

CORPORATE COMMUNICATIONS POLICY

Approved by BOD

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1. INTRODUCTION

AYA Bank's Communication Policy establishes a set of principles and guidelines to ensure that communication across AYA Bank is effective and appropriate and responds to the diverse information needs of all our stakeholders. This policy applies to AYA Bank's employees with respect to all information (general, confidential, or material) in whatever form or means, regarding the bank that is shared between the bank, employees, and other parties.

2. OBJECTIVES

The objective of this policy is to help preserve and enhance the Bank's reputation, both internally and externally, and to help ensure that relevant information reaches the targeted audience in the right format and at the right time.

3. GUIDING PRINCIPLES

Communication at AYA Bank is guided by the following principles:

3.1 Spokespersons

As regards public statements on behalf of AYA Bank, a basic rule is that the key spokespersons for the bank (i.e., persons giving on-the-record comments to the media) are Chairman of AYA Bank, Chief Executive Officer, Managing Director, Spokesperson nominated by the Board of Directors' of the Bank or an authorized person of individual subsidiaries.

However, decentralization of communication is sought whenever there are valid arguments for it: e.g., expertise or language skills. For example, where the disclosure relates to financial statements, information derived from financial statements or financial projections, the Chief Financial Officer shall be deemed a spoke person.

The Disclosure Officers are responsible for determining whether information is material, the timely disclosure of material information in accordance with securities laws, monitoring compliance with the policy and overseeing the disclosure controls, procedures and practices

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of the bank. Prior consultation with the Corporate Communications is desirable in case information is given that is not in the public domain.

Personnel, other than those authorized to speak on behalf of the Bank, are hereby instructed not to respond, under any circumstances, to inquiries from the news media. This will help ensure consistent disclosure and avoidance of selective disclosure.

3.2 Responsible individual behaviour

All AYA Bank employees should, in their daily work, behave as if they are representatives and ambassadors of the Bank. Therefore, each employee should be committed to preserving and enhancing AYA Bank's reputation. Any illegal or offensive behaviour or statement, including via social media accounts, which could cause damage to the Bank should be avoided. All employees have the responsibility to ensure that the communication process in the organization works effectively, timely, and transparently in accordance with the communication policy.

Senior Management

- Ensure that all important issues are communicated to staff in a timely and accurate manner.
- Ensure that the management behavior and style is consistent with the principles in this document.
- Ensure that managers are kept up to date with developments in the organization.
- Determine the messages and the methods of communication as appropriate.

Department Heads / Division Heads

- Ensure that mechanisms exist in the departments to allow the free flow of information, upwards and downwards.
- Ensure that staff views are considered, and responses are given where appropriate.
- Actively provide accurate up-to-date information to prevent confusion and unnecessary communication problems as a result.

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Covered Person

- Upon receiving media inquiries either directly or indirectly, Covered Person must refer the inquirer to the appropriate Authorized Spokesperson identified above.
- Maintain work environment that fosters fairness, respect, and integrity.
- Require conducting themselves in a lawful, honest and ethical manner in all of the Company's business practices.

Staff

- Participate actively in the communication process in the organization.
- When information perceived is inaccurate, or is unclear, communicate directly with the relevant manager(s) to address this.
- Provide accurate ongoing information regarding programs or processes to ensure efficiency and effectiveness of these.
- Take responsibility for sharing appropriate information.

3.3 Compliance

This policy should be read in conjunction with the Bank's Code of Ethical Conduct. AYA Bank has an obligation to ensure that all communications of material information are factual, accurate, credible, and in compliance with all applicable laws and regulatory requirements.

3.4 Transparency

As one of the leading financial institutions in Myanmar, AYA Bank strives our communication to be as transparent and open as possible while protecting personal information and privacy. AYA Bank is committed to providing the public with clear, accurate and reliable information at all times and establish close relationships with stakeholders, both internal and external through appropriate communication channels.

3.5 Confidentiality

All AYA Bank's documentation, correspondence, and company-related information, must be treated as confidential unless and until publicly available. Non-public information from or

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concerning suppliers, customers, employees, agents, consultants, and other parties must also be protected in accordance with legal and contractual requirements, including the AYA Bank Data Protection Procedure, when applicable.

3.6 Consistent and Proactive

AYA Bank shall always give correct and pertinent information to the public in order, as far as possible, to maintain public trust in bank and have a positive impact on market relations. Information must be fact-based and not speculative. AYA Bank shall proactively develop networking and engagements with its target groups and identifies topics of possible mutual interest.

3.7 Prompt Disclosure

AYA Bank recognizes the value of communicating bank-related information in a timely manner. Publicly available information on company related matters should be released to all internal & external stakeholders and to the public simultaneously. AYA Bank use modern communication technologies to convey its messages to its target groups. Synergies are sought when it comes to using different communication channels as appropriate. AYA Bank shall reply without undue delay to information requests by the media and the public.

4. TYPES OF COMMUNICATION

To develop the communications strategies, the two forms of communication need to work together: external communication and internal communication.

External Communication

External communication is an important area which supports AYA Bank in pursuing the overall goals as described in its vision, mission, and strategy. Customer relations (branding, marketing) and investor relations (name recognition) play an important role in the external relations of AYA Bank. In addition, external communication can promote image, overall knowledge, and awareness of AYA Bank among different stakeholders. Target audience for AYA Bank's external communication systems include customers, government and public administration bodies, non-governmental organizations, media, and public.

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Internal Communication

The main goal of AYA Bank internal communication is to support the organization in achieving the overall goals described in the vision and mission statement. Furthermore, the internal communication can strengthen the organizational culture and feeling of commitment among AYA Bank's staffs. Timely, transparent and relevant information sharing is an important principle to ensure efficient internal communication. Target audience for AYA Bank's internal communication system includes the members within the organization.

5. MEANS OF COMMUNICATION

For external communication, AYA Bank shall disseminate information about the status and activities of the bank through publication of newsletter, annual report, organizing seminars, delivering speeches by Chairman and Executive members of the top management team, developing the website, press release, media activities (digital/printed), interviews, online messaging, advertising and sponsoring.

For internal communication, information will be disseminated through notice boards, intranets, email/fast-track news bulletin, digital hub, directors' briefing, valued interviews and one to one employee briefings.

6. CRISIS COMMUNICATION

A crisis is a situation in which events are beyond AYA Bank's control which threaten to damage the Bank's relations with its shareholders, customers and employees, or its reputation, financial position, or other vital interests.

A Crisis Management Team will handle the crisis in accordance with Business Continuity Plan (BCP). Corporate Communications is responsible for managing all internal and external communication during a crisis that could adversely affect the Bank.

7. CONCLUSION

Corporate communication policy of AYA Bank stated in this document covers the aspects of both external and internal communications in possible situations to a certain extent. This policy shall be effective on the date approved by Board of Directors, reviewed every year and revised as necessary.