

# Communication and Disclosure Policy

## INTRODUCTION

This Communications and Disclosure Policy (the “Policy”) is intended to assist JS Global Capital Limited (the “Company”) for fulfilling its obligations to ensure that all information and material relevant to the Company’s shareholders and the market is disclosed in a timely manner, while protecting the Company’s commercially sensitive information.

The Company is committed to disclose information to the public and all stakeholders in accordance with Pakistan Stock Exchange Regulations, the Companies Act, 2017, The Securities Act, 2015, The Listed Companies (Code of Corporate Governance) Regulations, and any other applicable law(s) and Regulation(s) enforced from time to time.

The purpose of this policy is to ensure that all communication and disclosure to the shareholders, Public, Analysts, Investors/Potential Investors and other stakeholders are made in a timely and affective manner enabling them to make informed decisions about investment in the Company’s equity in accordance with all applicable laws and Regulations. The purpose of this policy is also to maintain fair disclosure of Company’s information without advantage to any particular investor(s).

## Criteria for Disclosure of Information

The Company is committed to providing information about the Company to the public in a manner that is consistent with all applicable legal and regulatory requirements and that promotes investor confidence by facilitating fair, orderly, and efficient behavior. The Company’s reports and documents filed with or submitted to regulators and the Company’s other public communications, must include full, fair, accurate, timely, and understandable disclosure. All employees who are involved in the Company’s disclosure process, including senior officers, are responsible for using their best efforts to ensure that the Company meets such requirements. Employees are prohibited from knowingly misrepresenting, omitting or causing others to misrepresent or omit, material information about the Company to others, including the Company’s independent auditors.

## Customer Privacy and Information Security

In each of our businesses, we are entrusted with important information about our customers – information vital to our ability to provide quality products and services. The JSGCL owes a strict duty of confidentiality to their customers. Employees will not disclose to any third-party particulars of the identity or financial, business or personal affairs of a customer, except pursuant to a statute or regulation, or a valid court order or unless:

- The customer has given prior written consent
- Disclosure is compelled by a court or statutory authority of competent jurisdiction
- Disclosure is compelled by law, due to money laundering, or by regulatory requirements, or
- Disclosure is necessary to protect the JSGCL's interest, for example disclosure to the police in case of suspected fraud.

**Release of Quarterly, Half Yearly and Annual Financial Results:**

The Company shall release its financial results on quarterly, half yearly and annually basis as required by the stock exchange and other applicable laws immediately after the approval of financial statements by the Board of Directors.

**Closed Period:**

The Company shall announce the closed period which will be determined and intimated to the Directors, Chief Executive Officer, Chief Financial Officer, Head of Internal Audit, other executives and stock exchange prior to the announcement of interim / final financial results and material business decisions, which may materially affect the market price of Company's securities.

**Insider Trading Restrictions:**

It is illegal for insider to purchase and sell share of the Company with knowledge of material information that has not been publicly disclosed except in the necessary course of business, it is also illegal for insider to inform any other person about the material non-public information. Insider and employees with knowledge of confidential material information about the Company, any counter parties in negotiation of material potential transaction and other parties in possession of undisclosed material information are prohibited from trading shares of the Company until information has been fully disclosed to the stock exchange, commission and public.

**Company's Website:**

The Company shall maintain a functional website as much as practicable to give the public access to public announcements, company's presentations, contacts and other relevant information in accordance to the regulations.

**POLICY REVISION:**

Any revision to this policy shall be subject to a review and approval by the Board as and when is required.