

RED STAR EXPRESS PLC
CORPORATE COMMUNICATIONS POLICY

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RED STAR EXPRESS PLC **CORPORATE COMMUNICATIONS POLICY**

1.0 INTRODUCTION

This Policy is to establish guidelines for Red Star Express Plc. (“Red Star Express” or the “Company”) for communications by the Company, including the release of material information about the Company to the general public, media, customers, potential investors, and other stakeholders.

1.1 SCOPE

This Policy applies to all the Company’s dealings with its directors, employees, consultants and contractors. The enforcement and Monitoring of this Policy is vested in the Office of the Executive Director, Sales and Marketing. Any clarification and or violation of this Policy should be brought to the attention of the Executive, Director Sales and Marketing.

2.0 INTERNAL COMMUNICATIONS

All internal communications/correspondence (i.e. internal memorandum, emails, company mails e.t.c) that are generated or transmitted via the company’s intranet, servers or any other media form shall be of acceptable language, non-political, non-religious and factual.

Such communication/correspondence must be conveyed using the company’s font type of **Arial size 12**. All reports, presentations, memos, emails and all official correspondence must conform to these font requirements.

2.1 Staff Forum

The Company actively encourages teamwork to achieve its performance targets and objectives. To this end the Company shall hold a staff forum at least once in every Quarter year, where employees have the opportunity to share any concerns with Senior Management.

The Company also promotes an “open door” policy. Employees are encouraged to raise work-related concerns with their Line Manager. If this is not the most appropriate person, they are encouraged to raise their concerns with any other Manager or the Human Resources unit, or any Senior Manager, up to and including the Group Managing Director.

3.0 External Communications

All Employees’ formal correspondence with third parties must be conveyed through the Company’s electronic mail or documented on printed paper bearing the Company’s letter head with the consent of the Head of the employee’s department initiating the correspondence.



Provided that where the external communications borders on any information of a financial nature, the approval of the Executive Director Finance and Administration shall be sought and obtained before such information is disclosed; and where the information is of a Sales, Marketing or any other incidental nature, the approval of the Executive Director Sales and Marketing must first be sought and obtained before such an information is disclosed.

Any communication with Government agencies and regulators, must be issued by a Head of Department and authorised by the Head, Corporate Resources or, in some cases and as the case may be, some government related matters should be referred to the Marketing and Corporate Affairs Unit.

3.1 Dealings with the Investment Community

In all its communications/dealings with the investment community, i.e. shareholders, institutional investors, individuals, regulators and all other stakeholders, the Company shall only disclose Non-Material Information. Where the Company decides to publicly disseminate information it shall be non-selective (i.e. all stakeholders must receive the same information on the same subject matter).

Only an authorized spokesperson (the Group Managing Director/CEO) or, in his absence, the Executive Director, Sales and Marketing or Executive Director Finance & Administration, may engage in discussions about the Company with this group of stakeholders. Any other employee who is contacted by a Third Party must refer the Third Party to the above mentioned persons.

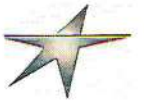
In any case of inadvertent disclosure of any material or price sensitive information by any unauthorised person, the attention of the GMD/CEO should be immediately brought to this fact. The GMD/CEO would consult with the Legal Adviser on whether or not to make a public statement.

4.0 Confidentiality and Disclosure of Information

Confidential material information of the Company is subject to strict confidentiality restrictions and care must be taken to ensure the information is used only to further the approved business purposes of the Company. Access to confidential material information is restricted to authorized persons who should be aware of their confidentiality obligations.

Wherever practical, confidential material information should:

- be identified as such;
- be stored in locked cabinets to which access is restricted;
- be removed promptly from meeting rooms at the conclusion of meetings;
- be subject to secure limited access of electronically stored computer information
- not be discussed in places where the discussion may be overheard
- not be copied unnecessarily or discarded where others can easily retrieve it.



Confidential information includes, among other things, any information not in the public domain concerning the Company and any information obtained from a third party with the belief that the information will be kept confidential and used specifically for the purpose for which it was conveyed. For this purpose, information about, employees, clients as well as the Company's Strategic and Business Plans are deemed confidential.

Where confidential information has to be transferred to third parties, the Company must ensure that a **Non-Disclosure Agreement (NDA)** is signed by the said third party.

5.0 Social Media- Blogs, Chat Rooms or Online Forums

Due to the immediacy of electronic information, Company employees are discouraged from participating and or responding to discussions about the Company on internet discussion forums, chat rooms, or bulletin boards. Red Star Express personnel may not, at any time, discuss confidential material information. Posting on official Red Star Express Plc social media fora by employees is restricted to authorized Marketing and Sales Unit Staff with the due approval of the Executive Director Sales and Marketing. The content of such postings must comply with guidelines set periodically by the Executive Director, Sales and Marketing.

5.1 INTERNAL MESSAGE BROADCAST

Messages to "all staff" shall be approved by the relevant Head of department, messages of a political or religious nature are prohibited from mass dissemination to Staff. Newsletters, presentations or news are to be broadcasted to all-staff via the Company's electronic mail platform.

6.0 Investors Relations Portal

The Company website www.redstarplc.com shall contain all Company policies, annual reports, quarterly reports and other key financial information. The information shall be provided in simple and plain language, easy to understand by all Stakeholders and investors. The information shall be timely, accurate and updated periodically to reflect the current position.

Shareholders and indeed all stakeholders will be able to make enquiries by sending emails to the company via investorrelations@redstarplc.com email.

The Head, Corporate Resources shall have direct responsibility for the processing of such enquiries and all mails received on the portal are treated and responses sent within the shortest possible time.



6.1 Financial Information

The Company's financial information shall be kept confidential and disclosure of such information shall be authorised by the Executive Director, Finance and Administration. No employee is permitted to divulge any information of a financial nature without due authorisation from the Executive Director, Finance and Admin.

6.2 CLOSURE PERIOD/BLACKOUT PERIOD

This is a period of 15 days before the date of any Board Meeting or Audit Committee Meeting to review and approve the accounts and 48 hours after submission of the said accounts to Regulatory authorities. The Company shall not respond to any request for information or make any pronouncement on its financials i.e. dividend, earnings or other material information during this period.

6.3 SHARE PRICE

The Company shall not comment on the performance of its shares. Employees are not permitted to comment on how the Company's share price will change over time, or whether or not investors should trade in the Company's shares.

7.0 RESPONDING TO RUMOURS

In general, no comment will be made in response to rumours or speculation regarding the Company. However, certain exceptions may be made under the direction of the Executive Director, Sales and Marketing (for example, if the competence and integrity of the Company is being impugned).

8.0 MEDIA RELATIONS

All media relations activities shall be coordinated by the Sales and Marketing Unit upon due authorization by the Executive Director, Sales and Marketing. Unless otherwise authorized by the Executive Director Sales and Marketing, Public Affairs, media-relations activities and media interviews are restricted to the GMD/CEO and the Executive Director, Sales and Marketing.

In addition, the Head, Corporate Resources is the primary spokesperson for the Company on matters of corporate governance.

The Company may periodically inform the public of its activities through the media via the following means:

8.1 NEWS RELEASE

News releases containing material information will be issued as soon as practicable



via print and electronic media with national distribution and shall be posted on the Company's website.

The Marketing and Sales Department (under the supervision of the Executive Director, Sales and Marketing) shall be responsible for the appropriate dissemination of information to the media.

8.2 MEDIA INTERVIEWS

Media interviews could be either one-on-one, telephone, tele/video-conference interviews. The interview session shall be organised by the Marketing and Sales Unit for the GMD/CEO or whoever is designated by the GMD/CEO.

8.3 MEDIA ENQUIRY

The GMD/CEO and the Executive Director Sales and Marketing are the only officers authorised to respond to any request for information by the media. A request for information previously approved for dissemination to the public by the GMD/CEO and or Executive Director Sales and Marketing ("Authorizing Officers") may be reissued without recourse to authorizing officers provided that such information remains factual as of the date of release.

9.0 CONSEQUENCES OF NON COMPLAINE WITH THIS POLICY

Red Star Express employees will be advised of this Policy and its importance from time to time. Red Star Express employees are responsible for consulting, understanding, and complying with this policy. There is no circumstance in which any law or regulation should be disregarded in the conduct of the Company's business.

Failure to comply with this policy may result in disciplinary action, including but not limited to termination of employment with the Company. This does not preclude the Company from taking further legal action where it deems necessary.

10.0 DEFINITION

As for the purpose of this Policy, the following terms have the following meanings:

"Authorized Spokesperson" means the Group Managing Director/Chief Executive Officer, Executive Director, Sales and Marketing, Executive Director, Finance and Administration and any other Employee authorised by the aforementioned officers to act on behalf of the company.

"Material Information": this shall mean information about certain aspects of the Company, that has not yet been made public but that will have at least a small impact on the Company's share price once released. All information capable of influencing an



investor on whether or not to invest in the Company shall be regarded as material information.

Either positive or negative information may be material.

"Non-public Information" means information that is not available to the general public.

11.0 REVIEW

This Policy may be reviewed biennially or as the Company deems expedient and it shall be approved by the Board.

Approved by the Board this 26th day of April 2018.


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GROUP MANAGING DIRECTOR/CEO


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DIRECTOR