



CORPORATE DISCLOSURES POLICIES AND PROCEDURES

FOR INTERNAL USE



Britam Legal and Company Secretarial Department

Policy Owner: Director Legal & Company Secretary
Title: Corporate Disclosures Policies and Procedures
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1. Purpose

Britam Holdings Plc (“the Company”) is committed to the highest standards of corporate governance, anchored on transparency, accountability, fairness and responsibility. As a listed financial services and insurance group, the Company recognizes that timely, accurate and balanced disclosure of material information is essential for maintaining market integrity, investor confidence, and compliance with applicable laws and regulations.

This Policy sets out the framework for the management, control and dissemination of corporate disclosures to shareholders, regulators and other stakeholders.

2. Scope

This Policy applies to Directors and senior Management, all employees across Britam Group, Subsidiaries and controlled entities and External parties authorized to communicate on behalf of the Company.

It applies to all forms of disclosure, including; Financial reporting and regulatory filings, public announcements and press releases, Investor presentations and analyst briefings, Website and digital communications.

3. Guiding Principles of Corporate Disclosure

The Company shall adhere to the following principles:

- 3.1. **Materiality:** The Company shall disclose all material information that may reasonably influence investment decisions or affect the price or value of its securities.
- 3.2. **Timeliness:** Material information shall be disclosed promptly and within prescribed regulatory timelines.
- 3.3. **Accuracy and Completeness:** Disclosures shall be true, fair, clear and not misleading, and shall include all relevant information.
- 3.4. **Fairness and Equality:** Information shall be disclosed equitably to all stakeholders, and no party shall receive preferential access.
- 3.5. **Accessibility:** Disclosed information shall be made readily accessible through appropriate channels, including the Company’s website.
- 3.6. **Confidentiality:** The Company shall maintain confidentiality of non-public material information until such information is formally disclosed.
- 3.7. **Consistency and Continuity:** The Company shall ensure consistency in messaging and continuity in disclosure practices.

4. Corporate Disclosure Requirements

4.1. Periodic Disclosures

- a) Annual audited financial statements
- b) Interim financial results
- c) Integrated and sustainability reports
- d) Governance and remuneration disclosures

4.2. Continuous Disclosures

- e) Material changes in financial performance
- f) Changes in Board or senior management
- g) Mergers, acquisitions and disposals
- h) Capital raising or restructuring
- i) Regulatory actions or investigations
- j) Material litigation or disputes

4.3. Insurance-Specific Disclosures

Given the Company's operations:

- a) Solvency and capital adequacy information
- b) Changes in actuarial assumptions or reserves
- c) Significant claims or catastrophic events
- d) Reinsurance arrangements where material

5. Disclosure on the Company Website

The Company shall, in compliance with regulatory requirements, publish on its website:

- a) Annual and interim reports
- b) Corporate governance policies and charters
- c) Board and Management information
- d) AGM notices and shareholder communications
- e) Shareholding structure and investor information
- f) Sustainability and ESG disclosures

6. Governance and Responsibilities

- 6.1. **Board of Directors:** The Board has overall responsibility for: Ensuring integrity of disclosures, approving major or sensitive disclosures and monitoring compliance with this Policy.
- 6.2. **Board Committees:** Relevant committees (Audit & Risk) shall assess adequacy of internal controls and review financial and risk disclosures.

- 6.3. **Management** shall Implement disclosure controls and procedures, ensure material information is identified and escalated and maintain compliance with disclosure obligations.
- 6.4. **Company Secretary** is responsible for Coordinating disclosures, ensuring compliance with regulatory requirements and maintaining disclosure records.

7. Disclosure Procedures

The Company shall maintain formal procedures to ensure:

- a) Identification of material information by relevant business units.
- b) Verification for accuracy, completeness and compliance.
- c) Review and approval by designated authorities including senior Management.
- d) Dissemination through approved channels.
- e) Retention of disclosure records for accountability.

8. Communication and Authorized Spokespersons

- 8.1. Only authorized persons shall communicate with Investors, Analysts and the Media.
- 8.2. Authorized spokespersons include Chairperson of the Board, Group Managing Director and Chief Executive Officer, the Company Secretary or designated officer.
- 8.3. All communications shall be aligned with publicly disclosed information.

9. Confidentiality and Insider Information

- 9.1. Material non-public information shall be strictly controlled and accessed on a need-to-know basis.
- 9.2. Employees shall not disclose unpublished material information and Trade in Company securities using insider information.

10. Monitoring and Compliance

Compliance with this Policy shall be monitored by the Board of Directors and Management. Any breaches shall be reported promptly, Investigated and addressed. Internal audit shall periodically review disclosure controls

11. Review Cycle

This policy will be reviewed every three years or when need arises to ensure it remains accurate, relevant, and aligned with current policies, evolving business needs and regulatory requirements



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