



COMMUNICATION POLICY

National Power Parks Management Company

<p>COMMUNICATION POLICY October 2016</p>	<p>Issuing Officer Company Secretary</p> <p>Target Audience Directors, all employees and temporary staff.</p> <p>Approving Authority Board of Directors</p> <p>Issuing Date October 8, 2016</p> <p>Revision Initial Issue</p> <p>Copy Rights National Power Parks Management Company (Pvt.) Ltd.</p>
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1. POLICY STATEMENT

National Power Park Management Company (Pvt.) Limited (the "Company") believes in open and effective communication with all its stakeholders; therefore, intends to establish framework procedures that define all communication activities occurring at the Company.

2. OBJECTIVES

- 2.1 To make all required disclosures on a broadly disseminated basis as required under the applicable laws and by various regulatory agencies;
- 2.2 To provide our stakeholders with timely, consistent and relevant information in an appropriate manner to ensure fair disclosure;
- 2.3 To prevent improper use or premature disclosure of confidential and material information; and,
- 2.4 To provide direction to the employees for appropriate treatment of material, confidential, general, and routine Company information.

3. SCOPE

- 3.1 The policy is applicable to all directors, employees and temporary staff of the Company (each a "Covered Person").
- 3.2 This policy applies to all information (general, confidential, material) in whatever form or means, regarding the Company including digital media communications such as mobile, web and social media etc.
- 3.3 Nothing in this Policy should be construed as prohibiting a Covered Person from complying with laws and regulations.

4. GUIDING PRINCIPLES

4.1 Open Communication

Our goal is to be a Company known for its open communication by proactively providing a regular flow of relevant information, thereby avoiding rumors, suspicion and mistrust resulting from concealment of information.

4.2 Based on Fact

Our communication is based on facts and evidence-based information. Our communication should not create misconceptions that could raise false expectations. This also means that the Company will not comment on rumors or third-party matters, and we do not speculate on the outcome of pending issues until such time as an official decision has been reached.

4.3 Clarity and Consistency

Our communication is clear and consistent. It is essential to the Company's reputation that all communication is in line with an agreed upon position, unambiguous and uniform.

4.4 Timeliness

We believe that timely communication is a sign of professionalism. It helps the stakeholders, regulators and business leaders to make smart and informed

decisions. The Company will endeavor to provide relevant and reliable information to its stakeholders in less time as far as possible keeping in view that accuracy and control are not compromised.

5. AUTHORIZED SPOKESPERSON

5.1 Unless otherwise approved by the Board of Directors of NPPMCL the only persons authorized to discuss Company matters with the news media, investment community or industry analysts are as follows:

- The Chief Executive Officer (CEO); and (In his absence)
- The Chief Financial Officer (CFO)

The foregoing are designated as "Authorized Spokesperson(s)".

5.2 The authorized spokesperson has a duty to speak truthfully and openly to the best of his/her knowledge regarding the Company, subject to the disclosure restrictions as described in this policy or as may be decided by the CEO on case to case basis.

6. PROCEDURAL GUIDELINES

6.1 Disclosure of Material Information

6.1.1 The Company recognizes that it must meet the disclosure expectations of external stakeholders and continuous disclosure obligations prescribed by various legislations.

6.1.2 The Company will make all financial information filings as required by legislation. This includes, but not limited to, quarterly and annual financial statements, and annual reports. The Company considers these documents as material information.

6.1.3 All agreements, contracts and their related documentation shall be considered as material information.

6.1.4 The Company will ensure that selective disclosure of material information does not occur. Thus, up to such time as it is broadly disclosed, material information will be considered confidential information.

6.1.5 Access to confidential information is restricted to authorized persons only.

6.1.6 The confidential information shall not be disclosed to anyone except where required by the law.

6.1.7 Where practical, confidential information should:

6.1.7.1 be stored in locked cabinets to which access is restricted;

6.1.7.2 be removed promptly from meeting rooms at the conclusion of meetings;

6.1.7.3 be subject to secure limited access of electronically stored computer information;

6.1.7.4 not be discussed in places where the discussion may be overheard; and

6.1.7.5 not be copied unnecessarily or discarded where others can easily retrieve it.

6.1.8 There is no simple standard or test for determining materiality and/or confidentiality of information. The CEO and Chief Financial Officer (CFO)

are the authority on deciding whether or not information is material and/or confidential.

6.1.9 The information required by the Government shall be communicated in an appropriate manner and in timely fashion.

6.1.10 Covered persons are required not to disclose internal matters or any development which relate in any way to material, nonpublic information to any person not affiliated with the Company (including without limitation, family members, relatives and friends) except as required in the performance of such Covered Persons' duties and in accordance with this policy.

6.2 Routine Information Requests

6.2.1 The employees should not disclose any routine information to anyone outside, except as required in the performance of regular duties for the Company as per their assigned job descriptions.

6.2.2 Enquiries received by the employees, other than in the ordinary course of business, from public for general and routine information should initially be discussed with CEO.

6.2.3 Upon approval of the CEO, the relevant head of department will answer the enquiry in an appropriate manner.

6.2.4 If enquiry is regarding Company's activities that constitute material or confidential information, the request will be dealt with in accordance with the provisions of this policy and applicable legislation, if any.

6.3 Information to the Board of Directors

6.3.1 Information to the Board of Directors, as a whole or to individual Board members, shall be disseminated through the Company Secretary.

6.3.2 The working papers for the Board and its Committees' meetings shall be circulated to the Board members by the Company Secretary after review of the CEO.

6.3.3 The minutes of meetings of the Board and its Committees shall be provided to the Board members after approval of the respective Chairman.

6.4 Forecasts and Forward-Looking Information

6.4.1 The use of forecasts and/or other forward-looking information should only be released with caution.

6.4.2 All forward-looking information must contain a statement that the information is forward-looking, a description of factors that may cause actual results to differ materially from the forward-looking information, all material assumptions and appropriate risk disclosure, and cautionary language.

6.4.3 Release of such forecasts and forward-looking information must first be approved by either the CEO or CFO.

6.5 Responding to Rumors

6.5.1 In general, no comment will be made in response to rumors or speculations

regarding the Company. However, certain exceptions may be made with the approval and directions of the CEO.

- 6.5.2 The Company shall decide the manner, time and forum for responding to rumors or speculations, if deemed necessary.

6.6 Press & Media Relations

- 6.6.1 Covered persons, other than those authorized to speak on behalf of the Company, are hereby instructed not to respond, under any circumstances to inquiries from the news media, investment community or industry analysts unless specifically authorized to do so by an Authorized Spokesperson. This will help ensure consistent disclosure and avoidance of selective disclosure. Covered persons who receive such inquiries either directly or indirectly must refer the inquirer to the appropriate Authorized Spokesperson mentioned above.
- 6.6.2 Unless otherwise authorized by the CEO, press and media relations activities and interviews are restricted to the CEO only.

6.7 Electronic Mail Communication

- 6.7.1 The Company provides its employees with electronic mail communications. The primary purpose of the electronic mail system is to expedite necessary business communications between two or more individuals. As such, the use of electronic mail is for the Company's business purposes only.
- 6.7.2 Use of email is a privilege and may be revoked at any time.
- 6.7.3 Any information included in email communications becomes the property of the Company and is subject to monitoring for compliance with all Company policies.
- 6.7.4 All electronic communications and stored information transmitted, received, or archived in the Company's information system are the property of the Company.
- 6.7.5 Emails sent via the Company email system should not contain content that is deemed to be offensive. This includes, though is not restricted to, the use of vulgar or harassing language/images.
- 6.7.6 The Company reserves the right to access and disclose all messages sent by e-mail.

6.8 Information Management on the Corporate Website

- 6.8.1 The corporate website is the online representation of the Company. As a public representation of the Company, it is necessary that all online content maintain a consistent, appropriate and effective presence for the Company's stakeholders need.
- 6.8.2 All online content to be published on the Company's website is to be checked for accuracy and approved by the appropriate authority.
- 6.8.3 The Company's website may contain advertising for commercial entities as may be approved by the CEO.

6.9 Internet Usage

- 6.9.1 The Company provides its employees with internet facility to be used in performance of their official work. As such employees are expected to use internet responsibly and productively.
- 6.9.2 The Company's employees are discouraged from participating in discussions about the Company on internet e.g. on discussion/social media forums, chat rooms, or bulletin boards. The employees may not, at any time, discuss confidential and material information.
- 6.9.3 All sites and downloads may be monitored and/or blocked by the Company if they are deemed to be harmful and/or not productive to business.

6.10 Regulatory Filings

- 6.10.1 All electronic and other regulatory filings made by or on behalf of the Company, including without limitation, all periodic and other filings required by applicable laws and regulations, shall be prepared and responsibility of the CFO, in case of tax filings, and Company Secretary, in case of corporate filings.
- 6.10.2 All such filings shall have been reviewed, where applicable, by the Company's legal advisor, the Company's independent registered public accounting firm and the CEO and where such filings include financial disclosure of the Company, the Company's Audit Committee.

7. QUESTIONS

All questions relating to this policy set forth herein should be referred to the Company's CFO or GM (Admn./HR).

8. NON-COMPLIANCE WITH THIS POLICY

- 8.1 The employees are responsible for consulting, understanding, and complying with this policy.
- 8.2 Failure to comply with this policy may result in disciplinary action, up to and including termination of employment with the Company.

9. SAVINGS

This policy can be changed, modified or abrogated at any time by the Audit Committee.