



NCBA

NCBA Group Stakeholder Relations Policy

May 2024

Policy Summary

SECTION	SUMMARY
Key Policy Issues Covered	<ul style="list-style-type: none">• Policy Rationale.• Purpose and Objectives.• Scope of Policy• Policy Guidelines.• Responsibilities and Accountabilities.• Policy Review.
Risks Covered	<ul style="list-style-type: none">• Strategic Risk.• Reputational Risk.• Operational Risk.• Regulatory Risk.
Responsibility of BGNC	Oversight and tracking of guidelines and principles of the Shareholder approved policy.
Monitoring by Board	Policy establishment and oversight over BGNC role.
Reporting	Disclosures to stakeholders on the Group's performance on policy objectives.

Related Policies & Guidelines

This policy shall be applied in conjunction with related laws, policies and operational guidelines, including:

- a. Central Bank of Kenya Prudential Guideline on Corporate Governance and Consumer Protection;
- b. The Capital Markets Authority's Code of Corporate Governance Practices for Issuers of Securities to the Public, 2015;
- c. The Group Board Charter;
- d. NCBA Group Whistle Blowing Policy; and
- e. The Terms of Reference of the Board Governance and Nominations Committee and Board Audit and Risk Committee.

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DEFINITIONS:

TERM	MEANING
ADRC	Alternative Dispute Resolution Committee, which shall be established for the sole purpose of resolution of disputes/ conflict with stakeholders and the Group by means of mediation, arbitration and other processes other than litigation.
Board	Means either of, or collectively: The Board of Directors of NCBA Group PLC and all its direct and indirect subsidiaries wherever located.
Environment	The surroundings within which humans exist are made up of: <ul style="list-style-type: none"> • The land, water and atmosphere of the earth. • Microorganisms, plant and animal life. • Any part or combination of the above and the interrelationships among and between them; and • The physical, chemical, aesthetic and cultural properties and conditions of the foregoing that influence human health and well-being.
GCS	Governance and Company Secretary Division
MCC	Marketing Communication and Citizenship
NCBA Group	Means either of, or collectively: NCBA Group PLC and all its direct and indirect subsidiaries wherever located.
Stakeholder	Means a party that has an interest in the Group, and can affect or be affected by the operations of the Group. The below are the various key stakeholders of the Group: <ol style="list-style-type: none"> a) Shareholders b) Investors c) Affiliates d) Workforce/Staff e) Regulatory Entities f) Customers g) Suppliers h) Media i) The Society at Large
Note:	
References to departments and roles made within this Group Policy may vary from one jurisdiction to another. Where no similar department or role exists within one of the Group's subsidiaries, the respective country Managing Director will assign responsibility to relevant committees, departments and roles charged with the responsibilities outlined within this policy.	

1. POLICY STATEMENT

The Board holds the responsibility for overseeing stakeholder relationships and fostering transparent communication to facilitate alignment of stakeholder interests with the Group's vision and sustainability objectives.

The Board views effective stakeholder relations and transparent communication as vital elements in safeguarding the Group's reputation and managing strategic and reputational risks, and recognises that transparency and disclosure are crucial for market-based monitoring of public companies, which are central to shareholders' ability to exercise their ownership rights and for other stakeholders to achieve broader socio-economic benefits from their various interactions with the Group. The Group further recognises that non-disclosure of material information can contribute to the practice of unethical behavior, weakening of market integrity and loss of investor confidence.

The NCBA Group believes that engaging effectively and providing timely and transparent disclosures enables its stakeholders to grasp the Group's vision, activities, policies, and performance, including its standards on environmental and ethical practices in connection with the communities it serves. The Group is dedicated to upholding and improving a strong stakeholder engagement and communication framework aligned with its vision.

2. PURPOSE AND OBJECTIVES

This Policy provides the principles governing the Group's relations with its stakeholders. The pillars supporting the effective management of the principles include but are not limited to:

- The periodic identification of key stakeholder groups;
- A framework for warm, neutral and non-confrontational relationships with our stakeholders;
- Non-political or non-religious stance in all forms of engagement;
- Established dispute resolution mechanisms to address internal and external disputes;
- Suitable, high quality, transparent and consistent communication reflective of the Group's brand, vision and values; and
- Effective risk management and enhancement of sustainable business practices.

3. SCOPE OF THE POLICY

This policy applies to all departments, divisions, subsidiaries and employees of the NCBA Group.

4. POLICY GUIDELINES

4.1 DISCLOSURES AND TRANSPARENCY

The Boards of each company within the Group are accountable for ensuring timely and balanced disclosures of material information. This involves establishing and upholding corporate disclosure policies and procedures to ensure effective, accurate, and transparent dissemination of relevant information about their operations and performance.

The Group's Boards consistently evaluate their financial and relevant non-financial reporting processes and statements. This assessment ensures adherence to required reporting standards and promotes appropriate disclosures presented in concise, accurate, and understandable language. The Group aims to enhance integrated reporting and is committed to fostering prudent and transparent disclosures based on the following policy principles:

- a) **Transparent and Open Communication:** The Group shall endeavour to maintain transparent and open communication about its vision, strategies, challenges and achievements.
- b) **Timely Disclosure:** The Group shall disclose relevant material information concerning itself on a timely basis, in particular meeting regulatory guidelines where they exist, to allow investors to make informed decisions about the acquisition, ownership obligations, rights, and sale of its shares. As the Group holding company is a public company listed on the Nairobi Securities Exchange, it will make such disclosures in line with the Capital Market's legislation and regulations for listed entities.
- c) **Affirmation of Financial Statements:** The Board of Directors shall affirm at least annually the accuracy of the Group's financial statements.
- d) **Accounting Standards:** To ensure adherence to high-quality international accounting standards, the Group will prepare its financial statements following the International Financial Reporting Standards (IFRS) issued by the International Accounting Standards Board (IASB). Any additional information mandated by regulatory bodies will also be incorporated. The Board Audit and Risk Committee will maintain oversight of key accounting policies and decisions taken under those policies. The accounting policies will also be disclosed in the Group's annual report.

- e) **Non-Financial Business Reporting:** The Group recognises that disclosing pertinent non-financial information is crucial for shareholders and investors to make informed investment decisions. Consequently, the Board will ensure sufficient non-financial disclosures are included in the annual report and accompanying statements, or as deemed necessary at any other time by the Board.
- f) **Disclosure of Ownership:** The Group will provide disclosures regarding its connections to both internal and external companies within or outside the corporate group, details about major shareholders, and any other relevant information essential for a comprehensive understanding of the company's relationships with other parties. These disclosures will complement information already provided on financial and operational performance, company goals, risk factors, stakeholder concerns, and governance structures within the Group.
- g) **Share Ownership:** The Group will disclose, through the annual report, ownership of its shares by senior management and Non-Executive Directors with the objective of ensuring transparency and ascertaining their level of independence.

The Group's procedures for disclosing material information will adhere to the following protocols:

- Compliance with relevant laws and regulations, including obtaining clearance from regulators.
- Designation of the Group Managing Director as the primary authority for representing the Group to stakeholders, with delegation permitted as outlined in this policy.
- Material information will be disclosed quarterly through various channels such as leading newspapers, press releases, investor briefings, or the Group's website. Any unscheduled disclosures will be made within one working day of determination, or sooner as required by regulations.
- Disclosures will occur outside of trading hours to ensure broad stakeholder access and understanding for informed decision-making.
- In certain cases, the Group may delay or withhold sensitive information subject to approval by regulators to preserve market integrity.

The Group has established a Staff and Related Parties Securities Trading Policy to manage insider information and prevent insider trading.

4.2 STAKEHOLDER ENGAGEMENT

The Group will annually interact with stakeholders, or as needed, through periodic surveys to assess their satisfaction levels and identify areas for value improvement within the Group. Feedback obtained from these engagements will be considered when developing enhancements to the Group's policies, procedures, and practices.

4.2.1 Identification of Stakeholders

The composition of NCBA Group's stakeholders is subject to regular shifts due to the dynamic nature and expansion of the business. As a result, periodic assessments become crucial to pinpoint the primary stakeholder groups and strategise on how to engage them efficiently.

The task of identifying these key stakeholder groups falls under the responsibility of the GCS' office, working closely with the MCC department. This process will entail outlining the nature of their association with the Group and elucidating their primary objectives and goals.

4.2.2 Stakeholder Rights

Recognising the pivotal role stakeholders play in the Group's sustainable wealth creation, we acknowledge and commit to enhancing the diverse rights of stakeholders in alignment with best practices and applicable regulations. Below are the enumerated rights of stakeholders:

a) Shareholders

- i. The right to receive notice(s) and attend general meetings;
- ii. The right to vote at the general meetings;
- iii. The right to receive a copy of the annual report and financial statements of the company;
- iv. Right to distributed profit, in form of dividends and other rights for bonus shares, scrip dividends or rights issues as applicable and in the proportion of the shareholding in the company;
- v. Right to the product of liquidation;
- vi. Right of members to require directors to convene a general meeting;
- vii. Right of members to demand a poll at a general meeting;
- viii. Right of members to appoint proxies and right of the proxy to demand a poll at a general meeting;
- ix. Right to a secure method of transfer and registration of ownership of shares;

- x. Right to full participation at the Annual General Meeting. This is achieved by ensuring that shareholders have:
 - a. sufficient information on the subject matter to be discussed at the Annual General Meeting;
 - b. the opportunity to seek clarification from management;
 - c. the opportunity to place items on the agenda for Annual General Meetings;
 - d. sufficient information to enable them to consider the costs and benefits of their votes; and
 - e. to ask questions, seek clarification on the performance as reflected in the annual reports and accounts or any other matter that may be relevant to the company's performance or promotion of shareholders' interests and to receive explanations from the Directors and/or management.

b) Investors

These include note holders, fund managers, lenders and Development Financial Institutions (DFIs).

- i. Right to receive the face value of the bond/notes/principal at maturity;
- ii. The right to receive periodic interest payments at the specified rate of the note/bond/facility face value;
- iii. Right to realise security in the event of default;
- iv. Right to the product of liquidation before ordinary and preference shareholders;
- v. Right to receive notices and attend note/bond holders meetings; and
- vi. Right to terminate the relationship if conditional covenants are breached.

c) Affiliates

- i. Right to receive communication that enables their management and Board to achieve their mandate;
- ii. Right to independence in order to operate as per their mandate in accordance to their Articles of Association and applicable law; and
- iii. Right to receive material information pertaining the Group.

d) Employees

- i. Right to fair treatment with respect to recruitment, training, promotion, terms and conditions of employment, termination of employment or other matters arising from employment;
- ii. Right to be free from discrimination and harassment of all types;

- iii. Right to fair wages for work performed;
- iv. Right to be free from retaliation for filing a claim or complaint against the employer and/or employees;
- v. Right to work place safety as prescribed in the Occupational Safety and Health Act (OSHA); and
- vi. Right to leave in accordance with the terms of the employment contract and provisions of labour laws.

e) Regulatory Authorities

- i. Right to issue, implement, and enforce applicable laws and regulations;
- ii. Right to issue, suspend or revoke licenses;
- iii. Right to impose sanctions for breaches of relevant legislation;
- iv. Right to levy financial penalties, proportional to the gravity and severity of the breach;
- v. Right to order a person to remedy or mitigate the effect of the breach, or make restitution or compensation to any aggrieved person(s);
- vi. Right to inquire, either on their own motion or at the request of any other person into the affairs of a regulated entity;
- vii. Right to intervene in the operations of licensees when considered necessary or expedient in the interest of the public, or for the protection of the interests of investors;
- viii. Right to have recourse against any person whose act or omission results in loss of investors'/shareholders' funds;
- ix. Right to information within such periods as they may specify; and
- x. Right of search and entry where satisfied that a person has committed or is reasonably suspected of committing an offence.

f) Customers

- i. Right to fair treatment and protection against unfair, deceptive, oppressive, aggressive or discriminatory practices, and/or unconscionable behaviour;
- ii. Right to information and advice, presented in clear, simple language, including information on key features of the Group's products and services;
- iii. Right to provision of suitable products and services;
- iv. Right to privacy of information; and
- v. Right to redress grievances and compensation for loss occasioned by the Group.

g) **Suppliers**

- i. Right to fair dealing and treatment;
- ii. Right to prompt payment for services offered;
- iii. Right to information on supplier selection criteria, and procurement policy and procedures;
- iv. Right to remedy for grievances, and compensation for loss caused by the Group; and
- v. Application of anti-corruption and anti-bribery practices.

h) **Media**

- i. Right to determine independently the editorial content of their broadcasts or other communication; and
- ii. Right to ask questions, seek clarification and receive fair responses.

i) **Society**

- i. Right to engagement, information and inclusion regarding initiatives that have an impact on the environment and community;
- ii. Right to redress for any environmental degradation, emissions, effluents and waste or loss, pecuniary or otherwise, occasioned by the activities of the Group; and
- iii. Right to co-exist in harmony with the corporation.

4.2.3 Stakeholder Communication

Communication and Public Relations (PR) significantly influence the Group's reputational risk. Effective public relations play a vital role in bolstering the Group's image and safeguarding it during crises. Maintaining the suitability, quality, and consistency of external communication is essential for brand management and impacts the brand's value directly, a responsibility primarily managed by the MCC Division, which also oversees external public relations functions. The Group may enlist the support of a public relations agency, supervised by the MCC department, to manage PR activities, including corporate events or crisis communication. All press releases from the NCBA Group are overseen by the Group Managing Director.

The Groups' channels of communication are based on suitability of application and effectiveness of purpose. The Group strives to interact with stakeholders yearly, or as needed, by conducting regular surveys to gauge satisfaction levels and pinpoint areas for improvement.

Feedback received from these engagements will influence the Group's decisions on enhancing its policies, procedures, and practices. The standard means of engagement with our stakeholders include, but are not limited to:

- **Shareholders:** In collaboration with the Group's Shares Registrar via periodic disclosures and surveys, general Meetings, periodic investor briefings, timely business performance and material information disclosures through the Group website and/or publications, and engagement through the Company Secretary's office and the annual report.
- **Investors:** Through periodic investor briefings, timely business performance and material information disclosures through the Group website and/or publications, engagement through the Company Secretary's office and the annual report.
- **Affiliates:** Through involvement at Board and management level on Group initiatives, and strategic initiatives and disclosures on changes that may affect their operations.
- **Employees:** Through inclusive/representative committees, employee surveys, development of clear and well-articulated policies and procedures, and communication on matters affecting their welfare.
- **Regulatory Authorities:** Through timely disclosures, consultations, feedback on regulatory matters and periodic meetings; both through direct contact and industry organisations.
- **Customers:** Through periodic surveys using both in-person control groups and remote channels, customer relationship management systems, text messages and emails, artificial intelligence systems such as chatbots, complaints and alternative dispute resolution mechanisms, relationship managers, involvement in product development initiatives and engagement with consumer associations where practical and feasible.
- **Suppliers:** Through periodic surveys using both in-person control groups, regular feedback and clear communication of Group standards.
- **Media:** Through press releases, individual and group meetings, and channels for communication on social media platforms.
- **Society:** Through our Citizenship efforts including participation in social networks with environmental and community organisations, and undertaking environmental impact assessments in credit facilitation and implementation of new facilities where applicable.

To facilitate effective information dissemination, the Group will endeavor to maintain up-to-date contact information for key stakeholders, which will include mechanisms such as text messaging and/or email, depending on the nature and urgency of the content.

Stakeholder communication will be overseen by the Group Managing Director's office. Staff will receive training to familiarise them with escalation procedures, communication channels, and appropriate responses, ensuring that stakeholders' feedback and requests are directed properly.

Communication from the Group Board to management and staff will be facilitated through the Group Managing Director, while the Group Corporate Communications Policy will address other aspects of internal communication. Crisis communication will be elaborated on in the Group Business Continuity Management Policy. The Group Managing Director holds ultimate responsibility for all internal communication aspects, with the support of the Group Director of Marketing, Communication, and Citizenship (MCC).

Regional Chief Executive Officers, collaborating with the Group Managing Director, will oversee stakeholder communication for their respective entities supported by the respective Country Heads of Marketing.

4.3 CITIZENSHIP

The Group is dedicated to fostering economic growth while upholding ethical standards and enhancing the well-being of local communities and society. The Group's strategic priorities further assimilate Corporate Citizenship as a key factor towards building NCBA's Brand Position. The Group is committed to identifying and supporting citizenship programs that:

- Generate goodwill and build sustainability within the communities in which we operate;
- Encourage involvement and volunteerism of employees in our citizenship activities; and
- Seek to establish mutually beneficial partnerships with customers and strategic partners with a view to improve our communities.

The Group's Citizenship Agenda is encapsulated with our Environmental, Social and Governance (ESG) framework that is underpinned by five (5) strategic pillars on community engagement as follows:

4.3.1 Nature and Biodiversity

The Group is committed to establishing and implementing initiatives to support the preservation of natural habitats and ecosystems through its financing activities in order to entrench sustainable natural resource management and prevention of habitat destruction. The measures will seek to facilitate collaboration with stakeholders to enhance research and innovation for the development of, and support for, practices that are protective to the environment, that mitigate environmental risk, and that are supportive of measures that enhance climate resilience.

4.3.2 Investing in Youth Employment

The Group is committed to empowering the youth in securing sustainable employment opportunities both within its network, and through support for various business sectors. The focal areas of this pillar include support for job creation through financing for business expansion and capacity building for small and medium-sized business entities on sustainable business practices, establishment of programs towards empowering youth entrepreneurship, and collaboration with like-minded partners, including Government, to develop youth empowerment programs, hence equipping them with business skills to spur employment and economic growth opportunities.

4.3.3 Women Economic Empowerment

The Group is committed to facilitating an environment that is supportive of equal opportunity for economic development irrespective of gender. With women having been identified as an economically marginalised segment of society, the Group will establish measures to enhance financial inclusion, support for access to entrepreneurship opportunities, committing a minimum portion of the procurement budget to women-driven businesses, and facilitating access to training and capacity building for women to better participate in business enterprises.

4.3.4 Innovation and Technology

The Group believes that technology and innovation are at the heart of all socio-economic development frameworks. As a result, the Group is committed to supporting technological and innovation development through enhancing digital inclusion in provision of financial services, promoting an innovation culture through its products and services, supporting the development of technologies that address social challenges in access to financial services, and investing in innovative solutions that support environmental sustainability and economic empowerment, while simultaneously ensuring

that data privacy and security and ethical considerations are embedded within this framework.

4.3.5 Community Development through Sport

The Group believes that society develops better and faster through cohesion. Sport is known globally as a connector that forges a sense of belonging and togetherness, alongside building pride, enhancing health and creating an ecosystem that supports businesses that provide goods and services to athletes and sports fans. The Group, through the NCBA Golf Series, commits to this pillar with a view to empowering inclusion and diversity, youth empowerment, integration of life skills through sport, championing environmental sustainability, promoting community health and wellness and promoting positive values and ethics.

4.4 STAKEHOLDER DISPUTE RESOLUTION FRAMEWORK

There shall be an Alternative Dispute Resolution Committee (ADRC) charged with the responsibility of resolving significant disputes between the Group and its Stakeholders. It shall promote the use of appropriate forms of dispute resolutions mechanisms as well as co-ordinate and communicate to relevant stakeholders through the mandated channels the progress made on disputes under consideration by the Committee.

The Committees Terms of Reference are as detailed here below:

4.4.1 Composition

The Committee will be comprised of the following members:

- a) Group Company Secretary;
- b) Executive Director, Finance;
- c) Group Director, Technology and Operations;
- d) Group Director, Regional Business; and
- e) Group Director, Digital Business.

Members of the Committee may nominate representatives to attend meetings in their absence. The Committee Chairperson will be appointed from among the members.

4.4.2 Attendees

The following will attend all meetings by virtue of their insights, knowledge and accountability on the management activities and/or assurance responsibility:

- a) Group Head, Customer Experience;
- b) Head of Operations; and
- c) Group Head, Enterprise Risk Management.

Other Heads of Department and/or staff members may periodically attend by invitation.

4.4.3 Quorum

The quorum necessary to transact business shall be no less than half of the members of the Committee. A duly convened meeting of the Committee at which a quorum is present shall be competent to exercise all or any of the authorities, powers and discretions vested in or exercisable by the Committee.

4.4.4 Notice and Agenda

Unless otherwise agreed, notice of each meeting together with the agenda items and relevant documents to be discussed will be forwarded to each member and any other invitee required to attend, at least three (3) days before the date of the meeting. However, considering the unpredictable nature of disputes, some of which may require immediate attention, the Committee may be required to convene within such shorter notice period as shall be communicated by the Secretary.

4.4.5 Secretary

The Head of Governance, Regulatory Affairs and Stakeholder Relations or, in the role holder's absence, any other nominee so appointed by the Chairperson during the meeting, shall act as Secretary of the Committee.

The Secretary shall:

- a) Minute the proceedings and resolutions of all meetings of the Committee including recording the names of those in attendance;
- b) Ascertain, at the beginning of each meeting, the existence of a quorum necessary to conduct the Committee's business;
- c) Ascertain, at the beginning of each meeting, any conflicts of interest and minute them appropriately; and
- d) Circulate the Minutes of the Committee meetings to all members of the Committee, and Resolutions thereof to the implementing parties.

4.4.6 Frequency of Meetings

The Committee will hold its meetings quarterly whenever there is business to be attended to. Ad-hoc meetings may be convened by the Committee's Chairman as required from time to time.

4.4.7 Mandate

The Committee shall undertake the following duties and responsibilities:

- a) Receive and review dispute cases escalated by Management, whereby an amicable solution has not been achieved and a significant risk for litigation or other significant reputational risk exposure exists;
- b) Consider complex disputes lodged by a stakeholder which cannot be resolved using the existing complaint handling mechanisms, or that may take significant resources to resolve;
- c) Consider disputes escalated by Regulators where NCBA is deemed liable and required to make recompense;
- d) Where feasible, meet with the aggrieved party to make an independent determination as to the veracity of their claim and significance of the dispute;
- e) Make such recommendations and/or pass resolutions towards amicably resolving disputes, preferably through internal mediation or arbitration, and corrective actions to be implemented by the Management Executive Committee.

The Committee, through an authorised officer, shall acknowledge receipt of complaints within 7 days to the complainant. Thereafter, the Stakeholder shall be apprised on the outcome of the review within 7 days. If the investigations / findings are not completed within 7 days, the Stakeholders shall be informed on the procedure to be used and the expected timelines.

Notwithstanding the above provisions, the GCS's Division shall handle disputes relating to Shareholders, while those emerging from the media and societal groups/ associations shall be handled by the Group Managing Director's office. Disputes relating to staff members shall continue to be handled separately as provided for under the Group Human Resources policies and procedures.

4.4.8 Reporting

The Committee Chairman, through the Group Managing Director, will periodically update the Board Governance and Nominations Committee and the Management

Executive Committee on the Committee's proceedings and key matters for Board and/or Management consideration as determined from its mandate.

4.4.9 Review

The Committee's Terms of Reference will be reviewed every three years, or more frequently as may be determined to be necessary by the Committee to reflect any significant changes affecting the Group's operating environment.

4.5 RESPONSIBILITIES AND ACCOUNTABILITIES

4.5.1 Board of Directors

In line with the requirements of the Central Bank of Kenya Prudential Guidelines on Corporate Governance and Consumer Protection, and the Code of Corporate Governance Practices for Issuers of Securities to the Public, the Board has oversight responsibility for the implementation of the Stakeholder Relations Policy. The Board will facilitate the allocation of appropriate resources to, and monitor the development, implementation and continuous improvement of its stakeholder engagement and communication programs. The Board shall also oversee Management's implementation of the functioning of mechanisms and processes that support constructive engagement with stakeholders.

Upon initial approval by the Group's shareholders, the Board will retain responsibility and accountability for future amendments, and ensure that any significant changes to the policy are communicated to stakeholders through the integrated report.

4.5.2 Board Governance and Nominations Committee (BGNC)

BGNC shall be responsible for overseeing Management's activities in:

- Ensuring transparent, high quality and consistent disclosure of the Group's activities to stakeholders, which is reflective of the Group's vision, brand and values.
- Identifying, recognising and protecting stakeholders' rights, and facilitating the effective exercise of their rights.
- Updating stakeholders via the Group's integrated report and website on the initiatives and measures undertaken within this framework towards the achievement of the Group's vision.
- Ensuring prompt and effective management action on all material ethical and reputational risks.

4.5.3 Senior Management

Senior Management will be responsible and accountable for:

- Communicating with stakeholders on the Group's business activities. The Group Managing Director may however, delegate some of the communication responsibilities to various members of senior management.
- Timely and effective communication to staff and counterparties over whom they have direct control, for example vendors and suppliers.
- The Group Company Secretary will be responsible for communication with the shareholders, investors, registrars and relevant regulatory authorities of the Group businesses.

4.5.4 Marketing, Communications and Citizenship (MCC)

MCC will monitor the avenues of engagement and communication used and ensure that the information upholds the Group's vision, brand and values. MCC will also present periodic reports to the Group Managing Director and senior management on the level of adherence with the Group's communication and citizenship frameworks and related policies. MCC will further be responsible for:

- Identifying and recommending appropriate information for stakeholders;
- Providing guidelines relating to communication and corporate affairs / public relations, external communication, corporate publications and social media;
- Communicating the Groups' internal and external messages through identified platforms as per defined policies; and
- Undertaking periodic surveys with relevant stakeholders.

4.5.5 Governance and Company Secretary Division (GCS)

GCS will be responsible for liaising with regulators and relevant service providers such as the shares registrar, and collaborate with MCC and responsible Group Divisions to ensure that requisite disclosures are made in an accurate and timely manner. Periodic reports will be submitted to the Board and regulatory bodies (where applicable) on the status of compliance. The Governance and Company Secretary Division will further be responsible for:

- Ensuring that the periodic governance audits include a review of the effectiveness of the implementation of this policy.
- Submitting the required governance regulatory reports to regulatory authorities.

4.6 POLICY REVIEW

This Policy will be reviewed every three years, or more frequently, based on changes in the internal and/or external environment affecting the Group's stakeholder profile.