

## Investor Relations Policy

### 1. Introduction

The purpose of this document is to focus on improving communications with shareholders through the implementation of an investor relations program, facilitating effective two-way communication between the Company and investors. An effective investor relations program allows investors and other financial market participants to gain a greater understanding of the entity's business, governance, financial performance and prospects.

### 2. Shareholder Communications Strategy

#### 2.1) Preface/Purpose

As a public listed company, Jubilee Life Insurance Company Limited, "Company" is obliged to provide information about itself, as to how it is governed, its operations, financial condition and future prospects. This information is directed to shareholders, stakeholders and the public in general. The aim is to fairly and accurately represent the Company, so that investors and potential investors can make properly informed investment decisions, and others can have a balanced understanding of the Company and its objectives.

The Policy described in this document sets out how the company will meet such obligations in as comprehensive manner as possible. In formulating this Policy, the Company has taken into account the recommendations contained in the Code of Corporate Governance 2012, and its disclosure obligations contained in the Listing Requirements of Karachi Stock Exchange (KSE), Securities Exchange Commission Pakistan (SECP), (Prohibition of Insider Trading) Guidelines, with which the Company is bound to comply. The Company also has a Code of Conduct, which should be read with this Policy.

This Policy shall serve two purposes, as it is the foundation of Jubilee Life's Investor Relations program, and provides an internal framework of processes and procedures around which the program is structured as well as it is a statement to the Company's shareholders and other stakeholders of how the Company intends to keep them informed of material developments, and maintain effective communications with them.

#### 2.2) Applicability

This policy shall be applicable on Jubilee Life's Board of Directors and all staff of the Company.

#### 2.3) Audience of the Policy

The audience of "shareholders, stakeholders and the public generally" is very wide. The Company recognizes this to include, Shareholders and prospective investors, Analysts, Fund managers and investment bankers, The financial press and other media, Government and regulators, Banks and creditors, Public Listed Companies and intermediaries, Business partners and service providers and other organizations and special interest groups.

#### 2.4) Subject Matter of the Policy

The subject matter of this policy shall be the Material Information concerning the Company, contained in either written or oral communications, including but not limited to the following:

- Reports and documents provided to the Exchange and other regulators;
- Materials and statements in the Company's Annual Reports, quarterly reports, press releases, letters and circulars to shareholders;
- Presentations on behalf of the Company;
- Information on the Company's website;

- Articles concerning the Company;
- Correspondence and emails;
- Verbal statements made to outside parties in meetings, briefings, press conferences, or during telephone conversations;
- Interviews with the media;
- Speeches given on behalf of the Company.

## **2.5) Maintaining good communication practices**

To improve shareholder communication, the Company undertakes the following to establish good communication with its shareholders:

## **2.6) Information to consider posting on the website**

As most shareholders will have access to the Company's website, the Company will develop a specific investor page on its website.

## **3. Material Information**

Material information shall be any information about the Company which might reasonably be expected to have a material effect on.

The Listing Requirements of the Exchange give comprehensive details and examples of what constitutes material information, and the Company will always comply fully with its disclosure obligations expressed in such requirements

## **4. Insider(s)**

Anyone who has access to material information about Jubilee Life, its financial condition and its operations, shall be regarded as an Insider. Material information which in the possession of an Insider which has not been disclosed to the Exchange and the investing public is considered "Inside Information".

Insiders shall not deal in the Company's securities while in possession of Inside Information, nor they shall pass on that information to help another person to deal in the Company's securities.

The Company's Code of Conduct in this regard, applies to all members of staff and contains provisions for the proper regulation and control of the trading in the Company's securities by employee Insiders.

The relevant provisions of the Listed Companies (Prohibition of Insider Trading) Guidelines apply to all Insiders.

## **5. Announcing Material Information**

The Company will follow a step-by-step approach, on the same day, as shown below:

- Step 1: Approval is given by the Board of Directors for release of material information in line with the chain of authority and responsibility.
- Step 2: An announcement is made to the Exchange.
- Step 3: Issue of a Company press release to all major newspapers and newswire services in Pakistan if so, decided by the management.

## **6. Authority & Responsibility to Communicate**

Jubilee Life has a clear structure for governance and daily management, providing a chain of authority and responsibility for Policy implementation:

## **7. Confidential Information & Leaks**

As a general rule, all information regarding the Company, its operations, financial condition and future prospects, shall be regarded as material and price-sensitive, and must be treated as confidential unless it is already in the public domain.



To protect the confidentiality of information, access to information shall be restricted only to those persons (employees, or third parties) who have a legitimate need for the information consistent with their duties or obligations to the Company. (For the benefit of staff, reference should be made to the Code of Conduct for guidance to help protect confidentiality and prevent leakage or misuse of confidential information).

#### **8. Rumors/Crisis Communications**

**Rumors:** From time to time, reports or rumors about the Company may circulate. Ordinarily, the Company will not respond to such reports or rumors, unless they appear to contain material information, or may be expected to affect the price of the Company's securities or trading activity in those securities.

When a report or rumor about the Company contains material errors, the Company will issue an announcement to the Exchange to deny or clarify the report or rumor and provide sufficient supporting information.

In general, the Company will take a proactive approach to the addressing of reports and rumors, so as to minimize uninformed speculation and promote an orderly market in its securities.

**Crisis Communications:** A serious and potentially damaging event, of either an operational or financial nature, which might materially and negatively affect the Company or its financial condition, or have a material adverse effect on the price of the Company's securities, shall be regarded as a crisis. The Company shall establish a Crisis Organization structure, within which the CEO shall act as the "Crisis Director", with assistance from the Management Team, if required.

In these situations, all communications shall be conducted through a team headed by the Corporate Relations Officer (CRO), with assistance from Company Secretary, Communications and Investor Relations, if necessary.

#### **9. Major Corporate Developments**

Major corporate developments, such as a merger or acquisition or the launch of a significant new business or product, will always attract special attention. The Company will strictly enforce its procedures for the protection of confidentiality until such time as the development has received all requisite internal approvals. Thereafter, special attention will be paid to ensure the widest and most complete dissemination of information concerning the development, in line with the provisions of this Policy and the Listing Requirements of the Exchange.

#### **10. The Company Website ([www.jubileelife.com](http://www.jubileelife.com))**

The Company will use its website as one of its primary communication sources to enhance existing modes of disseminating information, but not as a substitute for existing modes.

Communications is generally responsible for the content, presentation and the prompt updating of all sections of the Company website. Whereas, Investor Relations is responsible for the content of the Investor Relations sections of the website.

Press releases, presentation materials for briefings or meetings with investors, analysts and the media, along with any recordings of such briefings or meetings, will be posted on the website.

#### **11. Policy Matters**

This Policy shall be published on the Company's website in the Investor Relations section.