and other media is not in the necessary course of WCC's business. However, WCC is permitted to disclose such information to governmental authorities and regulatory bodies, to its lenders, if doing so is required to comply with applicable law and WCC's contractual obligations, or is otherwise in the necessary course of WCC's business.

If material information which has not been generally disclosed is disclosed to a third party in the necessary course of WCC's business, the recipient should be advised that the material information has not been generally disclosed and must be treated on a confidential basis. In appropriate circumstances, a confidentiality agreement should be entered into between WCC and the recipient.

4. Identifying and Rectifying Unintentional Selective Disclosure

If material information which has not been generally disclosed is inadvertently disclosed, WCC must take immediate steps to ensure that the information is generally disclosed and must immediately report the circumstances to the Audit Committee.

Pending the Material Information being generally disclosed, WCC should, where practical, contact the parties to whom the information was disclosed and inform them that the relevant information is Material Information which has not been generally disclosed and that they have a legal obligation to not disclose the information to others or to trade in the securities of WCC or any other issuer that is affected by the Material Information.

5. Contact with Analysts

The Designated spokesperson should avoid getting involved in the contents of an analyst's report, except to correct factual errors. Confirmation of or attempting to influence an analyst's opinions or conclusions may be considered to be disclosure by the Company. "No comment" is an acceptable answer to questions that cannot be answered without violating the rule against selective disclosure. After an interview, press conference, discussion with an analyst or visit to the Company's office by an analyst, a debriefing should be conducted to review what was actually said and a record of what was said should be filed in the disclosure records.

6. Notification of Market Surveillance

When the Exchanges are open for trading, advance notice of a press release announcing Material Information must be provided to the Market Surveillance Branch (or similar departments) of the Exchanges to determine if a halt in trading is necessary to provide time for the market to digest the news. When a press release announcing Material Information is issued outside of trading hours, the Market Surveillance Branch of the Exchanges should be notified before the market opens. Copies of all press releases should be supplied to the Market Surveillance Branch of the Exchanges and to the relevant securities regulators immediately.

7. Disclosure Records

The Disclosure Officer will maintain a file containing all public information about the Company. This includes news releases, brokerage research reports, reports in the press and notes from meetings with analysts or shareholders.

PART H - FORWARD-LOOKING INFORMATION

1. WCC's Practice on Analysts' Reports

Directors, officers and other employees should not review earnings estimates being prepared by analysts nor should they express comfort with or guidance on an analyst's report, earnings model or earnings estimate nor attempt to influence an analyst's opinion or conclusion. Doing so could constitute selective disclosure of material information. Correcting an analyst or rating agency report provided to WCC in draft for inaccurate information that, in the case of material information, has previously been generally disclosed does not constitute selective disclosure.

2. Earnings Guidance

It is WCC's practice not to give earnings guidance, other than any reference to earnings outlook that may be contained in WCC's MD&A.

3. Other Forward-Looking Information

(a) It is WCC's practice not to provide any forward-looking information relating to WCC, other than to regulators and others in the necessary course of business, and other than the forward-looking information that is permitted to be contained in annual and interim MD&A. Should WCC elect to release forward-looking information in a Corporate Document, the document must contain, proximate to the forward-looking information, (i) reasonable cautionary language identifying the information as forward-looking information, (ii) the material factors that could cause actual results to differ materially from the forward-looking information, including a range of reasonably possible outcomes, a sensitivity analysis or other qualitative analysis that will assist in assessing the related risks, and (iii) the material factors or assumptions that were reflected in the forward looking information.

(b) If the forward-looking information is contained in a Public Oral Statement, the person making the Public Oral Statement must: (i) make a cautionary statement that his or her comments contain forward-looking information, (ii) state that the actual results could differ materially from the forward-looking information, and (iii) state that certain material factors or assumptions were reflected in the forward-looking information.

(c) The information must be accompanied by a statement that WCC does not commit to update forward-looking information, but may provide an explanation of significant differences between actual results and previously disclosed forward-looking information.

PART I – CONFIDENTIALITY

1. Maintaining Confidentiality

Directors, officers and other employees of WCC must keep all material information about WCC confidential until it has been generally disclosed, subject to the necessary cause of business exception described above. They must assume that all material information about WCC is confidential unless they are absolutely certain that the information has been generally disclosed or they have first consulted with a member of the Disclosure Committee and have been advised that the information has been generally disclosed or is not material information. Guidelines with respect to maintaining the confidentiality of information are set forth in Appendix 3.

2. Rumours

WCC's policy is to, generally speaking, not comment on rumours or speculation. Inconsistent commenting on rumours may constitute selective disclosure.

PART J - ELECTRONIC COMMUNICATIONS

The CFO shall have overall responsibility for all content on WCC's Website. He/she will: (i) ensure that WCC's Website is up to date and accurate and that all Material Information is dated when it is posted or modified; (ii) move outdated information to an archive; (iii) establish minimum retention periods, which may vary depending on the kind of information posted; (iv) maintain on WCC's Website an accurate description of how WCC's Website is set up and maintained; and (v) report to the Disclosure Committee annually on the compliance of WCC's Website with the Disclosure Policy.

The CFO must approve all links from WCC's Website to third party Websites. Any such links will include a notice advising readers that they are leaving WCC's Website and that WCC is not responsible for the contents of the other site.

The CFO is responsible for maintaining the investor relations section of WCC's Website and is responsible for (i) monitoring all corporate information placed on the investor relations section of WCC's Website to ensure that it complies with relevant securities laws and the Disclosure Policy, (ii) ensuring that all of WCC's Corporate Documents which are filed on SEDAR are concurrently posted on WCC's Website, and (iii) posting on the investor relations section of WCC's Website all supplemental information that WCC provides to analysts and other market professionals (including data books, fact sheets, slides of investor presentations and other materials distributed at analyst or industry presentations).

Investor relations material must be contained in a separate section of WCC's Website and must include a notice advising readers that information which was accurate at the time of posting may have been superseded by subsequent disclosures. All data posted on WCC's Website, including text and audiovisual material, must show the date such material was issued. Any material changes in information must be updated immediately.

Disclosure on WCC's Website alone does not satisfy the requirement to generally disclose material information. No material information shall be disclosed on WCC's Website until it has been generally disclosed.

The CFO (or his/her delegate) is responsible for responding to electronic inquiries. Only information which has been generally disclosed shall be used in responding to electronic inquiries.

In order to prevent inadvertent disclosure of material information which has not been generally disclosed, directors, officers and other employees are prohibited from participating in Internet chat rooms or newsgroup discussions on matters pertaining to WCC.

PART K - DISTRIBUTION OF THIS POLICY

WCC will distribute a copy of the Disclosure Policy to each director and officer of WCC annually and /or whenever significant changes are made and will distribute a copy or a summary of the Disclosure Policy to all other employees. In addition, WCC will distribute copies or a summary of the Disclosure Policy to new directors, officers and employees of WCC when they join WCC. The Disclosure Policy shall also be included in WCC's Policy Binders, such that all employees have access to it.

PART L - CONSEQUENCES OF NON-COMPLIANCE WITH THIS POLICY

Any director, officer or other employee of WCC who violates the Disclosure Policy may face disciplinary action up to and including termination of his or her employment with WCC for cause and without notice. Violation of the Disclosure Policy may also constitute a breach of securities laws, and WCC may refer any such breach to the appropriate regulatory authority.

PART M – AUDIT

WCC's CFO is responsible for auditing the Disclosure Policy and Disclosure Controls through the provision of periodic reports (which shall be at least annual) to the Audit Committee, regarding the effectiveness of the Disclosure Controls and the Disclosure Policy.

Appendix 1

Definitions

“Core Document” means a prospectus, an annual information form, annual and interim financial statements, annual and interim MD&A, material change reports and any circular that is filed or required to be filed with applicable securities regulators;

“Corporate Document” means any written communication, including a communication prepared and transmitted only in electronic form, of WCC: (i) that is filed or required to be filed with a government, securities regulator or any other government agency under applicable securities or corporate law or with any stock exchange or quotation and trade reporting system under its by-laws, rules or regulations; or (ii) the content of which would reasonably be expected to affect the market price or value of WCC’s securities. Corporate Documents include Core Documents and news releases; and

“Public Oral Statement” means an oral statement made in circumstances in which a reasonable person would believe that information contained in the statement will become generally disclosed (such as at a news conference, analysts’ conference, a private meeting with analysts, an industry conference or an online conference, etc.).

“Material Change” means a change in the business, operations or capital of the Company that would reasonably be expected to have a significant effect on the market price or value of any of the securities of the Company and includes a decision to implement the change by the board of directors or by senior management who believe that confirmation of the decision by the board is probable;

“Material Fact” means a fact that significantly affects or would reasonably be expected to have a significant affect on the market price or value of the Company’s securities;

“Material Information” means any information (Material Fact or Material Change) relating to the business and affairs of the Company that results in or would reasonably be expected to result in a significant change in the market price or value of any of the Company’s securities; and

“Undisclosed Material Information” means Material Information pertaining to the Company that has not been publicly disclosed or information that has been publicly disclosed, but a reasonable period of time for its dissemination has not passed.

Appendix 2

Determining Whether or Not Information is Material

The term “Material Information” encompasses both material facts and material changes. A “material fact” means any fact that would reasonably be expected to have a significant effect on the market price or value of any of the securities of WCC. A “material change” with respect to WCC means a change in the business, operations or capital of WCC that would reasonably be expected to have a significant effect on the market price or value of any of WCC’s securities and includes a decision by the Board or by senior management (where senior management believes that Board confirmation of the decision is probable) to implement such a change.

The determination of whether or not information is material information often involves a difficult exercise of business judgment based on experience. If there is doubt about the question, those with access to the information should generally err on the side of caution and treat it as potentially material and therefore confidential until it has been generally disclosed.

Regulators have provided examples of events and information which they believe may be material and those of particular relevance to WCC are listed below:

- changes or potential changes in ownership or control of WCC
- Significant changes in corporate structure
- major reorganizations, amalgamations or mergers
- the public or private sale of additional securities
- shifts in financial circumstances
- developments that affect WCC’s resources, technology, products or markets
- a significant change in capital investment plans or corporate objectives
- the commencement of, or developments in, material legal proceedings or regulatory matters
- material modifications to rights of security holders
- significant acquisitions or dispositions of assets, property or joint venture interests
- the entering into or loss of a significant contract or other development relating to a major customer or supplier
- events regarding the WCC’s securities (for example, an event of default other than a technical default on which the Company is working with its Lenders to obtain a waiver, under a financing or other change in capital structure)

Appendix 3

Maintaining the Confidentiality of Information

In order to prevent the misuse or inadvertent disclosure of Material Information which has not been generally disclosed, the following procedures are recommended:

(a) Documents and files containing Material Information which has not been generally disclosed should be kept in a safe place which can only be accessed by individuals who require such information in the necessary course of WCC's business. Code names should be used if necessary.

(b) Confidential matters should not be discussed in places where the discussion may be overheard, such as elevators, hallways, restaurants, airplanes or taxis.

(c) Except where impractical, confidential matters that include undisclosed material information should not be discussed on wireless telephones or other wireless devices. If impractical, appropriate precautions should be taken to protect confidentiality.

(d) Confidential documents should not be read or displayed in public places and should not be discarded where others can retrieve them.

(e) Employees must ensure that they maintain the confidentiality of information in their possession outside the office as well as inside the office.

(f) Transmission of documents by electronic means, such as by fax or directly from one computer to another, should be made only where it is reasonable to believe that the transmission can be made and received under secure conditions.

(g) Unnecessary copying of confidential documents should be avoided and documents containing confidential information should be promptly removed from conference rooms and work areas after meetings have concluded. Extra copies of confidential documents should be shredded or otherwise destroyed.

(h) Access to confidential electronic data should be restricted through the use of passwords.