



TRINITY
METALS

GROUP POLICY


COMMUNICATION

Communication Policy and Procedures

Version History

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INTRODUCTION

PURPOSE

Transparent, clear, effective communication, ensuring relevant stakeholders are informed, is essential for the sustained success of the Company. This policy sets out the guidelines for the timely, effective, and appropriate flow of information from Trinity Metals Group and its Subsidiary Companies “Trinity Metals Group”).

It is also designed to ensure all employees are aware of their communication responsibilities and risks internally and externally.

The specific objectives of this policy are:

- To safeguard the reputation of Trinity Metals Group.
- To ensure key stakeholders are engaged and fully informed of the company’s performance and ongoing activities
- To enable timely dissemination of critical information regarding matters of public interest
- Setting out the guidelines for reporting on any emergency of crisis situation.
- To guide appropriate effective and responsible electronic, print, and verbal communication
- To guide public communication protocols – who is the company spokesman, who is permitted to engage depending on the situation

SCOPE

This policy applies to Trinity Metals and all affiliated Companies (Trinity Metals Group). It applies to all stakeholders involved in or affected by Trinity Metals, whether Directors, Employees, Consultants or Contractors, whether working part-time or full-time on Trinity Metals business, local communities, investors and the media.

COMMENCEMENT

This revised policy applies from May 2024.

AUTHORITY AND MANAGEMENT

The Board of Directors approved this policy and will review it periodically, not less than every two years or any other time deemed necessary.

POLICY

1. Communication Principles

The Company's official business language is English. Translated content will be provided in the National Language to ensure all employees are effectively engaged.

Trinity Metals recognizes that active communication with stakeholders and the public is integral part of running a sustainable business. We are committed to transparent, timely, accurate, and quality information dissemination to internal and external stakeholders.

External communication on behalf of the Company will only be permitted to authorised employees. No statement publicly will be considered as a Company statement unless it is communicated from a Company authorised person.

Trinity Metals is committed to developing inclusive two-way communication channels to optimize the flow of information throughout the organization.

2. COMMUNICATION ROLES AND RESPONSIBILITIES

To ensure effective communication and compliance to the Trinity Communication Policy, the following roles and responsibilities are adopted;

2.1 The Chief Executive Officer

The Chief Executive Officer is the Spokesperson of Trinity Metals Group for national or international communication, at a district/operational level this responsibility is delegated to the General Manager.

2.2 Head of Communication Department

The Group Communication and Brand Leader serves as the key contact on all communication issues.

S/he is responsible for coordinating all communication activities for Trinity Metals. S/he identify communication issues, develops communication strategies, implement and manage communication actions such as; campaigns, events, advertising, design and printing of communication materials, audio-visual, marketing and communication research. S/he is responsible for coordinating all interactions with the media, arranging media conferences, issuing media statements and handling media queries. S/he must ensure that the communication policy and procedures are communicated to all staff and adhered to. S/he provides communication advice and counsel to the CEO, Leadership Team and Heads of departments who need to interact with the media.

2.3 Trinity Metals Spokesperson

Although the Chief Executive Officer is the spokesperson of Trinity Metals Group and General Managers are the spokesperson at the Mine level, the CEO may designate a spokesperson depending on circumstances.

3. COMMUNICATION PROCEDURES

Communication must be delivered in a regular and timely manner and internal communication and where possible internal communication should precede any external communication. In all communication the Company Brand Guide must be followed. The following procedures govern this communication policy:

3.1 Media/External

The Trinity Communication Lead is the official Company line of contact with the media and any external communication approach. The following procedures will guide how Trinity Metals relates to the media.

1. Before responding to media queries, the Communication department must be consulted. In a situation where this is not possible, the response must be given by the CEO or General Manager depending on the situation and copied to the Communications department.
2. All media queries must be referred to the Group Communications and Brand Leader who will then engage with the relevant line Manager for appropriate response.
3. Media queries should expeditiously be dealt with ideally within 24 hours. Inquiries received after working hours will only be dealt with the following working day unless there is obvious urgency or instructions to do so.
4. Responses to media should be made through the respective channels of media houses. However, the Communications department might use other means of communication that it deems appropriate.
5. Trinity Metals shall work towards building and maintaining positive relations with the media.
6. Any information that goes out to the media must be approved by the Chief Executive Officer or the designated spokesperson for Trinity Metals.
7. The General Manager shall be the spokesperson at the Mine level and shall seek guidance from the Communication department when interacting with the media.
8. Trinity Metals employees and Subcontractors are urged to project a positive image of the Company when interacting with the external Community. When approached by the media they should always direct them to the communication department or the Spokesperson for Trinity Metals.
9. Any communication having an impact on employees should be copied to the HR Office in advance or as soon thereafter.

Inquiries from the public regarding Company activities that are confidential should not be responded to without the express approval of the Chief Executive Officer. When any

Employee receives such an inquiry, they must respectfully decline the request and forward the request to the Communication Department. Trinity Metals Ltd endeavors to publish all Company information released for public distribution on the Company's website.

3.2 Internal Communication Guidelines

The main purpose of internal communication is to facilitate and manage the flow of information within the Company, to create an informed community that shares the same vision and is committed to achieving it. Internal communication involves information about Trinity Metals' core business and other useful information that staff need to perform their duties or project the good image of Trinity Metals.

The following communication tools and techniques are used for internal communications, and some of them are also used for external communication:

- Meetings of the staff in various departments where the Heads of department and Supervisors share all important information.
- Trinity Metals website
- E-mails to all staff, who have access to Trinity Metals e-mails.
- Business update communiqués.
- Notice Boards
- Posters and flyers
- Newsletters
- Trainings
- Short messages (SMS, WhatsApp)
- Minutes of meetings
- Memos
- Mailing lists (the use of a mailing list which must be approved by the IT Manager).
- Social Media (LinkedIn, Twitter, Youtube, Zoom, facebook,...)
- Events, exhibitions, Open days and presentations
- Job publications

Other appropriate channels as long as it aligns with this policy.

Communication between Employees must be respectful and professional at all times. Employees must be addressed by their first names or initials in all written communication, except letters that must bear the employee's full name.

3.3 External Communication Guidelines

Trinity Metals Group aims to keep the public and its critical external stakeholder groups regularly informed about the Company's vision, mission, operations, and development.

The Company will use different tools and techniques to communicate

- a. Billboards
- b. Letters

- c. Broadcast media- Radio and Television
- d. Print media- Newspapers and the Trinity Metals Newsletter
- e. Conferences
- f. Social Media (LinkedIn, Twitter, YouTube, Zoom,..)
- g. Events, Exhibitions, Open days and presentations and community engagement outreach meetings.
- h. Visits, Guest speeches and other Ceremonies

All external communication campaigns must be organized in collaboration with the Communication department with guidance from the CEO or General Managers. In addition, the CEO must approve all external communication including with government representatives and regulators regarding confidential or sensitive information.

3.4 Personal Representation in the Media

An employee may at any time be approached by media in their private capacity for comment on personal interests which is unrelated to Trinity Metals' business. It is for the employee to decide whether they participate in such private interviews but they may not make any reference to Trinity Metals business unless prior approval has been given by the Communications Department and the General Manager.

3.5 Online / Digital Communications

Employees are prohibited from posting confidential or proprietary information about any aspect of the Company's business on the Internet, including (but not restricted to) chat rooms, WhatsApp social media platforms (Facebook, Twitter, LinkedIn, etc.), blogs, wikis, etc.

Employees must also refrain from using the Company e-mail to communicate with any parties about topics, activities, or events unrelated to Trinity Metals Group and its Subsidiaries.

3.6 Social Media Guidelines

The Company uses social media platforms such as LinkedIn, Twitter, Instagram, and Facebook to communicate and engage with external stakeholders and for branding, reputation building, and marketing. These social media channels are managed by the Group's communication team, which is responsible for developing and scheduling Company-focused content.

Disclosure of confidential information via social media platforms is strictly prohibited, and violating this rule may result in disciplinary action.

Social Media Guidelines for Employees and Contractors:

- a. Only authorized individuals will be permitted to post Company information on Company social media platforms.

- b. Official Company posts will be drafted by the communication lead or team and formally approved by the CEO or an authorised representative as appropriate before being made public.
- c. All social media postings will be factual.
- d. An employee is responsible for the content published in their capacity in any form of social media.
- e. Employees using social media are not representing the Company and need to take personal responsibility for ensuring that any reference to Trinity Metals Ltd is factually correct and does not breach confidentiality or privacy requirements.
- f. As representatives of the Trinity Metals Brand, employees should not post offensive, obscene, defamatory, threatening, harassing, bullying, discriminatory, hateful, racist, sexist, or overtly political information on any social media platform.
- g. Employees who are not authorised to speak on behalf of the Company should not imply that they are speaking on behalf of or as a representative of Trinity Metals Ltd or give any impression that the views expressed are those of Trinity Metals.
- h. Employees should avoid posting content that might otherwise cause damage to Trinity Metals' reputation or public image.
- i. If an Employee comes across information that they believe Trinity Metals should respond to, the employee should refer the matter to the Communication Department who will prepare a response with support from the relevant subject matter expert.
- j. Employees must not use social media in a way that might breach any Company policies, express or implied contractual obligations, legislation, or regulatory requirements. In particular, the use of social media must comply with all other corporate policies and contractual confidentiality requirements.
- k. Employees must not make disparaging or defamatory statements about the Company, Management, fellow employees, clients, customers, or suppliers; or harass, bully, or unlawfully discriminate against others on the platforms.
- l. Employees must not use data obtained in the course of their employment with the Company in any way which breaches the provisions of Rwandan law; breach copyright belonging to the Company; disclose any intellectual property, confidential or commercially sensitive information relating to the business; make statements which cause, or may cause, harm to Company reputation or otherwise be prejudicial to its interests.
- m. If the Employee discloses any information about the Company, s/he must state that their views may not represent those of the employer by clearly saying that **"the views posted are my personal views and do not necessarily represent the views of my employer"**.
- n. If an Employee is uncertain or concerned about the appropriateness of any statement or posting, they should discuss it with their Manager and the Communication Department before posting.

3.7 Responding to Rumours

In general, rumors or speculations regarding the Company will not be responded to but there may be exceptions that will require a response. Rumours and speculations must be reported to the Communications Department who will then seek guidance from the General Manager and Chief Executive Officer on how to respond.

3.8 Trinity Metals Group Website

The Trinity Metals Ltd. Website (www.trinity-metals.com) is the principal source of information about the Company and its Subsidiaries. Responsibilities:

- a. The Group Communication and Brand leader or a delegated official has the full responsibility of maintaining the Trinity Metals' website.
- b. There will only be one Trinity Metals website, Trinity subsidiary Companies are not permitted to develop their website.
- c. All information uploaded on the website will be approved by the Chief Executive Officer or a delegated official.
- d. It is the responsibility of each department to provide information to the communication department that can be used as a post on the website.
- e. The Group Communication and Brand Leader will work together with the IT department to ensure material on the website is factual and up-to-date.
- f. The Communication department shall accommodate staff and subcontractor blogs on the Trinity Website as long as they reflect the mission and vision of Trinity Metals Ltd.
- g. The Communication department shall be responsible for regularly scanning the website and advising relevant departments to provide updated content.
- h. Trinity Metals Ltd has the right to use appropriate and relevant photographs and videos featuring its Staff and Subcontractor Employees whenever deemed fit.
- i. Important updates and information changes must be published on the website in a timeous fashion.
- j. The Communication and Brand Leader is the gatekeeper of the website and its content and is responsible for ensuring that it remains organised, user-friendly and provides relevant information to cater for the needs of the various stakeholder groups.

3.9 Advertising

The Communication department is responsible for coordinating all advertising activities.

1. All departments from each mine advertising Trinity activities must ensure that the information in the advert is accurate and up to date.
2. New company logo (of Nyakabingo Mine, Rutongo Mines, and Musha Mines) must be included in all official communication, including, job adverts, events, and exhibitions.
3. All departments and staff should ensure that they do not misrepresent the logo in form or color and when using it in conjunction with other organizations permission needs to be obtained from the Communication Department.
4. Staff must ensure that they do not use official logos of the Mines without permission from the Communications Department
5. Trinity Metals and its Subsidiary Companies shall refrain from adverts that may cause reputational risk and erode its positive image and brand.

4. Corporate Image

The Communication department is responsible for the corporate image of Trinity Metals and its subsidiary companies. This responsibility includes the following;

- The look of Trinity Metals and its subsidiary companies in general.
- The type of communication materials to be used by the company such as folders, letter heads & footers, business cards.
- The way communication material is used and produced that is the font, use of logos, corporate identity and so forth.

4.1 Guidelines for Formal E-mails and Letters

All printed communications should follow the style and format outlined in the Company Brand Guide and associated templates in annex. Employees preparing e-mails and letters should:

- a. Use simple words
- b. Be concise
- c. Use appropriate letter formats depending on the type of letter you are writing.
- d. Be aware that all formal letters should be signed by the General Manager or the CEO for Group letters.
- e. Use conversational but professional language for internal letters and e-mails.
- f. Use formal language in external or Official Company letters or e-mails.
- g. Every Mine should use their Mine logo for both internal and external letters, Trinity Metals logo is used for Group matters only.
- h. Be aware that work e-mails are not private and may be viewed by Management without notice.
- i. Use Company e-mail only for Company-related communication.
- j. Use short sentences. Sentences of more than 25 words should be avoided.

4.2 Correspondence Management

1. All Trinity Metals outgoing correspondences are signed by the CEO or his designated manager.
2. All Mine outgoing correspondences should be signed by the General Manager or his designated manager.
3. All the Trinity outgoing correspondences should be reviewed by the Office of the Group General Counsel and copy Group Communication personnel before signature.
4. All outgoing letters should be sent through the respective company emails.
5. All incoming correspondences should be sent to the CEO, concerned General Manager and Group Communication Personnel immediately upon receipt.

4.3 Guidelines for Telephone Use

Trinity Metals' mobile phone devices should only be used for business-related communication. Personal telephone may be used where the Company has not provided Company mobile phone.

Employees communicating via official Company mobile telephone should be courteous and professional when receiving and making calls. This means using a positive and respectful tone of voice, appropriate greetings, and clear and concise language.

Any employee found misusing Company telephones will be subject to disciplinary action.

5. Marketing and Branding

Trinity Metals' branding aims at building a strong image to increase visibility both internally and externally and communicate a uniform message and build commitment among key stakeholders.

5.1. Regarding the use of logos;

The Group logo represents the organisation as a whole and it is the primary logo to be used at all times.

Mine logs are used on;

- a. Site infrastructure
- b. Site equipment
- c. Client paperwork's such as invoices
- d. Legal documents regarding specific sites
- e. Brochures of the Mine or Mine adverts
- f. Mine PPEs

6. Language Policy and Translations

English is the official business language for internal and external communication. For, translation all internal and external communication can be translated into Kinyarwanda.

7. Exhibitions

All departments taking part in fairs and exhibitions on behalf of Trinity Metals or its Subsidiary Companies must do so in consultation with the Communication department that is responsible for branding and corporate identity for Trinity Metals Ltd.

8. Events

Events must be organized in Consultation with the Communication department. The Communication department shall take full responsibility for media, publicity, and branding.

9. Crisis Communication

A crisis is any unusual situation that requires a quick and immediate reaction by Trinity Metals Group. If managed poorly, a crisis could have a negative impact on reputation and/or severe financial implications. Every organisation is vulnerable to a crisis of varying scales, it is necessary to be prepared to respond effectively in such situations.

9.1 Crisis Management procedure

In the event of a crisis, the following quick action should be taken:

- a. The Manager in whose area of responsibility the crisis occurs must immediately inform the General Manager of the Mine.
- b. The CEO as the Spokesperson for Trinity Metals Group must be informed immediately, and where appropriate s/he will in turn inform the Board of Directors.
- c. A Crisis Committee will be established incorporating the CEO, General Managers, Group HR, Group General Counsel, Group Security Coordinator and Group Communication and Brand Leader and the relevant internal subject-matter experts.
- d. The committee will establish a crisis action plan including a crisis communication plan. The crisis communication plan will, inter alia, include the following key aspects:
 - o Key stakeholder identification
 - o Frequency of communication
 - o Communication responsibilities including appointment of official adhoc spokesperson
 - o Monitoring impact of the communication
 - o Ongoing communication responses
- e. In the event of a crisis only the CEO or a designated spokesperson will be permitted to deliver a press, media statement, or interview.
- f. Employees and Subcontractors will be kept informed of the situation using all means of communication.

9.2 Enforcement

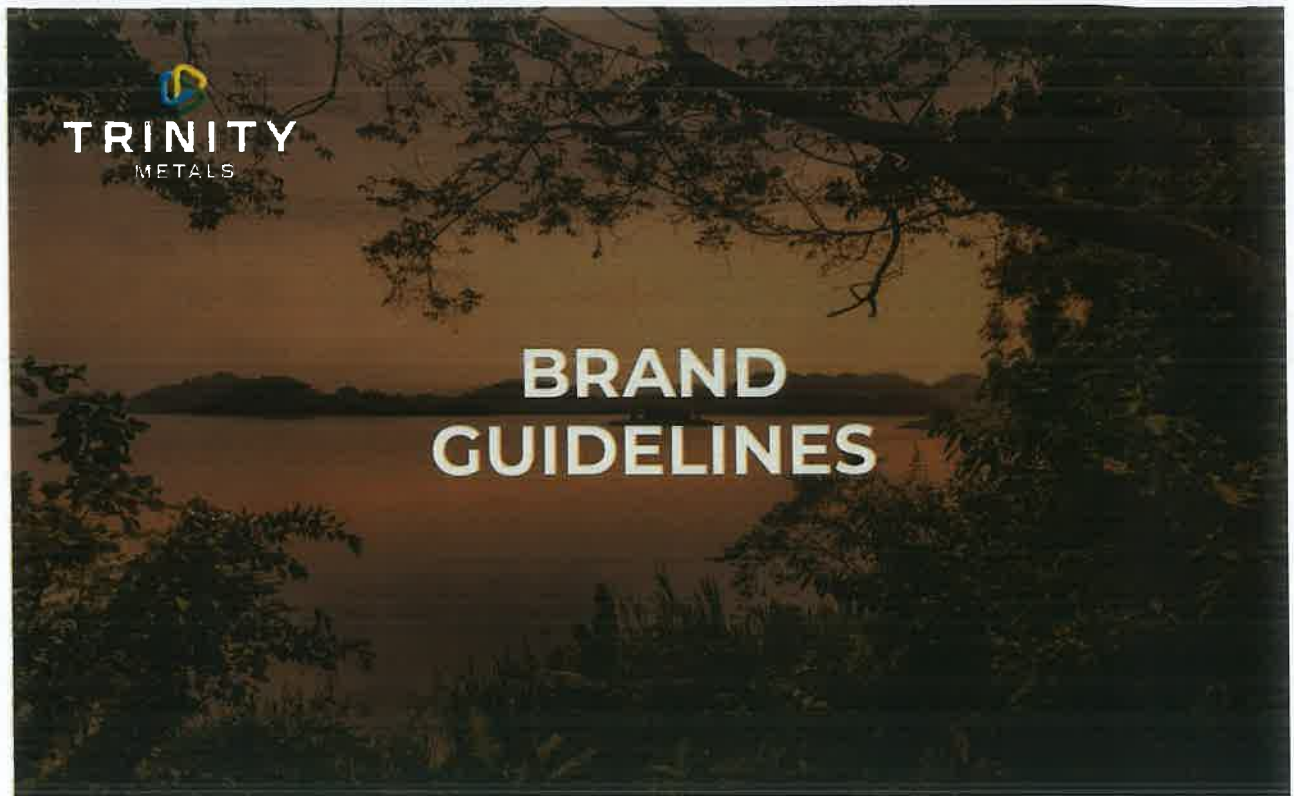
- a. The Trinity Metals Leadership Team will ensure that the structures and procedures necessary to secure effective communication both internally and externally are in place
- b. Every Employee and Subcontractor for Trinity Metals is responsible for the quality of their communication. Senior Managers will be responsible for communication standards within their area of responsibility.

10. Compliance

All Employees must comply with this policy. The Chief Executive Officer, General Managers, and Senior Management team of Trinity Metals Ltd and its Subsidiaries are ultimately responsible for ensuring compliance with this policy.

Any violation of this policy may be categorized as gross misconduct and will be dealt with in accordance with the Company's disciplinary policy and procedures. The Group Executives and the Board shall all ensure effective policy implementation.

11. Annexure



Trinity Rutongo
Letter Template_.pd



Trinity Nyakabingo
Letter Template_Sep



Trinity Musha Letter
Template_Septembe