Imagicaaworld Er	Communication Policy		
Document	Rev	Date	1 Olloy
	No		
HR Manual	01	01 January 2022	

# **COMMUNICATION POLICY**

# **SCOPE**

This Policy is applicable to all employees of **Imagicaaworld Entertainment Limited**, employees who are working under the contract of the Company and any third party contract employees.

## **PURPOSE**

**Imagicaaworld Entertainment Limited** strives to provide the public accurate and timely information, communicated in a professional manner, and in accordance with the laws regarding public information and data practices.

This policy provides guidelines for all communications using various mediums including:

- Printed materials such as newsletters, articles, and brochures.
- Electronic materials such as email, postings to web sites or social media sites.
- Media relations such as requests for interviews, news releases, and media inquiries.

This Policy applies to all employees, directors, officers, consultants and contractors. Any violation of this Policy should be brought to the attention of Management and may constitute grounds for termination of employment.

The Company also recognizes that employees may sometimes comment on matters outside of their official role as an employee of the Company. Therefore, this policy also provides guidelines for employees when communicating on matters pertaining to Company and its business.

### **GENERAL**

It shall be the Company's policy that all Communications with all internal and external 'Parties' comply with applicable law, and that Material, Non-Public Information of the Company be Publicly disseminated in an exclusive and selective way.

Only an Authorized Spokesperson shall engage in discussions about the Company with "Third Parties". No other individual/employee shall be authorized to speak on behalf of the Company. Any employee who is contacted by a "Third Party" must refer the "Third Party" to an Authorized Spokesperson.

Specifically, no employee or contractor, other than an Authorized Spokesperson, may communicate information of the Company to any outside party. This will typically be a released through email, press/media or conference call.

Occasionally, employees may be contacted by outside sources or the media requesting information about the Company or its Employees, Directors or Officers or Operations. In order to avoid providing inaccurate, incomplete or Material Information to outside sources, all outside inquiries regarding the Company or its Employees, Directors or Officers or Operations must be referred to an Authorized Spokesperson. Only an Authorized Spokesperson is authorized to make or approve public statements pertaining to the Company or its Employees, Directors or Officers or Operations.

Whenever an Authorized Spokesperson is uncertain about this Policy or Laws, the Authorized Spokesperson may consult with Legal department to insure compliance.

Imagicaaworld E	Communication Policy		
Document	Rev	Date	1 Olicy
	No		
HR Manual	01	01 January 2022	

An Authorized Spokesperson shall adhere to the principles set forth in this Policy and shall not disseminate information without the explicit prior approval of the Chairman, Company's Chief Executive Officer and Chief Operations Officer..

Photography and sharing of information by employees relating to Company Related information (including incidents/accidents or any negative impact event inside and outside the **Imagicaaworld Entertainment** facility but affecting AEL) is strictly prohibited.

Circulation of internal Company documents, photographs, internal communications towards Incidents/Accidents, Training, Briefing and/or conversation shall be termed as violation of this Policy and shall attract disciplinary action and/or including Civil proceedings as per Law.

# **GENERAL GUIDELINES FOR ALL COMMUNICATIONS (OFFICIAL AND PERSONAL)**

All employees have a responsibility to help communicate accurate and timely information in a professional manner towards <u>their job related information only</u>. Regardless of whether the communication is in the employee's official role or in a personal capacity, employees must comply with all laws related to compliance. Employees must follow all policies that may apply.

Examples of relevant policies include:

- **Technology and Computer Use Policy.** The Company reserves the right to inspect any electronic data on the computer or related system. This policy shall be complied with in full.
- Respectful Workplace Policy. Employees cannot publish information that is discriminatory, harassing, threatening, or sexually explicit. This policy shall be complied with in full.
- **Data Practices Policy.** Employees cannot disclose private or confidential information and must route data practices requests to the responsible authority. This policy shall be complied with in full.
- Political Activity Policy. Employees cannot use Company resources or participate in
  personal political activity while on duty or while discharging Company responsibilities. No
  employee may act in a manner that suggests that the Company either supports a
  particular candidate or political issue, or endorses the personal political opinions of the
  employee. This policy shall be complied with in full.

### ADDITIONAL GUIDELINES FOR OFFICIAL COMMUNICATIONS

## **Handling General Requests**

All employees are responsible for communicating basic and routine information <u>in relation only</u> <u>to their specific job duties</u>. Requests for private data or information outside of the scope of an individual's job duties shall not be encouraged.

### **Handling Media Requests**

With the exception of routine events and basic information that is readily available to the public, all requests for interviews or information from the media are to be routed through reporting Head.

Media requests include anything intended to be published or viewable to others in some form such as television, radio, newspapers, newsletters, and web sites.

Imagicaaworld Entertainment Limited			Communication Policy
Document	Rev	Date	1 Olloy
	No		
HR Manual	01	01 January 2022	

When responding to media requests, employees should follow these steps:

- 1. If the request is for routine or public information (such as Park timings) provide the information and notify reporting Head of the request.
- 2. If the request is regarding information about Company personnel, potential litigation, controversial issues, and any opinion on a Company matter, or if you are unsure if it is a "routine" question, forward the request to the reporting Manager. An appropriate response would be, "I'm sorry, I don't have the full information regarding that issue. Let me take some basic information and submit your request to the appropriate person who will get back to you as soon as he/she can"
- 3. Ask the media representative's name, questions and contact information.

## Communicating on behalf of the Company

The Directors, CEO, COO and Company Nominated Communications Officer are authorized to communicate on behalf of the Company in interviews, publications, news releases, on social media sites, and related communications.

Other employee may represent the Company <u>only if approved</u> by the Chairman, Director's to communicate on a specific topic.

When speaking on behalf of the Company:

- Employees must identify themselves as representing the Company
- All information must be respectful, professional and truthful. Corrections must be issued when needed.
- Personal opinions generally don't belong in official Company statements.
- One exception is Communication related to promoting a Company service. For example, if an employee posted on the Facebook page, "My family visited the Park this weekend and really enjoyed the new band shelter". Employees who have been approved to use social media sites on behalf of the Company should seek assistance from the Head of Department on this topic.

Employees need to notify; if they will be using their personal technology (cell phones, home computer, cameras, etc) for Company business. Employees should be aware that the data transmitted or stored may be subject to the data practices Act.

No Company data shall be shared with any 'Third Party' either through social media or email.

# ADDITIONAL GUIDELINES FOR PERSONAL COMMUNICATIONS

It is important for employees to remember that the personal communications of employees may reflect on the Company, especially if employees are commenting on Company business.

The following guidelines shall apply to personal communications including various forms such as social media (Facebook, Twitter, blogs, YouTube, etc), letters to the editor of newspapers, and personal endorsements.

• Remember that what you write is public, and will be so for a long time. It may also be spread to large audiences. Use common sense when using email or social media sites. Refrain from sending or posting information on Social Media and Websites.

Imagicaaworld Entertainment Limited			Communication Policy
Document	Rev	Date	1 Olloy
	No		
HR Manual	01	01 January 2022	

- The Company expects its employees to be truthful, courteous and respectful towards supervisors, co-workers, Guests and other persons associated with the Company. Do not engage in name-calling or personal attacks.
- Do not publish something related to Company business.
- Company resources, working time, or official Company positions cannot be used for Personal Profit or Business Interests, or to participate in personal political activity.
- Personal social media or email names should not be tied to the Company name.

# **INDIRECT COMMUNICATIONS: CHAT ROOMS**

- Any communication shall constitute a violation of this Policy if made directly and/or indirectly by any employee to any outside party.
- No employee shall contribute to or participate in "chat rooms" or similar online forums
  with respect to companies engaged in business to the extent any such information or
  any other party is gained as a result of the employee's relationship with Company or any
  other insider.

The posts in these forums may contain misleading or unsubstantiated information and may be made by unsophisticated investors who are poorly informed. Accordingly, no employee shall discuss the Company or Company-related information in such a forum.

Posts in these forums can result in the disclosure of Material Nonpublic Information and may bring significant legal and financial risk to the Company and are therefore prohibited.

### **VIOLATION OF THIS POLICY**

Selective disclosure of Material, Nonpublic Information in any forum other than the approved methods listed above, and by any individual other than an Authorized Spokesperson, and without the approval of the Directors, Chief Executive Officer or Chief Operations Officer is considered a violation of this Policy and may be considered a violation of Company Laws.

Violation of this Policy may result in immediate termination of employment and/or potentially a Civil enforcement action against the individual offender.