



Investor Relations Policy

January 24, 2017

ICI PAKISTAN LTD.

ICI PAKISTAN LIMITED

Investor Relations Policy (“IRP or IR Policy”)

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1. Preamble

ICI Pakistan Limited (“ICI” / “Company”) is committed to disclosing information to the public in accordance with the listing rules stipulated by the Pakistan Stock Exchange Limited (“PSX”), as well as the Code of Corporate Governance 2012. This Investors’ Relation Policy (“Policy”) aims to ensure that the Company’s investors are able to access information of the Company, which includes business updates, stock and financial performance, etc., in a timely manner.

2. Objective & Scope

The purpose of this Policy is to enable effective communication between the Company, the financial community, and other constituencies, such as analysts, shareholders and investors / potential investors [“Investor(s)”], regarding the Company’s historical performance and future prospects. The scope of this Policy is to maintain fair disclosure of the Company’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 the Company’s equity within the ambit of the applicable law(s) and regulation(s).

3. Disclosure Protocols

3.1 Standards for Information Disclosure

ICI’s information disclosure should meet the criteria laid down in the Company Laws, Code of Corporate Governance, Listing Regulations and any other law(s) and regulation(s) enforced from time to time.

3.2 Access to Company Information and Policy

The information which is required to be disclosed under the Policy including the Policy itself is available on the Company’s website (<http://www.ici.com.pk>).

3.3 Communication Channels

The CEO, CFO and/or Company Secretary will be the primary contacts who may communicate information on behalf of the Company to the Investors. In addition to the primary contacts, where required, nominated individual(s) may be designated to communicate on behalf of the Company and its affiliate (s) in response to specific inquiries (where required).

3.4 Quarterly Earnings Release & Analyst Briefing

ICI will release earnings information quarterly as required by the Pakistan Stock Exchange Limited after the accounts are approved by the Board of Directors.

3.5 Communication with Analysts

ICI maintains open communication with analysts. If the Company 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 Company
- Providing general information about markets and activities

3.6 Analyst Earnings Models and Reports

ICI will not share earnings projections and will not provide information (deemed to be inside information) to analysts in their efforts to develop earnings estimates.

3.7 Closed Period

ICI shall announce a “closed period,” which is determined and intimated to the Directors, CEO, CFO, Head of Internal Audit, other Executives* and stock exchange(s), prior to the announcement of interim/final results, and business decisions, which may materially affect the market price of Company’s securities.

** An Executive, as determined by the Board, is an employee of the Company who is drawing a basic salary of PKR 2.4 million or above in a year*

3.8 Responding to Market Rumors

The Company 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 ICI, or if the stock exchange requests disclosure when the rumor is causing unusual trading activity in ICI securities. If deemed necessary than ICI shall clarify such false information/rumor.

4. Policy Revision

Any revision to this Policy will be subject to a review and approval by the Board as and when required.

Any query related to the Investor Relations Policy should be addressed to the Company Secretariat at email: info.shareholder@ici.com.pk