



# Stakeholder Communication Policy

Adopted on ..... 2026

**TABLE OF CONTENTS**

1. Introduction ..... 3

2. Purpose..... 3

3. Scope..... 3

4. Policy Statement ..... 4

5. Stakeholder Engagement Principles..... 4

6. Stakeholder Communication Strategy ..... 4

7. Stakeholder Communication Plan ..... 4

8. Stakeholder Identification and Prioritization..... 5

9. Communication Principles ..... 6

10. Disclosure Practices ..... 7

11. Roles and Responsibilities ..... 7

12. Communication Channels ..... 7

13. Procedures for Responding to Stakeholder Queries and Concerns..... 7

14. Review and Updates ..... 9

15. Compliance ..... 9

16. Effective Date ..... 10

## 1. Introduction

- i) The Stakeholder Communication Policy (hereinafter referred to as the “Policy”) for Sameer Africa PLC (“the Company”) has been prepared to strengthen commitment to the Company’s stakeholders because the Company exists in an ecosystem that prospers due to maintaining strong and mutually beneficial relationships with all its stakeholders.
- ii) The Policy is prepared and shall be implemented in full adherence to the applicable laws and regulatory frameworks, including but not limited to:-
  - Nairobi Securities Exchange (NSE) Market Participants Rules
  - Environmental, Social and Governance (ESG) Disclosures Guidance
  - Capital Markets Authority (CMA) Code of Corporate Governance Practices for Issuers of Securities to the Public, 2015
  - The Companies Act, 2015
  - Data Protection Act, 2019
  - The Company’s Articles of Association
  - The Company’s Board Charter

## 2. Purpose

The objectives of this Policy are to:-

- i) **Foster stakeholder trust and confidence** by ensuring clear, honest, and consistent communication.
- ii) **Facilitate timely and accurate dissemination of information** in accordance with NSE Listing Rules, CMA regulations and any other regulatory requirements.
- iii) **Enhance stakeholder understanding** of the Company’s strategic goals, operations, financial performance, and governance.
- iv) **Promote meaningful two-way engagement**, enabling stakeholders to raise concerns, provide feedback, and participate in dialogue.
- v) **Mitigate risks and enhance decision-making** by incorporating stakeholder perspectives and expectations into the Company’s strategy.
- vi) **Safeguard the Company’s brand and reputation** through responsible, respectful, and professional interactions.

## 3. Scope

- i) This Policy applies to all communication activities involving the Company’s stakeholders, including but not limited to shareholders, investors, regulators, employees, customers, suppliers, media, and the broader community.
- ii) This Policy also applies to all directors and employees of the Company. It is further binding on service providers, contractors and agents of the Company, in so far as they engage stakeholders on behalf of the Company.

#### 4. Policy Statement

The Company is committed to:

- i) Providing accurate, balanced, and timely information to stakeholders.
- ii) Ensuring openness and transparency in all communications.
- iii) Complying with all applicable laws, NSE rules, and CMA guidelines.
- iv) Protecting confidential and price-sensitive information.
- v) Engaging stakeholders in a manner that respects their rights and interests.

#### 5. Stakeholder Engagement Principles

The Company is committed to inclusive stakeholder engagement based on the principles of:

- i) **Relevance:** focusing on those issues of material concern to its stakeholders and the Company and identifying how best to address them for mutual benefit.
- ii) **Completeness:** Understanding the views, needs, performance expectations and perceptions associated with these material issues while also taking cognisance of prevailing local and international trends.
- iii) **Responsiveness:** Engaging with stakeholders on these material issues and giving relevant, timely and meaningful feedback.

#### 6. Stakeholder Communication Strategy

- i) The Company shall identify its key stakeholders following the methodology outlined in Clause No. 8 of this Policy.
- ii) Having identified its key stakeholders, the Company shall develop a Stakeholder Communication Strategy that defines the overarching principles, goals, and direction for communicating with stakeholders.
- iii) Constructive engagement with stakeholders shall be deliberate and planned.

#### 7. Stakeholder Communication Plan

The Company shall develop a Stakeholder Communication Plan to operationalise the Stakeholder Communication Strategy. The plan will include:-

- i) **Detailed Objectives:** Specific, measurable goals for communication activities, to ideally be aligned with the strategic objectives.
- ii) **Stakeholder Analysis:** Identification and assessment of individual stakeholders or groups, including their needs, expectations, and preferred channels.
- iii) **Communication Channels and Tools:** Selection of methods and platforms (e.g., email, meetings, newsletters, social media) for each stakeholder group.

- iv) **Message Development:** Tailored messages for different stakeholders, ensuring relevance and clarity.
- v) **Frequency and Timing:** Schedule for communications, including how often and when updates or engagements will occur.
- vi) **Roles and Responsibilities:** Assignment of team members to specific communication tasks or stakeholder groups.
- vii) **Feedback Mechanisms:** Processes for stakeholders to provide input, ask questions, or raise concerns
- viii) **Issue Escalation Procedures:** Steps to address and resolve stakeholder issues or conflicts.
- ix) **Monitoring and Evaluation:** Methods for tracking the effectiveness of communication efforts and making adjustments as needed.
- x) **Key Performance Indicators (KPIs) and metrics:** Specific indicators to measure progress toward communication objectives.

The Communication Plan shall be reviewed annually and updated as needed to reflect changing stakeholder expectations or external developments.

## 8. Stakeholder Identification and Prioritization

- i) Stakeholders are those individuals, groups of individuals or organisations that impact and/or could be impacted by the Company's activities and performance.
- ii) The Company will identify its stakeholders and prioritize communication based on their influence and interest.
- iii) The below table is an example of a matrix that the Company may use for purposes of stakeholder identification and prioritisation:

Stakeholder Group	Influence	Interest	Communication Strategy	Frequency	Channels
Regulators (CMA and NSE)	High	High	Frequent communication	Ongoing	Reports, regulatory filings, meetings, official letters
Institutional Investors	High	High	Frequent communication	Quarterly/ Annually	Investor reports, annual reports
Retail Investors	High	Low	Routine engagement	Periodic	Website/social media, newsletters
The Board	High	High	Frequent communication	Quarterly or as needed	Quarterly reports, annual reports, sustainability reports

Stakeholder Group	Influence	Interest	Communication Strategy	Frequency	Channels
Employees	High	High	Regular engagement	Ongoing	Internal memos, intranet, staff meetings, annual reports, sustainability reports
Tenants	Low	High	Routine engagement	Ongoing	Property manager meetings, surveys, tenant visits, email, telephone, notices, letters
Property Managers	Low	High	Routine engagement	Ongoing	Regular meetings
Community	Low	High	Routine engagement	Annually	Website/social media, community forums
Media	Low	Low	Monitoring	As needed	Website/social media, press releases, media briefings
Suppliers	Low	Low	Monitoring	As needed	Supplier communications
The public in general	Low	Low	Monitoring	As needed	Website/social media, press releases, media briefings

## 9. Communication Principles

- i) **Transparency:** Disclose material information in a clear, concise, and understandable manner.
- ii) **Timeliness:** Provide information promptly to enable informed decision-making.
- iii) **Accuracy:** Ensure all information disclosed is truthful and complete.
- iv) **Confidentiality:** Protect sensitive information until officially disclosed.
- v) **Consistency:** Maintain consistent messaging across all platforms and communications.
- vi) **Accessibility and Inclusivity:** Communication methods will be tailored to ensure reach and relevance across all stakeholder groups, considering linguistic, technological, and geographical diversity.

## 10. Disclosure Practices

- i) The Company will adhere to the Corporate Disclosure Policy and Procedures.
- ii) The Company is subject to NSE and CMA disclosure requirements, including financial performance, governance matters, and ESG issues.
- iii) Financial statements will be prepared in accordance with International Financial Reporting Standards (IFRS).
- iv) The Board will affirm the accuracy of financial and non-financial disclosures at least annually.
- v) Material information will be disseminated through appropriate channels such as annual reports, quarterly financial statements, investor briefings, and the Company's website.

## 11. Roles and Responsibilities

- i) **Board of Directors:** Oversight of the policy implementation, ensuring compliance with regulatory requirements, and approving key disclosures.
- ii) **Audit, Risk and Corporate Governance Committee:** Monitor disclosure quality and stakeholder engagement effectiveness.
- iii) **Compliance Officer:** Support the board ensure compliance with the obligations of the Company under the Capital Markets Regulations and Act, and any other relevant written law during the period that the Company is a publicly listed and traded on the Nairobi Securities Exchange (NSE).
- iv) **Company Secretary:** Manage communication logistics, maintain records of communications, and ensure regulatory filings.
- v) **Management:** Execute communication strategies, prepare disclosures, and engage with stakeholders as per this policy.

## 12. Communication Channels

- i) Annual general meetings and shareholder forums.
- ii) Financial and sustainability reports.
- iii) Press releases and media briefings.
- iv) Company website.
- v) Social media platforms.
- vi) Direct communications such as emails, newsletters, and meetings.

## 13. Procedures for Responding to Stakeholder Queries and Concerns

### 13.1 Designated Contact Points

- The Managing Director shall coordinate all external communications and serve as the first point of contact for stakeholder enquiries.

- Contact information (email, telephone, and mailing address) shall be publicly displayed on the Company's website and official documents.

DRAFT

### 13.2 Query Management and Escalation

- All stakeholder queries and concerns shall be logged, tracked, and managed through a structured internal system to ensure prompt and consistent resolution.
- Any query not resolved within the prescribed time will be escalated to the relevant executive for immediate action.

### 13.3 Feedback and Continuous Improvement

- Stakeholder feedback will be regularly reviewed by the management team and the Board's Audit, Risk and Corporate Governance Committee to improve practices, communications, and products.
- Insights from engagement activities will be incorporated into strategy formulation, risk assessments, and sustainability reporting.
- Feedback from stakeholders will be used to improve communication practices continuously.

## 14. Review and Updates

- i) This Policy will be reviewed and updated every three (3) years by the Board of Directors to ensure its continued relevance, effectiveness, and alignment with evolving best practices and regulatory requirements.
- ii) The Board may amend and update this Policy as it deems necessary at the recommendation of the Audit, Risk and Corporate Governance Committee, and is free to implement any supplementary or other policies and guidelines for better implementation of this Policy.

## 15. Derogation and Compliance

### 15.1 Derogation

The Board may, upon recommendation of the Audit Risk and Corporate Governance Committee, deviate from the Policy if exceptional circumstances provide valid reasons to do so and may only be temporary until a new policy is adopted. Exceptional circumstances are circumstances in which deviation is necessary to serve the long-term prospects and sustainability of the Company.

### 15.2 Compliance

Where the terms of this Policy differ from any existing or newly enacted law, articles, rule or regulation governing the Company, the law, article, rule or regulation will take precedence over this Policy and procedures until this Policy is changed to conform to the law, article, rule, or regulation.

## 16. Contact Information

For questions related to this Policy, please contact:

The Managing Director  
Sameer Africa PLC

P.O. Box 30429-00100  
Nairobi, Kenya  
+254 730 156 222  
[info@sameerafrica.com](mailto:info@sameerafrica.com)

**17. Effective Date**

This Policy will be effective from the date of approval below.

**Approved and adopted by the members of the Company on ..... 2026.**

DRAFT