

## Communications Policy

This Communications Policy sets out the guidelines governing communication with the internal and external stakeholders of KIPAY. This Policy is part of KIPAY's Corporate Policies. It outlines the guidelines governing internal and external communications in KIPAY.

### Definition

Communication is a two-way process which establishes a foundation for good stakeholder relations throughout all KIPAYs activities.

### Introduction

KIPAYs' communication involves dialogue between partners, contractors, clients, affected communities, government, institutions and other partners.

### Principles

Stakeholder engagement should be inclusive and participatory. Information provided should be thorough and timely, allowing for feedback and a response. This takes into account the needs of vulnerable social groups, cultural norms, gender, logistical constraints and local literacy levels. We seek to build and share knowledge with members, partners and broader communities on all our activities.

**Authorised Persons** are Directors, CEO, Management and other individuals specifically approved by the Management from time to time for specific kinds of communications on behalf of KIPAY.

**Basic Company Information** is any information about KIPAY, including its business, markets, products, services, operations, objectives and CSR.

**Confidential Company Information** is any Company Information that has not been made publicly available by KIPAY, as well as information of third parties that the KIPAY is obligated to keep confidential.

**Internal Stakeholders** refer to KIAP Staff, Management and Directors.

**External Stakeholders** refer to regulators, government and other authorities; KIPAY shareholders; members; issuers; investors; partners, other exchanges; affected communities, institutions, media; service providers; the general public, and other partners.

**Internal Communication** is the dissemination of information to internal stakeholders.

**External Communication** is the diffusion of information to external stakeholders.

### PURPOSE

The purpose of this Policy is to define and provide guidelines on the extent, quality and output of communication with KIPAY external stakeholders and on the faithfulness to and quality of internal communications in line with KIPAY's standards.

### POLICY STATEMENT

KIPAY is committed to the dissemination of timely, accurate and high quality information to its internal and external stakeholders. All internal and external communications should be aimed towards the achievement of KIPAY's vision and mission, and should be in line with its company strategy. All communication should be in line with KIPAYs-approved standards. Only Authorised Persons are permitted to undertake KIPAYs internal and external communications.

### Guiding Principles

KIPAY recognises that active communication with different stakeholders and the general public is an integral part of our Strategy. In order to reach our overall goals for communication, the following guiding principles should always be followed:

- a) Only Authorised Persons shall be permitted to have formal engagements with external stakeholders via media engagements and press releases.
- b) All information must be conveyed through the appropriate and approved communication channels to KIPAY's stakeholders in a timely manner.
- c) All information distributed to stakeholders shall be accurate, transparent and open as possible, while considering the need to protect KIPAY's confidential information.
- d) KIPAY shall proactively develop contacts with its target stakeholder groups and ensure timely, open and constant communication.
- e) All communication must be clear, concise and intentional.
- f) Regular feedback is encouraged from all KIPAY stakeholders and will be applied towards ensuring better performance.
- g) All KIPAY communication must be consistent in style and message to build stakeholder trust.

### Guidelines for External Communication

The support and participation of KIPAY's external stakeholders are crucial to its long-term success and is therefore always desired. All communication to external stakeholders should be secured on this premise and aimed at making the stakeholders feel involved and not alienated. External communication should also promote overall knowledge and awareness of KIPAY. All external communication must be approved by Management.

The Management/CEO shall approve all communication with government representatives, as well as confidential or sensitive information. All presentations/materials for external use must be reviewed by Management prior to exposing these documents to the stakeholders to ensure brand compliance and accuracy of information related to the Company. This includes presentations to external stakeholders at meetings, seminars, conferences, etc. and materials to be uploaded to the website.

KIPAY's relationship with the media is at the heart of its success. The media, which serves as the medium through which KIPAY reaches its external stakeholders, is accorded high priority in KIPAY. As such, communication with media is to be handled with the highest levels of sensitivity and professionalism and must always be handled by Management.

Only Authorised Persons shall be permitted to grant interviews of any sort (print, TV, online) and be quoted with respect to KIPAY's external communications.

### Disclosure of Confidential Information

KIPAY is committed to providing timely, accurate, and complete disclosure of its basic company information in an appropriate manner. Disclosure of confidential information is however strictly prohibited as detailed in the KIPAY Confidentiality and Non-Disclosure Agreement which is signed by all Staff members upon assumption of duty. Violation of this Agreement may attract legal redress.

### Public Statements of Personal Opinion

KIPAY Staff members should refrain from making public statements of personal opinion regarding KIPAY. Such public statements may include quotes given to the media, contribution to social media, published articles, etc. Any such public statements must be approved by the Management before publication.

### Grievance

A Grievance Redress Mechanism ensures that anyone with a complaint or concern about KIPAY's activities can tell us and get feedback from us on how the company will address this concern or issue. The procedure applies to past and present project activities. This mechanism is established recognizing the importance of transparency and accountability.