

CORPORATE COMMUNICATIONS POLICY

This Corporate Communications Policy sets out the guidelines governing communication with internal and external stakeholders of United Capital Plc (the “Company”).

It is the property of the Company, and shall, under no circumstances, be copied, sold, or reproduced for private or commercial use without the express permission of the Company.

This Policy supersedes all extant policies, documents and board decisions relating to corporate communication in the Company. The approval of this Policy by the Board shall be appropriately communicated by the Company Secretary.

Save for the Memorandum and Articles of Association of the Company, in the event of a conflict between the provisions of this Policy and the provisions of any other Policy or Document of the Company, the provisions of this Policy shall prevail.

1. Introduction

The Company and its employees interact internally with each other and externally with external stakeholders in various ways. Such interaction could be in the form of emails, press releases, newsletters, advertorials, tweets, other social media communication, etc. Employees may also be invited to speak or participate in various public functions in an official capacity. In certain instances, third party vendors or contractors may also be required to communicate on behalf of the Company.

In view of the foregoing, it is imperative that the principles that will govern any form of corporate communication in the Company are clearly defined.

2. Purpose

The objectives of this Policy are as follows:

- 2.1. To encourage effective internal communication between the Company's employees.
- 2.2. To encourage effective communication with external stakeholders.
- 2.3. To provide clear directions to all employees on how to communicate Company's publicly available information.
- 2.4. To help employees understand the Company's communication style regarding non-public information as well as the people authorised to handle such information.
- 2.5. To clarify the restrictions on communication with the media.
- 2.6. To streamline the process of accepting public speaking appointments.
- 2.7. To set out the principles governing the use of social media by employees.

3. Scope

This policy is applicable to:

- 3.1. All employees of the Company as it relates to any form of corporate communications.
- 3.2. All vendors and contractors who are creating or contributing to blogs, social networking sites, discussion forums, or any other kind of social media on behalf of the Company.
- 3.3. This Corporate Communications Policy shall be applicable in conjunction with the Brand Guidelines, the Crisis Management Policy, and the Human Resources Policy Manual in place from time to time.

4. Responsibilities

The Head, Marketing & Corporate Communications (Head, MCC) shall have primary responsibility of implementing this Policy.

The Head, Marketing & Corporate Communications shall be responsible for the day-to-day implementation and sensitization of employees on the provisions of this Policy.

5. Definition of Terms

- 5.1. **Restricted or Confidential information:** information which is made available by the GCEO or on the GCEO's directive to only select employees who by virtue of their position and authority need to know such information and disclosure of which can result in severe financial and reputation damage to the Company.
- 5.2. **Internal communication:** the transmission of information between the Company's employees. It takes place across all levels and departments/units within the Company.
- 5.3. **Publicly available information:** information that is already legitimately available in the public domain (for example, information that is available to all Company's employees, or available on Company's website or contained in Company's external publications and reports).

- 5.4. **Non-public information:** all information that has not been made publicly available through media channels but has been disclosed internally to all Company's employees.
- 5.5. **Media:** include print media, broadcast media, internet/wire news services, analyst reports and analysis, etc.
- 5.6. **Stakeholders:** people, groups, or organizations that have direct or indirect stake in the Company because they can affect or be affected by the Company's actions, objectives, and policies.
- 5.7. **External stakeholders:** include the media, rating agencies, regulators, vendors, government and governmental agencies, business partners, financial institutions, etc.

6 External Communication

6.1 General

- 6.1.1 External stakeholders should be informed of major business events affecting the Company in a factual and timely manner.
- 6.1.2 The Company communicates and markets its different businesses to a diverse set of stakeholders that operate in different legal, regulatory and cultural environment.
- 6.1.3 Good and effective communication safeguards the Company's reputation, results in supportive stakeholders, builds our brand and leads to sustainable value.
- 6.1.4 Our communication must be in line with all regulatory requirements in all areas of our business.

6.2 Communication of publicly available information

- 6.2.1 The Company supports the participation of all employees in helping to build the Company's brand. However, this shall be done through knowledgeable and accurate communication of the Company's key messages whether in business or social settings.

6.2.2 Information shall be deemed to be publicly available if it has been officially communicated to all staff from the Executive Office by email or at staff meetings, unless otherwise stated.

6.2.3 When presentations are prepared for internal or external use, the appropriate presentation template shall be used.

6.2.4 All presentations prepared for external purposes shall be reviewed and approved by the GCEO or by any senior management staff designated by the GCEO.

6.3 **Communication with the Media**

6.3.1 The media are both a key audience and a major influencer of other stakeholders of the Company and therefore play a big role in shaping the Company's reputation. Accordingly, communication with the media shall be carefully managed and thoroughly coordinated.

6.3.2 Communication with the media, both in formal and informal environments and in any form of platform (including social media) is strictly within the purview of authorised spokespersons.

6.4 **Communication with Regulators**

6.4.1 In most instances, communication with regulators is done in compliance with regulatory obligations such as the filing of returns and submission of information. Such returns or submissions shall only be filed and signed by the required officers of the Company.

6.4.2 All other engagements with regulators should be approved by the CEO on advice from the Legal unit.

6.5 **Management of confidential information**

The provisions of the Code of Conduct shall apply in matters relating to confidential information.

6.6 **Communication of non-public information**

6.6.1 Communication of non-public information shall always be treated with extreme care. This is because any leak of non-public information to the public may expose the Company to reputational risk.

6.6.2 The following rules shall apply to communication of non-public information:

6.6.2.1 Only the Chairman or GCEO is authorised to communicate non-public information to our stakeholders.

6.6.2.2 Where in doubt of what constitutes non-public information, please check with the Head, MCC.

6.6.2.3 Employees shall not provide non-public information to any source unless:

- i. The employee is authorised by the GCEO to do so; and
- ii. The employee is sure the information is accurate and authorised for release.

