

CUTIX PLC

COMMUNICATION POLICY

1.0 OBJECTIVE

The aim of the policy is to ensure effective communication within and outside Cutix Plc. The policy is designed to provide guidelines on how the Company should act in its daily communications with employees and external stakeholders as well as the awareness of the Company's approach to disclosure, confidentiality and corporate communications.

2.0 BACKGROUND

The current innovation in the communication industry and its fast and immediate reach to end users presents a need for a reviewed communication policy that will guide communication channel throughout the organization. Communication is the imparting or exchanging of information by speaking, writing, or using other mediums to pass across information from one person to another or a group of people.

3.0 POLICY GUIDELINES

3.1. External Communication

- 3.1.1 All presentations/materials for external use must be reviewed and approved by the CEO or any designated officer prior to exposing these documents to the stakeholders to ensure accuracy of information. This includes presentations to external stakeholders at meetings, seminars, conferences etc and materials to be uploaded to the website.
- 3.1.2 Employees are prohibited from making any public posting of confidential information related to any aspect of the Company's business on or any other media platform.
- 3.1.3 Communication with external bodies shall be done through authorized Officers of the Company.
- 3.1.4 All community development sponsorship and projects shall go through the Public Relations Officer
- 3.1.5 Only approved information about the Company shall be communicated
- 3.1.6 Employees shall communicate only approved logo and advertorials and they shall not be used for personal gain.
- 3.1.7 Sending of the Company's documented procedures, internal memos, policies and all related documents to unauthorized persons or institutions is highly prohibited.
- 3.1.8 A copy of all approved interview or publication shall be sent to the Chief Executive Officer upon release.
- 3.1.9 External letters shall be signed by two duly authorized Management Staff
- 3.1.10 Cutix letterhead paper shall not be used by employees for personal purposes.
- 3.1.11 Personal posts in Cutix advertorial platforms are prohibited.

3.2 Internal Communication

- 3.2.1 Internal communications on behalf of the Company or intended for employees shall be handled by the Human Resources department or as directed by the CEO.
- 3.2.2 Where written communication is used, such correspondence shall be conveyed using the Company's official font type (Times New Roman and font 12) and document format. All reports, presentations, memos and all official correspondents must conform to these standards.
- 3.2.3 Official correspondence in electronic format (e-mails) must be sent through the Company's electronic mail platform.
- 3.2.4 Communication to and from offices shall be done through the Secretary's in-tray and notice boards using memos; phones, voice calls, texts or emails as the situation requires.
- 3.2.5 Internal requests from employees shall be made through their direct supervisors.
- 3.2.6 Interaction between and amongst employees shall be with respect and dignity.
- 3.2.7 All departments, essential units and area offices shall be assigned Intercom for internal communication.

CUTIX PLC

3.3 Communication with Third Parties and Media

- 3.3.1 Staff shall obtain approval before granting Interviews to media outlets in their personal capacity. All planned media interviews with any Senior Management staff of Cutix must be reviewed by the CEO to prevent incidence that may result in negative media reportage.
- 3.3.2 Employee's formal correspondence with external parties must be conveyed through the Company's channels as required in the usual course of business.
- 3.3.3 Official communication to media must be conducted with the approval of the CEO or any other officer as designated by the CEO.
- 3.3.4 Employees must be guided in their personal communications to the media, giving due consideration to the Company's corporate image and reputation.
- 3.3.5 All media enquires must be directed to the Company's Public Relations Unit.
- 3.3.6 The Company shall issue press releases from time to time to disclose information that is important or of use to the public. Press releases will be prepared and reviewed in accordance with the Company's established procedures.
- 3.3.7 The Company may organise a formal engagement with the media to make an important announcement regarding the Company's activities or to provide clarity/defence on an issue requiring the Company's urgent feedback.
- 3.3.8 In the event of any impromptu enquiries from the media and/or media participation by an employee, the Public Relations Unit should be notified within 24 hours of such media contact.

3.4 General Communication

- 3.4.1 International business communication shall be made via texting, emails, data calls, telephone voice calls or to landlines except during emergencies their mobile lines can be called.
- 3.4.2 The internet shall be used for official purpose only.
- 3.4.3 All official communications shall be in writing for future referencing.
- 3.4.4 All information communicated in respect of the Company shall be kept confidential except information required by law in the normal course of duty to be communicated.
- 3.4.5 Every employee shall sign non-disclosure agreement

3.5 Communication with Investors and Other Stakeholders

- 3.5.1 The Company shall on a regular basis provide up to date information to the shareholders on the following:
 - a) Information briefings to media and analysts
 - b) Notices of meetings and explanatory materials
 - c) Financial information including annual reports
 - d) All other Company announcements
- 3.5.2 In preparing for general meetings of the Company, the Company Secretary shall prepare notice of meeting and related explanatory information so that they provide all of the information that is relevant to shareholders in making decisions on matters to be voted on by them at the meeting.
- 3.5.3 The information to be provided in the notice of meeting shall be presented clearly and concisely so that it is easy to understand and not ambiguous.
- 3.5.4 The Company shall use general meetings as a tool to effectively communicate with shareholders and allow shareholders a reasonable opportunity to ask questions of the Board of Directors and to otherwise participate in the meeting.
- 3.5.5 The Company's external auditor shall be invited to attend each Annual General Meeting and to be available to answer shareholder's questions about the conduct of the audit and the preparation and content of the auditor's report.
- 3.5.6 To ensure that shareholders obtains all relevant information to assist them in exercising their rights as shareholders, Cutix shall make available a telephone number and an e-mail address for shareholders to make their enquiries.

CUTIX PLC

- 3.5.7 Contact details of designated Company's staff should be clearly identified on the Company's website, in the Annual Report and in other communications.
- 3.5.8 The Commercial department of the Company shall ensure that distributors are visited at least once quarterly to find out their opinions and top challenges.
- 3.5.9 Commercial department shall formerly and timely communicate changes in the price of products to the distributors.
- 3.5.10 The Enterprise Assurance Department (EAD) shall call distributors to ensure they are served and treated according to the standard and requirements set by the Company.
- 3.5.11 The Commercial Departmental shall collect data base of customers from distributors for follow up.
- 3.5.12 Only the CEO, the Company Secretary or any other delegated employee may engage in discussions about the Company with the stakeholders.
- 3.5.13 All complaints from investors shall be handled by the Company Secretary in line with the Company's Complaint Management Policy.
- 3.5.14 Stakeholders can make enquiries by sending mails to the Company via the Company Secretary or Head of Commercial department.
- 3.5.15 All financial information posted on the Company's website will show the date of preparation or posting of the information.
- 3.5.16 All electronic and other regulatory filings made by the Company including all periodic and other filings required by applicable laws and regulations, shall be prepared by and be the responsibility of the Chief Financial Officer and the Company Secretary as the case may be.

4.0 ENFORCEMENT

Employees are expected to fully comply with this policy. Any breach of this policy will attract sanctions as determined by the Company's Condition of Service.

5.0 REVIEW

This policy shall be reviewed when necessary.

6.0 EXEMPTION

Only the Board reserves the right to make changes to this policy.

Reviewed by: The GNC Committee on July 18, 2019

Approved by: The Board of Directors on August 29, 2019



Amb. Odi Nwosu
Board Chairman