



# Media Protocol Policy

Imperial Holdings Limited

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## Objective

This document sets out Imperial Holdings Limited's ("Imperial", "the company" or "the Group") key guidelines for engaging with all media - print, newswire, broadcast and online.

It is critical to understand that any statement made by a representative or employee of Imperial directly or indirectly to media, including via social media platforms, will be seen as a public and official statement from the company. In today's world of global newswire services and the internet, a comment or statement intended for a very small audience has the potential to appear in national and international print and electronic publications in many languages within a short period of time, which could potentially have a reputational impact on the company and its brand.

For this reason, it is imperative that a clear set of guidelines are strictly adhered to, in order to avoid any unintended and potential reputational damage to the company.

If an employee, or other person to whom the Protocol applies (see below), is in any doubt about engaging with the media in any way, they should consult with Group Investor Relations (issues pertaining to strategy, reputation, performance etc.) or Group Marketing (issues relating to CSI initiatives and projects).

Engaging with and responding to the media in a timely and professional manner is good business practice. Imperial's spokespeople will often rely on experts within the Group for information in order to respond to media requests. They will filter the information and present it to the journalist in the most effective and timely manner, after the correct internal approval procedures have been followed. Therefore, it is important for all those who may be contacted by one of Imperial's spokespeople to assist with the required information and to respond quickly. As a guide, most media expect responses within 24 hours for daily publications.

## Who does the Protocol apply to?

This Protocol applies to all directors, employees, contractors, consultants, and external advisers of Imperial and all its subsidiaries.

This Protocol will be available to all employees in hard and electronic format and it is the responsibility of all the employees to read, understand and adhere to the Protocol at all times, including outside of working hours.

It is the responsibility of employees to ensure that the contractors, consultants, and external advisers, which they engage with, are made aware of this protocol and adhere to it.

External advisers are only permitted to provide consultation and compile press releases and other media related documentation on behalf of Imperial, on request from or with the permission of the company. External advisers are prohibited from communicating with the media except if they are specifically appointed to do so.

## Roles and responsibilities

The designated media spokespeople and liaisons for Imperial and its divisions are:

**Group (all queries relating to Imperial Holdings Limited, including financial and operational results or performance of the group or divisions, SENS announcements, corporate actions, strategy, outlook, market and economic related events)**

- CEO
- CFO
- Group Investor Relations Manager
- Group Marketing Head - for road safety initiatives only

**Divisions (queries relating specifically to the division's communications initiatives and announcements, excluding any information of a price sensitive in nature)**

- Division CEO
- Divisional Marketing Head

Under no circumstances may any price sensitive information be disclosed to any person outside Imperial unless such information has been previously, or is being simultaneously disclosed by way of a news release and publicly filed report and with prior approval from the Group CEO.

Particular care should be taken to avoid the disclosure of any new\* financial and operational information during Imperial's closed periods so as not to breach the JSE and Financial Markets Act requirements. Closed periods are defined as follows:

- 1<sup>st</sup> January until the publication of the Group's interim results
- 1<sup>st</sup> July until the publication of the Group's full-year results
- Any period during which the group is trading under cautionary

\* new information is defined as any information that is not already available on Imperial's website or in the public domain.

## **Procedure for handling Group media enquiries and interview requests**

As a general rule, all media queries and interview requests for Imperial, with the exception of announcements published specifically by a division, should be channelled through the Group Investor Relations Manager, who will direct the query to the Group CEO. In these instances, only the Group CEO or Group Investor Relations Manager will respond directly, or through an external communications adviser, to media.

All broadcast interviews are to be conducted by the Group CEO only, unless otherwise delegated.

Interviews relating specifically to road safety initiatives are to be handled by Group Marketing.

Imperial employees should not comment on the following issues publicly in any forum due to market disclosure obligations and potential price sensitivity of the information:

- Operational or financial performance of Imperial or any of its subsidiaries, operating or financial entities,
- Share price levels or performance,
- Market speculation,
- Forward looking statements such as commodity prices or economic forecasts,
- Project or corporate finance,
- Capital expenditure,
- Operating expenditure,
- Unpublished resource data,

- Expected production levels,
- Production and/or development schedule,
- Price planning assumptions,
- Anything that is likely to impact Imperial's share price.

If in doubt on what is considered restricted information, the relevant media liaison contacts should consult with the Group Investor Relations Manager. While it is important to be helpful to media and respond in a timely manner, it is more important to ensure the disclosure obligations are adhered to and any new information is first approved by the Group CEO. All publically available information regarding Imperial and its projects will be published on the company's corporate website [www.imperial.co.za](http://www.imperial.co.za).

There will be many times when the divisional spokespeople are dealing with local media on non-controversial and local subject matter. These conversations do not require approval from the Group CEO or the Group Investor Relations Manager, provided these communications do not breach the disclosure obligations.

## Ensuring consistency

Together with the Group's Investor Relations and Marketing teams, the divisional communication and marketing teams are responsible for compiling and aligning the company's messaging to ensure it is presented consistently to all stakeholder groups around the world – internally and externally

There are a number of areas where there is collaboration between different parts of the business. It is important that accuracy, and consistency of messaging and corporate identity are followed. These include:

- Financial reporting
- Issues management
- External announcements and presentations
- Marketing documents – newsletters, brochures, fact sheets, etc.
- Website content

All branding/corporate identity queries are to be directed to the Group Marketing Head.

## Responding to third party comment or market speculation

The standard response practice to inaccurate information by a third party or a market rumour is not to comment. However, there may be times when Imperial may wish to do so if there is a danger to its reputation. The Group CEO via Group Investor Relations must be consulted and must approve any release of information of this nature.

## Speeches and presentations by a non-designated spokesperson

There may be occasions when an Imperial employee, who is not a designated spokesperson or media liaison contact, will be tasked to make a speech or presentation at a public forum. Following these speeches, there may be requests from media for interviews or related queries. These requests should be channelled to the relevant spokespeople to respond, after obtaining the correct approvals.

## General Enquiries

For general enquiries please contact:

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