

**BRAND MARKETING AND COMMUNICATION  
COMMUNICATION POLICY**

**TAB/BMC/COM/24/001**

**Version 1.0**

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|--------------------------------|--------------------------------------------|
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## **1. PURPOSE**

Alternative Bank Ltd. ("AltBank" or "the Company") acknowledges the critical importance of both internal and external communication activities in shaping the perception of AltBank. The AltBank Communications Policy ("Policy") governs various aspects including communication rules, usage of company communication facilities, management of digital assets, representation of the Company in the media, and confidentiality of company information and procedures. This Policy applies to all members of AltBank.

## **2. DEFINITIONS**

"Employee" refers to:

- Permanent Employees
- Temporary Employees or Seconded
- Contractors
- Non-Permanent Staff (regardless of their Location)

## **3. APPLICABILITY & SCOPE**

This policy applies to all staff categories, including full-time employees, non-full-time employees, temporary and contract employees, as well as contractors, and/or individuals on temporary assignments within the Company.

## **4. POLICY REQUIREMENTS**

### **4.1.1. General Principles and Guidelines**

Ignorance or claimed ignorance shall not excuse acts or omissions contrary to these rules, and all breaches shall result in disciplinary action as per the organization's sanction grid.

Approval from relevant authorities is mandatory for all external communication deployments.

#### **Approval Authorities:**

- Communications Deployment must be approved by at least three managers or the Chief Marketing Officer (CMO).
- All product and service communications, along with related materials, must undergo review and approval by the Internal Shariah Team. Materials deemed sensitive or requiring additional review will be escalated to the Advisory Committee of Experts (ACE) for final approval before dissemination.
- Communications must be approved by the Compliance Council to ensure adherence to regulatory guidelines.
- Management approval is necessary for all communications before deployment.

### **4.1.2. General Principles**

- External engagement opportunities must be communicated at least 48 hours in advance to the Chief Marketing Officer for coordinated planning.
- Designated spokespersons must obtain written authorization before engaging with the

media.

- Employees not designated as spokespersons must refrain from media communication and redirect media inquiries to the Chief Marketing Officer or Communications Manager.

## 4.2. Guidelines

### Stakeholder Communication

#### 4.2.1

These guidelines prescribe the ideal procedure and mechanism for communicating with the various identified stakeholders:

| S/N | Type of Stakeholder                | Means of Communication                                                                                                                                                                                                                                                                                                                                                              |
|-----|------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1.  | Shareholders                       | Annual General Meeting<br><br>Financial Results and Annual Reports: These are to be reviewed by the Board Audit Committee and the external auditors, and subsequently recommended to the Board for approval before publication. The office of the Chief Financial Officer (CFO) of the Bank will then be required to secure the required regulatory approvals prior to publication. |
| 2.  | Creditors                          | Credit Ratings/Financial Reports/Formal Correspondence                                                                                                                                                                                                                                                                                                                              |
| 3.  | Employees                          | Internal Communication Channels/ Internal Policies/Performance Reviews                                                                                                                                                                                                                                                                                                              |
| 4.  | Customers                          | Customer Service Channels/Interactions through Relationship Managers/Formal written correspondence                                                                                                                                                                                                                                                                                  |
| 5.  | Government Agencies and Regulators | The Bank shall submit all statutory and regulatory returns at the statutory date.<br><br>Regulatory audits<br><br>Bank's website and social media platforms                                                                                                                                                                                                                         |
| 6.  | General Public                     | Corporate Social Responsibility Initiatives/Brand and media campaigns                                                                                                                                                                                                                                                                                                               |

|    |           |                                                                                                                                                                                                                                                                                           |
|----|-----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 7. | The Media | <p>Press releases: All Bank communication and press releases shall originate from Public Relations unit, Communications Officer, or such other person or entity as authorized by the Chief Marketing Officer.</p> <p>Press conferences</p> <p>Media parleys with executives annually.</p> |
|----|-----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

#### **4.2.2 Internal Communication:**

The Chief Marketing Officer has general oversight responsibilities for all internal communications in collaboration with the Human Capital Team and any relevant business units within the Bank.

The Bank shall ensure that there are effective internal communications channels for communicating with its internal stakeholders in order to achieve its business objectives.

### **4.3. Minimum requirements to comply with this Policy**

#### **4.3.1 Print Publication and External Media Relations**

- 4.3.1.1** The engagement of all new publications must receive written approval of the Chief Marketing Officer.
- 4.3.1.2** All such approved publications must clearly indicate who the editor(s) is (are) by showing the full names at the end of each publication. Any publication with an unknown author is strictly prohibited.
- 4.3.1.3** All official communication meant for external circulation must be ratified by the Communications Manager and subject to approval by the Chief Marketing Officer to ensure conformity with company regulations.
- 4.3.1.4** Engagement by our brands with consumers via public relations activities (known as brand communications or brand PR) is owned by the Communication Unit. Only the Communications Manager may interact directly with consumer-facing media (blogs, online TVs, influencers), and oversee PR campaigns, as authorized by the Chief Marketing Officer.
- 4.3.1.5** All official company publications, banners, flags, signposts, billboards, etcetera, using the company's logo must ensure that the logo is in the format and colors approved by the BMC (Brand Marketing and Communication) Creative Team with oversight from the Chief Marketing Officer.

**4.3.1.6** Departmental publications are restricted to the business activities of the department and are for internal circulation only with the approval of the "Business Unit" Head.

**4.3.1.7** All company communication and press releases shall originate from such other person or entity authorized by the Chief Marketing Officer.

#### **4.3.2. Media Relations**

**4.3.2.1. Authorization for Media Communication:** Departments or individuals within AltBank are not permitted to engage with the media directly or indirectly regarding matters concerning the Company or Group unless authorized by the Chief Marketing Officer. Official media contacts are managed by the AltBank Head of Communication.

**4.3.2.2. Spokesperson Designations**  
For the purpose of our operations within the country where AltBank operates, considering the unique regulatory environment and the complexity of the AltBank structure, there are two distinct sets of spokespersons with varying levels of interaction with the media.

**4.3.2.2.1. Group A:** The CEO of AltBank serves as the official spokesperson for the company. Only the CEO is authorized to address the media on all areas of the bank, representing AltBank and all associated businesses and SPVs.

**4.3.2.2.2. Group B:** This group consists of:

- The Executive Directors of the bank who can speak for only areas of their businesses; for example, ED of CIB speaks for all areas of CIB.
- The CFO, who can speak on the company financials and investor relations matters.
- The Chief Marketing Officer, who can speak to the media with approval from the AltBank CEO.
- The Head of Shariah Team, who can speak to Shariah non-compliance issues
- The Chief Marketing Officer and the Communication Manager can provide holding statements to the media without needing approval from any specific category.

**4.3.3. Reputational Risk Management:** Issues - potential or actual - arise during business. An issue is any matter with the potential to impact our reputation or the reputation of our brands.

**4.3.3.1.** When faced with any issue that can impact our reputation

and products negatively, the first point of contact for employees should be the Chief Marketing Officer. If unavailable, please alert the Communications Manager or any member of the Brand Marketing and Communications Team.

4.3.3.2. From time to time, Altbank or its subsidiaries may receive publicity in the media that may have a damaging effect on its reputation. Such media could be newspapers, magazines, television, radio, or the internet. Unless the comments published explicitly mention Altbank and not a general reference to the banking industry, Altbank should not respond.

4.3.3.3. If Altbank receives publicity that has a medium to high risk of harming its reputation, the Chief Marketing Officer will engage the media with a position after consulting with the CEO and the Head of Shariah Audit.

The Bank's executive leadership, including to the Chief Legal Officer and/or Chief Compliance and/or Chief Audit functions will be consulted for proper dimensioning of risks to aid development of the appropriate response.

4.3.3.4. The company, its business units, and subsidiaries are NOT to respond in writing to letters of criticism that are sent to the media by employees, stakeholders, or customers without consulting the CEO, Chief Marketing Officer, and the Communications Unit.

#### **4.3.4. Crisis Communication**

4.3.4.1. Altbank recognizes the importance of effective communication during crisis, such as incidents that significantly impact its business or reputation.

4.3.4.2. The CEO and Executive Directors (EDs) are the only authorized spokespersons during a crisis. The CMO may appoint spokespersons to communicate with employees, customers, and shareholders.

4.3.4.3. Crisis communication must align with AltBank's Business Continuity Management Policy.

#### **4.3.5. Outside Business Interest Communication**

4.3.5.1. Altbank recognizes that staff members may have outside business interests or hobbies that they engage in outside official office hours.

When a staff member gets a media request (Print, Electronic or Digital) to speak on their personal interest, he/she must obtain clearance from the Compliance Department with proper notification from the Chief Marketing Officer and the Communication Manager before engaging with the media regarding outside business interests or hobbies.

Employees must clearly state that their views are personal and do not represent AltBank in any way.

- 4.3.5.2 Employees representing an interest group in a media interaction must also seek approval from the Chief Compliance Officer and notify the CMO.

- 5. RELIGIOUS GREETINGS:** The Bank's Management retains the discretion to select suitable religious greetings for external communications, fostering an inclusive environment that respects diverse faiths. All religious greetings must be submitted to the Advisory Committee of Experts (ACE) for approval prior to release.

## **6. ROLES & RESPONSIBILITIES:**

### **6.1 Chief Executive**

- Chief spokesperson for Alt
- Oversee and provide final approval to Chief Marketing Officer on communication matters

### **6.2. Bank CEO, Bank Executive Directors, CFO, CEOs of the subsidiaries, Business Heads**

- Bank CEO to speak on behalf of the bank. EDs to speak on behalf of the business areas. CEOs of the subsidiaries to speak on behalf of their businesses.

### **6.3. Chief Marketing Officer**

- Provide holding statements where required, speaks on marketing campaigns, other strategic issues as agreed.
- Ensure that the company is positively and accurately represented in public and the media, with coherent information that is in line with the company and group policies.
- Ensure that authorized information to be released to the media is coordinated centrally through company authorized channels to ensure proper and effective dissemination both externally and within the company.
- Ensure that for the purposes of disseminating information, the company engages with publications that are properly defined and registered; and that the engagement with these publications contributes to the building and the positive promotion of the group's reputation and brand.
- Regulate the use of electronic media for dissemination of information and data. Clearly communicate all procedures for responding to third parties and granting

#### **6.4. Human Capital**

- Draw staff attention to their obligation of maintaining confidentiality relating to company matters.

#### **6.5. Compliance**

- Assess requests for media engagement by staff on their outside business interest and provide the required approvals.

### **7. DISCIPLINARY ACTION**

Related policies and procedures

- Letter of engagement (confidentiality) - staff
- Social Media Policy
- Group Investor Relations Policy
- Outside Business interests Policy
- Disciplinary Policy

#### **Monitoring**

All breaches of this policy should be reported to the Chief Marketing Officer and/or Chief Compliance Officer. It will be dealt with in line with the Altbank Disciplinary Policy.

Potential sanctions include but are not limited to:

1. Warning
2. Suspension of employee
3. Limitation of communications facilities
4. Termination of appointment or contract (whichever is the case)
5. Dismissal
6. Legal action

### **8. LETTERHEAD POLICY**

Key provisions on the use of the Bank's Letterhead.

- Altbank's Letterhead (physical or electronic) is a legal document that must not be altered or modified for any purpose whatsoever.
- Employees who attempt to modify the Bank's letterhead will be deemed as breaching company communications policy and will be sanctioned accordingly.
- The Bank's letterhead is strictly limited to official business and may not be used for personal or non-Altbank purposes. Marking the letterhead "Personal and Unofficial" is unacceptable. Employees must exercise care to separate their official and personal activities to avoid potential conflicts of interest as well as the appearance of such conflicts.

### **9. PERIODIC REVIEW**

This policy shall be reviewed every two years to ensure the policy is up to date and meets the Bank's needs.