STAKEHOLDER COMMUNICATION POLICY

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STAKEHOLDER COMMUNICATION POLICY

1. PURPOSE

1.1 The purpose of this Policy is to establish a framework for transparent, consistent, and effective communication between the Company and its stakeholders.

1.2 The Company recognises that effective stakeholder communication promotes trust, enhances corporate reputation, and supports informed decision-making by stakeholders.

1.3 This Policy aims to:

- ensure timely, accurate, and balanced communication with stakeholders;
- promote transparency and accountability;
- support compliance with applicable securities laws and regulatory requirements;
- maintain investor confidence and safeguard the Company's reputation.

1.4 This Policy aligns with the principles of good corporate governance set out in the Corporate Governance Code for Issuers of Securities to the Public issued by the Capital Markets Authority and the listing requirements of the Nairobi Securities Exchange.

2. SCOPE

2.1 This Policy applies to:

- the Board of Directors;
- management;
- employees and persons authorised to communicate on behalf of the Company.

2.2 The Policy governs all external communications with stakeholders including shareholders, investors, regulators, customers, employees, suppliers, communities, and the media.

2.3 Relationship with other policies:

2.3.1 <u>Corporate Disclosure & Procedures Policy</u>

2.3.1.1 This Policy should be read together with the Company's Corporate Disclosure Policy and Procedures.

2.3.1.2 The Corporate Disclosure & Procedures Policy governs:

- identification of Material Information;
- approval of Corporate Disclosures;
- publication of Corporate Disclosures.

2.3.2 <u>Relationship with the Insider Trading Policy</u>

2.3.2.1 Directors, officers, employees, and advisers must comply with the Company's Insider Trading Policy.

2.3.2.2 Material non-public information must remain confidential until it has been publicly disclosed in accordance with the Corporate Disclosure & Procedures Policy.

3. DEFINITIONS

3.1 "Corporate Disclosure" - Any communication, announcement, report, statement, or document containing Material Information about the Company's financial condition, performance, governance, risk profile, or other significant developments, made available to shareholders, regulators, the public, or other stakeholders.

3.2 "Material Information" – means information that a reasonable investor would consider important in deciding whether to buy, hold, or sell the Company's securities. This may include, but is not limited to, audited and unaudited financial results, strategic business decisions, operational milestones, mergers, acquisitions and divestments, profit warnings and regulatory approvals or sanctions that CMA requires disclosed.

3.3 "Securities Exchange" - means any stock exchange or regulated market on which the Company's securities are listed or admitted to trading from time to time, including the Nairobi Securities Exchange, the Dar es Salaam Stock Exchange, and the Uganda Securities Exchange.

3.4 "Stakeholders" - include individuals or groups that have an interest in or may be affected by the Company's activities. These include shareholders, investors, regulators and Securities Exchange, employees, Board of Directors customers, suppliers, business partners, communities and civil society, Government bodies and the media.

4. GUIDING PRINCIPLES

The Company shall adhere to the following principles when communicating with stakeholders:

4.1 Transparency

The Company shall communicate openly and provide relevant information necessary for stakeholders to understand its operations and performance.

4.2 Timeliness

Information shall be communicated promptly to ensure stakeholders have access to current and relevant information.

4.3 Accuracy and Consistency

Information disclosed by the Company shall be accurate, clear, and consistent across all communication channels.

4.4 Fairness and Equal Access

All stakeholders, particularly shareholders and investors, shall have fair and equal access to information.

4.5 Compliance

All communications shall comply with applicable laws, regulatory requirements, and listing rules of the relevant securities exchanges, including the Nairobi Securities Exchange, the Dar es Salaam Stock Exchange, and the Uganda Securities Exchange.

5. POLICY STATEMENT

Jubilee Holdings Limited is committed to open, transparent, and consistent communication with all stakeholders in order to foster trust, mutual understanding, and long-term value creation. The Company shall ensure that all communications are accurate, timely, and accessible, and that stakeholders are provided with opportunities to give feedback through appropriate channels.

The Board of Directors has overall responsibility for overseeing the integrity of stakeholder communications, while Management is responsible for implementing this Policy, maintaining appropriate channels, and reporting to the Board on communication outcomes.

The Company shall disclose information in a fair and equitable manner to all stakeholders and shall use a variety of channels including print and digital platforms and face-to-face engagements to information is effectively disseminated and understood.

6. STAKEHOLDER ENGAGEMENT

The Company recognises the importance of maintaining constructive relationships with its stakeholders. The Company shall seek to engage stakeholders in a manner that promotes dialogue, understanding, and long-term value creation.

7. COMMUNICATION CHANNELS

7.1 The Company will communicate with stakeholders through appropriate channels including:

- Securities Exchange announcements platforms;
- Print and electronically media;
- Company Website.
- Integrated Financial Reports
- Annual General Meetings (AGMs);
- Investor briefings;
- Analyst presentations;
- Shareholders engagement forums;
- Customer Communication Platforms and Service Desks;
- Employee and business partners townhalls, newsletters, newsletters & circulars;
- Community outreach and ESG engagements;
- Social media platforms;

7.2 All communications across any of the above channels must be consistent and adhere to the Company's brand guidelines,

8. MEDIA RELATIONS AND AUTHORISED SPOKESPERSONS

8.1 The Company recognises the media as an important channel for disseminating information to the public.

8.2 Media engagements shall be conducted through Authorised Spokespersons to ensure accuracy and consistency in communications.

8.3 The Company's authorised spokespersons shall be:

- the Chairperson of the Board;
- the Group Chief Executive Officer;
- the Group Head – Marketing & Corporate Communications
- any other person authorised by the Board.
    - (individually "Authorised Spokesperson")

8.4 Employees who are not Authorised Spokespersons must not communicate with the media, investors, or analysts on behalf of the Company unless authorised to do so.

9. COMMUNICATION WITH SHAREHOLDERS AND INVESTORS

9.1 The Company is committed to maintaining open and constructive dialogue with shareholders and the investment community.

9.2 Shareholder communication may occur through:

- the Annual General Meeting;
- periodic financial reporting;
- investor presentations;
- analyst briefings;
- regulatory announcements;
- corporate website disclosures.

9.3 The Board shall ensure that shareholders receive sufficient information to enable them to assess the Company's performance, governance, and strategy.

9.4 The Board shall also ensure that communication with shareholders is undertaken in compliance with the Corporate Disclosures and Procedures Policy.

10. NO SELECTIVE DISCLOSURE

10.1 The Company shall not selectively disclose non-public Material Information to analysts, investors, journalists or other stakeholders.

10.2 Where Material Information is inadvertently disclosed, the Company shall promptly disclose such information publicly in accordance with the Corporate Disclosure & Procedures Policy.

11. CONFIDENTIALITY

Employees must maintain the confidentiality of Material Information and must not disclose Material Information unless authorised or legally required.

12. OVERSIGHT AND RESPONSIBILITY

12.1 The Board of Directors has overall responsibility for ensuring effective stakeholder communication.

12.2 Management is responsible for implementing this Policy and ensuring compliance.

12.3 The Company Secretary shall oversee Corporate Disclosures and ensure compliance with Corporate Disclosures and Procedures Policy.

13. POLICY REVIEW

13.1 This Policy shall be reviewed every two (2) years or earlier when necessary to ensure it remains aligned with changes in laws, regulations, listing rules, market practices, and the Company's operational environment.

Once approved, any revisions or updates of this Policy shall be communicated to all stakeholders and published on the Company's Website.

Approved by the Board on 01.04.2026

Chairman ……………………………………………