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COMMUNICATION POLICY

Purpose

The purpose of this policy is to record the ORM's course of action with regard to communicating with the investors and other stakeholders in order to avoid selective disclosure of material non-public information.

General Policy Regarding Disclosure of Material Information

It is ORM's policy to disclose material information on a broadly disseminated basis at a time deemed appropriate by the authorized spokesperson, in compliance with statutory or stock exchange rules, regulations and requirements.

No authorized spokesperson may disclose material non-public information unless it is simultaneously and widely disseminated to the public in accordance with the provisions of the relevant statutory and stock exchange rules, regulations and requirements, or unless it is a permitted non-public disclosure made in accordance with paragraph below.

Acceptable methods in respect of the public disclosure of material non-public information may include the use of one or a combination of the following:

A press release issued to recognized national news services following the provision (and subsequent publication) of the same information on the Pakistan Stock Exchange (PSX) news services in accordance with the provisions of the relevant PSX requirements relating to the publication of material non-public information; or

Verbally by means of a conference call, which interested parties may listen to by telephone or through the internet, provided that the public receives reasonable prior notice of the conference call by press release, notification on PSX news services or press notification. The notice must provide the time and date of the conference call and inform the public how to access the teleconference call by telephone or through the internet.

We strictly prohibit and restrict to disclose non-public information through social media platforms, e.g. Twitter, Facebook, etc.

It is ORM's policy to coordinate the release of announcements in the province in which ORM's registered office and PSX is situated, so that investors in each jurisdiction have access to material information at the same time.

COMMUNICATION POLICY

Permitted Non-Public Disclosure

Notwithstanding anything to the contrary contained in this communication policy, authorized spokespersons are permitted to disclose material non-public information to:

Lawyers, accountants, consultants, any sponsors, advisors and/or any person(s) if it is in the normal course of the exercise of their employment, profession or duties and with whom ORM's negotiating with a view to effecting a transaction, raising finance or obtaining a credit rating; which persons, amongst others, may include prospective underwriters of an issue of certificates, providers of funds or loans or potential placers of the balance of a right issue not taken up by certificate holders. In such cases, ORM must advise the recipients that such information is confidential and potentially constitutes non-public information and the receiving party must acknowledge such confidentiality.

Furthermore, any person that is acting on ORM's behalf or on its account must draw up an insider list and ensure that every person on that list acknowledges their legal and regulatory duties and is aware of the sanctions of any misuse or improper circulation of such disclosed information; or

Any government department, PSX, National Clearing Company of Pakistan (NCCPL), Central Depository Company of Pakistan (CDC), Securities and Exchange Commission of Pakistan (SECP) or any other regulatory body;

Third parties (even subject to a time embargo) such as, amongst others, the media or printers and typesetters of announcements, circulars, reports, etc. provided there is a confidentiality in place.

In the event of a breach of confidentiality and if the market becomes aware of material non-public information, ORM must immediately publicly announce details of such information.

INVESTOR RELATION POLICY

Preamble

ORM's investor relations policy describes the principles and practices that ORM applies in order to act with integrity towards its certificate holders and investors and as a responsible party in the capital markets. This policy ties in with the ORM's values and the businesses we are building and guides ORM's interactions with its certificate holders, investors, analysts and the broader financial markets.

This policy aims to ensure timely, transparent, consistent and credible information on corporate strategies, trends, operational performance and financial data to the investing public in line with listing regulations stipulated by Pakistan Stock Exchange (PSX) as well as the Code of Corporate Governance. In addition, we take account of the increased demand for transparency and accountability regarding our non-financial (or sustainability) performance.

Purpose and Scope

The purpose of this policy is to ensure effective communication between ORM, the financial community, and other constituencies, such as analysts, certificate holders and investors / potential investors, regarding ORM's historical performance and future prospects.

The scope of this policy is to maintain fair disclosure of ORM's information without advantage to any particular investor(s) and it also aims at providing information necessary to enable them make informed decisions about investment in ORM's equity within the ambit of the applicable law(s) and regulation(s).

Access to Information and Meeting

ORM shall ensure the timely disclosure of the investor related information in the ORM's website (www.orientrentalmodaraba.com) which should meet the criteria laid down in the Companies Act 2017, Code of Corporate Governance, PSX Listing Regulations and any other law(s) and regulation(s) enforced from time to time.

Certificate holders, investors and analysts have access to the investor relation function, the contact details of which are posted on the ORM's website. Questions will be dealt with in a timely manner.

INVESTOR RELATION POLICY

Requests from certificate holders, investors or analysts for meetings with senior management shall be met as schedules may permit. If senior management is unavailable, access to the head of investor relations will be provided where possible. In general, first time meetings with the ORM will be conducted by the head of investor relations.

Analysts Reports

ORM may review an analyst's report or earnings model for factual accuracy of information that is within the public domain. The ORM will not share earnings projections and does not provide information (deemed to be inside information) to analysts in their efforts to develop earnings estimates.

Communication With Analysts

The ORM maintains open communication with analysts. If the ORM is asked to review an analyst draft report, or other analyst material to be published, the comments will be limited to the following:

- Correcting historical data
- Discussing general factors that might influence the operations of the ORM
- Providing general information about markets and activities

Quarterly Earnings Release And Analyst Briefing

The ORM will release earnings information quarterly as required by the SECP & PSX subject to the approval by BOD. The procedure to follow shall be in complaint with the requirements laid down by SECP and PSX from time to time.

Investor Relations Calendar

The ORM would be publishing such notices and circulars as are mandatory, which contains the dates of earnings publications, AGMs, dividend payouts and other important dates.

Substitute For The Head Of Investor Relations

In the absence of the head of investor relations or non-appointment of anyone on the said position, the CFO of the ORM fulfills the responsibilities of the position so required.

PROVISIONS APPLICABLE TO BOTH COMMUNICATION AND INVESTOR RELATION POLICY

Applicability

This policy applies to all directors of the modaraba management company and employees of the ORM.

Communication

The authorized persons will be the primary contacts who may communicate information on behalf of the ORM to the investors. In addition to the primary contacts, where required, nominated individual(s) may be designated to communicate on behalf of the ORM and its affiliate(s) in response to specific inquiries (where required).

Responding To Rumors

From time to time, authorized spokespersons may be asked to comment on fluctuations in the ORM's share price. Authorized spokespersons should respond to such enquiries substantially as follows: "It is the ORM's policy not to comment on movements in the share price or volume."

The ORM does not have a general duty to monitor and to correct or verify rumors in the market place unless such rumors can be attributed to ORM, or if the stock exchange requests disclosure when the rumor is causing unusual trading activity in ORM securities. If deemed necessary than ORM shall clarify such false information/rumor.

Closed Period

The ORM will announce a "closed period," which is determined and intimated to the Directors, CEO, CFO, Head of Internal Audit, other Executives and PSX, prior to the announcement of interim/final results, and business decisions, which may materially affect the market price of ORM's securities.

Monitoring The ORM's Website

The head of investor relations monitors for placing and removing all investor-related information on ORM's websites in accordance with this communication policy and the requirements of the PSX and SECP.

M JAMAL AHMEDANI
Company Secretary