



## Communication Policy

February 2025

### Purpose and Scope

This Communication Policy establishes a framework for managing all forms of communication at **Access Financial Services Limited** ("AFS"), a licensed microcredit institution listed on the Junior Market of the Jamaica Stock Exchange (JSE). The policy aims to ensure transparency, consistency, and compliance with regulatory requirements, while safeguarding the Company's reputation and fostering effective engagement with stakeholders.

Communication is essential to AFS' ability to maintain trust with investors, customers, employees, regulators, and the public. This policy provides clear guidelines for internal and external communications, as well as the use of social media in both professional and personal contexts. It also outlines specific communication expectations for different stakeholder groups, including how to handle communications with investors, regulators, employees, and customers.

The goal of this policy is to mitigate risks associated with communication, such as misinformation, compliance violations, or reputational damage, by ensuring that communication is consistent, accurate, and aligned with AFS' values.

To remain agile and responsive to the evolving digital landscape, this policy will be updated periodically to account for emerging communication channels, such as new social media platforms and messaging apps, ensuring that AFS stays current with developments in communication technology.

### 2. Related Policies and Consequences of Violations

Employees must adhere to AFS's **Code of Conduct** and **Compliance Policy**. Violations of these policies may result in disciplinary action, including suspension, termination of employment, or legal consequences, depending on the severity of the violation.

### 3. Corporate Disclosure

AFS is committed to making corporate communications regarding material information timely, transparent, and compliant with legal, regulatory, and stock exchange requirements.

- **Timely Disclosure:** Material information, including any changes in financial standing, business operations, or events that could impact share value, must be disclosed to the public promptly and in compliance with JSE regulations.
- **Equal Access:** AFS ensures that all investors have equal access to relevant information, with no selective disclosure. This includes adherence to JSE's guidelines for information dissemination.

## 4. Media Engagement and External Communications

### 4.1 Media Engagement

This section governs AFS' interactions with external media and ensures that a consistent and professional approach is maintained. Effective media engagement strengthens AFS' reputation, attracts investors, and builds lasting relationships with customers.

### 4.2 Consequences of Non-Compliance

Failure to follow the media engagement guidelines may result in:

- **Damage to AFS' reputation,** leading to a loss of stakeholder trust.
- **Impact on stock price and investor confidence,** possible suspension of trades, and risk to the Company's operational license.
- **Legal consequences** for individuals or the Company.

### 4.3 Ownership & Accountability

- **CEO:** The CEO is responsible for all communication on behalf of the company and serves as the primary point of contact for external communications, including media relations and stakeholder engagement. While the CEO holds ultimate accountability, support from relevant officers and department heads as needed. All communication will be directed through the CEO's office.
- **Executive Chairman:** Leads investor communications and major media engagements.
- **Manager – Legal & Corporate Affairs:** Responsible for overseeing legal matters and corporate affairs, ensuring compliance and supporting communication with external stakeholders.
- **Marketing & Sales Manager:** Accountable for consumer communication, public relations, and promoting AFS' brand image.
- **All Employees:** Should be guided by the policy and ensure they have authorization before attempting to speak on behalf of the Company. Where permission is granted, they must exercise discretion.

### 4.4 Interactions with Media & External Communications Channels

- **Prior Approval:** Employees must obtain prior approval from the **CEO** or the **Manager - Legal & Corporate Affairs** before engaging with the media. Media engagement includes,

but is not limited to, interviews, press releases, public statements, or any communication with journalists or media outlets.

**Employees are explicitly prohibited from engaging with the media without obtaining prior authorization to avoid reputational risks, to ensure consistent messaging, and ensure compliance with legal and regulatory guidelines.**

- **Referral Process:** All media inquiries must be referred to the **CEO** and/or **Manager- Legal & Corporate Affairs**.
- **Approval of Announcements:** All media releases and public announcements require approval from the **CEO** and/or **Manager- Legal & Corporate Affairs** before issuance.
- **Online Discussions:** Comments on external news platforms or forums regarding AFS must be approved by the **CEO** or designated spokesperson.

#### **4.5 Authorized Spokespersons**

Only the following individuals are authorized to speak on behalf of AFS:

- **Executive Chairman**
- **Chief Executive Officer (CEO)**
- **Manager- Legal & Corporate Affairs**
- **Company Secretary & Board of Directors**
- **Marketing & Sales Manager** (with prior approval)
- **Other Members of Management** (subject to training and CEO/Executive Chairman approval)

#### **4.6 Training**

- Authorized Spokespersons will receive comprehensive media training to ensure they are equipped to represent AFS effectively and consistently. Training will be conducted on a regular basis and updated as necessary to ensure ongoing preparedness.

#### **4.7 Marketing & Public Relations**

- **Pre-approval Requirement:** The **Marketing** and **Public Relations** teams cannot engage with external media or oversee campaigns without prior approval from the **CEO**.
- **Escalation of Issues:** Any issues arising in the media or public domain must be escalated immediately to the **CEO** and **Manager- Legal & Corporate Affairs** for guidance.
- **Approval of Campaigns:** All marketing and public relations activities must be reviewed and approved by the **CEO** before execution.

### **5. Investor Communications (JSE Compliance)**

- **Public Information Only:** AFS will only disclose publicly available information such as annual reports, financial statements, and disclosures mandated by the JSE.

- **Investor Inquiries:** All investor inquiries must be directed to the **CEO** or **Company Secretary** for response.
- **Compliance with JSE:** Investor presentations, annual reports, and financial statements must comply with JSE disclosure rules and standards (refer to AFS's **Compliance Policy**).

## 6. Social Media Policy

AFS acknowledges the power of social media in connecting with a wide audience but recognizes the risks associated with unregulated or inappropriate use. This policy outlines guidelines for responsible social media usage by employees.

### 6.1 General Principles

- **Respect & Professionalism:** Employees must maintain professionalism and respect for others while engaging on social media. Offensive, discriminatory, or harmful content must be avoided. This includes interactions and communication on employees' personal social media.
- **Confidentiality & Data Protection:** Employees should not share confidential information about the Company, customers, or colleagues on social media. This includes customer personal data, business strategies, and financial performance (refer to **Data Protection Policy**).
- **Transparency & Disclosure:** Employees should avoid discussing AFS or its operations on social media. Authorized employees who are approved spokespersons must clearly identify themselves as affiliated with AFS. Misleading or deceptive statements are prohibited.
- **Internal & Legal Matters:** Only authorized spokespersons are permitted to discuss legal, internal, or financial matters. Employees must refrain from commenting on pending legal issues or internal disputes.
- **Comply with the Law:** Employees must adhere to applicable laws, including intellectual property laws, privacy laws, and platform terms of service.
- **Responsibility:** Employees should avoid engaging in discussions outside their area of expertise. If an issue arises, it should be escalated to the relevant management team.

### 6.2 Social Media Account Ownership

- **Company Accounts:** Social media accounts created by AFS for business purposes are the property of the Company. Employees are prohibited from altering or claiming ownership of these accounts upon departure.
- **Content Ownership:** All posts, images, and media generated for official AFS social media accounts remain the property of AFS, even in instances where employees have left the organization.

### 6.3 Social Media Crisis Management

- **Escalation Process:** Employees must report any damaging, misleading, or inappropriate content about AFS posted on social media immediately to the **Marketing Department, CEO, Mager Legal Affairs** or other **management team members**.
- **Legal & Compliance Risks:** Employees must be cautious when engaging in discussions that may lead to legal risks such as defamation, privacy violations, or intellectual property infringement.

#### 6.4 Use of Personal Accounts

Employees are free to express personal opinions on their personal social media accounts; however, they must remain mindful of the potential impact these activities can have on the company's reputation and image. Social media blurs the line between personal and professional, so it is important to consider how personal posts might be perceived by others, including customers, investors, colleagues, and the public.

**Implying Official Representation:** Employees should avoid implying that their personal opinions or posts represent AFS, especially when discussing professional or company-related matters. This includes:

- Refraining from using company logos, hashtags, or titles in a way that could suggest an official stance.
- Ensuring that personal views are clearly stated as their own and not those of the company (e.g., including a disclaimer like "opinions are my own").
- Avoiding any suggestion that AFS has endorsed or is associated with personal statements made on social media.

**Negative Impact on the Brand:** Personal social media activities that could negatively affect AFS' reputation may lead to disciplinary action. While personal accounts are, in theory, private, the following activities should be avoided:

- Engaging in negative commentary about AFS' competitors, customers, colleagues, or the company's policies.
- Posting or commenting on sensitive topics (e.g., crises or scandals) that could reflect poorly on AFS or its stakeholders.

**Discretion and Professionalism:** Employees are encouraged to exercise discretion when engaging in sensitive or controversial discussions online. Even on personal accounts, employees should:

- Be cautious when discussing work-related issues or expressing frustration about workplace matters. Comments that reflect negatively on the company or its employees could be misinterpreted or spread beyond the intended audience.
- Remember that social media content can be shared widely and may live online permanently. Even if a post is intended for a private audience, it could be forwarded or made public.

- Consider the potential consequences of sharing certain personal opinions publicly, especially if they contradict AFS' values or business interests.

**Accountability and Consequences:** AFS respects its employees' right to express personal views on social media; however, it is important to remember that personal posts can have professional consequences. Personal social media activities that negatively affect the company's reputation or cause confusion about AFS' official position may result in disciplinary action.

Disciplinary measures will be evaluated on a case-by-case basis, considering factors such as:

- The severity of the post and its potential impact on AFS.
- Whether the post was clearly identified as personal and not official.
- The context in which the post was made (e.g., was it during a crisis situation or related to a work issue?).

## 7. Crisis Communication

In the event of a crisis, such as a data breach, financial misstatement, or negative media coverage, AFS will activate a **Crisis Communication Plan** to ensure clear, coordinated, and timely communication with stakeholders.

- **Crisis Communication Team:** A designated team, including the **CEO, Manager- Legal & Corporate Affairs, Marketing**, and other relevant stakeholders, will manage the communication process.
- **Timely Updates:** Key stakeholders, including regulators, investors, employees, and customers, will be kept informed with accurate and transparent updates.
- **Media & Public Engagement:** Pre-approved templates and strategies will guide AFS' media interactions and public statements.
- **Internal Communication:** Employees will receive internal memos and briefings on the situation and AFS' response.

**Note:** Periodic **Crisis Communication Simulations** will be conducted to ensure the team is prepared to manage real-world crises effectively.

## 8. Review & Amendments

This policy will be reviewed annually or as necessary to align with changes in regulatory requirements, technology, and business needs.

- **Approval of Amendments:** All amendments to this policy must be approved by the **Board of Directors** or **CEO**.

## **Conclusion**

This **Communication Policy** ensures that all forms of communication are handled responsibly, maintaining transparency, regulatory compliance, and safeguarding the Company's reputation across all stakeholder groups. This policy also addresses the evolving role of social media, balancing engagement with risk mitigation to protect AFS' brand integrity.

## Appendix

### Crisis Communication Guide for Access Financial Services Limited

#### 1. Objective

The primary objective of this Crisis Communication Guide is to ensure Access Financial Services Limited (AFS) has a general framework on which to build a tailored plan that will ensure effective communication during a crisis, protect the company's reputation, maintain stakeholder trust, and provide timely, accurate information.

#### 2. Crisis Definition

A crisis is defined as any event, issue, or situation that could significantly damage AFS' reputation, operations, or financial stability. This includes, but is not limited to:

- Natural disasters
- Legal issues (e.g., lawsuits, regulatory violations)
- Cyberattacks or data breaches
- Financial fraud or misconduct
- Public relations incidents (e.g., customer dissatisfaction, employee misconduct)
- Health or safety incidents affecting employees, clients, or partners

#### 3. Crisis Communication Goals

- **Immediate Response:** Provide timely, accurate, and clear communication to internal and external stakeholders.
- **Transparency:** Be honest about the situation while protecting sensitive information.
- **Minimize Damage:** Control the narrative and reduce reputational damage.
- **Stakeholder Confidence:** Keep customers, employees, investors, and the public informed.
- **Restore Normalcy:** Communicate AFS's plan for recovery and the steps being taken to resolve the crisis.

#### 4. Crisis Communication Team (CCT)

- **Marketing Manager:** Oversees the plan and communication strategy.
- **Public Relations Consultant/Public Relations Officer:** Handles media inquiries and external communication.
- **Manager-Legal & Corporate Affairs:** Provides guidance on legal implications and compliance.
- **IT Manager:** Ensures cybersecurity issues are addressed and provides updates.
- **HR & Training Manager:** Manages internal communication with employees and stakeholders.
- **CEO/Executive Team:** Approves major statements and communicates with key stakeholders.



## 5. Key Stakeholders

- **Employees:** Internal communication and morale.
- **Clients:** Clear updates on the situation's impact on services.
- **Investors/Shareholders:** Updates on business stability and crisis management.
- **Media:** Provide information while controlling the narrative.
- **Regulatory Authorities:** Ensure compliance with laws and regulations.

## 6. Crisis Communication Channels

- **Internal Communication:** Email, intranet, and staff meetings.
- **External Communication:** Press releases, website updates, social media, customer notifications (SMS, email), phone hotlines.
- **Media Relations:** Press conferences, media advisories, and direct outreach to journalists.

## 7. Crisis Communication Process

- **Phase 1: Initial Response (First 24 hours)**
  - Assess the crisis and gather all facts.
  - Notify the Crisis Communication Team and assign roles.
  - Provide a report to the Board of Directors
  - Prepare initial statements for employees, clients, and the media.
  - Establish a communication timeline for updates.

*Note: The Board must be kept informed in a timely manner on all developments as practical under the circumstances.*

- **Phase 2: Ongoing Communication (1-7 days)**
  - Monitor media and social media for feedback.
  - Update stakeholders with relevant developments.
  - Coordinate with regulatory authorities, if necessary.
  - Adjust the communication strategy based on the crisis evolution.
- **Phase 3: Recovery (Beyond 7 days)**
  - Shift focus to recovery and rebuilding trust.
  - Communicate long-term steps AFS is taking to prevent recurrence.
  - Evaluate the impact and learnings for future crisis management.

## 8. Message Development

- **Clarity:** Messages must be clear, concise, and easy to understand.
- **Empathy:** Acknowledge the impact on stakeholders and show empathy.
- **Actionable Information:** Provide details on what is being done and how the situation is being managed.
- **Consistency:** Ensure all spokespersons are aligned in their messaging.

## 9. Crisis Communication Simulations

To ensure readiness, AFS should conduct regular crisis communication simulations, which will prepare the team to handle a real crisis situation effectively.

### Crisis Communication Simulation

#### Simulation 1: Data Breach Crisis

**Scenario:** A cybersecurity breach exposes sensitive client information.

**Objective:** Ensure the communication team is prepared to respond swiftly, protect the company's reputation, and provide transparent updates to stakeholders.

#### Simulation Steps:

1. **Initial Alert:** The IT department discovers unauthorized access to customer data. They immediately inform the Crisis Communication Team.
2. **Crisis Team Activation:** The Marketing Manager activates the communication plan and convenes the team for an emergency meeting.
3. **Message Development:**
  - o Communication must be made to the relevant regulators & authorities
  - o Internal communication goes out to employees to inform them of the breach.
  - o A holding statement is drafted for the public, stating the breach, its potential impact, and AFS's commitment to addressing the issue.
4. **Press Release:** A formal press release is prepared and shared with media outlets. It provides information on the breach, AFS's investigation, and steps being taken to safeguard data.
5. **Customer Communication:** Customers are notified via email and text with instructions on how to protect their data and what AFS is doing to remedy the situation.
6. **Social Media Monitoring:** Monitor social media channels for customer reactions and feedback. Respond promptly to queries and concerns.
7. **Media Q&A:** Simulate a press conference, where the team responds to hypothetical questions from the media regarding the breach.
8. **Follow-Up Communication:** Regular updates are sent to stakeholders as investigations progress and remediation steps are implemented.

#### Debrief:

- Evaluate response times, message consistency, and the effectiveness of communication tools.
- Identify any areas for improvement, such as additional training, resource allocation, or technology requirements.

## **Simulation 2: Legal Issue (Lawsuit)**

**Scenario:** A major client files a lawsuit against AFS, claiming financial misconduct.

**Objective:** Prepare the team to manage legal crisis communication, protect the company's legal position, and maintain stakeholder trust.

### **Simulation Steps:**

1. **Legal Alert:** The Legal Department informs the Crisis Communication Team of the lawsuit.
2. **Crisis Team Activation:** Convene the team to review the lawsuit and determine the key messages.
3. **Internal Communication:** Employees are briefed on the situation with specific instructions on how to respond if asked by external parties.
4. **Public Statement:** A holding statement is released, expressing AFS's commitment to resolving the issue while respecting the legal process.
5. **Media Engagement:** Prepare a media advisory and conduct interviews or press briefings. The company's stance on the lawsuit is clearly communicated, without compromising legal strategy.
6. **Customer Communication:** Communicate to clients that the lawsuit will not affect their services or the integrity of the company.
7. **Ongoing Updates:** Maintain transparency as the case progresses, issuing updates as appropriate and ensuring accuracy.

### **Debrief:**

- Assess the legal implications of the communication strategies used.
- Identify improvements for handling legal crises without compromising ongoing legal proceedings.

## **10. Review and Testing**

- Conduct quarterly simulations of different crisis scenarios to ensure preparedness.
- Regularly review and update the crisis communication plan to incorporate feedback from previous simulations and real-world events.

**CHANGES, ADDITIONS OR DELETIONS**

Changes, additions or deletions to this document may only be made with written agreement by the Chief Executive Officer.

***APPROVAL***

*Accepted and Approved by:*



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**Chief Executive Officer**

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March 18, 2025

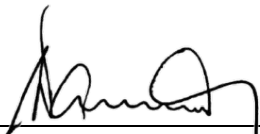
**Date**



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**Chairman – Audit & Risk  
Management Committee**

\_\_\_\_\_  
March 18, 2025

**Date**



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**Chairman – Board of Directors**

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March 18, 2025

**Date**