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PACIFIC & ORIENT INSURANCE CO. BERHAD

COMMUNICATION POLICY

1. PURPOSE

This document sets out the policy of Pacific & Orient Insurance Co. Berhad ("POI" or "the Company") on external and internal communication.

2. GOALS

External Communication

External communication should support POI in pursuing the overall goals as described in its mission and strategic plan. The basic mission of the Company is to provide the best services to its external customers.

Internal Communication

Like POI's goals for its external communication, the main goal of the Company's internal communication is to support the Company in achieving the overall goals described in the Company's mission and strategic plan.

3. GUIDING PRINCIPLES

POI recognises that active communication with different stakeholders and the general public is an integral part of good business and administration. In order to reach its overall goals for communication, POI follows a set of guiding principles, i.e. communication shall be transparent/accessible, reliable, timely, consistent, relevant, simple – easy to use and understand, clear, accurate and cultural awareness i.e. communication material is provided in Bahasa Malaysia and English due to multicultural environment.

4. TARGET GROUPS

External Communication

Regulators, customers/policyholders, agents, reinsurers and co-insurers, general public

Internal Communication

Staff

5. COMMUNICATION CHANNELS

To fulfill its goals for communication, POI employs a variety of communication tools. The communication tools used include annual report, internet/website, email, seminars, meetings (internal), operating manuals, memorandums, bulletin/notice boards, circulars and guidelines from

regulatory authorities, telephone/facsimile, advertising and sponsoring and induction programmes. The most important of them are listed below. The responsible functions within the Company are also mentioned.

Table 1

Target Group	Responsible Function	Communication Tool
Regulators	Chief Executive Officer ("CEO"), Chief Operating Officer ("COO"), Company Secretarial, Compliance Officer, Internal Audit	Visits, letters (including reports), emails
Customers / Policyholders	Heads of business units	Internet website, brochures, leaflets, advertising (billboards and radio), mails
Agents, Reinsurers, Co-insurers	Heads of business units	Internet, seminars, emails, telephone, facsimile, circulars and guidelines, sponsoring, mails
General public	Company Secretarial, Accounts	Interim accounts publication in newspapers, internet, advertising
Staff	CEO, COO, Heads of business units, Human Resource	Email, meetings, internal memorandums, seminars, operating manuals, notice boards, circulars and guidelines, telephone, induction programmes

6. BASIC RULES FOR COMMUNICATION

Responsibility for external and internal communication

The CEO has the overall responsibility for POI's external and internal communication. However, the responsibility is delegated depending on the key target groups e.g., with a view to external communication, Marketing and Underwriting are in continuous contact with customers and agents. In internal communication, responsibility is shared by Human Resources, Senior Management and heads of business units.

Spokespersons for the Company

As regards public statements on behalf of POI, the key spokesperson for the Company (i.e. person giving on-the-record comments to the media) is the CEO or the P&O Group CEO (the Company being a major and wholly-owned subsidiary of P&O). However, communication may be delegated to the COO in the event the CEO and the P&O Group CEO is overseas.

Coordination of communication

Information on public appearances by POI representatives is to be sent in a timely manner to Senior Management. All interview requests and media contributions are to be channeled through the CEO's Office.

7. DOCUMENT REVISION

The communication policy is approved by the Board. Any changes to the communication policy may only be authorized by the Board.