

	MOPANI COPPER MINES PLC POLICY COMMUNICATION		
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PURPOSE To serve as a guide to MCM's official internal and external communication process			

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DOCUMENT REVISION CONTROL

REVISION NUMBER	PAGE NUMBER/S	CHANGE EFFECTED	DATE OF ISSUE
0.1	All	First Review	17th September 2007
0.2	All	Second Review	14 th March 2008
1.0	All	Copy for signature	26 th March 2008
1.1	All	Company Logo has been officially changed with effect from 1 st September 2011 without variation in document content. A waiver has , therefore, been granted to effect these changes without recourse to appending fresh signatures for this particular change	1 st September 2011
2.0	All	Released for official use	1 st September 2011
2.1	All	Company Logo has been officially changed with effect from 26 th March 2015 without variation in document content. A waiver has , therefore, been granted to effect these changes without recourse to appending fresh signatures for this particular change	26 th March 2015
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3.1	2 4 4,5	Revision of Approval Signatories list Redefining responsibilities for authorised agents of the company to speak to the media – Public Relations Manager replaces Manager Corporate Affairs Grouping Policy Statements	11 th November 2016
3.2	All	Copy for review and comments	14 th November 2016
3.3	5	Insertion of item 4.6 and 4.7(iv) after review by Management.	23 rd November 2016
4.0	All	Copy for Signatures	21 st December 2016
5.0	All	Change in Company logo without recourse to fresh signatures.	11 th March 2019
5.1	1 5	Change in document owner from Manager, Corporate Affairs to Manager, Public Relations. Addition of Radio Interview to item 4.3(i). Addition of Health and Safety, Community and Quality to item 4.6	29 th November 2019
5.2	All	Copy for review and comments	3 rd December 2019
6.0	All	Copy for signatures	17 th December 2019
7.0	All	Change in Company logo strapline from A Glencore Managed Company to A ZCCM-IH	18 th May 2021

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REVISION NUMBER	PAGE NUMBER/S	CHANGE EFFECTED	DATE OF ISSUE
		Subsidiary without recourse to fresh signatures.	
7.1	All	Amendment of Policy to align to ZCCM-IH's Communications and Operational Guidelines Policy	19 th August 2021
7.2	All	Copy for Management review	19 th August 2021
8.0	All	Copy for Signatures	27 th August 2021
8.1	33 - 39	Amendment of the Social Media Protocol to include Website Management	15 th February 2022
9.0	All	Copy for Signatures	23 rd February 2022
9.1	All	Company Logo has been officially changed with effect from 20 th May 2024 without variation in document content. A waiver has, therefore, been granted to effect these changes without recourse to appending fresh signatures for this particular change	20 th May 2024
10.0	All	Released for official use	20 th May 2024
0.1b	7	Change of company vision and values	26 th September 2025
	12	Removed the Addendum on Data Protection, and instead referenced the Policy – POL-063	“
0.2b	All	Copy for Management review	30 th September 2025
1.0b	All	Copy for Signatures	02 nd October 2025

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APPROVAL SIGNATURES

ROLE	RESPONSIBILITY	NAME	SIGNATURE	REVIEW DATE
ORIGINATOR	Public Relations Manager	Nebert Mulenga		02-10-2025
FUNCTIONAL HEAD	Chief Services Officer	Oscar Matebele	<i>Matebele Oscar</i>	08-10-2025
REVIEWER 1	Manager - Quality Assurance and Analytical Services	Obed Mahenga	<i>Mahenga Obed</i>	08-10-2025
REVIEWER 2	Head Internal Audit	Bwalya N Peters	<i>Peters Bwalya</i>	08-10-2025
REVIEWER 3	IT Manager	James Shumba	<i>James Shumba</i>	27-10-2025
REVIEWER 4	Head Legal & Company Secretary	Alick Gondwe	<i>Alick Gondwe</i>	27-10-2025
APPROVED BY	Chief Executive Officer	Charles P Sakanya	<i>Sakanya Charles</i>	27-10-2025

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I. DEFINITIONS

- **Agent** means person or company that does business for another person or company.
- **Agency** means a business that provides a service for people or company, especially by giving them information.
- **Authorised Persons** means officers mandated to undertake the Company's communication: (i) Chief Executive Officer (CEO); (ii) Public Relations Manager; (iii) Chief Services Officer; (iv) other individuals specifically approved by the Chief Executive Officer from time to time for specific kinds of communications on behalf of the Company. Authorised persons are also those whose communication with staff members and external stakeholders fall within their approved job description.
- **Basic Company Information** is any information about MCM, including its business, products, services, projects, finances, operations, objectives and employees.
- **Board** means the Board of Directors of the Company.
- **Communication** means the process of giving information or making views known to someone either verbally or in writing.
- **Company** means MCM.
- **Confidential Company Information** is any Company Information that has not been made publicly available by MCM as well as information of third parties that Mopani Coper Mines PLC is obligated to keep confidential.
- **Corporate Communication** means the Company's way of communicating with internal and external stakeholders.
- **External Communication** is the dissemination of information to external stakeholders.
- **External Stakeholders** refer to Regulators, Government, Shareholders, Media, Service providers, Suppliers, Contractors, Business Associations, Non-governmental organisations, host communities and the general public, etc.
- **Internal Communication** is the dissemination of information to internal stakeholders.
- **Internal Stakeholders** refer to MCM Staff, Management and Board of Directors.
- **Intranet** means any exclusively internal electronic communication platform(s) sponsored by the Company.
- **Internet connectivity** means access to the internet provided by an internet service provider.
- **Press Media** are MCM's media partners that focus on delivering news to the general public or a target public. These include print media (newspapers, news magazines), broadcast media (radio and television), and digital media (online newspapers, social media platforms, news blogs, etc.).
- **Social Media** is any facility for online publication and commentary, including, without limitation, blogs, wikis and platforms such as Facebook, Instagram, WhatsApp, LinkedIn, Twitter, Snapchat, YouTube, Google Business Development and any other form of

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communication that may now or in the future be classified or generally regarded as Social Media.

- **Website** refers to a collection of web pages containing information about MCM and published under the Company’s domain name on the internet.

II. **ABBREVIATIONS**

- **CCCT:** Core Crisis Communication Team
- **CEO:** Chief Executive Officer
- **CSO:** Chief Services Officer
- **ECCTT:** Extended Crisis Communication Task Team
- **MCM:** Mopani Copper Mines PLC
- **PRD:** Public Relations Department
- **PRM:** Public Relations Manager
- **PRO:** Public Relations Officer

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1. SCOPE

This policy serves as a formal guide to Mopani Copper Mines PLC (MCM)'s official communication process, internally to the employees and externally to the public. MCM is committed to ensuring that appropriate policies, procedures and monitoring arrangements are in place to support good internal and external communications. MCM is further committed to developing two-way communications channels recognising that the key stakeholder groups are critical to the success of the business. It is the aim of MCM to continually improve communications, thus assisting both internal and external audiences in understanding the Company's activities, vision and values.

This Policy also provides guidelines on the responsibility of communicating MCM's corporate image using various media including but not limited to:

- a) Printed materials such as newsletters, articles, letters and marketing paraphernalia;
- b) Electronic materials such as email, postings to websites or social media sites;
- c) Media relations such as requests for interviews, news releases and media inquiries; and,
- d) Spokespersons.

This Policy is anchored on propagating the following:

- i. **Vision:** "To become a world champion mine through BEST".
- ii. **Mission:** "To deliver superior value to all stakeholders".
- iii. **Values:**
 - 1. Business wise
 - 2. Enablement and Empowerment
 - 3. Safety, Health and Environment
 - 4. Togetherness Through Teamwork

This policy applies to:

- i. All MCM employees, Management officials and Board of Directors;
- ii. Any written or verbal communication to an external audience on behalf of or in relation to MCM, including but not limited to: shareholders, any form of media, analysts, industry representatives, Government representatives, statutory and regulatory bodies, community stakeholders, unions, industrial tribunals or external participants at networking events or workshops;
- iii. All forms of formal and informal MCM branded communications intended for an external audience or that has a reasonable chance of ending up in the public domain, including but not limited to: MCM publications, advertisements, advertorials, newsletters, videos, reports, Power Point presentations, submissions to Government or regulatory bodies, general communications, emails, speeches or any other presentations; and,
- iv. Use of company social media platforms and website.

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2. OBJECTIVES

The objective of MCM Communication Policy is to inform and guide response on all matters that may arise from or affect MCM stakeholders and business activities. The following are the key objectives:

2.1. INTERNAL

- i. To maximise staff potential by improving the communication systems and ensuring appropriate mechanisms are in place for increasing staff understanding of MCM’s vision, core values and corporate objectives and goals;
- ii. To ensure that robust systems of communications are in place;
- iii. To ensure that all staff are kept abreast of the policies and procedures relevant to their work;
- iv. To ensure that all staff are made aware of, and participate in, the implementation of the Communication Policy;
- v. To develop a formal consultative process, including staff briefings, which will contribute to achieving the Company’s corporate objectives; and,
- vi. To ensure staff maximise potential opportunities to promote MCM’s corporate identity to relevant stakeholders as its primary brand ambassadors.

2.2. EXTERNAL

- i. To develop effective two-way communication channels between MCM and all key external stakeholders;
- ii. To ensure timely communication of changes or developments within the Company to all key external stakeholders;
- iii. To build and maintain confidence in the quality of investments and projects being undertaken to maximise stakeholder satisfaction;
- iv. To develop and sustain positive relationships with key external stakeholders;
- v. To ensure brand consistency in the application of Company identity tools; and,
- vi. To provide Company oversight guidance on communication matters.

2.3. POLICY GUIDING PRINCIPLES

MCM strives to provide to all its stakeholders, **internal** and **external**, accurate and timely information, communicated in a professional manner, and in accordance with the laws governing public information.

The Chief Executive Officer and the Public Relations Manager are solely responsible for managing information disclosed to shareholders, analysts, the media and the general public.

The following are identified stakeholders of MCM with their respective guiding procedural principles:

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2.4. INTERNAL STAKEHOLDERS

i. Board of Directors

- a. The Chief Executive Officer will keep the Board informed about issues facing MCM on a regular basis, through Board Meetings, as well as in writing during periods in between Board Meetings.
- b. All discussions by the Board will be held in strict confidence, until such a time that the Board agrees to make an internal or a public announcement.
- c. The Board is committed to internal communication and will issue a "Notice from the Board" to employees of MCM whenever clarification is deemed necessary. The Notice will be signed by the Chairperson of the Board.
- d. Communication of notices and minutes of Board meetings and proceedings among Board Directors shall be undertaken by the Company Secretary, who is the Board Secretary.
- e. Any issues that may be of public interest on which the Board has come to a conclusion during a Board Meeting must be prepared in the form of a Media Release by the Public Relations Department. A decision must be taken within the Board to release information to the media on a specific issue and the Public Relations Department will release to the media. Such media releases from the Board resolutions must be approved by the CEO, prior to being submitted to the Chairperson of the Board for final approval, and then distributed to the media.

ii. Employees

The participation and support of employees is fundamental to the overall successful operation of MCM.

- a. MCM internal communication will seek to be concise, considerate, objective, transparent and consistent in order to ensure that all employees fully identify with the Company Vision, Mission, Values and Strategies.
- b. Through MCM internal communications, employees shall be exposed to, and included in, the formulation and implementation of the organisation's strategic plans and business development, to instil a sense of purpose and ownership in them.
- c. Internal communication shall aim at fostering a sense of belonging throughout the organisation at every level thereby increasing active participation and team spirit.
- d. MCM internal communication will be ongoing and consistent.
- e. Internal communication will be aimed at fostering and strengthening a positive and progressive organisational culture.
- f. All communication to MCM employees and the Unions by Management shall be done in writing unless otherwise authorised by the Chief Executive Officer or his/ her nominee.
- g. Communication to employees will take the form of written briefs, memos, letters, brochures and other publications that will be deemed appropriate by Management.

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- h. Internal communication shall be handled by the departments responsible for such correspondence, that is, Employee Relations and Human Resource – for general staff members, and Company Secretariat – for Board of Directors.
- i. Communication between and amongst staff members must be professional at all times.

2.5. EXTERNAL STAKEHOLDERS

External communication is aimed at increasing the visibility of the Company in the public domain, so as to make it a recognisable brand, and grow its support base.

The Chairperson of the Board, shall communicate on policy matters while the CEO shall communicate on operational matters of MCM. This will apply in respect of all audiences.

Guiding Principles for targeted MCM external audience groups include, but are not limited to:

i. Shareholders

- a. In line with good corporate governance principles and to enhance a strong culture of disclosure, communication with shareholders must be timely and transparent.
- b. Shareholders of MCM should be privy to all information.
- c. It is imperative that communication be consistent at all times and that selective disclosure is avoided at all times.
- d. Communication with the shareholders should be of a formal, direct, one-on-one nature and should be undertaken by the Chief Executive Officer.
- e. Communication (normally of a Policy nature) to the shareholders and Senior Government officials at the level of a Minister will be handled by the MCM Board Chairperson.
- f. Communication (normally of Operational nature) to the shareholders and Senior Government officials at the level of a Minister or a Permanent Secretary will be handled by the Chief Executive Officer.

ii. Analysts and Academic Institutions

- a. Economic analysts, research professionals and academic organisations have the potential to influence the perception of MCM, hence, they should be engaged proactively and communication channels kept open at all times.
- b. This should be the responsibility of the Public Relations Department who would be expected to manage the relationship with this stakeholder group and provide regular updates on Company developments or respond to requests without delay.
- c. This stakeholder group should be invited to attend presentations on new developments and Company innovations and should be courted further by direct communication through one-on-one meetings, update phone calls and emails.

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iii. Environmental Organisations, Civil Society Organisations, Community-Based Organisations and Non-Governmental Organisations

- a. Communication to this group should be on-going, proactive and geared at building one-on-one relationships and implementing tools and tactics, which resonate with each of the organisations concerned.
- b. The Corporate Affairs Department shall be responsible for managing this stakeholder group.

iv. Suppliers, Contractors And Service Providers

- a. This group should be generally kept informed of relevant Company Policies and news via formal business meetings, public media, online/ digital platforms or by written correspondence.
- b. The Supply and Corporate Affairs departments will be responsible for managing this stakeholder group.
- c. All written correspondence and announcements for tenders will be required to be vetted and checked by the Public Relations Department prior to being published or sent out.

v. Media

- a. MCM's policy is to be proactive, open and transparent to the media. All media organisations and professionals will be treated equally.
- b. Managing relations with the media should be in an open and pragmatic manner.
- c. MCM will be proactive in disseminating information about the Company and its activities that are deemed in the best interests of the business by the Board and Management.
- d. Forming positive relationships with journalists/media houses both local and international is crucial to the effectiveness and ultimate success of MCM communications.
- e. All media releases, responses to media queries and requests for interviews must be approved by the Chief Executive Officer.
- f. The Public Relations Department shall be responsible for managing media relations.
- g. Guidelines on Media Relations are found in the Addendum of the Policy.

2.6. COMMUNICATION FORMAT

- i. All communication, other than expressly arranged as a media briefing, television or radio interview/ coverage of an event, will be written in English in a format that displays the approved company logo, and signed off by an authorised person.
- ii. The approved font for all typed correspondence will be Arial 11, with line spacing 1.5.
- iii. All internal notices to employees will be formatted as per Form [FM-CH-029](#).
- iv. All business cards will be formatted as per sample [FM-CH-062](#)
- v. All advertisements placed for employment vacancies will be formatted as per Form [FM-CH-005](#).

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- vi. All official announcements will be formatted as per Form [FM-CH-061](#).
- vii. All official communication shall be on headed paper as per form [FM-CH-050](#).
- viii. All corporate advertisements will be designed as per Form [FM-CH-063](#) with wording that is concise and relevant to the market being targeted.
- ix. All advertisements and announcements will be placed in at least two reputable Zambian nation-wide distributed daily newspapers.

3. POLICY RESPONSIBILITIES

POSITION TITLE	ROLE	DESCRIPTION OF TASK
Public Relations Manager	Originate	Develop, review and amend this document
Chief Services Officer	Review	Review, edit and amend this document
Manager Quality & Analytical Services	Review	Review this document to ensure conformity to Company's set standards
Manager Internal Audit	Review	Review this document to ensure conformity to standard good corporate governance practices
Company Secretary	Review	Review this document to ensure conformity to standard legal practices on public disclosure and confidentiality
Departmental Managers	Implementation	Policy implementation and dissemination within their departments.
All Mopani Employees	Adherence	To adhere to this policy at all times.

4. POLICY REQUIREMENTS

4.1 DISCLOSURE OF CONFIDENTIAL INFORMATION

MCM is committed to providing timely, accurate, and complete disclosure of its basic Company information in an appropriate manner. Disclosure of confidential information is, however, strictly prohibited as detailed in the MCM Data Protection Policy 063 (POL 063) and MCM Contract of Employment on Confidentiality and Non-Disclosure, which is signed by all Staff members upon assumption of duty. Violation of this Agreement may attract disciplinary action.

4.2 PUBLIC STATEMENTS OF PERSONAL OPINION

MCM staff members should refrain from making public statements of their personal opinions regarding MCM as facts. Such public statements may include quotes given to the media, contributions to blogs, comments on social media platforms, published articles, etc. Any such public statements must be approved by the Chief Executive Officer before publication or dissemination.

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4.3 COMMUNICATION MESSAGES AND CHANNELS

MCM's communication objective is to ensure that information included in every message should be complete, factual and verifiable. Every communication message of an operational nature shall be approved by the Chief Executive Officer prior to being released to the public.

Target Group	Key Message	Communication tools and tactics
Shareholders	We are committed to our Vision of becoming a world champion mine through BEST and Mission of delivering superior value for all stakeholders from our operations.	Company updates on operations, one-on-one briefs by the Chief Executive Officer, corporate newsletters, website constant updates, press releases on multimedia platforms both local and international
Media (Local and international)	We provide timely and accurate information on the Company in accordance with all regulations. Where there are inaccurate stories or quotes, we will endeavour to correct them and respond according to our Communication Policy.	Press releases, media query responses, media workshops and field tours, press briefings/conferences, press interviews, radio and TV interview programmes.
MCM members of staff	You are a critical and an integral part of the Company. MCM is committed to ensuring you contribute to the success of the Company and that your contribution is rewarded fairly. MCM is committed to improving your welfare and will endeavour to honour its commitments.	Internal newsletter, notice boards, intranet, social media platforms, departmental meetings, management briefings, memos and notices, workshops / seminars, face-to-face interactions, telephone/ mobile phones and email.
Analysts, Researchers and Academic institutions	We disseminate timely and accurate information in accordance with local regulations and international norms, provide easy access to Management to enable analysts to conduct proper research on the Company, and respond to requests without delay.	Website, interviews, emails, presentations on new developments and innovations, direct communication through one-on-one meetings, update calls and emails.

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Target Group	Key Message	Communication tools and tactics
Local (host) communities	We are committed to contributing towards building resilient and thriving local communities.	Corporate Social Responsibility activities, local/ community mainstream media, community town hall meetings
General public (women, men and youths)	MCM contributes its fair share of taxes to the Government and local authorities in Kitwe and Mufulira; it is a partner in development and job creation.	Multi-media platforms, website and social media platforms; community road shows.
Civil and Environmental Societies; Non-governmental organisations, Community- and faith-based organisations	MCM is committed to environmental protection and its sustainability, good corporate governance practices and community development.	Corporate newsletter, town hall meetings, website, mainstream media and social media platforms
Industrial Labour Unions	MCM is committed to safeguarding jobs in a sustainable manner, and is always open to dialogue	One-on-one meetings, Management/ Union engagements, written correspondence, website and mainstream media
Government	MCM is committed to job creation and economic growth of the country in general and Copperbelt Province in particular.	One-on-one meetings, written correspondence; mainstream media;
Politicians	MCM is open to dialogue and committed to professionalism and providing quick feedback to queries.	One-on-one meetings, letters, emails

4.4 COMPANY SPOKESPERSONS

The Public Relations Manager shall be the authorised Spokesperson of the Company.

The Chief Executive Officer will authorise other persons to speak to a particular audience with respect to a particular specialist topic or for a particular purpose.

The Chief Executive Officer has the final say on the dissemination of all Company communication to internal and external audiences.

Guidelines on Company Spokespersons are found in the Addendum.

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4.5 COMPANY COMMUNICATION OVERSIGHT

The Public Relations Manager shall ensure that there is adequate and effective communication of information within the Company and with all external stakeholders.

In the event of a crisis, the Public Relations Department shall provide the necessary support as per the Crisis Management Policy (**MPL-320**).

The Public Relations Manager will further support and provide guidance to all departments on communication issues to ensure consistency in the messages being communicated and adherence to the Company's communication ethos.

4.6 POLICY MONITORING

Periodic review of Company communication activities will be monitored and evaluated to ascertain impact and effectiveness. Internal and external surveys will be instituted periodically and recommendations made that will maximise value for the Company in meeting the objectives of the Communication Policy and the overall Company Vision.

4.7 POLICY ACCESSIBILITY

The details of this Policy will be communicated to the Board, Management and all Staff of MCM. This Communication Policy will be available for viewing by all employees of the Company on the intranet and in the Controlled Documents database while an abridged version will be available for perusal by external stakeholders on the Company's website.

4.8 COMPLIANCE WITH THIS POLICY

Unauthorised representation of the Company by an employee shall result in disciplinary action that may include summary dismissal. Further, external communication not undertaken in the format provided for shall be liable to disciplinary recourse. If there is anything in this policy that an employee does not understand or fully comprehend, they are encouraged to discuss it with their respective departmental head. Please note that the procedures and guidelines outlined in this Policy may be reviewed or changed at any time. Alerts to important changes and updates will be published on the Company intranet.

4.9 POLICY REVIEW AND AMENDMENTS

This Communications Policy is subject to review by Management every two years and will be amended (as appropriate) to reflect current best practices in communicating with all stakeholders while ad hoc amendments may also be effected from time to time based on the Company's changes in the Communication function.

4.10 CONCLUSION

This Communication Policy will facilitate and enhance MCM's effective, comprehensive, proactive and purposeful communication with both internal and external stakeholders.

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REFERENCE	AUTHOR	TITLE
PJD 11/2001	MCM	Mopani Policy for Communicating Externally.
POL -063	MCM	Data Protection Policy
POL-027(A)	MCM	Code of Conduct for Employees

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5.1 APPENDIX: GUIDING PRINCIPLES OF COMMUNICATION

1. OVERALL GUIDELINES

MCM recognises the importance of active communication with different stakeholders and the general public as an integral part of good business and administration. In order to attain its overall objectives for communication, the Company must follow a set of guiding principles, as follows:

i. Efficiency

Make use of modern communication technologies in a timely manner to convey messages to identified target groups. Synergies are sought when using different communication channels. MCM must respond, without unnecessary delay, to information requests by the media and the general public.

ii. Transparency

MCM should strive in its communication to be as transparent and open as possible. This will contribute to maintaining a high level of accountability and credibility.

iii. Proactivity

MCM should proactively develop contacts with its target groups and identify topics of possible mutual interest for engagement with such stakeholders.

iv. Clarity

MCM should aim at attaining clarity when communicating by sending uniform and clear messages on key policy and operational issues. Unnecessary jargon should be avoided. To reinforce clarity, every effort must be taken to adhere to a well-defined visual identity in the Company's external communication.

v. Cultural Awareness

The Company must be sensitive of the multicultural environment it operates in when communicating with its audiences.

vi. Feedback

MCM should actively and regularly seek feedback on its image and communication activities both from the media as well as from its stakeholders. This feedback would be used to fine-tune communication activities.

vii. Overall Approval

The Chief Executive Officer will give overall and prior approval and consent before the release and dissemination of any Company information.

viii. Comments on Rumours or Speculations

MCM typically will not confirm or deny rumours or speculations concerning the Company so long as it is clear that the Company is not the source of the rumour or speculation and that such a rumour has no potential to disrupt the Company's operations or dent its corporate image.

If the Company or any of its Management officials and employees receives any inquiry from any internal or external audience, an authorised spokesperson should

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respond to that inquiry by stating that the Company's policy is not to comment on rumours or speculation concerning the Company.

If, for any reason, the Company decides to respond to a rumour or speculation, the Company shall publicly release its response through a Press release or in another manner reasonably designed to provide broad public distribution of the information.

The Chief Executive Officer will give final approval on any response to a rumour or speculation.

The release of information that has not been verified and approved will result in disciplinary action against the individual responsible as the release of inaccurate information runs the risk of misleading the public and undermining the credibility of MCM.

2. GUIDING PRINCIPLES OF COMMUNICATION MESSAGES

All MCM communication messages will be in line with the following guidelines:

- i. Acronyms and jargon are to be avoided;
- ii. Key communication points will be supported by visuals to clarify;
- iii. Familiar frames of reference will be used to explain, for example, "parts per billion or tons per day";
- iv. Statistics and key information will be provided in written form to avoid error; and,
- v. Messages will be simple and direct.

Prior to the development of any communication messages for MCM, the following questions in relation to the Company's audiences, will be answered:

- i. Who are they, where are they from?
- ii. What are their interests and concerns?
- iii. What are their likely perceptions and biases?
- iv. Will they be receptive or resistant or even hostile?
- v. Why would the communication be important to them?
- vi. What would be the effect if this communication is not done?
- vii. What will be the frequency of communication?
- viii. Which communication channels will be used?

3. GUIDELINES FOR COMPANY SPOKESPERSONS

To the extent practicable, authorised spokespersons should contact appropriate persons within the Company in order to review as much of the substance of any intended communication with any external audience.

The text of any written communication to be published, circulated or provided to one or more external audiences shall be approved by the Chief Executive Officer with input from

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the relevant departments where necessary, prior to such communication being sent, published or otherwise disseminated.

4. GUIDELINES FOR BUILDING TRUST, CREDIBILITY AND CONFIDENCE

The following guidelines will be adopted in all MCM communication in order to build credibility and establish confidence with the Company’s publics and target audiences:

- i. MCM accepts and regards the public as a partner. MCM will work with, and for, the public to inform, dispel misinformation and, to every degree possible, allay fears and concerns.
- ii. MCM appreciates the public’s specific concerns. MCM understands the fact that statistics and probabilities do not necessarily answer all questions.
- iii. MCM will be sensitive to people’s fears and worries on a human level.
- iv. MCM will not overstate or dwell on tragedy, but will empathise with the public and provide answers that respect their humanity.
- v. MCM will be honest, open and acknowledge that once lost, trust and credibility are almost impossible to regain.
- vi. MCM will not mislead the public by lying or failing to provide information that is important to their understanding of issues.
- vii. MCM will work with other credible sources. Conflicts and disagreements among organisations and credible spokespersons create confusion and breed distrust.
- viii. MCM will coordinate all information and communication efforts in collaboration with other legitimate parties in cases where joint communication is called for.
- ix. MCM will meet the needs of the media by ensuring that it maintains a credible and sound working relationship with the media, fully cognisant of the fact that the role of the media is to inform the public, with or without, MCM’s cooperation.
- x. MCM will work with the media to ensure that the information they are providing the public is enlightening and as accurate as possible.

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Addendum 1: MCM Media Protocol

1. Individual interaction with the media

MCM restrains employees to hold, share, impart or receive any particular views, beliefs, thoughts, opinions or information on the Company.

Where Company staff appear before a panel discussion or professional event presentations in their personal capacity, the employee may only comment on technical knowledge and add a disclaimer that they are not speaking on behalf of the Company, and that whatever professional technical information they provide is their own opinion and not of the Company.

Any media queries should be channelled to the Public Relations Department.

In the event of any crisis, only individuals authorised to handle the communication function in accordance with the Crisis Communication Protocol (Addendum 2) may communicate with the media.

2. Communication on sensitive matters

Employees must bring any sensitive emerging issues of potential media or public interest related to the Company to the attention of the Chief Executive Officer or the Public Relations Department, who must then in consultation with relevant management heads, develop a media response where necessary.

3. Media training

The Public Relations Department must provide assistance to employees related to interaction with, and management of, the media including assistance with preparation for media interviews through briefings, guidance and support in attending to enquiries from the media, and the drafting of media releases if need be.

4. Media engagement

When an issue of public interest relating to MCM arises, the Public Relations Manager must assess the potential level of public interest and journalistic value ("newsworthiness") of the matter, and if it is found that pro-active media engagement is required, the following must be taken into consideration:

- i. The media is fully entitled to information and dealing with the media warrants the same level of professional courtesy and respect as interaction with any other stakeholder of the Company.
- ii. Media representatives are usually operating under time pressure requiring quick response times.
- iii. All information that is provided to the media must be truthful, accurate, unambiguous, clear and factual.
- iv. When commenting on matters of public interest concerning the Company, disparaging comments on other organisations, groups or individuals must not be made.
- v. Expert comments and research-based findings may involve comments on the positions taken by, and findings of, other organisations, groups or individuals.

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- vi. The Public Relations Department must log all media enquiries and the Company's responses thereto.

5. Media Requests

Any request from the media should be recorded accurately and passed on immediately to the Chief Executive Officer or in his/ her absence, to the appointed officer to act in the position of Chief Executive Officer for action. As far as practical, all media practitioners should be courteously advised to put their enquiries in writing (letter, email, etc.).

6. Media monitoring

The Public Relations Department is responsible for ensuring that a media monitoring service is in place to monitor the news coverage relating to the Company and to assist in managing the reputation of the Company.

7. Confidentiality

Except for the official Spokesperson of the Company, the personal and contact details of the Chief Executive Officer, the Board Chairperson and Board Directors, or any members of staff may not be provided to the media without explicit prior consent granted by the official concerned.

The release of any information regarding the employees of the Company must be managed consistently with the Company's policies on confidentiality.

8. Discretion

Consideration must always be given to the sensitivities and potential for causing offence when discussing the topics of religion, politics or any other controversial issues that may provoke a charged, emotional response, whether directly or indirectly related to the Company.

9. Guidelines for engaging with the media

When engaging in media interviews or making media statements, spokespersons must refrain from:

- i. Using profane or offensive language or content;
- ii. Engaging in a topic that promotes, fosters, or perpetuates discrimination on the basis of race, age, tribe, political affiliation, religion, gender, marital status, nation of origin, physical or mental disability, or other grounds protected under Zambian equal opportunity legislation;
- iii. Constructing content or drafting a posting or using material that is, or might be construed as threatening, defamatory, harassing, bullying or discriminatory towards any stakeholder of the Company;
- iv. Engaging in conduct, or encouragement, of any illegal activity;
- v. Submitting information that might compromise the safety or security of the public or public systems;
- vi. Disclosing any confidential or personal information obtained in their capacity as an employee of the Company;

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- vii. Using the name of the Company, crest or logo without first obtaining prior approval from the Public Relations Department, and,
- viii. Using content that is either misleading or deceptive.

10. **Guidelines for seeking media coverage**

The Public Relations Manager must assist Management officials or employees, who wish to obtain publicity or media exposure for their work.

MCM will ensure that communication with the media does not lead to confusion resulting in inaccurate reports and misinterpretations.

Information supplied to the media will be balanced against opinions that are different from those of MCM. MCM will focus on factual communication.

11. **Guidelines for Participating in Media Interviews**

DOS and DON'TS BEFORE, DURING AND AFTER AN INTERVIEW:

	Dos	Don'ts
BEFORE	1. Ask who will be conducting the interview. 2. Ask which subjects they want to cover. 3. Caution the interviewer on the limits of your knowledge. 4. Inquire about the format and duration. 5. Ask who else will be interviewed. 6. Suggest other interviewees. 7. Prepare and practice.	1. Allow yourself to be interviewed on a topic outside of your expertise. 2. Be overconfident or become overly familiar or comfortable with your interviewer.
DURING	1. Be honest and accurate. 2. Deliver and re-deliver your key message(s). 3. State your conclusions first, and then provide supporting data. 4. Be forthcoming to the extent you decide beforehand. 5. Offer to get information you don't have. 6. Stress the facts. 7. Give a reason if you can't discuss a subject. 8. Correct mistakes by stating you would like an opportunity to clarify. 9. Assume that microphones and recording equipment are turned on.	1. Lie or try to cloud the truth. 2. Improvise or dwell on negative allegations. 3. Raise issues you don't want to see in the story. 4. Answer questions off the top of your head. 5. Speculate, guess, assume or hypothesize. 6. Speak for others. 7. Say "no comment." 8. Be led into other areas of discussion.
AFTER	1. Remember you are still on the record. 2. Be helpful. Volunteer to get information. Be available. 3. Respect deadlines and deliver whatever additional information you said you would deliver. 4. Follow-up to see if any additional questions have emerged. 5. Watch for and read the resulting report.	1. Assume an interview is over or that recording equipment is turned off. 2. Complain to the reporter's boss first.

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	Dos	Don'ts
	6. Ignore minor reporting errors that don't affect the point of the story. 7. Call the reporter to politely point out if there are inaccuracies that do affect the point of the story.	
DURING A CRISIS	1. Plan now. 2. Respond quickly—the first 24 hours are critical. 3. Respond straightforwardly. 4. Be accurate. 5. Strive to reassure as well as alert and inform your audience.	1. Assume “it will never happen here.” 2. Allow your issues to be defined by someone else. 3. Think that refusing to discuss a story will allay public concerns or prevent people from seeking, and finding, information—accurate or not—elsewhere.

12. Guidelines for avoiding pitfalls in media communication

- i. **Abstractions** – Use examples, stories, and analogies to make your point.
Don't assume there is a common understanding between you and your audience.
- ii. **Attacks** – Respond to issues, not to people. Strive to end debates, not further them.
Don't respond to an attack with an attack of your own.
- iii. **Attitude/ non-verbal messages** – Remain calm, attentive and polite. Adopt a relaxed, neutral physical stance.
Don't let your feelings interfere with your ability to communicate positively.
Never convey disgust, frustration, indifference, or smugness.
Never lose your temper.
Don't allow your body language, your position in the room, or your dress to affect your message.
- iv. **Blame** – Accept your share of responsibility for a problem.
Don't try to shift blame or responsibility to others and **don't** magnify the fault to be found in others in order to deflect criticism or minimise your culpability.
- v. **Costs** – Focus on the benefits to be derived, not on the costs entailed.
Don't discuss issues in terms of their Kwacha or Dollar value, or complain about a lack of funds.
- vi. **Guarantees** – It is better to offer likelihood, emphasising progress and on-going efforts.
Don't make comments like, “There are no guarantees in life.”
- vii. **Humour** – Avoid it. If used, direct it at yourself.
Don't use it in relation to safety, or health, or in describing risk.
- viii. **Jargon** – Define all technical terms and acronyms.

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Don't use language that may not be understood by even a portion of your audience.

- ix. **Length of presentations** – Plan, practice and deliver a cogent 15-minute presentation.

Don't believe that what you are saying is inherently more interesting than other topics and therefore warrants more time. By the same token, **don't** end your remarks after 15 minutes if there are important audience questions in need of answering.

- x. **Negative allegations** – Refute allegations succinctly.

Don't repeat allegations or refer to them in ways that give them credibility.

- xi. **Negative words and phrases** – Use positive or neutral terms.

Don't cite national problems, or make highly-charged analogies.

- xii. **"off-the-record"** – Always assume everything you say and do is part of the public record.

Don't make side comments or "confidential" remarks. (The rule is: **Never** say anything that you are not willing to see printed on the front page of a newspaper).

- xiii. **Personal identity** – Speak for the organisation. Use the pronoun "We."

Don't give the impression that you, alone, are the authority on the issues being raised or the sole decision-maker. **Never** disagree with the organisation you are representing, e.g. by saying, "Personally, I don't agree," or "Speaking for myself . . .," or "If it were me"

- xiv. **Promises** – It is better to state your willingness to try. Promise only what you can deliver.

Don't make promises you can't keep and never make a promise on behalf of someone else.

- xv. **Reliance on words alone** – Use visuals and hand-outs to emphasise key points.

Don't rely entirely on the spoken word to explain your point.

- xvi. **Speculation** – Stick to the facts of what has, is, and will be done.

Don't speculate on what could be done, or on what might happen, or on possible outcomes other than the intended one(s), or about worst case scenarios.

- xvii. **Statistics** – Use them to illuminate larger points and to emphasise trends and achievements.

Don't make them the focus of your remarks, or overuse them.

- xviii. **Technical details and data** – Focus on empathy, efforts and results.

Don't try to fully inform and educate audiences on the details of trivial issues.

- xix. **Managing hostile situations:** Dealing ineffectively with hostility can erode trust and credibility. Remember, though, public hostility is usually directed at you as a representative of an organisation, not you as an individual, so **don't** take it personally.

- xx. **Diffusing anger and hostility:** Acknowledge the existence of hostility. The worst thing you can do is pretend it's not there.

Practice self-management. Send the message that you are in control.

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Control your apprehension. Anxiety undercuts confidence, concentration, and momentum.

Be prepared. Practice your presentation and anticipated questions and answers.

Listen. Recognize people’s frustrations—communicate empathy and caring.

Assume a listening posture. Use eye contact.

Answer questions thoughtfully. Turn negatives into positives and bridge back to your messages.

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Addendum 2: Crisis Communication Protocol

1. Principles of Crisis Communication

In the event of an occurrence (internal or external) that causes significant disturbance in the Company's activities or has the potential of causing long-term reputational damage, crisis communication in accordance with the following principles should be undertaken:

- i. Whenever possible, crisis communication must be undertaken pre-emptively in order to prevent or minimise a crisis.
- ii. Crisis communication must be open, accountable and accessible to all audiences, keeping in mind all legal, regulatory and privacy concerns.
- iii. Speedy, pro-active and regular communication of crisis information must be maintained as circumstances change.
- iv. Relevant crisis information concerning all affected departments of the Company must be made available to all concerned.
- v. In view of the importance of the media in times of a crisis due to their role in informing the general public, effective and proactive relationships with media must be maintained.
- vi. Taking into account that different media are relevant for different stakeholders, all the different traditional and new media channels must be used to communicate with stakeholders.

2. The nature and categories of crises

Crises contemplated in this Protocol include:

a. ***Victim Crises: Minimal Crisis Responsibility and Mild Reputational Risk***

- i. Natural disasters: acts of nature such as floods, droughts, or earthquakes and health issues/ medical crises/ pandemics, among others.
- ii. Rumours: false and damaging information being circulated about the Company.
- iii. Workplace violence: attack by former or current employee on current employee(s) on-site.
- iv. Product Tampering/ Malevolence: external agent causing damage to the Company.

b. ***Accident Crises: Low Crisis Responsibility and Moderate Reputational Risk***

- i. Challenges: stakeholder claiming that the Company is operating in an inappropriate manner.
- ii. Technical-error accidents: equipment or technology failure that causes an industrial accident.
- iii. Technical-error product harm: equipment or technology failure that causes a product to be defective or potentially harmful.

c. ***Preventable Crises: Strong Crisis Responsibility and Severe Reputational Risk***

- i. Human-error accidents: industrial accident caused by human error.

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- ii. Human-error product harm: product being defective or potentially harmful because of human error.
- iii. Organisational misdeed: management actions putting stakeholders at risk and/ or violating the law.
- iv. Organisational misdeed with no injuries: Stakeholders being deceived without injury.
- v. Organisational misdeed with injuries: Stakeholders being placed at risk by management and injuries occur.

3. Post-Crisis Phase

- i. Deliver all information promised to stakeholders as soon as that information is known.
- ii. Keep stakeholders updated on the progression of recovery efforts including any corrective measures being taken and any progress made.
- iii. Analyse the crisis management effort for lessons and integrate those lessons into the organisation's crisis management system.

4. Crisis communication teams

The Company's Core Crisis Communication Team (CCCT) will be managed by the office of the Chief Executive Officer and will be composed of Representation from the following –

- i. Chief Services Officer
- ii. Company Secretary
- iii. Public Relations Manager
- iv. HSE Manager
- v. Security Manager
- vi. Employee Relations Manager
- vii. Medical Services Manager
- viii. Respective Mine Manager

When necessary, the following additional members may be added to the CCCT to form an extended Crisis Communication Task Team (ECCTT) to formulate responses to a crisis:

- i. Responsible General Manager
- ii. Chief Financial Officer
- iii. General Manager Technical Officer
- iv. Human Resources Manager
- v. Internal Audit Manager

The responsibilities of a CCCT are to assess a crisis, to decide on the activation of a crisis communication plan, and to devise a strategy to address the crisis.

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The responsibilities of an ECCTT are to help in formulating a response based on the strategy devised by the relevant CCCT.

5. Considerations relating to the implementation of a crisis plan

The primary consideration is to ensure the safety of all the employees and to protect the integrity and reputation of the Company in any crisis.

A plan must be implemented in conjunction with the normal decision-making hierarchy of the Company and does not substitute that decision-making process.

When the CCCT activates a plan, the employees must be aware of the plan and of the roles everyone plays in its execution.

6. Procedure for the management of crisis communication

The following steps must be taken to effectively manage crisis communication by the Company:

Step 1: Anticipate and prepare for a crisis before it happens

The Public Relations Department and other relevant departments must periodically assess crisis risks and anticipate the possible crises that may occur, taking into account the risk assessment register of the Company, anticipating worst case scenarios of all possible crises, and being prepared for the possible reaction of stakeholders to news of a crisis.

The following points for the preparation for a crisis must be considered:

- i. Prepare checklists for the employees: Provide staff with preparation checklists as a precautionary tool. As an example, an evacuation plan could assist MCM employees during a crisis.
- ii. Maintain regular contact, open discussion and good working relationships: The CCCT should maintain regular contact and good working relationships with management and employees, advising the appropriate persons when internal issues or developments appear likely to lead to public relations problems. Similarly, employees and other stakeholders should regularly notify CCCT of internal developments that may escalate into crises.
- iii. Monitor the media: The Public Relations Department must monitor all media channels with regard to local and international news coverage of sectors in which the Company has interests in, advising the appropriate officer(s) of issues and/or trends that might lead to negative stories. Keep an up-to-date media list and compile a Crisis Kit.

Step 2: Identify, assess and report a crisis

If any employee believes a crisis is pending or is under way, it must immediately be reported to the Public Relations Department, which should then collect as much accurate information as possible from appropriate and credible sources and notify the CCCT.

Based on a proper assessment of the nature and scope of the situation, the CCCT concerned must make a decision regarding the severity of the situation and make one of two choices:

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- Devise and implement a strategy to deflate the situation or
- Immediately convene the relevant ECCTT and confer with them regarding the nature and severity of the crisis.

Step 3: Response to a crisis

In the case of a smouldering crisis, the CCCT concerned must devise a simple strategy to forestall the crisis, and if needed, the CCCT must, upon approval by the Chief Executive Officer, implement the strategy forthwith.

If the nature of the crisis concerns issues and events requiring input from several units of the Company, or if a simple strategy is not likely to be effective, the ECCTT concerned must convene.

If the CCCT concerned is of the opinion that a potential crisis or controversy is not an immediate emergency, it must prepare a communications strategy as part of a coordinated Company response.

In the case of an immediate and unforeseen crisis:

- The CCCT concerned must, after assessing the seriousness of the situation, officially declare an emergency and develop a communication strategy, typically involving a short and simple first statement –
 - acknowledging the crisis
 - stating facts surrounding the crisis, and
 - providing contact details for further enquiries
- The first statement must be disseminated to management and employees as well as other stakeholders such as the media via all available media channels, as soon as possible.
- In an emergency, the first communication to key Company audiences should ideally happen within 60 minutes of notification of the event, with regular updates afterwards.
- If the nature of the emergency or crisis is such that it is not possible for the CCCT concerned to convene or make timeous decisions, the Public Relations Manager may, in consultation with the Chief Executive Officer, begin taking action pending decisions of the CCCT regarding the approval or adjustment of such action.
- Additional, off-site venues should be identified in advance to provide for circumstances where members of the CCCT or the ECCTT concerned cannot operate from their usual working environment, and such venues must have all possible facilities and resources necessary to allow members of the different teams to conduct their work uninterruptedly, offline and away from their usual offices. This provision applies to employees in instances where employees have to work offsite either at home or a designated place.

Step 4: Take action

In the event of a sudden crisis, the CCCT concerned must be convened within two hours, and if all its members cannot attend immediately, the available members may proceed with actions designed to use the available time optimally. The following actions must be taken:

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- Firstly the safety of employees and surrounding buildings/companies must be secured immediately and the activation of all applicable safety plans and safety measures should be carried out immediately.
- Once the CCCT has devised a strategy and way forward, the relevant ECCTT must be informed to take action.

Designate a spokesperson

- As far as possible only one spokesperson must be designated so that the Company provides a unified, consistent message to the public.
- In cases of a significant crisis, the Chief Executive Officer, or the highest ranking company official available must take the lead in conveying the Company's response to the crisis, and otherwise the Public Relations Manager must perform this function.
- The spokesperson must work closely with the official that has the most direct knowledge of the crisis, for example the responsible mine/ site manager.
- The spokesperson must be kept informed of the latest developments and must be assigned one or more communication officers to provide assistance.
- The spokesperson and assistants must be kept abreast of the most current and critical information and developments, and they must therefore connect with information providers on the ground, such as emergency response personnel, State Police and relevant government officials, and maintain contact and good relations with them for the duration of the crisis.

Identify key MCM stakeholders/ target audiences

Determine which of the Company's internal and external stakeholders need to be informed of the situation and in what order.

The internal stakeholders are:

- Employees
- Members of the Board

The external stakeholders include:

- The media
- Unions
- Shareholders
- Community leaders
- Government departments concerned
- Relevant business interests/ associations
- Local law enforcement
- The local communities
- The municipality concerned

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- Non-Governmental Organisations, Environmental Organisations, Civil Society Organisations, etc

There should be the right messages to a specific audience and the dissemination of statements and press releases to the stakeholders concerned. Messages must be delivered repeatedly and clearly and by one voice and the channels used to communicate with each audience may be different.

The Public Relations Manager should:

- Write press releases for different audiences and media and submit them to the Chief Executive Officer for approval.
- Identify the appropriate mediums through which to communicate the messages to each audience in accordance with a list of all stakeholders and proposed channels for each provided by the Public Relations Manager.
- Coordinate the communication with the Company Secretary or Legal Department in order to allow for the release of as much information as possible without jeopardising any possible investigations or potential litigation.

The CCCT should allocate tasks to perform the following functions:

- maintaining meeting notes, to-do lists, information files on the ongoing crisis and other items by a designated secretary;
- web coordination to oversee all web changes and regular updates in consultation with the Public Relations Manager;
- media monitoring to study all media coverage and anticipate any problems in the way information is flowing to the news media, providing daily summaries of relevant media coverage to Management.

Establish and communicate a clear line of communication

- The CCCT or ECCTT concerned must, as a first priority, disseminate a notice to all employees identifying the lines of communication with internal and external target audiences, clearly indicating –
 - who are authorised to gather and verify information
 - where new and critical information must be forwarded to
 - who are authorised to release information
 - where media enquiries must be directed
 - where public enquiries must be directed
- Gather as many details as possible surrounding the crisis. Develop and maintain a fact sheet highlighting all known detail surrounding the crisis.
- Develop several key messages for each of the MCM stakeholders. Messages must –
 - be clear and simple for the stakeholders and the media
 - demonstrate concern about what is happening and for the people involved

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- explain what the company is doing to solve the problem
 - evolve as circumstances change but must always aim to restore and maintain confidence and calmness, balancing a sense of concern with resolve and action.
- iv. Draft follow-up statements as more significant information becomes available after discussion of the situation, anticipation of outcomes and exploring the company's view on the potential crisis in order to remain proactive and dispel the development of rumours and speculation.

Follow-up statements must be used in response to media enquiries

Prepare standby statements according to the unfolding events, and prepare background information for the media. Statements must be factual, not speculative and would typically include:

- i. facts surrounding the crisis;
- ii. the company's stand in response to the crisis;
- iii. what the company recommends the audience to do or not to do;
- iv. confirmation of who the official spokesperson is; and,
- v. contact details for media enquiries.

The statement must be disseminated as soon as possible to the Company board, management, employees and other stakeholders via various communication channels, and follow-up statements must be sent out to the Company stakeholders once they are in operation.

The Public Relations Department must keep the following in mind:

i. Control the flow of information

The ECCTT should control the flow of information by holding a series of press briefings for the media – weekly, daily or hourly, depending on the nature of the crisis to enable the Company to operate in a proactive manner, while providing the media with a timetable for when they can expect an update.

ii. Control the message

The Company should stick to the facts and to its main messages, thus controlling the nature of information being disseminated. This information should be completely truthful and forthcoming. All "bad" news should be told up-front and all at once in order to prevent it to trickle out slowly leading to protracted negative media coverage.

iii. Release information first internally

Whenever practical, attempts should be made to inform employees of crises before details are released externally. If needed, a public forum should be scheduled to communicate details of the incident and events to all employees, particularly those at the affected site. The timeliness of this meeting is critical and every effort should be made to ensure it occurs within three workdays from the occurrence of the crisis.

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iv. Respond to the media quickly and fairly

The media provides a way for the Company to get its message to the public. The media will also shape public opinion about how the company is responding to the crisis, and it is therefore important to cooperate with the media, to be sensitive to media deadlines and to provide all reporters with the same, not exclusive, information.

- Determine whether a news conference is an appropriate means of conveying information to employees, the media, public and other stakeholders. If so, it may become necessary to schedule periodic news briefings.
- Distribute press releases and statements to the news media as rapidly as possible.

Recommend strategies for internal and external communication. Final approval of the recommendations by the team will rest with the Chief Executive Officer.

Develop a plan to assist those who have been affected by considering what the company can do to help with, for instance, grief counselling, mental health services, support groups, memorial services, safety seminars, distribution of safety tips, and hotline numbers that provide information to family members.

Provide guidance to the public. If the crisis involves a health risk, relevant Company officials should research the risk and work in collaboration with external relevant health officials to offer guidance to the public about symptoms management including treatment and encourage them to contact Company and public health officials.

Implement, evaluate its effectiveness and update the plan continuously.

Step 5: After crisis evaluation

The CCCT concerned must determine when a crisis has ended and routine communications processes may be resumed.

The decision to declare the end of a crisis triggers a review of the manner in which the crisis was handled and how crisis communication may be improved.

The following steps must be included in the evaluation:

- Secure loose ends: the resolution of the crisis must be communicated appropriately to the audiences concerned. If changed, voice mail and web site must be updated and all media contacts must be double-checked for completed interaction.
- Recognising the heroes. The CCCT must work with employees to determine the best and most appropriate means of recognising the 'heroes' involved in the situation.
- Evaluate. The CCCT must meet within 10 days following a crisis and review all actions taken as a result of the crisis to determine effectiveness and efficiency of operations and make any necessary changes to this plan.
- View or read media coverage. The media coverage of the crisis must be reviewed to determine how each of the Company's actions was covered by the Press in order to improve media strategies. The Public Relations Department who

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documented and monitored the news coverage surrounding a crisis, including internet publicity, newspaper articles, radio and television broadcasts and social media must supply the CCCT with a summary of news coverage, and the CCCT must note:

- overall success or failure of the crisis communication effort
- problems to be avoided in the future
- appropriate follow-up measures
- Thank parties involved. Depending upon the nature of the crisis, services and assistance may have been rendered by agencies, companies or individuals from outside the company, and the Chief Executive Officer must ensure that applicable follow-up information and letters of appreciation are forwarded to the persons and institutions concerned.

7. Availability and review of this Protocol

This Protocol must be made available to all internal stakeholders. It will be evaluated and updated at least once every two years by the Public Relations Manager to ensure understanding of and commitment by all role-players to their responsibilities.

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Addendum 3: Website and Social Media Protocol

1. Protocol Statement

MCM recognises the importance and benefits of communicating through the Website and Social Media as powerful vehicles for disseminating relevant news to the Company's stakeholders; to listen to the voices of employees; to connect with its audience online; as an important tool for branding and promoting the public image of the company; and to build goodwill.

The Company encourages the use of the Website and Social Media platforms by its employees while accepting the responsibility to limit and avoid the significant risks involved to the privacy, security and reputation of MCM and employees wherever possible.

The Company's communication through the Website and Social Media must comply with its duty to protect and advance the values of the Company.

This Protocol, as part of the Communication Policy, contains the minimum standards and guidelines that must be followed by MCM through assigned staff on the Website and approved Social Media platforms on behalf of the Company and on private or individual employees' social media accounts in communications implicating the Company.

2. Objectives of the Protocol

There are five main objectives of this Website and Social Media framework: -

- i. ***To increase the understanding of stakeholders' issues*** and ensure that MCM can engage them accordingly. This enables MCM to effectively contribute to community development.
- ii. ***To ensure the MCM Website and approved Social Media platforms constitute the primary source of information on the Company.*** MCM believes that the immediacy, engagement and wide reach of the MCM Website integrated with MCM Social Media Channels is ideal to inform and communicate with members globally on an immediate, broad and non-conditional basis.
- iii. ***To engage with MCM audiences responsibly*** so that they in turn, have more meaningful interactions and feedback with the Company.
- iv. ***To learn and interact:*** The Company believes in the importance of open exchange of information and ideas between MCM and its stakeholders.
- v. ***To showcase or contribute:*** MCM as a corporate citizen makes important contributions to developing thriving and resilient local communities through basic infrastructure development, provision of water and sanitation facilities, running educational and health facilities and creating quality jobs for Zambians.

3. Creation and Administration of official MCM Website and Social Media accounts

i. MCM Website

- The Company Website shall be used as a central repository and reference point in all online communications. It will be used to highlight and actively solicit engagement in other channels, including social media.
- The Website is an active core collection of information and functionality for communicating with stakeholders to sell the Company brand.

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- The Website is part of an inter-connected chain of communications across multiple platforms, including social media which will be actively managed.
- The Company Website shall have the domain name and Uniform Resource Locator (URL) bearing the Company name.
- The Website shall have timely and constant up-to-date Company information.
- Any posting to the site from other departments should be approved by the Public Relations Manager.
- Departments should send any content for posting on the website through to the Public Relations Department.
- The Website design, development, hosting and maintenance services will either be done internally or by an external agency working in liaison with the Public Relations Department. The team managing the technical aspects of the Website must adhere to the following guidelines:
 - Any changes or posting to the website shall be approved by the Public Relations Manager.
 - The technical details and functionality of the Website shall be as detailed in the scope provided by MCM; including the security and other compliance requirements.

ii. Social media accounts

- The Public Relations Department is responsible for the creation and administration of the Company accounts on social media platforms.
- The Public Relations Manager, the Chief Services Officer and the Employee Relations Manager are the only authorised persons with access to the Company social media accounts. However, any posting will require approval from the Public Relations Manager prior to posting. Material and sensitive information will go through the approval process as per the Company Communication Policy.
- Only authorised persons with access to the Company social media accounts may use social media to interact, engage or comment on behalf of the Company.
- The Public Relations Officer may respond and address queries raised on the social media platforms that are generic in nature. Any sensitive topics will be referred to the Public Relations Manager.
- All official MCM social media accounts must adhere strictly to the Company Communication Policy and must include the name “MCM” in the account name.

The official MCM social media account will use the following wording in the “About us” or similar section of the account: *MCM reserves the right to remove members or comments that contradict the values of MCM or are detrimental to the good name, order, discipline or performance of the work of the Company or of any part of the Company, including any office bearer, supporter, member or employee thereof.*

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4. Guidelines on the use of the Website and Social Media channels

i. Building identifiable audiences

MCM will actively get people to connect with the Company via the Website and all Social Media platforms. The MCM Website and social media platforms will have strong imagery and strategic corporate messages that call on stakeholders to take action or accentuate the positive image of the Company.

ii. Online Digital Channels of Communication

The following are the key Social Media channels that MCM will use to disseminate its Company information apart from the Website and emails: -

- a) Twitter and Twitter advertisements
- b) Facebook and Facebook advertisements
- c) LinkedIn and advertisements
- d) Youtube
- e) Google Business Development

MCM has undertaken to establish these channels to build a brand voice/presence so that one piece of published information appears in multiple channels to maximise exposure and reduce costs. This will be done bearing in mind the appropriateness of the channels into which content can be channelled; namely databases and email systems, the Company Websites and Social Media platforms.

a. Twitter

MCM will have one Twitter account to be used for two reasons: to ensure **immediacy** of dissemination of news and as an **outreach** tool to drive traffic to its Website.

The hash tag for the publication of other information is #MCM# and this may be used in tandem with other hashtags for specific events or conversations from time to time.

Posting of content to this platform shall follow the Company Communications Policy guidelines.

b. Facebook

The main purpose of MCM's Facebook page is to **engage** with all of MCM's communities in an emotive and innovative way, be the interface of MCM for the common man, increase recognition and be social. The focus also includes educating followers on the Company's key developments and all key issues therein in general.

Facebook will not have the frequency of news events that the Company Twitter account will have or follow or post international or regional news unless it is directly relevant to the Company. Significant MCM press releases will be posted on Facebook.

MCM will not post any sector related news on Facebook unless the Company is responsible for it or unless it is directly related to the Company's projects and activities.

c. LinkedIn

MCM will use LinkedIn to establish a professional presence and **target** individually, persons and organisations of direct relevance to the business for professional

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networking purposes. It will also be used to position the Company as an industry leader and promote the business to all stakeholders as a Proudly Zambian-owned Mining Company.

MCM might post news to do with the Zambian energy and mining sectors to the page account where the information is not negative.

d. Google Business Development

MCM will use Google Business Development to establish a professional presence and increase traffic to its Website and other Social Media platforms by featuring in major search engines. The **target** is to make it easy for individuals and organisations of direct relevance to the business to find the Company's platforms for professional networking purposes.

e. YouTube

MCM will use YouTube to post videos about the Company developments and its innovations. Videos will be embedded into the Company Website. The Company Website will be associated with the YouTube channel to signify official representation of the brand on YouTube.

iii. Content Types

It is MCM's policy to use all possible media types to publish content. A selection of the media that may be used includes, but not limited to, the following:-

- a) Articles by professional journalists
- b) Audio and podcasts
- c) Branded email campaigns
- d) Infographics
- e) Internal PR releases
- f) Company presentations
- g) Professional photography
- h) Testimonials about Mopani from third parties
- i) Third party news of MCM on news and social media

As a minimum, MCM will seek to publish links and images with every interaction online and where possible include audio and video.

iv. Copyright

MCM will only upload content (including music, videos, and artwork) that it created or that it is authorised to use, to avoid any copyright violation.

v. Handling Criticism

MCM will not allow persistent misrepresentation of the Company and its employees to be published on the Company Website and Social Media channels. MCM will encourage healthy debate, and politely correct any misinformation that the stakeholder could have made about the Company or its brand. MCM will make sure that the stakeholder involved understands that the Company is going to address their complaints, and inform them of what the next steps would be.

MCM will acknowledge negative posts, criticism on any issue related to Company projects, products or services (and not delete these, save for disparaging comments).

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MCM will have empathy for the angry customer or stakeholder and try to understand their mind set and take them seriously.

Every effort will be made to ensure that they are assisted as quickly as possible.

vi. Offensive or inappropriate posts

MCM will consider removing any content that others might find offensive or threatening. All stakeholders will be requested to respect other people's views and beliefs and consider their impact on others when posting their comments. Where there is an offensive or clearly inappropriate post, MCM will refer back to the Social Media Terms and Conditions and give a warning. If the person continues they would be blocked. MCM will direct all abusive comments or serious user aggression to the proprietors or regulatory body of the Social Media platform.

vii. Commercial and spam posts

MCM will remove any posts that are obviously commercial or otherwise spam-like. The Company will discourage commercial entities passing themselves off as individuals, in order to post advertising materials or links.

viii. Dealing with misrepresentations about MCM

When misrepresentations are made about MCM by media or by the online community, MCM may use its Social Media channels to add comments on the original discussion — to point that out. This will always be done with respect by sticking to the facts.

ix. Hate speech

MCM will not tolerate racism, sexism, homophobia or any form of hate-speech or contributions that could be interpreted as such. MCM recognises the difference between criticising a particular government, organisation, community or belief and attacking people on the basis of their race, religion, sex, gender, political affiliation, tribe, disability or age.

x. Legal jeopardy

MCM will remove any posts that may put the Company in legal jeopardy, such as potential libellous or defamatory posts.

xi. Taking the conversation offline

In some instances (particularly where extended dialogue is involved or the issue debated is complex) MCM will not engage stakeholders publicly on the Website or Social Media but rather will redirect the conversation into an offline general discussion (by asking the community contact for their phone number or email so that they are engaged privately) to avoid any unnecessary public conflict.

xii. Rumours

Rumours about MCM that are posted in Internet chat rooms and Social Media are covered by this framework. Employees should not respond to rumours about MCM found in Internet or mobile phone chat rooms or Social Media. All rumours should be referred to designated Company spokespersons for appropriate action.

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xiii. Errors or omissions

MCM will honestly respond to its mistakes where necessary. If an error is made, MCM will be upfront about the mistake and correct it quickly using the same dissemination channels used to distribute the misinformation in the first place. If there is need to modify content that was previously posted, MCM will make it clear that it has done so.

5. Guidelines for the Official Website and Social Media Administrator

Only the mandated persons as per Company Communication Policy or their duly appointed nominees are authorised to communicate on the Company Website and Social Media platforms on behalf of the Company.

Employees of the Company who see a post that they think requires, or would benefit from, an official response, must be encouraged to inform the Public Relations Department about it, where possible accompanied by a screenshot of, and link to, the relevant content.

Comments and posts made by mandated persons on behalf of MCM must be for the sole purpose of:

- i. Advancing or articulating the official position of the Company on a particular subject;
- ii. Marketing and promoting the Company;
- iii. Conveying critical information during crisis situations; or
- iv. Engaging one-on-one with stakeholders in order to improve their experience with the Company.

The use of the Website and Social Media platforms for official communication purposes forms part of the Company's communications strategy and must comply with the Communication Policy and all its Addenda.

The Public Relations Department personnel are personally responsible for communications made by them on the Website and Social Media.

6. Monitoring of official Company Website and Social Media accounts

The Company reserves the right to monitor any online activity relating to the official Website and Social Media accounts and to remove inappropriate posts and material that contravenes this framework, or to block disruptive users and to require an employee to do so.

The Company reserves the right to edit or amend any misleading or inaccurate online content regarding anything concerning the Company or the MCM brand.

7. General principles on the use of employee's personal or private social media accounts in relation to MCM

Employees of the Company may not bring the name of MCM into disrepute through their conduct on social media, and must therefore keep in mind that –

- i. All contractual obligations, as well as the obligations incurred in terms of the policies of the company apply equally to conduct on social media;
- ii. On the Social Media platforms, one's affiliation with MCM is easily identified, known or presumed and one's online content is therefore readily associated with MCM;

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iii. Communication on Social Media is no different from other forms of communication where judgment, common sense and integrity is called for.

8. Specific principles governing employees

As soon as an employee leaves the Company, such person must remove all Social Media references to MCM as “current employer”.

Academic employees and topic experts wishing to provide commentary within their area of expertise on Social Media must be encouraged to engage in public debate and to provide commentary within their area of expertise, but notwithstanding their right to express their technical expertise or views without restriction, must, where the discussion, publication of findings or making of announcements may generate robust debate or interaction which may directly reflect on the Company, be encouraged to liaise with the Public Relations Manager first, in order to ensure effective coverage and to anticipate the type of publicity likely to result.

9. Availability and review of this Protocol

This Protocol must be made available to all internal stakeholders. It will be evaluated and updated at least once every two years by the Public Relations Manager to ensure understanding of, and commitment by, all role-players to their responsibilities.

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