
INVESTOR RELATIONS POLICY

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1. GENERAL PRINCIPLES

- 1.1 This policy has been established by the Board of Directors (**the Board**) of Huge Group Limited (**the Company**) to assist it, and where applicable, its subsidiary companies (**the Group**), in respect of any activity and communication with the public, the media, shareholders and institutional investors and analysts.
- 1.2 The Board, and the provisions of this policy, remain subject to the provisions of the Companies Act 71 of 2008 (as amended), the Company's Memorandum of Incorporation (**Mol**) and the JSE Limited Listing Requirements (**JSE Listings Requirements**).
- 1.3 The Board recognises that the principle of ethical and effective leadership espoused in the King Code on Corporate Governance 2016 (**King IV**) includes transparency in communicating information in a timely, accurate and consistent manner. The Board aims, through the ambit of this policy, to apply and uphold these principles.

2. MATERIAL INFORMATION

- 2.1 The Company complies with the JSE Listings Requirements and in particular the definition of material information, which is information that, if omitted or misstated, could influence the economic decisions of users and includes a change in, or constituent of, a particular factor that may be regarded in the circumstances as being material and that, as a rule of thumb, would normally be equal to or exceed 10%.
- 2.2 Material information which is made publicly available will be published on the Stock Exchange News Service (**SENS**) and a national paper, where required.

3. ENGAGEMENTS WITH INSTITUTIONAL INVESTORS AND ANALYSTS

- 3.1 It is generally recognised that analysts or institutional investors require a broader understanding of the Company's operations, activities and strategy. In accordance with market practice, the Company may be required to provide more detailed information to these parties. Such information will only be distributed in line

with the JSE Listing Requirements and will not constitute inside information as envisaged by the Financial Markets Act.

- 3.2 In communicating information on the Company, the Company will not give preference to any shareholder, institutional or otherwise, or analyst, and management will make every effort to ensure that the Company is not perceived to grant such preference.
- 3.3 Two official representatives, defined in clause 6 below, should be present at all times in meeting with institutional investors and analysts. Where this is not practically possible, the official representative must be accompanied by at least one other member of the Board or the Company Secretary.
- 3.4 All enquiries for information must be directed to the Chief Executive Officer, who is responsible for ensuring that information is distributed in accordance with this policy.

4. VOLUNTARY DISCLOSURES AND MARKET ENGAGEMENT

- 4.1 Information made publicly available will be published on SENS and in a national paper, where required.
- 4.2 The Company will issue an Integrated Report to its shareholders, which will be publicly available on its website. The Annual Financial Statements of the Company, on a consolidated basis, will be included in the Integrated Report.
- 4.3 The Company will engage in a formal investor communication, in whatever format it deems appropriate, one being with the release of its full year financial results. When engaging in such investor communication, the Company may in its discretion determine invitees and the practical logistics of the engagement. Any material information intended to be disclosed at such event will be communicated prior to the event and in accordance with the JSE Listings Requirements.
- 4.4 Any presentations given by the Company will be made available on its website and any conference calls made by representatives of the Company will be recorded and such recordings will be made available on its website.
- 4.5 The Company will publish an annual investor calendar on its website which will contain the dates of earnings publications, annual general meetings and other important dates.

5. FORWARD LOOKING STATEMENTS

The Company will only issue forward looking statements at a time and in a manner that is strictly in accordance with the JSE Listings Requirements. Any forward-looking statement will be identified as such and will be updated as and when required.

6. REPRESENTATIVES OF THE COMPANY

6.1 In respect of all public, investor and media interactions and statements, only the following representatives may act on the Company's behalf:

- 6.1.1 Chairman of the Board;
- 6.1.2 Chief Executive Officer; and
- 6.1.3 Chief Financial Officer.

(the official representatives)

6.2 In respect of an emergency situation where none of the official representatives are immediately available, a member of the Board may issue a general "holding statement" until such time as an official representative is available but that Board member concerned may not engage in answering questions or providing any further information.

6.3 No employees or professional advisor of the Group, aside from the official representatives, may issue a statement on behalf of the Company or engage with the investor community or members of the press, unless specifically authorised to do so by an official representative.

6.4 The Company makes no undertaking as to the accuracy of any information provided outside the ambit of this policy. Any person who purports to provide information on the Company, who is not an official representative, may be subject to a sanction by the Company.

7. INCORPORATING FEEDBACK

Feedback received from engagements with shareholders, institutional investors and analysts will be shared at Board meetings and where appropriate, will be incorporated into the strategy, planning for sustainable growth and general corporate value enhancement.

8. ANALYST REPORTS AND MODELS

- 8.1 The Company will not evaluate or comment on any analyst reports concerning the Company. Where such a report contains factual errors, the Board may, in its discretion, issue a response clarifying such errors.
- 8.2 The Company will not share earnings projections and will not share any non-public information to analysts to assist them in their efforts to develop earnings estimates.

9. MARKET RUMOURS

As a general rule, the Company will not respond to market rumours. However, if such rumours have a significant influence on the listed stock of the Company, or the Company is approached by a regulator to clarify such rumours, then the Company will issue an appropriate response.

10. REPORTING STANDARDS

The Company adheres to the International Financial Reporting Standards (IFRS) in preparing and presenting its financial reports. However, the Board may in its discretion apply other voluntary standards, such as the International Integrated Reporting Framework and the recommendations of King IV, to enhance transparency.

11. STORAGE OF INFORMATION

- 11.1 Records of all information placed in the public domain by the Company are retained in accordance with the relevant legislative and regulatory requirements and will be accessible to the public through the office of the Company Secretariat and where applicable, subject to the provisions of the Company's PAIA Rules.
- 11.2 Official representatives are required by the Company to maintain a record of all interactions with institutional investors and analysts, which repository is maintained by the Company Secretariat.

12. CLOSED PERIODS

12.1 Based on the Company's financial year end of February, the Company will enter closed periods from 1 March to 31 May and from 1 September to 30 November (or such earlier date as the financial results may be released). The Company may also release cautionary announcements or be involved in corporate actions which will constitute a closed period as defined by the JSE Listings Requirements.

12.2 During closed periods, engagements with institutional investors and analysts may be limited to discussions on strategy, historical information and any other information which is already in the public domain.

13. GENERAL

13.1 This policy will be reviewed by the Board on an annual basis and may be updated as required, with the approval of the Board.

13.2 This policy will be made publicly available on the Company's website.

13.3 Any general queries relating to this policy may be addressed through the office of the Company Secretariat.