

OLYMPIA CAPITAL HOLDINGS PLC

COMMUNICATION POLICY





Olympia Capital Holdings Plc

Communication Policy

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1. Purpose

Olympia Capital Holdings Plc (hereafter referred to as “OCHL”) has a critical responsibility to ensure that all disclosures, announcements, and reports relating to key operational matters and its performance made by the Company to the investment community, regulators, and other stakeholders are materially accurate, complete, and timely.

This policy sets out the framework within which OCHL will prepare and disseminate any communication with current and potential investors as well as other market participants, regulators, and stakeholders.

This will ensure that all set regulations are strictly adhered to and shareholders, and investors (both current and prospective), will not only have timely and easy access to relevant information but that the same is communicated in the most efficient and equitable manner.

2. Scope of Communication

The scope of communication covers all aspects of the organization's operations, including its products and services, financial performance, strategic plans, policies, and initiatives. Communication channels include but are not limited to:

- i. **Internal communication between employees, departments, and management;**
- ii. **External communication with customers, suppliers, shareholders, regulators, media, and the general public; and**
- iii. **Corporate communication through the organization's website, social media, and other digital platforms.**

3. Communication Principles

The following principles guide communication within the organization and with its stakeholders:

Transparency: Communication is open, honest, and accurate.

Timeliness: Communication is timely and responsive to the needs of stakeholders.

Relevance: Communication is relevant, meaningful, and appropriate to the audience.

Consistency: Communication is consistent with the organization's values, mission, and objectives.

Accessibility: Communication is accessible to all stakeholders, including those with disabilities; and

Privacy: Communication respects the privacy of individuals and confidential information.

Transparency

Timeliness

Relevance

Consistency

Accessibility

Privacy

4. Responsibilities

- i. OCHL will determine the members of staff that will be responsible for approving all communications to shareholders, their representatives, regulators, and other key stakeholders. The main communication includes but is not limited to press releases, financial results presentations to the media, analysts, and institutional and retail investors, and other documents containing price-sensitive information for disclosure to the market.
- ii. OCHL will task the authorized personnel to speak with the public and media in the event of rumors or information leaks concerning the Company's operations and price-sensitive information, and where necessary, in order to restore a situation of parity of information, the appointed persons will be in charge of issuing a statement as to the truthfulness of the information and supplementing or correcting it.
- iii. The Board of Directors will consider and approve the press releases and commentaries relating to the Company's operations, half-year and full-year financial results, and any other matters as would have been recommended by Management.
- iv. OCHL will coordinate and manage the company's communication of financial and other information to the financial markets observing the following responsibilities:
 - o Manage communication and relationships with financial markets, current and potential investors, financial analysts, and regulators.
 - o Preparing the financial results presentations, press releases, and press commentary and preparing roadshows materials and other publications containing relevant information for the market and the disclosure of price-sensitive information.
 - o Ensuring that the information disclosed to the market is consistent with that reported to the market regulators; and
 - o Managing and updating the OCHL website with the financial results and other documents that provide financial performance to interested parties mainly investors, their representatives, and the media.

- v. OCHL will identify and resource a department within the Company’s Management Structure and the same will be charged with reviewing the consistency of information from OCHL for external publication through the media. This ensures that the non-financial information released does not conflict with earlier released information or has the potential to give an unintended impression or meaning.
- vi. The department cited under 2(v). above will also be tasked with updating the OCHL website and providing technical support for activities and making sure that announcements are also streamed live to views online across key social media sites, and in remote locations.
- vii. Heads of Departments in other divisions will be responsible for facilitating and providing financial and non-financial information to the department defined under 2(v) above, and the information will need to be initially approved by the Board of Directors unless the same is not deemed to be material information as would be confirmed by the Company’s Chief Executive Officer (hereinafter “CEO”). This information is utilized in building the content for the announcements and presentations.

5. Equipment/Software and Communication Channels

OCHL is to utilize any and every equipment and software required to support the Company’s Communication as envisaged under this policy and the same be sufficient to support both physical and virtual communications to the targeted stakeholders as would be defined under each of the corporate communications. The following are the communication channels available to the organization:

- i. Meetings and presentations.
- ii. Memos and Notices.
- iii. Emails and instant messaging.
- iv. Newsletters and reports.
- v. Social media and the organization's website.
- vi. Press releases and media interviews.



6. Financial Results

- i. OCHL will consolidate information from the various Heads of Departments to support the release of the Company’s financial and non-financial aspects of the Company’s performance. The bulk of the information on financial performance will be obtained from the Company’s Finance Department.

- ii. Having received the relevant documentation from the related departments, OCHL shall prepare a summary of the topics to guide the preparation of either the Annual or half-year (interim) results, as the case may be.
- iii. OCHL will ensure that the results prepared for circulation contain a summarized presentation, press release and press commentary and ensure that the information is materially accurate and complete. The CEO will also review and approve the results presentation and press commentary before presenting the same to the Board of Directors (hereinafter the “BOD”) for approval.
- iv. The announcement of the full and half-year results will be done within 24 hours of the BOD’s approval for submission to shareholders.
- v. The Chairman of the BOD and the CEO are the only officials authorized to make announcements of the financial results.
- vi. OCHL will engage the various departments within the Company or contracted providers (for example a contracted Public Relations firm) in preparing the venue, program, Master of Ceremony (where necessary), and additional resources required for the results announcement, press conference, and investor briefing including branding the venue appropriately.
- vii. OCHL will draft a communication or press release to be sent to financial analysts and other investor’s representatives. Additional communication will be generated for internal stakeholders informing them of the financial results. These communications will be shared by email and will state the type of financial results, the period applicable, and where the results can be viewed.
- viii. OCHL will provide a link from where staff members can view the results announcement and simultaneously, coordinate and ensure that the live webcast of the announcement is available for viewing by investors and other key stakeholders.
- ix. OCHL will ensure that the results are lodged with the Capital Markets Authority (hereafter “CMA”) and the Nairobi Securities Exchange (hereinafter “NSE”) shortly after the commencement of the announcement of the financial results.
- x. OCHL will ensure that the summary of and full financial results are posted on the Company’s website at the same time the results are announced.
- xi. OCHL will draft a press release and have it approved by Management and the full board and coordinate with the Media team to ensure that it is published within 24 hours after the announcement in at least two newspapers with nationwide reach.
- xii. OCHL will save a copy of the presentation, press release, and press commentary in the Company’s shared folders for future reference.

7. Press Releases

- i. Press releases will be published on matters that would reasonably be expected to be communicated to the investor or required to be communicated by regulatory bodies due to their material effect on the company's valuation and prices of its securities.
- ii. OCHL must ensure the following are published: -
 - **Announcement of full and half-year (interim) financial results.**
 - **Appointments or resignations of directors.**
 - **Acquisitions and disposals.**
 - **Strategic partnerships.**
 - **Capital increases and/or issues of capital designed to raise financial resources.**
 - **Issue of bonds.**
 - **Mergers/ spin-offs, and**
 - **And any other matters that would have an impact on the valuation of the company and its securities.**
- iii. Any press release published by OCHL must contain the facts needed to ensure full and fair representation of the event and allow for the assessment of such an event.
- iv. Price-sensitive information must be published in such a way as to avoid confusion with other marketing activities. There must be a distinction between information relating to the Company's valuation and its securities vis-a-vis that relating to its products and services.
- v. OCHL will draft the press release, have it reviewed internally and will be responsible for lodging a copy of the press release with the regulator (CMA and the NSE) to ensure it reaches before its publication.
- vi. OCHL will coordinate with the Media team to ensure that the press release is published in at least two newspapers with nationwide reach.
- vii. OCHL will keep a copy of the press release in the Company's shared folders for future reference.

8. Engagements with the financial community

In the case of encounters with the financial community through road shows, conference calls, conventions and conferences, and one-on-one meetings, the following protocol will be observed:

- i. OCHL will determine the persons authorized to hold meetings or share information with the representatives of any financial community.
- ii. OCHL shall prepare a document containing a schedule of all the meetings, times, dates, and locations.
- iii. OCHL will ensure all the presentations, summaries, and other documentation intended for the presentation/distribution to participants are prepared on time and are accurate.
- iv. Where necessary OCHL shall coordinate with the relevant department to make the presentations available on the Company's webpage.

9. Information disclosed in the Annual General Meeting (hereinafter "AGM") and Extraordinary General Meetings (hereinafter "EGM")

- i. The information to be communicated at the AGMs/EGMs will be set out in the agenda placed in the Notice of the respective meetings.
- ii. The chairman of the BOD and the External Auditor must present their reports to the AGMs/EGMs as will be necessary and be available to answer any questions from shareholders.
- iii. Queries from the shareholders during the AGMs/EGMs will be handled as set out in the Rules of Procedure of the AGMs; and
- iv. Price-sensitive information shall not be disclosed at the AGM/EGM meetings unless previously communicated to the CMA/NSE as provided for under this policy.

10. Preparation of the Annual Report

The annual report provides shareholders and other stakeholders with more details on the financial and non-financial performance of the company for a specific financial year. The annual report will be prepared in both the print and the digital formats. The digital format should be accessible via different



digital platforms. The following guidelines will be followed in the preparation and circulation of the annual reports:

- i. OCHL is responsible for overseeing the preparation of the annual report. This includes coordinating the whole process from hiring a vendor to designing the report in both the print and digital versions.
- ii. OCHL will also ensure the report is available to shareholders before the date of the AGM in line with the timelines provided under the Companies Act, 2015.
- iii. The Annual report will also be disseminated via the Company's webpage, and an abridged summary published in at least two newspapers with nationwide circulation.
- iv. OCHL will through the relevant departments agree on the overall theme of the annual report. This will require seeking the opinion of key parties in the organization.
- v. OCHL will engage the services of a vendor who will design and avail final versions of the print and digital versions of the annual report, that will be circulated to the Company's stakeholders.
- vi. The various divisions within OCHL would be coordinated to collect and collate the content for the annual report to prepare a manuscript that will include the audited financial accounts.
- vii. OCHL will hand over the manuscript to the identified design vendor to commence designing the annual report and will coordinate with the relevant department to obtain all the images required for the annual report.
- viii. Once completed, the draft annual report will be shared with the CEO and the Board of Directors for their comments and additional inputs; and
- ix. Once completed OCHL will coordinate with the designer to have the print and the digital copies uploaded on the Company's webpage.

11. Provision of information and documentation on the Company's webpage

The Company's webpage is an additional consolidated channel through which OCHL communicates information to shareholders, institutional investors, analysts, and other stakeholders as follows:

- i. OCHL will ensure that no publication required to be lodged with the CMA and NSE is posted on the website before it has been first lodged with the two bodies.
- ii. OCHL is in charge of providing the information to be made available or updated on the Company's webpage and ensuring that the information on the webpage is always current.
- iii. The website will be maintained according to the Company's Website Maintenance procedures and global best practices in cyber security.

12. Information to the CMA and/or NSE

Both the CMA and NSE have the mandate to be served with information and can demand such information as provided for in the Capital Markets Act. The Act clearly states that all information and documents that OCHL is expected to serve to both institutions as well as the kind of information that the two bodies can demand from the Company. This will be undertaken in the following ways:

- i. OCHL will be responsible for ensuring that information that must be disclosed to the CMA and NSE under the regulations set in the Capital Markets Act is disclosed.
- ii. OCHL will prepare and seek approval of reports or information that are required to be lodged with the CMA and NSE.
- iii. OCHL must ensure that all material announcements made to the shareholders are also lodged first with the CMA and NSE.
- iv. OCHL will ensure that information requested by CMA and NSE within their regulatory mandate is prepared and provided in a format that will be communicated to the regulators.

13. Leaks and Rumors

In the case of release of information that has not been disclosed in the manner set out in this procedure and which relates directly to the company's financial information, organization, and management and has caused or potentially might affect the share price in a significant way.

OCHL shall immediately verify the need or advisability of informing the market as to the truthfulness of the leaked or rumored information, supplementing and correcting its contents, where necessary, to restore parity of information between stakeholders and various market participants.

14. Crisis Communication

OCHL recognizes the importance of effective crisis communication in managing potential crises that may impact its reputation or operations. OCHL will establish and maintain appropriate communication channels and procedures to facilitate effective crisis communication.

15. Training and Development

OCHL will provide training and development opportunities to employees to enhance their communication skills and will also ensure that employees understand their roles and responsibilities in communication and adhere to this communication policy.

16. Amendments

OCHL will continue to improve its communication and engagement with stakeholders to address their concerns and expectations. This policy can be modified based on the company's specific needs, circumstances, and feedback from stakeholders.

Any proposed changes to this policy will be approved and amended by the Board from time to time and communicated to staff.

17. Effective Date

This policy is effective immediately.

Last update and review: March 7, 2024