COMMUNICATION POLICY

UBL FUND MANAGERS LTD.



1	<u>Contents</u>	
1.	<u>Contents</u> Introduction	4
2.	Scope	4
3.	Ownership, Maintenance and Approval	4
4.	Guiding Principles	4
5.	Guidelines for External Communication	5
6.	Disclosures	6
7.	Guidelines for Internal Communication	6



1. Introduction

The Communication Policy provides a roadmap to aid in the successful delivery of the messages of both external and internal stakeholders, as well as the companies associated therewith.

2. Scope

The purpose of this Policy is to define and provide guidelines on the extent, quality and output of communication on behalf of UBL Fund Managers and on the adherence to and quality of internal communications.

The policy shall be applicable to all marketing and communications activities undertaken by UBL Funds and Al-Ameen Funds falling under any specific or general law such as the NBFC Regulation, The Companies Act, and amendments thereof and relevant circulars including the Circular 16 of 2014 in relation to advertisements.

3. Ownership, Maintenance and Approval

This policy is owned by the Marketing department, however the responsibility of maintenance, review and update lies with Marketing and Compliance Department. Marketing Department and Compliance will review and update the policy after every three years and put it up for BODs approval as required.

The policy shall be effective immediately from the date of approval by the Board of Directors.

4. **Guiding Principles**

UBL Funds recognizes that active communication with different stakeholders and the general public is an integral part. In order to reach its overall goals for communication, the following guiding principles are proposed:

- a) Only Authorized Persons or persons duly authorized by the CEO, generally or specifically shall be permitted to have any formal engagement with the media or any other external stakeholder; the list of Authorized Persons shall be disseminated through corporate announcement and will remain the same until changed.
- b) All information must be conveyed through the appropriate and approved communication channels to UBL Funds stakeholders in a timely manner. All requests for information by stakeholders shall be responded to by the relevant Group/Division without unnecessary delays. Prescribed TATs should well within regulatory requirements.



- c) All information disseminated to stakeholders shall be accurate, transparent and open as possible, while considering the need to protect UBL Funds confidential information.
- d) All communication must be clear, concise and shall be based on principles of good faith; fair dealing and does not in any way mislead or deceive any person.
- e) All communication must be consistent in style and message to build stakeholder trust and shall not directly seek to defame other AMCs, capital markets, and products of the capital markets, its participants or asset classes.

5. **Guidelines for External Communication**

All external communication which includes Notices, Announcements, advertising must be approved by the Head of the Department who wants to disburse the communication and with the review of Compliance Department.

CEO and Compliance Head where required shall approve all communication with government, its agencies and regulators. However regulatory requirements, filings required to comply with law and any communication with the customer or a third party as part of the normal daily activity can be handled by relevant competent persons/HODs. Such filings would include sharing of corporate actions with the exchange/s, frequent and periodic filings with regulators, other information sought by regulatory authorities.

All presentations/materials for external use must be reviewed by Compliance prior to exposing these documents to the stakeholders to ensure brand compliance and accuracy of information related to the Company and products. This includes presentations to external stakeholders at meetings, seminars, conferences, etc. and materials to be uploaded to the website.

Communication with media is to be handled with the highest levels of sensitivity and professionalism and must always be handled by Head of Marketing, CEO and or anyone who the CEO approves. Only authorized Persons shall be permitted to grant interviews of any sort (print, TV, online) and be quoted with respect to UBL Funds external communications.



6. Advertisement Guidelines

All advertisements and marketing communication shall follow the requirements of Circular 16 of 2014 in letter and spirit.

7. <u>Disclosures</u>

It will be ensured at all times that all relevant and required disclosures are made adequately

8. Guidelines for Internal Communication

Departments of UBL Funds may from time to time require internal communication to be carried out at an organizational level keeping employees abreast of any relevant updates.

The HR department is responsible for addressing the organization via the corporate communications channel.

Heads of departments may choose to use different platforms to do the same.

