



CGPH GROUP SOCIAL MEDIA POLICY

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Policy Owner	Group Legal & Compliance
Approved by	Director of CGPH Group Ltd.
Applies to	All CGPH Group Companies
Classification	Internal Group Policy
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Review Cycle	Annual

1. Introduction

CGPH Group Ltd. recognises that social media has become an essential communication tool for businesses, professionals and institutions. The responsible use of social media contributes to strengthening the Group's reputation, promoting its activities and maintaining constructive relationships with clients, investors, counterparties and the wider public.

At the same time, inappropriate use of social media may expose the Group to legal, regulatory, commercial and reputational risks.

This Policy establishes the standards governing the professional and personal use of social media by individuals acting on behalf of the Group and provides guidance to ensure that online activities remain consistent with the Group's values, professional standards and legal obligations.

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This Policy shall be read together with the Group Code of Ethics, Group Code of Conduct, Confidentiality Policy, Data Protection Policy and all other relevant Group governance documents.

2. Scope

This Policy applies to every company belonging to the CGPH Group and to every director, officer, employee, consultant, contractor, advisor and representative acting on behalf of a Group Company.

The Policy applies to both official corporate social media accounts and personal social media accounts whenever an individual's online activity may reasonably be associated with the Group or affect its reputation.

3. Objectives

The objectives of this Policy are to:

1. Promote responsible communication.
2. Protect the reputation and credibility of the Group.
3. Safeguard confidential information.
4. Ensure compliance with applicable laws and regulations.
5. Encourage professional online behaviour.
6. Reduce legal, regulatory and reputational risks associated with social media activities.
7. Provide clear guidance regarding the use of digital communication platforms.

4. General Principles

Personnel are expected to exercise sound judgement whenever using social media.

All online communications should reflect professionalism, integrity, respect and common sense.

Individuals should remember that information published online may remain publicly accessible indefinitely, regardless of subsequent deletion.

Every communication capable of being associated with the Group should be accurate, respectful and consistent with the Group's professional image.

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5. Official Corporate Communications

Only individuals specifically authorised by the Group may publish content on behalf of a Group Company.

Official communications shall be accurate, consistent and aligned with the Group's branding and communication strategy.

Corporate accounts shall only be used for legitimate business purposes.

Official announcements regarding transactions, partnerships, investments, corporate developments, financial information or strategic initiatives shall only be published following the appropriate internal approval process.

6. Personal Use of Social Media

The Group recognises the right of individuals to maintain personal social media accounts.

However, personal use of social media shall not interfere with professional responsibilities or adversely affect the reputation of the Group.

Personnel should avoid creating the impression that personal opinions represent the official views of the Group unless expressly authorised.

Where appropriate, individuals are encouraged to clarify that opinions expressed are personal.

7. Confidentiality

Personnel shall never disclose confidential, proprietary or privileged information through social media. Confidential information relating to clients, investors, counterparties, transactions, negotiations, internal projects, financial information, legal matters or business strategies shall not be published without proper authorisation.

Confidentiality obligations continue after the termination of employment or any other professional relationship with the Group.

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8. Respectful Communications

Personnel shall communicate respectfully and professionally at all times.

Social media shall not be used to publish offensive, defamatory, discriminatory, abusive or harassing content.

Personal disagreements shall never be conducted in a manner capable of damaging the reputation of the Group.

Online interactions should reflect the same standards of professionalism expected in any business environment.

9. Accuracy of Information

Personnel shall ensure that any information relating to the Group which they are authorised to publish is accurate and complete.

False, misleading or speculative statements regarding the Group, its clients or its business activities shall be avoided.

Where incorrect information has been published, reasonable efforts shall be made to correct it promptly.

10. Protection of the Group's Reputation

Every individual acting on behalf of the Group has a responsibility to protect its reputation.

Personnel shall avoid online behaviour that could reasonably undermine public confidence in the Group or damage relationships with clients, investors, regulators, suppliers or business partners.

Comments made on social media should remain consistent with the Group's commitment to professionalism and ethical conduct.

11. Intellectual Property

Personnel shall respect intellectual property rights belonging to the Group and to third parties.

Logos, trademarks, copyrighted materials, presentations, reports, photographs and other proprietary content shall not be published without appropriate authorisation.

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The use of third-party materials shall comply with applicable intellectual property laws and licensing requirements.

12. Client and Third-Party Relationships

Personnel shall respect the confidentiality and privacy of clients, investors, counterparties and business partners.

No reference shall be made to ongoing or completed engagements unless disclosure has been expressly authorised or is otherwise permitted by law.

Photographs, testimonials or references involving clients or counterparties shall not be published without appropriate consent.

13. Use of Artificial Intelligence and Digital Content

Artificial intelligence and automated content generation tools may support communication activities where appropriate.

Any content generated using such tools shall be reviewed carefully before publication.

Personnel remain fully responsible for the accuracy, legality and appropriateness of any content they publish.

Confidential or personal information shall not be uploaded to external platforms unless expressly authorised and compliant with applicable Group policies.

14. Regulatory Compliance

Personnel shall comply with all applicable laws, regulations and professional obligations when using social media.

Communications shall not constitute misleading advertising, market abuse, unlawful financial promotion, defamation or any other unlawful activity.

Where regulatory approval or disclosure requirements apply, such requirements shall be observed before publication.

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15. Media Enquiries

Only authorised representatives may communicate with journalists, media organisations or public authorities on behalf of the Group.

Personnel receiving media enquiries relating to the Group shall refer such enquiries to the appropriate authorised function.

No individual shall make public statements regarding confidential matters or ongoing transactions without prior approval.

16. Monitoring and Compliance

The Group reserves the right, to the extent permitted by applicable law, to monitor compliance with this Policy where necessary to protect its legitimate business interests.

Monitoring activities shall always respect applicable privacy and employment laws.

Any concerns regarding potential breaches of this Policy may be investigated in accordance with the Group's internal procedures.

17. Training and Awareness

The Group shall promote awareness of responsible social media use through appropriate guidance and training.

Personnel are encouraged to remain informed regarding evolving digital communication practices, cybersecurity risks and applicable legal requirements.

Managers shall promote responsible online behaviour within their respective teams.

18. Responsibilities

Every individual acting on behalf of the Group is responsible for complying with this Policy.

Managers shall ensure that personnel understand the standards governing social media use.

Group Legal & Compliance shall provide guidance regarding legal, regulatory and reputational issues arising from social media activities.

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The Board of Directors shall oversee the effectiveness of the Group's governance framework, including policies relating to external communications and reputation management.

19. Breaches of this Policy

Failure to comply with this Policy may result in disciplinary action, termination of employment or engagement, contractual consequences or other measures considered appropriate by the Group.

Serious breaches involving confidential information, reputational damage, regulatory violations or unlawful conduct may also result in legal proceedings or reporting to competent authorities where required.

20. Review

This Policy shall be reviewed periodically to ensure that it remains consistent with the Group's activities, technological developments, applicable laws and recognised governance standards.

Material amendments shall be approved by the Board of Directors of CGPH Group Ltd.

21. Final Provisions

The responsible use of social media is an important component of the Group's governance and reputation management framework.

Every individual acting on behalf of the Group contributes to the public image of the organisation through their online conduct.

By promoting professionalism, transparency and responsible communication, the Group seeks to maintain the confidence of its clients, investors, counterparties, regulators and the wider community while protecting its reputation and long-term business interests.

Approved by:

Director of CGPH Group Ltd.

Date: July 1, 2026

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