



Stakeholder Engagement Policy



POL-603: Stakeholder Engagement Policy

Effective Date: November 4, 2021

Reach of Policy: VMIL

Date Approved: November 4, 2021

Scope: This policy governs VM Investments Limited, VM Wealth Management Limited and their staff and employees.

Recalls/Retires: N/A

Also see: VM Group Standard Approach to Crisis Management, VMIL Corporate Governance Policy, VM Group Communication Policy, VM Group Social Media Policy



Table of Contents

Key Terms.....	ii
Abbreviation.....	ii
1 Introduction.....	1
1.1 Background.....	1
1.2 Objectives.....	2
1.3 Policy Owner.....	2
2 Policy Statements.....	3
2.1 Communication Channels.....	4
2.2 Asking questions at annual and quarterly shareholder meetings.....	4
2.3 Staying informed.....	5
2.4 Disclosure of material non-public information.....	5
3 Roles and Responsibilities.....	6
3.1 Reviewing progress and making improvements.....	6
3.2 Communication.....	6
4 Appendices.....	7
Appendix A: References.....	7
Appendix B: Revision History.....	7



Key Terms

Investor	An investor is any holder of a debt or equity security issued by VM Investments Limited.
Material Non-Public Information	This refers to news or information that has not yet been disseminated to the public that could have an impact on the value of securities issued by a company.
Shareholder	A shareholder is a person or entity that owns shares in VM Investments Limited.
Stakeholder	Includes an Employee, an Investor, a Shareholder in VM Investments Limited and/or VM Wealth Management and can either affect or be affected by its business.
Stakeholder Engagement	This refers to the process by which VM Investments Limited communicates with, and gets to know, its stakeholders.

Abbreviation

JSE	Jamaica Stock Exchange
-----	------------------------



1 Introduction

VM Investments Limited (VMIL) is committed to implementing appropriate management strategies and processes that will identify and manage engagement with its Stakeholders.

Stakeholder Engagement continues to be an important consideration for companies in communicating their long-term strategy to, and deepening relationships with, their stakeholders, and boards are becoming ever more involved in the process.

1.1 Background

Communication with stakeholders no longer takes place solely within the bounds of the proxy season. Stakeholders and companies alike benefit from year-round communication.

As the VMIL Group operates in a highly competitive market, continuous and effective Stakeholder Engagement is vital to achieving high Stakeholder trust and accomplishing business targets. A robust and current Stakeholder Engagement Policy (SEP) is therefore a critical component of VMIL's Communications Policy.



1.2 Objectives

Lines of Communication must be clear, and the SEP identifies the critical Stakeholders and the priority in which information will be sent to them using the most suitable channels.

Engagement strategies include:

- Providing regular updates through press briefings or issuing of releases
- Making spokespersons accessible
- Responding promptly to inaccurate reports
- Doing media interviews
- Providing thought leadership through various media channels
- Promptly responding to social media queries
- Proactively communicating with Stakeholders via real-time channels
- Conducting Stakeholders' surveys and convening focus groups and similar fora

1.3 Policy Owner

This policy is owned by the Chief Executive Officer of VMIL and execution of the mandate contained herein may be delegated to a designate of the CEO's choosing.



2 Policy Statements

This policy identifies how VMIL, its Board and management engage with Stakeholders and it explains how Stakeholders may communicate with the Board and management.

VMIL's Board of Directors (the Board) understands that to make informed decisions about VMIL and to communicate their views to VMIL, Stakeholders need to understand VMIL's business operations and performance. The Board believes engaging with our Stakeholders increases transparency and encourages them to take an active interest in how the Company is run.

Stakeholders may wish to communicate with the Board on:

- Board structure, composition, and performance
- General Board oversight, including committee charters
- Material strategic decisions
- Corporate governance practices
- Disclosure of financial and non-financial information
- Executive compensation
- Oversight of risk, including environmental and social risks
- Succession planning
- Changes to the senior management structure
- Specific administrative, managerial or policy issues

The Board and management communicate with Stakeholders in a number of ways:

- The Board and management discuss important business developments and answer Shareholder questions at annual Shareholder meetings. VMIL's external auditor is also present and can answer questions about the most recent audit of the Company's financial statements.
- Management holds conference calls for quarterly earnings releases and major corporate developments as soon as practical after information is publicly released. These calls are open to all Stakeholders in listen-only mode and feature a live webcast with a question-and-answer period with pre-qualified analysts. Webcasts are available on the VMIL YouTube channel – in real time and in VMIL's archives



2.1 Communication Channels

VMIL communicates with Stakeholders through its Annual Report; quarterly reports to Shareholders; press releases; website posts; participation in industry and other conferences, and other meetings.

VMIL maintains a dedicated section of its website reserved for “Investor Relations”. This section of the website is the resource centre for Investors and potential Investors to access corporate governance materials, annual and quarterly reports, proxy statements, AGM and Investor briefing materials and a calendar of Investor events.

The Board considers and adopts best new practices for engaging Stakeholders when they apply to VMIL’s circumstances and those will be executed in accordance with the broader VM Group communication policies.

VMIL will make optimal use of available tools to engage Stakeholders including, but not limited to, website updates, engaging reports, Investor briefings, media interviews, social media interactions and meetings.

2.2 Asking questions at annual and quarterly shareholder meetings

The Board encourages questions from Shareholders at its annual shareholder meeting, its Annual General Meeting (AGM). There is a number of ways to ask them:

- In person at the Shareholder meeting
- In writing, when registering in person at the Shareholder meeting
- During the webcast
- Prior to the meeting, by email to the Corporate Secretary
- Prior to the meeting, by mail or fax to the Corporate Secretary



2.3 Staying informed

Stakeholders may register at vmwmclientservices@myvmgroup.com to receive email alerts about VMIL in their personal mailboxes.

Queries and requests received from Stakeholders will be responded to within three (3) business days.

2.4 Disclosure of material non-public information

VMIL is committed to ensuring that information is disseminated to the marketplace in a transparent and equitable manner. In that regard, VMIL will issue press releases prior to quarterly and annual meetings and conference calls.

VMIL is committed to providing timely, accurate and balanced disclosure of all material information about VMIL and to providing fair and equal access to such information.

The Board requires that management has processes in place to support its policy of full, true, plain and timely disclosure of financial results, significant developments and other material information to appropriate Stakeholders.

VMIL will comply with Rule 410 of the JSE Main Market Rule Book on Communication of Announcements and any other applicable rule of the JSE and other regulators, using all available and appropriate communication channels.



3 Roles and Responsibilities

3.1 Reviewing progress and making improvements

Stakeholder Engagement activities are reported to the Corporate Governance Committee of the Board of Directors at least quarterly.

The Corporate Governance Committee will report upwards to VMIL's Board of Directors.

This framework will be reviewed at least annually.

3.2 Communication

Communication in compliance with the provisions of this policy will be the responsibility of the VM Group Corporate Communications Unit.

Social media engagement will be as per the relevant communications policies of the VM Group.

Critical communicators such as the personnel who man telephones and take feedback and answer questions (Member Engagement Team) and those who manage the social media platforms will be selected and trained in advance.

VM Investments Limited will utilize the most relevant and impactful channels to relay communications. The channels will vary depending on the specific circumstances and the intended recipients of the message. The channel options for communications are:

- External
 - VM Investments Limited website
 - VM Investments Limited Social Media Channels
 - Newsletters
 - Emails
 - Direct Mail

- Internal
 - Email
 - VM Group Townhall
 - VM Insider videos



4 Appendices

Appendix A: *References*

References	
Policies	<ul style="list-style-type: none"> • VM Group Standard Approach to Crisis Management • VMIL Corporate Governance Policy • VM Group Communication Policy • VM Group Social Media Policy
Procedures	N/A
Task Lists	N/A

Appendix B: *Revision History*

Summary of Changes

Version	Changes	Done by	Date
1.0	Policy Creation	Nicole Adamson	October 1, 2021

Review

Version	Reviewed By	Date Review
1.0	Corporate Governance Committee	November 4, 2021



Approval

Version	Approved By	Date Approved	Date Effective
1.0	VMIL Corporate Governance Committee	November 4, 2021	November 4, 2021



Stakeholder Engagement Policy

Statement of Adoption

The foregoing Stakeholder Engagement Policy document dated October 1, 2021, has been presented at the Corporate Governance Committee Meeting of The Victoria Mutual Investments Limited, and has been adopted for approval on November 4, 2021.

Chairman

Milton Samuda (Mr.)

Company Secretary

Keri-Gaye Brown (Ms.)

Date: November 4, 2021
