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STAKEHOLDER COMMUNICATION POLICY

2026

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1. GENERAL DEFINITIONS

Definitions and Abbreviations

Definitions

In this Policy, unless the contrary is indicated,

a) 'Material information' means any information that is likely to affect investor decision-making and the market price of securities.
b) 'Company' means Longhorn Publishers Plc and its subsidiaries.
c) 'Board' means the Board of Directors as constituted under the Company's Articles of Association.
d) 'Stakeholder' means all those with interests in an organization; for example, as shareholders, employees, suppliers, customers, or members of the wider community (who could be affected by environmental consequences of an organization's activities)
e) 'Employee' means any person employed by the Company for wages or salary or on a permanent or fixed term employment contract.
f) *'Shareholder'* means an owner of shares in the company.
g) *'Stakeholder'* means an individual or a group of individuals with an interest, often financial, in the success of a business.
h) *'Regulator'* means a governing body or agency that sets policies for how businesses operate within their jurisdictions.
i) *'Author'* means a person who writes books or the person who wrote a particular book.
j) *'Competitor'* means a person or an organization that competes against others, especially in business.
k) *'Supplier'* means a person or company that sells or supplies something such as goods or equipment to customers.

ABBREVIATIONS

NSE : Nairobi Securities Exchange
CMA : Capital Markets Authority
GMD/CEO: Group Managing Director/Chief Executive Officer
COO: Chief Operations Officer

2. Introduction

Longhorn Publishers PLC is committed to ensuring effective, transparent, and compliant communication across all levels of the organization. This Communication Policy aligns with regulatory requirements, including the Data Protection Act, 2019, and Capital Markets Authority (CMA) regulations, to ensure responsible disclosure, protection of stakeholder interests, and confidentiality where applicable.

With increasing scrutiny on corporate governance and information dissemination, Longhorn Publishers PLC has established this policy to provide clear guidelines on how internal and external communication should be handled. This structured approach aims to mitigate risks related to misinformation, enhance regulatory compliance, and foster a culture of transparency and accountability in corporate communications.

2.1 Policy Statement

Longhorn Publishers PLC is committed to upholding high communication standards that ensure accuracy, compliance, and integrity. This policy governs the dissemination of information to stakeholders, including shareholders, regulators, employees, customers, and the public. It establishes a framework for responsible communication, ensuring that all disclosures align with corporate governance principles and applicable legal requirements.

2.2 Policy Purpose

The purpose of this policy is to provide clear communication guidelines that promote transparency, protect confidential information, and ensure compliance with relevant regulatory and legal standards. It aims to:

a) Define the responsibilities of key personnel in internal and external communication.
b) Establish protocols for handling material information and confidential data.
c) Mitigate risks associated with misinformation, regulatory breaches, and data security.
d) Ensure the protection of stakeholder interests through accurate and responsible disclosures.

2.3 Policy Scope

This policy applies to all employees, board members, and third parties acting on behalf of the company in internal and external communications, including but not limited to:

- Press releases and public announcements
- Social media interactions
- Investor relations and financial disclosures
- Internal memos and email communication
- Customer and vendor communication

All individuals covered under this policy must adhere to its principles, ensuring that communication is factual, consistent and compliant with regulatory requirements.

2.4 Policy Objectives

i. Ensure transparent communication. Facilitate timely and accurate communication with all stakeholders, maintaining consistency and credibility.
ii. Protect confidentiality and integrity. Safeguard sensitive corporate information and prevent unauthorized disclosures.
iii. Regulatory compliance. Ensure adherence to CMA regulations, the Data Protection Act, 2019, and other applicable laws.
iv. Mitigate communication risks. Prevent misinformation, data breaches, and unauthorized disclosures that may impact company reputation and regulatory standing.
v. Enhance internal and external coordination. Establish structured channels for communication within the organization and with external stakeholders.

3. Communication Principles

3.1 Transparency and Accuracy

All communications must be factual, accurate, and in line with the company's business objectives. Misleading, exaggerated, or false information is strictly prohibited.

3.2 Compliance with the Data Protection Act, 2019

- Personal data collected and processed by the company must be handled lawfully, fairly, and securely.
- Consent must be obtained before collecting and sharing personal data, except in cases permitted by law.
- Employees handling personal data must undergo training on data privacy and security practices.
- Data subjects have the right to access, correct, and request deletion of their data.

3.3 Compliance with regulatory requirements

- All material information affecting share value must be disclosed to investors in a timely manner. Insider trading and unauthorized disclosure of confidential information are prohibited.
- Any corporate announcements must be approved by the board of directors before release.

3.4 Internal Communication

- Official communication channels (emails, internal portals, and meetings) must be used for internal discussions.
- Employees must refrain from sharing confidential information externally without authorisation.
- Access to employee personal information is restricted to authorized personnel only. Employee data shall be used solely for legitimate business purposes and stored securely with appropriate encryption.

- Internal communications containing personal data must be marked as confidential and sharing of employee information requires prior consent from the affected individual
- Employees must use corporate email accounts for all work-related communications

3.5 External Communication and Media Relations

In order for the Company's communications to live up to the Company's policies and goals, it is essential that the Company's spokespersons are those individuals with the best expertise and overview. Only designated spokespersons are permitted to issue statements on behalf of the Company. The Designated Spokespersons of the Company are the Chairman of the Board and the GMD/CEO. The spokespersons must have access to relevant information about the Company's position and performance and about their particular areas of expertise. They must also be fully familiar with the rules and standards concerning information as outlined by the Capital Markets Authority (CMA) and the Nairobi Securities Exchange (NSE).

The Chairman of the Board of Directors may issue statements on pertinent issues arising from the Board's responsibility for ownership issues, strategies, nominations, appointments, compensation, and corporate governance of the Company and its subsidiaries. Other Board members are not expected to make statements on behalf of the Company without prior consultation with and approval from the Board Chairman.

The GMD/CEO is the principal spokesperson for the Company on Company-wide matters, including but not limited to the Company's financial position, business strategies, market assessments and competition analysis.

Social Media Policy

- Employees must distinguish personal opinions from official company statements. In such cases, the employee concerned must state clearly that his/her statement is from a personal viewpoint, and does not necessarily reflect the views or opinions of the Company or Management.
- Sharing sensitive or confidential company information on social media is strictly prohibited.
- The company reserves the right to monitor and take necessary action on social media violations.

4. Co-ordination

In order for the Chairman and the GMD/CEO to be able to act with authority as spokespersons for internal and external communication, it is essential that these individuals are kept informed about pertinent activities in all parts of the Company and the Group, and about questions originating from external stakeholders. This procedure helps to ensure high-quality communication and identifies where in the organization the ultimate responsibility for information lies.

Board members and Management are informed about Group and industry news and about articles and features in external media through reports from the Company's

Departments and via news coverage services and the Intranet.

5. Disclosure of Material Information

5.1 Determination of whether information is material

Information about the Company is considered to be material if it has a significant effect or would reasonably be expected to have a significant effect on the market price of the Company's securities.

5.2 Method and content of disclosure of material information

The Company shall disclose all material information to external stakeholders as soon as practicable after the event giving rise to the material information has occurred. All material information shall be disclosed via press releases as approved by the Capital Markets Authority. The material information shall also be posted on the Company's website.

The press release shall include sufficient information to enable external stakeholders to understand the nature and timing of the event giving rise to the material information as well as to allow such stakeholders to make an informed assessment of the effect of the material information on the market price of the Company's securities.

Material changes concerning the Company must be reported in accordance with the Capital Markets Authority regulations.

6. Responsibility for Disclosure of Material Information

The Chairman of the Board and the GMD/CEO shall have responsibility for the disclosure of material information. These individuals have responsibility for the disclosure of material information because, by virtue of their positions within the Company:

a) They are completely familiar with the operations of the Company;
b) They are continuously up-to-date on pending material developments within the Company; and
c) They have sufficient understanding of the disclosure regulations to enable them to determine whether information is material and hence requires disclosure.

The Chairman and the GMD/CEO are the only individuals authorized to communicate with analysts, shareholders and other stakeholders regarding the material disclosed by the Company. By establishing this restriction, the Company ensures that:

a) A consistent message is delivered to external stakeholders regarding Company matters;
b) Only information authorized to be disclosed to external stakeholders is disclosed; and
c) Selective disclosure of material information is avoided.

In certain circumstances, the Chairman and the GMD/CEO may, on a case-by-case basis, delegate their responsibility for external communication to other suitably qualified individuals within the Company. However, without such explicit delegation, external communication is restricted to the Chairman and the GMD/CEO.

Where a press release contains information based on the Company's financial statements prior to the release of such statements, such press release should first be reviewed by the Audit and Risk Committee and thereafter, its release should be sanctioned by the Board of Directors.

7. Material Information

It is not possible to define all categories of material information. However, information should be regarded as material if there is a reasonable likelihood that it would be considered important to an investor in making an investment decision regarding the purchase or sale of the Company's securities.

While it may be difficult under this standard to determine whether particular information is material, there are various categories of information that are particularly sensitive and, as a general rule, should always be considered material. Examples of such information may include:

- Financial results i.e. annual and half year results, and related commentaries
- Significant corporate events, such as a pending or proposed merger, joint venture or tender offer, a significant investment, the acquisition or disposition of a significant business or asset.
- Earnings and dividends of an unusual nature;
- The acquisition or loss of a significant contract;
- A significant new product or discovery or product announcements of a significant nature;
- Change in control or significant change in management;
- The public or private sale of a significant amount of additional securities;
- A significant labour dispute or lawsuit against the Company;
- Establishment of a programme to make purchases of the Company's own shares;
- A tender offer for another listed company's securities;
- A significant alteration of the memorandum and articles of association of the Company;
- Peculiar circumstances that may prevail with respect to the Company or the relevant industry;
- Creation of significant financial obligations or significant changes in financial obligation;
- Impending bankruptcy or financial liquidity problems;
- Significant legal or regulatory developments, whether actual or threatened;

8. Press releases

The Company will issue press releases from time to time to disclose information that is important or of use to the public. Press releases will be prepared and reviewed in accordance with the Company's established practices, including review by the Company's Auditors, Company Secretaries and Legal Counsel, if appropriate. Press releases will be approved by and issued under the supervision of the Board of Directors, GMD/CEO and COO, as may be deemed appropriate.

9. Competitor information

No employee shall discuss financial or operational information about competitors. A

Designated Spokesperson should say that the Company does not comment about its competitors and suggest that the Third Party call the competitor directly.

A Designated Spokesperson may discuss market share figures and facts from competitors' earnings announcements.

10. Rumors

No employee may comment on rumors. A Designated Spokesperson is permitted to state that the Company has a policy against commenting on rumors.

11. Confidentiality And Information Security

- All employees must sign a confidentiality agreement upon joining the company.
- Internal documents and unpublished financial reports should only be accessible to authorized personnel.
- Secure communication tools must be used for transmitting sensitive information.

12. Non-Compliance And Disciplinary Action

Violations of this policy may result in disciplinary action, including termination of employment or legal action. Employees are encouraged to report any breaches or suspected violations to the GMD/CEO.

13. Policy Review and Amendments

This policy shall be reviewed annually or as required to reflect changes in regulations and best practices. Amendments shall be approved by the Board of Directors and communicated to all employees.

Appendix 1

INTERNAL COMMUNICATION

a) Purpose

The purpose of the Company's internal communication is to contribute to the Company's business objectives. It shall provide open and explanatory information aimed at informing employees of the Company's development, enhancing their knowledge of values, business objectives and strategies in order to strengthen their commitment, motivation, loyalty and sense of responsibility.

b) Principles

Internal communication at Longhorn Publishers PLC shall contribute to the Group's business objectives. To this end, internal communication shall maintain a high standard, encourage two-way dialogue at all levels and develop possibilities for employees to give feedback and to be part of an open, inclusive communications climate.

c) Responsibility

The GMD/CEO and the respective Heads of Department, bear the primary responsibility for creating an open communication culture that conforms to the Company's core values and Code of Conduct and has the necessary organization and resources for distributing relevant information to employees.

d) Classification of Information

Information within the company is classified into the following categories:

- Public Information: Data that can be freely shared both internally and externally.
- Internal Use Only: Information intended for employees but not the public.
- Confidential Information: Sensitive data limited to specific departments or individuals with authorized access.
- Highly Confidential Information: Critical information with access restricted to executive leadership, board members, or specific personnel with clearance.

e) Access Control & Communication Guidelines

- General Employees: Have access to public and internal-use-only information required for their roles.
- Departmental Access: Confidential information is shared on a need-to-know basis within relevant departments.
- Executive & Leadership Access: Highly confidential information is accessible only by senior executives, legal, finance, and other key personnel.
- Board & Regulatory Access: Specific financial, legal, and strategic communications are restricted to the board and relevant regulatory bodies.
- Investor Relations & Public Disclosures: Only authorized spokespersons (Chairman, GMD, COO/CFOO) may communicate material company information externally, in compliance with stock exchange regulations.

f) Communication Methods & Security

- Email & Messaging: Employees must use company-provided communication tools with appropriate access restrictions.
- Meetings & Discussions: Sensitive information should be discussed in

secured, access-controlled environments.

- Document Sharing & Storage: Confidential files must be stored in secure company systems with controlled permissions. The confidential files should have a list of who should have access to the information.
- Remote Communication: Employees must use secure VPNs and company-approved devices for accessing confidential information outside office premises.

g) Confidentiality & Legal Compliance

- Employees must adhere to insider trading laws and avoid unauthorized disclosure of material, non-public information.
- Breaches of confidentiality will be subject to disciplinary action, up to and including termination and legal consequences.
- All communication activities must comply with regulatory requirements, including disclosure obligations under the CMA and NSE.
- Employees must undergo training on communication protocols, data privacy, and information security best practices.

Appendix 2

EXTERNAL COMMUNICATION

1. Investor Relations

Purpose
The purpose of Investor Relations is to keep the capital markets, which includes present and potential investors, the general public and relevant regulatory authorities, continuously informed about pertinent Company information.

The information provided by Investor Relations also serves to broaden knowledge of and interest in the Company and thereby improve liquidity in trading of the Company's share, reduce risk from information deficits, and facilitate the raising of capital in the equity and debt markets when desired.
For the time being and unless otherwise informed, the role of Investor Relations will be performed by the GMD/CEO.

Target groups
Target groups are current and potential shareholders, current and potential creditors, stockbrokers, financial analysts, financial and market journalists, the Capital Markets Authority (CMA) and the Nairobi Securities Exchange (NSE).

Principles
The information disclosed by the Company concerning its financial position and development shall at least meet the minimum requirements prescribed for companies listed on the Nairobi Securities Exchange (NSE). The following principles apply:

a) *Reliability* - All information to the capital markets shall be factual and correct, and must not be misleading in any way
b) *Speed* - All information shall be issued as quickly as possible, so that the Company always retains the initiative to issue first-hand news
c) *Simultaneity* - All information to the markets shall be conveyed to the relevant regulators including the NSE and the CMA simultaneously
d) *Long term, consistent and proactive* – the Company shall always give correct and pertinent information to the capital markets in order, as far as possible, to avoid surprises that could reduce market trust in the Company and have a negative impact on the Group's capital market relations. Information must be fact-based and not speculative.
e) *Pre-approval* – Some information to be released by way of press notices must be pre-approved by the Capital Markets Authority prior to release.

2. Communication with Shareholders

Company position
The Company pursues the fundamental principles of making fair disclosure of information to shareholders and conducting frank communication with shareholders.

The Board of Directors of the Company is responsible for maintaining an on-going dialogue with shareholders, and regularly reviewing the Communication Policy to

ensure its effectiveness.

The Company maintains a policy on frank communication and aims to deliver information to shareholders and investors through various channels which include the Company's financial reports (including interim and annual reports), annual general meetings and other extraordinary general meetings that may be convened as well as by making available on the Company's website all the disclosed information submitted to the Capital Markets Authority and the Nairobi Securities Exchange, the Company's pertinent communications and other Company's publications.

Communication channels

a) Shareholders are encouraged to participate in general meetings or to appoint proxies to attend and vote at meetings for and on their behalf if they are unable to attend the meetings.
b) There shall be appropriate arrangements to encourage shareholders' participation in general meetings.
c) The Company shall monitor and regularly review procedures for general meetings and, if necessary, changes will be made to ensure that shareholders' needs are best served.
d) Members of the Board of Directors of the Company, the Senior Management team, the Company Secretary and the External Auditors are required to attend annual general meetings to answer shareholders' questions.
e) According to the relevant provisions of the Articles of Association of the Company, notices of general meetings shall be dispatched to shareholders no less than 21 clear days prior to the date of the meeting together with relevant circulars and meeting materials.

Corporate Communications

a) Corporate Communications will include but are not limited to (i) Annual Reports which contain among others, the directors' and auditors' reports, (ii) any interim financial reports and related commentaries, (iii) Notices of general meetings and related proxy forms (iv) circulars to shareholders to explain/support resolutions being proposed at general meetings.
b) Corporate Communications should be made available to the Shareholders in a timely manner.
c) Shareholders shall receive the Corporate Communications either in the printed form or through electronic means or through press announcements.
d) Shareholders are encouraged to provide to the Share Registrar of the Company, amongst other things, their contact details including telephone contacts and email address in order to facilitate timely and effective communication.

Shareholders' enquiries

a) Shareholders shall raise queries regarding their shareholdings with the Company's Share Registrar.
b) Shareholders and investors may at any time request the Company's public information from the Company, the Company Secretary or the Company's Share Registrar. The Company provides an enquiry line and a designated email address for shareholders to raise any query.

The Company's website

a) A dedicated "Investor Relations" section is available on the Company's website

i.e longhornpublishers.com.

b) Pertinent information submitted by the Company to the Capital Markets Authority and the Nairobi Securities Exchange shall be posted on the Company's website immediately thereafter. Such information includes financial statements, results announcements, circulars and notices of general meetings and relevant explanatory documents, (if any) and any other information required to be published under the Capital Markets Regulations from time to time.
c) Press releases and newsletters issued by the Company from time to time are also available on the Company's website.
d) Information on the Company's website is updated on a regular basis.

Ongoing communication with shareholders

In order to facilitate communication between the Company and the shareholders, the Company will organize various activities regularly including:

a) Inviting shareholders to participate in the Company's results announcement briefings and roadshows;
b) Organizing site visiting tours;
c) Holding one-on-one meetings and conference calls with shareholders; and
d) Participating in investors summits or annual conferences held by relevant organizations.

Shareholders privacy

The Company recognizes the importance of protecting shareholders' privacy and will not disclose shareholders' information which is not in the public domain without their prior consent, unless required by law.

Authors and Customers

a) Personal data collected from authors (e.g., contact details, payment information, and manuscript submissions) will only be used for purposes such as contract fulfillment, payment processing, and correspondence.
b) Manuscripts submitted by authors will be handled with the utmost confidentiality and only shared with relevant internal personnel or contracted editors under confidentiality agreements.
c) Reader feedback or survey data will be anonymized unless specific consent is given to attribute it to an individual.

Marketing and Promotions

Direct marketing communication (e.g., email newsletters) will only be sent to individuals who have opted in. Recipients can opt out of marketing communications at any time.

Third-Party Sharing

Data will only be shared with third parties (e.g., printers, distributors) for agreed purposes and in compliance with the Data Protection Act. Third parties must sign data-sharing agreements to ensure they adhere to the Data Protection Act's requirements for data protection.

Responding to Data Subject Requests

Under the Data Protection Act, individuals have the right to:

a) Access Personal Data:

- Requests for data access must be submitted in writing to Longhorn Publishers.
- Responses will be provided within 30 days, barring exceptional circumstances.

b) Request Correction or Deletion:

- Individuals may request corrections to inaccurate data or deletion of their personal data, unless retention is required by law.
- Corrections or deletions will be confirmed within 14 days.

c) Object to Processing:

- Data subjects may object to their data being used for direct marketing or other specified purposes.
- Objections will be addressed promptly, and communication preferences will be updated accordingly.
- All requests must be documented, and any changes made to personal data must be logged in compliance with DPA requirements.

Guidelines on Security Measures

a. Data Storage and Backups

- All personal data must be stored in secure systems with access restricted to authorized personnel.
- Regular backups of data must be performed and stored securely to ensure recovery in case of data loss.

b. Encryption

Sensitive data, including manuscripts, contracts, and payment details, must be encrypted.

c. Access Controls

Employees will be granted access to data and communication tools based on their role and responsibilities. Access logs will be reviewed periodically to detect unauthorized activity.

d. Incident Response

Any data breach or unauthorized communication must be reported immediately to the GMD/CEO. The company will notify affected individuals and the Office of the Data Protection Commissioner (ODPC) within 72 hours of identifying a significant breach.

Whistleblowing Mechanism

Longhorn Publishers encourages stakeholders to report any suspected violations of this policy, data breaches, or unethical practices. Reports can be made confidentially through:

- A dedicated email: longhornpublishers@whistleblowing.co.za
- A secure whistleblowing toll free number: 0800 720 521

The company ensures protection for whistleblowers against retaliation and will investigate all reports promptly.

This Policy was approved by the Board of Directors on 17th September 2026 and signed on its behalf by:

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PROF. GITHU MUIGAI, EGH, SC
GROUP CHAIRMAN

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MS. EMMA MILOYO
CHAIR, NOMINATIONS, GOVERNANCE AND HUMAN RESOURCE COMMITTEE