



COMMUNICATION POLICY
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3.0	8 th June 2026	Kinta Petonia – HOD Marketing Adwoa Yeboah- Comms. Officer	New template update

Company

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1. Introduction

BCM recognizes the importance of effective, timely communication internally and externally by the organization. The policy's objective is to promote transparency, clarity, and consistency in communication to foster a culture of open communication, collaboration and trust in the organization, its shareholders and the wider investment community.

1.1 Scope

This policy applies to all BCM employees, directors, officers of Management, and stakeholders.

1.2 Compliance Policy

This Policy is supplemented by guidance and training that support the internal processes for identifying relevant information and its prompt distribution, and for managing BCM's disclosure obligations.

Failure to comply with the Policy may lead to a breach of applicable disclosure rules or other regulations which may result in BCM incurring liability, and cause directors or other officers in BCM to incur personal liability. Disciplinary action, including dismissal in serious cases, may be taken against any person who fails to comply with the Policy. For more details on the disciplinary measures please refer to the employee handbook.

2. Communication Channels

Effective communication is a key to the success of BCM and to ensure that information is shared efficiently and effectively, we use a variety of communication channels to reach different audiences and convey different types of messages. This policy outlines the purpose, guidelines, and best practices for using each of these communication channels, as well as expectations for responsiveness, confidentiality, and data security.

2.1 Internal

Internal communication channels such as emails, team or departmental meetings and company-wide announcement e.g. the dissemination of information to all staff that are of fundamental significance to the day-to-day operation of BCM, including:

- a) reports
- b) newsletters
- c) minutes of meetings
- d) memos

- e) financial statement, etc.

2.2 External

External communication channels such as:

Website: all significant information released to the public will be posted in the press release section of BCM website at www.bcm-group.com. The Management may opt to publish significant information like press release via other channels such as newspapers, TV and radio stations.

Social media accounts (X, LinkedIn, Facebook, Instagram): promotional information will be released to the public via these social media accounts to create awareness and increase the company's positive exposure on the internet e.g. banners for days of observances and other public relations events (community engagement, events and sponsorships).

2.3 Details on Communication Channels

2.3.1 Internal Channels

Email:

- **Do:** It is appropriate to use clear and concise subject lines, prioritize urgent emails, and include relevant attachments when sending emails.
- **Don't:** Ignoring emails, using email for non-essential information, use jargon or slang, or forget to proofread.

Team / Departmental Meetings:

- **Do:** Prepare agendas, encourage active participation, summarize action items, share updates, discuss challenges, and coordinate objectives.
- **Don't:** Dominate discussions, interrupt others, raise your voice or being emotional, fail to follow upon tasks, use meetings for gossip, criticize colleagues or neglect to take minutes.

Company-wide Announcements:

- **Do:** Use clear and concise language, provide context, and include relevant details.
- **Don't:** Communicate trivial information, use jargon or slang, or reply to all users unnecessarily.

Intranet:

- **Do:** Keep content up to date, organize information logically, and use clear subject folder.

- **Don't:** Post sensitive information, edit or remove content without permission, neglect to update content.

2.3.2 External Channels

Social media:

- **Do:** Share engaging content, respond promptly to inquiries, use relevant hashtags.
- **Don't:** Post inappropriate content, engage in online arguments, neglect to monitor comments, and avoid publishing misleading information.

Press Release:

- **Do:** Use clear and concise language, provide relevant details, and include contact information.
- **Don't:** Overuse jargon, neglect to proofread, or fail to follow up with media outlets.

Customer Communications:

- **Do:** Respond promptly, use clear and concise language, provide all relevant information, ensure compliance with clients' requirements, provide consistent follow-ups.
- **Don't:** Overuse automated response, neglect to follow up, or provide inaccurate information.

Public Relations:

- **Do:** Build relationships with media representatives, provide timely responses, and offer expert insights.
- **Don't:** Pitch irrelevant stories, neglect to follow up, or engage in spin or manipulation.

By following these dos and don'ts, BCM can effectively utilize each channel to achieve our communication goals or objectives.

2.4 Guiding Principles

Clarity: use clear, concise language to disseminate messages and avoid ambiguity and jargon.

Consistency: maintain a consistent tone, style and branding.

Transparency: share information openly and accurately.

Inclusivity: encourage diverse perspectives and participation.

Timeliness: communicate promptly, meeting deadlines and expectations.

3. Authorized Spokespersons

In order to ensure that the public, regulators, newsletter writers and the media receive consistent and accurate information, only the Chief Executive Officer, or a person specifically authorized by the Chief Executive Officer (Authorized Spokesperson), may serve as an Authorized Spokesperson to speak on behalf of the Company. The Chief Executive Officer may, from time to time, designate others within the Company with authority to speak on behalf of the Company as back-ups, or to respond to specific inquiries. Persons who are not Authorized Spokespersons must not respond under any circumstances to inquiries from the public, the media or other people unless specifically requested to do so by an Authorized Spokesperson. All information and /or inquiries made to non-designated spokespersons shall be initially referred to an Authorized Spokesperson.

3.1 Responsibilities

Heads of Departments are responsible for ensuring that their team members are aware of and understand the communication policy. They must provide guidance and support to their team members to ensure that they are implementing the policy effectively. This includes providing regular feedback and coaching, addressing any communication-related issues that arise, recognizing and rewarding excellent communication practices. Heads of Departments are also responsible for ensuring that their department's communication practices align with the company's overall communication strategy and policy.

Staff members are responsible for adhering to the communication policy in their daily work. This includes being aware of and following the guidelines and procedures outlined in the policy, being mindful of their tone and language in all forms of communication, and to be professional in all interactions with colleagues, public and stakeholders. The staff members' responsibilities are to report any communication-related issues or concerns to their supervisors or the communication team, and to suggest improvements to the communication policy and practices.

Executive Board role is to set the tone and direction for communication within the company by leading an example in demonstrating excellent communication practices and promoting the culture of openness, transparent, and respectful communication. The Executive Board is also responsible for ensuring that the communication policy coincides with the company's overall

strategy and objectives to provide the necessary resources and support to implement the policy effectively.

3.2 Confidentiality & Data Protection

We will communicate openly and transparently with the public within the bounds of commercial confidentiality. We will protect confidential information from improper disclosure, and any authorized communication of confidential information should be limited to relevant individuals to carry out their work, ensuring that private information about clients, employees, partners and our company is well protected.

Our communications are expressions of our strategy, identity and values. You must ensure the accuracy of any information released. You must ensure that all communications are conducted appropriately in line with procedures, policies, established standards and directives. Communication conducted in an inappropriate, untruthful or indifferent manner poses a grave risk to our reputation and its compliance with BCM's Code of Conduct and the rest of this policy, and they may expose the company to legal liability.

Examples of confidential information are:

- Employee records
- Unpublished financial information
- Data of customers/partners/vendors
- Customers list (existing and prospective)
- Unpublished goals, forecasts and initiatives marked as confidential

As part of our hiring process, we may ask you to sign non-compete and non-disclosure agreements (NDAs.) We are also committed to:

- Restrict and monitor access to sensitive data.
- Develop transparent data collection procedures.
- Train employees in online privacy and security measures.
- Build secure networks to protect online data from cyberattacks.
- Establish data protection practices (e.g. secure locks, data encryption, frequent backups, access authorization.)

We also expect you to act responsibly when handling confidential information. You must:

- Lock or secure confidential information at all times.

- Shred confidential documents when they're no longer needed.
- Make sure you view confidential information on secure devices only.
- Only disclose information to other employees when it's necessary and authorized.
- Keep confidential documents inside our company's premises unless it's absolutely necessary to move them.

You must not:

- Use confidential information for your personal benefit or profit.
- Disclose confidential information to anyone outside of our company.
- Replicate confidential documents and files and store them on insecure devices.

This policy is important for our company's legality and reputation, and we will terminate any employee who breaches our confidentiality guidelines for personal profit. We may also discipline any unintentional breach of this policy depending on its frequency and seriousness.

We will terminate employees who repeatedly disregard this policy, even when they do so unintentionally. For more details on the disciplinary measures, please refer to the employee handbook.