



## **Communication Policy**

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### **Purpose and scope**

This policy sets out how we should handle internal and external communication for P H Beck. It applies to all work-related contacts, networks and business established whilst working for P H Beck. These will remain the property of P H Beck LTD even after your employment ends. It applies to all employees.

### **Policy objectives**

From press releases to posts on social media, the things we say in public and the way we say them have a huge impact on how people think and feel about P H Beck. The objectives of this policy are to:

- Ensure that we are consistent, clear and effective in all our communications to media and the financial community.
- Prevent misinterpretation or legal consequences which could arise from a public statement being made by someone without authority; and
- Explain our approach to social media communications to allow the creation and sharing of content and join in with conversations online, whilst avoiding issues for both P H Beck and P H Beck employees and their careers. This policy should be read in conjunction with our Code of Conduct.

### **Requirements Consistency and transparency:**

All communications about P H Beck must be truthful, fair and accurate - they should never be misleading. They must be transparent and based on reliable information, as well as consistent with our brand standards and core values.

### **Social media:**

People must use common sense when communicating on social networks, paying special attention to confidentiality and company loyalty. For the purposes of this policy, social media means any facility for online publication and commentary, including but not limited to Facebook, LinkedIn, Twitter, Flickr, YouTube, Snapchat and What's App, as well as blogs, or any news sites/blogs comment sections. In particular, employees must not:

- Engage in any activity or disclose information that brings or is likely to bring P H Beck into disrepute;
- Use the internet to attack, abuse or criticise P H Beck businesses or teams, colleagues, clients, suppliers or partners or post any derogatory comments;
- Retweet, share or forward content that is in bad taste or potentially damaging to P H Beck or others;
- Blog or post messages anonymously, using pseudonyms or false screen names. Always use your real name, be clear who you are and identify that you work for P H Beck;
- Use P H Beck's logo or branding, or post as P H Beck on blogs or social networks - only the managers and marketing teams can post as P H Beck;
- Say anything that is dishonest, untrue or misleading – if you have a vested interest in a discussion, say so;
- Post or publish any sensitive or confidential information;
- Set up a group, page, blog, website or network that mentions P H Beck without the prior approval of the Directors; and
- Let your use of social networking sites interfere with your job or commitments to clients before posting to a social network, sending a text or an email, or posting a comment on a news article or blog, the following must be considered: Is it...
  - True? • Helpful? • Inspirational? • Necessary? • Kind?

We are surrounded by technology that is constantly connected, such as smartphones with social media apps and cameras; therefore you must not:

- Send texts, emails or photographs that could impact P H Beck's reputation as a responsible business, even if sent in confidence, as these can end up in the public domain;
- Work or drive in an unsafe or reckless manner as not only does this endangers yourself and others; it can be caught on camera and uploaded to YouTube or Twitter, bringing P H Beck into disrepute. Such acts will result in disciplinary action.

#### **Public Media & financial communications:**

Nobody is allowed to talk to the media without approval from the Directors. The only people permitted to communicate with the financial community (analysts, investors, financial media) are the Directors.

#### **Media material:**

All communications material for the media should be produced to a high professional standard and must be clear, accurate, timely and fairly reflect the relevant facts and the views of P H Beck. Media material must:

- Comply with all codes and laws applicable in any jurisdiction where it is issued;
- Comply with all applicable P H Beck policies and procedures, including those relating to intellectual property, brand standards, stock exchange disclosure and listing rules, sales and marketing practices; and
- Be reviewed and approved by the Directors prior to release, and appropriately archived.

#### **Public relations and interactions with governments:**

All information must be reviewed and approved by the Directors, before being publicly released. All information provided to government bodies and public authorities must be accurate, up to date and void of any political opinions. It must also be consistent with our strategy and any previous communications we may have made on the matter. All public relations representatives acting on our behalf are bound by confidentiality agreements and must disclose any conflicts of interest.

#### **Responsibilities**

##### The Directors is responsible for:

- Reviewing, endorsing and achieving this policy's aims.

##### The Office Manager is responsible for:

- Administering this policy on behalf of the Directors; and
- Developing and rolling out the supporting strategies.
- Supporting the Directors in implementing the policy.
- Ensuring that this policy and supporting strategies and procedures are distributed, implemented and complied with.

##### Managers are responsible for:

- Implementing and enforcing the processes and procedures;
- Ensuring that their people are aware of their responsibilities and receive appropriate training; and
- Addressing any inappropriate behaviour.

Employees are responsible for:

- Carrying out their work in line with this policy and associated procedures;
- Challenging any behaviour that falls short of the expectations of this policy; and
- Identifying any breaches of this policy and reporting them to their line manager.



Neil Haughton  
Director



Mark Dennison  
Director

Dated 28.07.2025

*Reviewed by Cheryl Bathard, Office Manager*

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