



Corporate Communications Policy

Revision History

Version	Policy Owner	Approval Authority	Effective Date
1.0	Marketing	Board of Directors	October 30, 2025



1. Purpose

This policy sets out principles, roles, authorisations and procedures for all external and internal communications by Lucky Investments Limited (the “Company”) to ensure accuracy, consistency, regulatory compliance, and protection of the Company’s reputation.

2. Scope

Covers all directors, officers, employees, contractors, agencies, and third parties acting on behalf of the Company across: media relations, investor relations, regulatory disclosures, digital & social media, marketing, advertising, internal communications, and crisis communications.

3. Governing Principles

1. Accuracy & Honesty — All communications must be factual, verifiable, and not misleading.
2. Regulatory Compliance — Comply with the Companies Act 2017, SECP Corporate Governance Regulations, PSX Listing Rules (if applicable), PECA, and other relevant laws and regulations.
3. Confidentiality & Insider Information — Do not disclose non-public, price-sensitive, or confidential information unless authorised and filed with regulatory bodies as required.
4. Timeliness — Material or price-sensitive information must be shared with regulators and exchanges before general release, where applicable.
5. Accountability — Only designated spokespersons are authorised. All official statements must be approved and recorded.
6. Respect & Professionalism — Communications must avoid defamatory, discriminatory, obscene, or unlawful content.

4. Roles & Responsibilities

- Board of Directors: Approves the overarching policy, crisis framework, and appointment of authorised spokespersons.
- Chief Executive Officer (CEO): Final approver for major external announcements and crisis responses.
- Head of Corporate Communications: Oversees day-to-day communication activities, media relations, content clearance, social media governance, training, and communication record maintenance.
- Head of Compliance / Company Secretary: Conducts legal & compliance review, coordinates regulatory filings, and confirms compliance with disclosure obligations.
- Fund Manager Report (FMR): In due coordination with Business Team, Research, Compliance, and Marketing, Communications team Handles publishing of FMR across all external PR platforms while ensuring mandatory disclosures.
- All Employees: Must follow this policy, refer all media or external inquiries to the Communications team, and avoid posting company-related matters on social media without permission.

5. Authorisation & Clearance

1. Only authorised spokespersons (CEO only authorized currently) may speak to media, investors, or regulators. A list of authorised spokespersons will be maintained internally after CEO approval.
2. All external statements, press releases, regulatory filings, and presentations must receive written clearance from the Head of Corporate Communications or Legal and CEO before release.
3. Social media posts on official channels require pre-approval workflows and moderation. Employee personal accounts must include a disclaimer when discussing company matters and must not reveal confidential information.

6. External Communications — Media & Social Media

- Media Relations: All media enquiries must be logged and responded to by the Communications team. No employee should provide off-the-record comments without prior approval.
- Press Releases & Announcements: Drafts must be cleared by Legal and Communications; price-sensitive



information (if any) must be communicated to PSX/SECP prior to public release when required.

- Social Media: Maintain official policy for each platform, including content calendars, moderation rules, escalation processes for negative content, and record retention.
- Third-Party Agencies: Agencies working on behalf of the Company must follow this Policy and receive pre-approval for messaging.

7. Investor & Regulatory Disclosures

- Adhere to PSX listing rules and SECP disclosure requirements for listed entities only. Price-sensitive information (material facts, financial results, significant contracts, M&A, changes in board/management, share issuances, defaults) must be disclosed promptly to the Exchange and regulator as required by law.
- Forward-looking statements must include risk qualifiers and be approved by Management and Legal.

8. Internal Communications

- Internal channels (intranet, e-mail, townhalls) must be used to inform employees about major business developments and align messages before external release.
- Confidential HR, legal, or financial information must be shared on a need-to-know basis and encrypted where necessary.

9. Crisis Communications

- Crisis Team: CEO, Head of Communications, Compliance, Company Secretary, and relevant business heads designated by CEO.
- Immediate Actions: Contain misinformation, assess legal/regulatory exposure, prepare holding statement, notify regulators if required, and schedule media/investor briefings.
- Holding Statement: A short authorised message acknowledging the situation, confirming investigation, and promising timely updates.
- Post-crisis Review: Document lessons learned, corrective actions, and update records.

10. Legal & Regulatory Compliance (Pakistan)

This policy is designed to align with:

- The Companies Act, 2017 (SECP)
- Listed Companies (Code of Corporate Governance) Regulations & PSX Listing Rules
- Prevention of Electronic Crimes Act (PECA)
- Relevant SECP circulars and exchange guidance notes

11. Records & Retention

Maintain logs of media enquiries, press releases, regulatory filings, social media posts, and approvals for a minimum period as required by law.

12. Training & Awareness

Provide regular training for authorised spokespersons, senior management, and employee awareness sessions on social media and disclosure responsibilities.

13. Breach & Disciplinary Action

Violations of this policy may result in disciplinary action up to termination and legal consequences for breach of laws or regulations.

14. Review & Amendment

This policy will be reviewed annually, or sooner if there are material changes in law, regulation, or Company structure.

Annex: Quick Authorisation Matrix

- Routine press statements — Head of Communications after CEO approval.
- Marketing Content – Head of Communications, Shariah Advisor after CEO approval



- Financial results announcements and regulatory filings — CFO + Compliance + CEO.
- Material contracts agreements publishing – Business Head + Legal + Compliance + CEO
- Crisis holding statements — Crisis Team lead + Legal + CEO.