	The Hub Power Company Limited	External Communications Policy
	Approved by the Board on May 9, 2019	

**Purpose**

The reputation and image of The Hub Power Company Ltd. (Hubco) amongst its key audiences is an essential component to the organization’s business success. In an age where information about a company flows instantaneously and is accessible at a global level, it is critical that all our communication with external audiences is managed in a coordinated manner and aligned with the Company’s Vision, Value and Mission.

In the interests of the reputation of the company and shareholder confidence, it is of vital importance that the information we disseminate is accurate, consistent and timely and through people who are authorized to do so.

**Objective**

The objective of this Policy is to provide guidance for Hubco, its group-companies and employees’ use of information, their communication with third parties, usage of website, internet and various social media platforms.

**Policy**

As an over-riding principle, no employee in the organization is authorized to communicate externally about Hubco’s prospects, performance and policies, except as specified herein. In particular, employees should not make sales or profits forecasts, nor predict product and regulatory approvals or launch dates or communicate information which is not already in the public domain (unless they have prior written approval from Public Relations Department or Company Secretary).

All statements and / or disclosure made in reports and documents that Hubco releases for public consumption and / or files or submits to appropriate authorities must be fair, accurate, timely and understandable.

**Scope**

This Policy applies to all employees of Hubco, and employees of its subsidiaries.

**Effective date**

This Policy is effective immediately.

## **General**

For the purposes of this Policy, the following terms shall have the meanings attributed to them:

Any reference to “Hubco” and / or “Company” means and shall be read to include, unless stated otherwise, The Hub Power Company Ltd., Hub Power Services Ltd., Hub Power Holdings Ltd., Thar Energy Ltd and Narowal Energy Ltd, Laraib Energy Ltd. and Thal Nova Thar Limited or any other projects being undertaken by the Company.

Any reference to the Chairman, Chief Executive Officer, Company Secretary or Manager Public Relations shall mean such officers of the respective and relevant company.

Any reference to ‘press’, ‘media’ shall mean all individuals and organizations who maintain print or broadcast information for public consumption. This definition includes but is not limited to: newspapers, magazines, television, digital news feeds, etc.

Any reference to ‘social media’ shall mean digital communication content created by individuals, using accessible, expandable, and upgradeable publishing technologies, through and on the Internet. Examples of social media include but are not limited to: Facebook, blogs, MySpace, RSS, YouTube, Twitter, LinkedIn, Instagram, Flickr, Google+, chat rooms on WhatsApp and other social networking sites or applications.

## **EXTERNAL COMMUNICATIONS GENERALLY**

External communication generally includes, but is not limited to:

- Media Statement
- Press Release
- Commentary / Analysis on Price Sensitive Information
- Interview to Print / Electronic Media
- Interpersonal Discussion with Media Representatives
- Presentation to Government or other External Stakeholders

## **Authorized Spokespersons**

As a general principle, comments relating to the Company’s corporate activities such as the financial results or performance, the outlook for the Company’s earnings, or the market or value of the Company’s shares can only be made by the Chairman, Chief Executive Officer (CEO), Chief Financial Officer (CFO), Company Secretary and Manager Public Relations.

Such spokespersons will, at all occasions, liaise with the Company Secretary to ensure that all proposed public announcements are already in the public domain and avoid commenting on price sensitive information.

### **Group Companies and Divisional Information**

Only the Chairman and CEO of The Hub Power Company Ltd. is authorized to speak on or communicate in respect of the overall group-wide issues, including strategy, financial performance of the group, etc. The CEOs and CFOs of the subsidiaries may discuss the activities of the Company or a division as part of general discussion with customers, regulatory bodies or media provided such information is publicly available or not price sensitive.

### **Communication with members of the Press**

Hubco employees are not authorized to communicate with the press in any shape or form. There may be times where press representatives may demand immediate response; it is important for employees to understand that they are under no obligation to provide a reply to them and that they should not respond to any member of the press without prior authorization from the Public Relations Department.

In the event that the press does reach out to and attempts to communicate with an employee and requests a response on a particular topic (albeit even a general subject), the employee must immediately notify their Head of Department, Company Secretary and Public Relations Department. Under no circumstances should any employee initiate contact or respond to the press, except insofar as to inform that member of the press to contact the Public Relations Department of Hubco.

All communication initiated by or with external parties will be handled by the Public Relations Department.

Furthermore, all subsequent contact with the press after the initial outreach should be referred to the Public Relations Department. It is clarified that the CEOs and CFOs of the subsidiaries may discuss the activities of the Company as part of general discussion with the press provided such information is publicly available and not price sensitive.

Any communication that involves financial information relating to the Company's outlook, or other price-sensitive information must be referred to the Company Secretary and Public Relations Department.

### **Leaks, Rumors and Speculation**

The Company's policy is generally not to comment on speculation, and employees should not be drawn into a discussion on or in regard to leaks, rumors or speculation. Employees should refer enquiries to the Company Secretary (shareholders/analysts enquiries) and Public Relations Department (media enquiries), and such enquiries will be dealt with in accordance with this Policy.

### **Meetings with Investors and Analysts**

The Company may host briefing sessions for investors and analysts on its half and full year results and at other times, as deemed necessary. In addition, as part of the Company's desire to broaden its investment base, management presents at various investment conferences and conducts investor visits during the year.

All legitimate requests for information will be treated equally, regardless of whether the request is from an institutional investor, a private individual investor, a buy-side analyst, business journalist or the public at large.

Without prejudice to this principle, requests for one-on-one meetings will be considered on their merits and shall be referred to Chief Financial Officer, Company Secretary or Public Relations Department for consideration.

### **Meetings with Individual Analysts or Shareholders**

In one-on-one meetings with analysts or shareholders, employees will only discuss information that is in the public domain or information that may not be in the public domain but is not price sensitive and thus where subsequent formal disclosure is not required. This would include all interactions in professional and personal capacity with the analysts or shareholders, at formal/informal events or telephonic conversations.

Such one-on-one meetings will be used only to provide background information and elaborate on previously disclosed information related to subjects such as:

- Vision and Strategy
- Management
- Financial and Operational matters
- Business Risks
- Industry trends and issues
- Assumptions related to earnings and other types of forecasts

In one-on-one meetings, particular care is required when dealing with analyst questions that raise issues outside the intended scope of the discussion. If a question can only be answered by disclosing price sensitive information, an answer should be declined, or it should be taken on notice and consideration given to whether formal disclosure to the market is appropriate before responding.

### **Blackout Periods**

To protect against inadvertent disclosure of price sensitive information, the Company imposes communication blackout periods for financial information between the end of the financial reporting quarters (30 June, 30 September, 31 December and March 31) and announcement of results to the market. Any briefings or media contact in this period will not include discussion of the pending financial results of the Company.

### **Other Disclosure and Inadvertent Disclosures**

Employees may only refer to publicly available information when speaking to external parties. If any price sensitive information is inadvertently released by an employee in discussions with any party outside the Company, the employee must immediately inform the Company Secretary.

## **MEDIA RELEASES, SPONSORSHIPS AND OTHER DEALINGS WITH THE MEDIA**

Public Relations Department is responsible for maintaining and improving the overall relationship with media outlets in Pakistan and overseas.

### **Media Releases**

All press (media) releases require prior approval from the Company Secretary and will be released by Public Relations Department or the approved PR agency.

If customers or other third parties are mentioned in the release, they should also approve the relevant parts of the release. All media releases must be approved by the Company Secretary prior to their release. This is necessary to ensure the release contains no price sensitive information or, if it does contain information that should be disclosed to the market, a release can first be made to the Pakistan Stock Exchange and / or Security Exchange Commission.

### **Media Queries & Invitations**

All media meetups are to be conducted by the Company Secretary or Public Relations Department. In case any employee receives formal invitation to a press event or informal query from a journalist, the Company Secretary or Public Relations Department shall be notified and contacted for the response.

### **Media Coverage**

Any event or occurrence taking place at Company premises that can potentially impact Hubco's reputation shall be referred to the Public Relations Department by the host department so that the event or occurrence can be brought into the public knowledge utilizing appropriate media platform(s) in order to ensure that the Company is able to extract due benefit (if possible) towards its image and reputation.

All subsidiaries, departments and plant sites must maintain contact with Public Relations Department on matters that may have an impact on Hubco's reputation and / or area likely to come to public notice, including but not limited to:

- Production, withdrawal, acquisition or sale of products or the acquisition or sale of businesses;
- Major project developments, personnel changes, operating procedures, organization, products or policy involving or affecting Hubco;
- Public statements, publications or coverage relating to government actions or investigations affecting Hubco; and Litigation issues.

The aforementioned event or occurrence can be published or broadcasted in the media through a Press or Photo Release or direct coverage by the media on-site. However, the decision to choose the due course will be made by the Company Secretary, Public Relations Department and the host Department.

In order to procure appropriate media coverage for any initiative (event or function) undertaken by Hubco, the relevant department shall contact the Public Relations department at least 10 working days prior to the date of the event. The relevant department shall provide the necessary information as requested by the Public Relations Department.

## **Website**

The Company will maintain a Website providing information on its operations and services as well as information useful to shareholders and market participants. The website contains an Investor section which directs shareholders directly to information likely to be of greatest interest to them. The Company will post all recent information material to its shareholders and market participants on its website. The website shall be compliant to the regulations prescribed by the Security and Exchange Commission of Pakistan (SECP). The Public Relations Department will be responsible for all information to be uploaded on the website and for such purpose will coordinate with each relevant department in a timely manner. The relevant department will ensure the factual accuracy of the information provided to the Public Relations Department.

## **Social Media**

Employees are not permitted to make any public postings of company events that are non-public, confidential or proprietary information related to any aspect of Hubco's business on the Internet or social media platforms including blogs, wikis, microblogs, message boards, chat rooms, electronic newsletters, online forums, social networking sites, and other sites and services that permit users to share information with others in a contemporaneous manner. Employees are not allowed to respond to or share any information in regard to the Company on or using social media platforms without prior approval from the Company Secretary or Public Relations Department.

## **Sponsorships of External Events**

In order to manage Hubco's corporate presence at related public platforms, all departments or group associates shall liaise with the Company Secretary and/or Public Relations Department to provide sponsorships or funding to an external event. The external events shall be relevant to Hubco's industry and its area of interest (Power sector, Educational Institutes, relevant trade-bodies, regulators, media, local community events, etc.)

## **Third Party Announcements, Endorsements and Use of the Hubco Logo**

From time-to-time, organizations or businesses external to Hubco may seek to issue a news release that promotes a business relationship or identifies a partnership with Hubco. Such announcements by third parties require advance approval from Public Relations Department. Department heads are required to present the business rationale for the issuance of news releases by third parties that refer to an existing or proposed relationship with Hubco. The Public Relations Department will then work with the third party to determine appropriateness of the announcement and a plan for the external distribution of the information.

In general, Hubco does not allow the use of its name, logo or statements by its employees in the printed or electronic documents of suppliers, consultants, business partners or other third parties without the written permission of the Company Secretary or Public Relations Department. All requests from third parties to use the company logo should be referred to Public Relations Department, which will provide guidance on the correct use of the logo.

## **Crisis Communication**

All crises (or anticipated crises) should be reported to the Company Secretary and Public Relations Department. No one is authorized to speak to the news media during a crisis without clearance/approval from the Chief Executive Officer, Company Secretary of Hubco or the relevant Group Head.

- A. Only the Chief Executive Officer of Hubco or Group Company or their designated representative may speak on behalf of Hub Power Company Limited. Final approval of all disclosures and strategies will rest with the Chief Executive Officer of Hubco or Group Company or the Company Secretary of Hubco or their designated representative.
- B. All formal responses (as mentioned in the Appendix) to external media will be managed through the Company Secretary and Public Relations Department. The Company Secretary and Public Relations Department and Communications will coordinate with site admin and security personnel for accuracy and compliance with Hubco policies. The Company Secretary and Public Relations Department will distribute verified information to media.
- C. Plant managers and admins at the sites will immediately inform the Company Secretary and Public Relations Department upon their knowledge of or anticipation of a crisis incident. This is to ensure that information is channeled through the correct sources. (as per the Information flow in the Appendix).
- D. Accident, calamity, natural disaster, mechanical failure, human loss or human error, can all present serious complications for Hubco at any time (refer to Appendix for further details about Crisis and its types). Strict adherence to the Crisis Communication Protocols shall be observed.
- E. Media inquiries should be referred to the Company Secretary or Public Relations Department. Employees should refrain from answering questions or offering information or unsolicited advice.
- F. Any dissemination of information on a global level must have approval of the Company Secretary or Public Relations Department or their designated representatives.

**COMPLIANCE WITH THE POLICY**

The Company Secretary and the Public Relations Department will arrange training sessions to be conducted for executives and other employees to describe the operation of this Policy and its constituents.

**BREACH OF THE POLICY**

Violations of this Policy shall be considered gross misconduct and are subject to disciplinary actions that may include dismissal from the Company.

**CONFIDENTIAL INFORMATION**

Employees must not make any unauthorized disclosures of confidential information or use it for purposes other than those for which it was disclosed except as required by law. Requirements imposed by a confidentiality agreement or undertaking with a third party imposed by law, or specified in the Company's policies, procedures or rules must be followed.

Whenever confidential information is to be provided to another party, staff must ensure that measures are in place to maintain the confidentiality of that information, such as a legally binding confidentiality agreement.



## Appendix

### CRISIS COMMUNICATION PROTOCOL

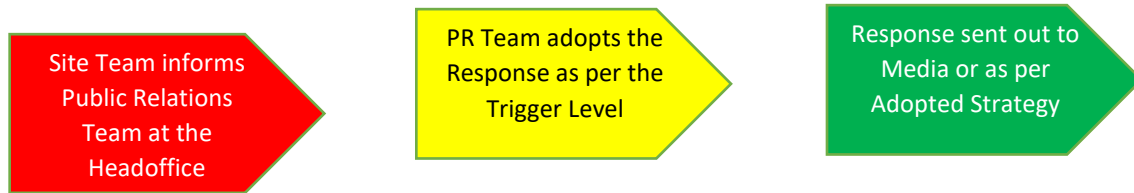
#### **Definitions:**

**Crisis.** Crisis is defined as a significant disturbance in Hub Power Company's operations which results in extensive news coverage and public scrutiny and which has the potential to cause long-term public relations challenges.

**Crisis Media Events.** Crisis media events are defined as any incident that may result in external media interest that could negatively affect the corporate image of Hub Power Company's and/or have a negative or harmful effect on its employees or shareholders. Media contacts, including telephone calls and on-site reporters, should be expected if a serious accident, incident, or death occurs. This includes but is not limited to:

- a) Death or serious injury of a direct or indirect employee, visitor, etc. within vicinity of the plant or Headoffice due to any operational, business or related activity.
- b) Death, injury or incident involving alcohol, illegal or prescription drugs or social events.
- c) Fire, earthquake, flood or other natural disaster affecting the plant or surrounding
- d) Inappropriate actions of a member of staff, new member, or non-member. Inappropriate actions include, but are not limited to: harassment, fraud, illegal activity and violations of district, provincial or federal laws.
- e) Situations involving suspected criminal activity on or nearby the Head Office or Sites. Such situations include, but are not limited to, bomb threats, labor "lockdowns," shooting sprees and riots.

## Flow of Information during a crisis - Site to Head Office to Media



### **TRIGGER LEVEL PLAN**

#### **ESCALATION LEVEL 1**

##### SITUATION:

- An accident (as categorized in the policy) takes place at a site
- No Media Representative reaches or calls the plant staff / Public Relations Department
- Negative news appearance in the **Tier-3** (local newspaper of Hub, Narowal or Mirpur) print media, statement by a local political party

##### RESPONSE:

- Extensive monitoring in all print and electronic channels
- No response statement from Hubco until the issue reaches the escalation level 2

#### **ESCALATION LEVEL 2**

##### SITUATION:

- An accident (as categorized in the policy) takes place at a site
- Negative news appears in the **Tier-2** print media (local newspaper of Hub, Quetta, Karachi, Narowal, Lahore, Mirpur - Muzaffarabad or Islamabad), statement by small political parties
- Media Queries / complaints / calls to Hubco Staff at Site / Public Relations Department

##### RESPONSE:

- Issuance of a standby statement from Hubco in the print media (only in the publication(s) where the negative news has appeared)
- Extensive monitoring of print, electronic and social media

### **ESCALATION LEVEL 3**

#### SITUATION:

- An accident (as categorized in the policy) takes place at a site
- Negative appearance in the Major Newspapers (Dawn, Jang, Business Recorder, etc.) and/or statement by mainstream political or religious groups / organizations
- Media queries / complaints / calls to Hubco Staff at Site / Public Relations Department
- Public demonstration outside the plant

#### RESPONSE:

- Issuance of a standby statement from Hubco in the print media
- Extensive monitoring of print, electronic and social media

### **ESCALATION LEVEL 4**

#### SITUATION:

- An accident (as categorized in the policy) takes place at a site
- Negative appearance in the Major Newspapers (Dawn, Jang, Business Recorder, etc.) and News Channels (Geo, ARY, Express, etc.)
- Statement by mainstream political religious groups / organizations
- Media queries / complaints / calls to Hubco Staff at Site / Public Relations Department
- Public demonstration outside plant

#### RESPONSE:

- Press Conference by the CEO (or his nominated executives)
- Issuance of a standby statement from Hubco in the print, electronic and social media
- Extensive monitoring of print, electronic and social media