



# **COMMUNICATION STANDARD POLICY**

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# **Internal Communication Policy**

## **Purpose**

The purpose of this policy is to facilitate better communication, paving the way for better business. We have kept this basic principle in mind as we draft the policy to coincide with our business' values.

This policy also seeks to identify the various channels of communication within our company, their intended purpose and the roles and responsibilities of staff in accessing and using them.

We believe courtesy, tact and consideration should guide each employee in relationships with fellow workers and the public. It is mandatory that each employee in this organization show maximum respect to every other person in the organization and other contacts in a business context. The purpose of communication should be to help others and to make our business run as effectively as possible, thereby gaining the respect of our colleagues and customers.

## **Objectives**

The Policy has the objective of enhancing and streamlining internal communications to reinforce our mission, vision and strategic priorities. This involves ensuring that information disseminated to staff is relevant, easy to access, accurate, and appropriate in both content and quantity.

We will continue to develop and try new communication platforms, channels, and tools to improve information sharing and collaboration between employees.

This policy is to be implemented in a way that ensures compliance with relevant legislative requirements and standards of best practice.

Employees are encouraged to share information with their colleagues about activities and events which have an association with the organization and it is expected that staff will use the channels and associated tools for purposes and in compliance with this and other relevant policies and procedures.

Users of these and other information employees privy to, are expected to use them for work purposes, and not to be shared with those whom it is not meant for. Email, payslips and salary information should be treated as confidential and are intended

solely for the use of the individual to whom it is addressed and employees must not copy or show them to anyone. Failure to do so may result in disciplinary action for employees and those who have left the employment are liable for legal action.

## **Rationale**

Effective Communication is significant in performing the basic functions of management, i.e., Planning, Organizing, Leading and Controlling.

Communication serves as a foundation for planning. All the essential information must be communicated to the managers who in-turn must communicate the plans to subordinates so as to implement them. Organizing also requires effective communication with others about their job task. Similarly leaders as managers must communicate effectively with their subordinates so as to achieve the team goals. Leading is not possible without written and oral communication.

Employees devote a great part of their time in communication. They generally devote approximately 6 hours per day in communicating. They spend great time on face to face or telephonic communication with superiors, subordinates, colleagues, customers or vendors. Written Communication in form of letters, reports or memos wherever oral communication is not feasible cannot be overemphasized as well.

This makes effective communication a building block of successful organizations. In other words, communication acts as the organization's blood.

Communication promotes motivation to employees by informing and clarifying on task to be done, the manner they are performing the task, and how to improve their performance if it is not up to the mark.

Communication is a source of information to members of the organization for decision-making process as it helps in identifying and assessing alternative course of actions.

Communication also plays a crucial role in altering individual's attitudes, i.e., a well-informed individual will have better attitude than a less-informed individual. Organizational newsletters, meetings and various other forms of oral and written communication help in molding employee's attitudes.

Communication also helps in socializing. In today's life the only presence of another individual fosters communication. It is also said that one cannot survive without communication.

As discussed earlier, communication also assists in controlling process. It helps in setting clear guidelines about the behaviour of employees in various ways. There are various levels of hierarchy and certain principles and guidelines that employees must

follow in an organization. They must comply with organizational policies, perform their job role efficiently and communicate any work problem and grievance to their superiors. Thus, communication helps in controlling function of management.

An effective and efficient communication policy requires managerial proficiency in delivering and receiving messages.

## **Guidelines**

Courtesy, friendliness, and a spirit of helpfulness are important and guide the company's dealings with employees and customers.

Differences of opinion should be handled privately and discreetly. Gossip and backbiting are to be avoided. Communicate directly with the person or persons involved to resolve differences.

Conservative criticism — that which will improve business by clarifying or instructing — should be welcomed when delivered with respect and tact. Destructive criticism — that which is designed to harm business or another person — is not to be practiced.

Employees should strive to maintain a civil work atmosphere at all times and refrain from shouting, yelling, using vulgarities or swearing at co-workers or customers.

The standard work environment should be free from disparaging remarks about religion, ethnicity, sexual preferences, appearance and other non-work related matters. Each employee has the responsibility to foster an understanding of others' differences in order to create an environment where those differences contribute to a better organization.

Inappropriate remarks based on any of the following are not tolerated and such behavior will result in immediate termination of employment: race, religion, ethnic origin, physical attributes, mental or physical disability, color, ancestry, marital status, pregnancy, medical condition, citizenship and/or age.

Inappropriate remarks include those that treat a group of people in a uniform way, assign a behavior in a disparaging way, imply inferiority of a group, are supposedly funny at someone else's expense, and/or cause embarrassment or distress to others based on comments about a particular group of people.

## **Communication channels**

We have a number of existing internal communication channels available, including:

Channel	Purpose
Staff Bulletin	Dissemination of information from the Management to staff which is important and relevant to their interests, including training, employment vacancies and significant announcements.
Staff surveys	Used to gather information and feedback from staff.
Social networks (eg. Facebook, Twitter, Instagram)	Used to collaborate and communicate with internal and external stakeholders online.
Corporate Communication email address	Made available for staff to contribute feedback and ideas for improvements.
All Staff and All Subsidiaries emails	Used for important messages to staff, subsidiaries as it apply. Members of staff are required to read authorized all

Channel	Purpose
	staff emails.
Emails sent to Distribution Lists	Used to inform groups about important information as well as to promote upcoming events and activities.

### **Staff Bulletin**

The Staff Bulletin informs staff of Management messages, information relevant to new hires, staff profiles, activities, news about the Group, employment vacancies, and professional development and training opportunities.

Contributions for the Staff Bulletin must be sent in advance to the Internal Communications Officer who will review the content, consult the contributor about any amendments and, if suitable, approve the item for inclusion.

### **Staff surveys**

We will conduct a staff engagement survey at least every 6 months, and other surveys from time to time. The results of the staff engagement survey will be made available to staff.

Surveys should be disseminated to staff through the internal communication channels identified in this policy.

Members of staff are required to read the all staff emails which they receive. It is the responsibility of staff to regularly check their official email accounts for such email messages.

## **External Communications Policy**

### **Purpose**

This External Communications Policy sets forth our policies regarding how Company representatives may communicate with outside parties, particularly securities market professionals and those who may own or trade in our shares.

This Policy applies to all Company employees, directors, officers, consultants and contractors. Any violation of this Policy should be brought to the attention of Head of Brand Communication or an Authorized Spokesperson and may constitute grounds for severe disciplinary action.

## **General Policy**

It is the Company's policy that all its communications with Third Parties comply with applicable law, and that Material, Non-Public Information of the Company be Publicly Disseminated in a non-exclusionary and non-selective way. Only an Authorized Spokesperson may engage in discussions about the Company with Third Parties. No other individual is authorized to speak on behalf of the Company. Any other Insider who is contacted by a Third Party must refer the Third Party to an Authorized Spokesperson.

Specifically, no Insider, other than an Authorized Spokesperson, may communicate Material, Nonpublic Information of the Company to a Third Party. An Authorized Spokesperson may only provide Material, Nonpublic Information to a Third Party if such information has been previously or is simultaneously Publicly Disseminated. This will typically be a press release or conference call that is open to the public.

Occasionally, employees may be contacted by outside sources or the media requesting information about the Company or its employees, directors or officers or operations. In order to avoid providing inaccurate, incomplete or Material Information to outside sources, all outside inquiries regarding the Company or its employees, directors or officers or operations must be referred to an Authorized Spokesperson. Only an Authorized Spokesperson is authorized to make or approve public statements pertaining to the Company or its employees, directors or officers or operations.

In the event of non-intentional disclosure by an Insider of information that might be Material, Nonpublic Information, the Insider must immediately inform an Authorized Spokesperson, who, in turn, may consult with Brand Communication department as to whether prompt public dissemination of this information is required. If required, the information must be Publicly Disseminated within 24 hours of the inadvertent disclosure.

Whenever an Authorized Spokesperson is uncertain about this Policy or federal securities laws, the Authorized Spokesperson may consult with legal department to ensure compliance.

An Authorized Spokesperson may not depart from the principles set forth in this Policy without the explicit prior approval of the Head of Brand Communication.

## **Financial Information**

No Insider may provide "guidance" to Third Parties on a selective basis, directly or indirectly, and may not disclose to Third Parties any information regarding the Company's internal projections of future operating results, business transactions, customer or supplier developments or other Material Information that has not been Publicly Disseminated, either in a press release, SEC filing or other appropriate method. Additionally, no Insider shall comment on past guidance, even though it has been Publicly Disseminated.

Except as set forth below, no Insider may review financial reports prior to their being published, send such reports to investors or prospective investors, comment on an tax model, endorse or ratify revenue or earnings projections, or express comfort or disagreement with "salary or tax range" or how the Company arrived at their estimates. An Authorized Spokesperson may, however, review such report solely for the purpose of confirming or correcting Publicly Disseminated information that may be contained in the report.

## **Press Releases**

The Company will issue press releases from time to time to disclose information that is important or of use to the public. Press releases will be prepared and reviewed in accordance with the Company's established practices, including review by the Head of Brand Communication, if appropriate. Press releases will be approved by and issued under the supervision of an Authorized Spokesperson.

## **Product And Company Information**

No Insider shall disclose to Third Parties any Material, Nonpublic Information regarding the Company or its products and services.

## **Share Price**

No Insider shall comment on how the Company's share price will change over time, on whether people should buy or sell the Company's shares or whether he or she believes that the share price reacted or will react to a particular event (i.e., business transaction, Company press release, etc.).



## **Competitor Information**

No Insider shall discuss financial or operational information about competitors. An Authorized Spokesperson should say that the Company does not comment about its competitors and suggest that the Third Party call the competitor directly.

An Authorized Spokesperson may discuss market share figures and facts from competitors' earnings announcements.

## **Rumors**

No Insider may comment on rumors. An Authorized Spokesperson is permitted to state that the Company has a policy against commenting on rumors.

## **Indirect Communications; Chat Rooms; Other Electronic Communications Methods**

Any communication that would constitute a violation of this Policy if made directly by an Insider to a Third Party shall also constitute a violation if made indirectly to a Third Party. No Insider shall contribute to or participate in "chat rooms" or similar online forums or use Other Electronic Communications Methods (as defined below) with respect to the Company or vendors engaged in business with us to the extent any such information regarding us or any other party is gained as a result of the Insider's relationship with us or any other Insider. The posts in these forums may contain misleading or unsubstantiated information and may be made by unsophisticated investors who are poorly informed. Accordingly, no Insider may discuss the Company or Company-related information in such a forum. Posts in these forums can result in the disclosure of Material Nonpublic Information and may bring significant legal and financial risk to the Company and are therefore prohibited. Any use of chat rooms or Other Electronic Communications Methods, including blogs or social media sites, must be in strict compliance with this general electronic communications policies.

## **Violation of This Policy**

Selective disclosure of Material, Nonpublic Information in any forum other than the approved methods listed above, and by any individual other than an Authorized Spokesperson, and without the express approval of the Head of Brand Communication is considered a violation of this Policy and may be considered a violation of Communication Standard Policy. A violation of this Policy may result in severe disciplinary action as deemed appropriate by the Company against such offender.

## Key Terms

As used in this Policy, the following terms have the following meanings:

"Authorized Spokesperson" means the Head of Brand Communication or person(s) approved and given adequate briefing document by Head of Brand Communication to perform such functions, or any other Company employee or representative who has been authorized to speak with a Third Party with respect to a particular topic or on a particular occasion. The Company shall post on its external website the current list of Authorized Spokesperson(s), which may be updated from time to time.

"Insider" means an employee, officer, director, consultant or contractor of the Company.

"Material Information": It is not possible to define all categories of material information. However, information should be regarded as material if there is a reasonable likelihood that it would be considered important to an investor in making an investment decision regarding the purchase or sale of the Company's securities.

While it may be difficult under this policy to determine whether particular information is material, there are various categories of information that are particularly sensitive and, as a general rule, should always be considered material. Examples of such information may include:

Significant corporate events, such as Annual General Meetings, a pending or proposed merger, joint venture or tender offer, a sign investment, the acquisition or disposition of a significant business or asset or a change in control of the Company

Financial results, financial condition, earnings pre-announcements, projections or forecasts

Restatements of financial results or material impairments, write-offs or restructurings

Changes in independent auditors or changes in reliance on certain audit report

Business plans or budgets

Creation of significant financial obligations or significant changes in financial obligation

Impending bankruptcy or financial liquidity problems

Significant developments involving business relationships

Product/service announcements of a significant nature

Significant developments in research and development or relating to intellectual property

Significant legal or regulatory developments, whether actual or threatened

Major events involving the Company's securities

Significant corporate events, such as a pending or proposed merger, joint venture or tender offer, a sign investment, the acquisition or disposition of a significant business or asset or a change in control of the Company

Major personnel changes

Either positive or negative information may be material.

"Nonpublic Information" means information that has not been Publicly Disseminated and is otherwise not available to the general public.

"Other Electronic Communications Methods" means blogs, electronic mail messaging, text messaging, audio messaging or video messaging; social media site or website comments; or other communications using messaging systems embedded in software applications (such as LinkedIn In-mail, WhatsApp, Google Talk or Facebook Messenger) whether or not viewers of the communications are the general public, or a limited group of individuals granted rights to view the information.

"Publicly Disseminated" means that information has been made available through the distribution of a press release through a widely disseminated news or wire service, or by another non-exclusionary method of disclosure that is reasonably designed to provide broad public access -- such as an announcement at a conference of which the public had adequate notice and to which the public was granted access, either by personal attendance, or telephonic or electronic access. Notably, information is generally not considered to be Publicly Disseminated if it has only been posted to the Company's website.

"Third Party" means securities market professionals (including, but not limited to, consultants, brokers, investment advisers, regulators and fund managers), existing or prospective shareholders (including anyone who may be reasonably expected to trade on the basis of Material, Nonpublic Information), reporters and any other party who is not bound by a duty of confidentiality to the Company.

This policy is not intended to address disclosures that may be required by legal, governmental and regulatory authorities or otherwise by law. This policy applies to all staff.