

# Policy for disclosure of information and communication with investors and other stakeholders

„SIRMA GROUP HOLDING“ JSC

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## General

This policy is applicable to “Sirma Group Holding” JSC and its subsidiaries (Sirma, the Group, the Company, SGH).

Sirma's policy for disclosure of information and communication with investors and other stakeholders (the Policy) is in accordance with the requirements of:

- The Public Offering of Securities Act (POSA)
- Regulation 596/2014 of the EP and the Committee
- Accountancy Law

The policy is also consistent with Sirma's Good Corporate Governance Program as well as all remaining applicable internal company documents.

## Leading principles and stakeholders

Sirma recognizes the importance of timely, transparent, appropriate, impartial, and timely disclosure of information about the company to all stakeholders, such as:

- Employees
- Shareholders
- Potential investors
- Customers
- Vendors
- Regulators

This information helps various stakeholder groups make informed decisions about their interactions with Sirma. Accordingly, Sirma adheres to the following company disclosure principles:

- **Full compliance** with the regulatory provisions related to the disclosure of information;
- **Transparency:** Honest and open sharing of full information;
- **Timeliness:** Disclosure of any information required to be disclosed in a timely manner;
- **Impartiality:** Disclosure of information to all interested parties at the same time;
- **Consistency:** Compliance with the consistency and commensurability of the disclosed information;
- **Confidentiality:** Ensuring that no information is leaked to a third party (including other employees) prior to the official disclosure of the information by the Company.

This policy seeks to provide the organization, allocate responsibility and define the means of compliance with these disclosure rules.

## Disclosure content

The current regulatory framework (see above) in Bulgaria and Europe obliges Sirma to disclose regulated information regarding:

- its operations;
- financial position;
- non-financial development;
- significant transactions and inside information.

Sirma discloses this information in accordance with the statutory deadlines, striving to ensure equal access to this information for all interested parties.

In addition, with respect to information not required to be disclosed by law, Sirma proactively discloses corporate information that is deemed to be commercially, environmentally, and socially important, as well as information that may affect stakeholders and is useful to enhance their understanding of Sirma.

## Aim

Communication with stakeholders and investors /SI/ aims to ensure equal, timely, and effective access to information about SGH for everyone. This is achieved by:

- Adherence to the statutory deadlines for disclosure of regulated information;

- Provided timely, accurate, and detailed information to all its stakeholders (managers, employees, investors, customers, suppliers, regulators, etc.) about the state of SGH and the prospects for its development;
- Ensured reliable two-way communication - from SGH management to stakeholders and from stakeholders and investors to SGH management;
- Determination of the collected information for the markets of Sirma;
- Determination and protection of the information collected about investors in SGH;
- Determination of the types of communication channels with stakeholders and investors, the individual goals of each type of SI, and their periodicity;
- Preventing the unregulated dissemination of information.

## Organization and control

The information about Sirma, which is subsequently disclosed, is collected by the Financial and Accounting Department. Employees in this department follow a SPECIAL CODE OF CONDUCT FOR FINANCIAL AND ACCOUNTING POSITIONS in addition to INSTRUCTIONS AND DEFINITIONS REGARDING THE OBLIGATIONS OF PARTIES WITH ACCESS TO INSIDER INFORMATION. The purpose of these internal regulatory provisions is to avoid the possibility of misuse in the disclosure of information about Sirma.

All activities under this policy are carried out directly or organized by the Director of Investor Relations /IRD/ and the Marketing Department of the company.

Sirma makes efforts to publicize the information always in two languages - **Bulgarian and English**. Exceptions to this rule are only allowed for certain media (e.g. sharing an interview conducted in a given language, sharing a third party publication in a specific language, etc.).

Any disclosed information should be reviewed and approved by member(s) of the Disclosure Committee of the SGH Board of Directors prior to its publication.

A brief written report on each published piece of information is sent by IRD to the Board of Directors, together with a link to the publication itself. The purpose of this report is the full awareness of the SGH management of the published information. This is extremely important to avoid unsynchronized and/or unregulated sharing of information by individuals with access to inside information with third parties.

## Types of information

### Information on corporate governance

In its quarterly and annual reports, Sirma regularly discloses the most important information about the development of its corporate governance. Full information on all elements of the company's corporate governance is published on the company's website, [www.sirma.com](http://www.sirma.com), where it is updated periodically.

Corporate governance information contains:

- Information on all General Meetings held by the company;
- Information about the members of the Board of Directors;
- Information on the various Committees to the Board of Directors and their mandates;
- Information about the company's auditors;
- Information on the shareholder structure of the capital;

- All public internal regulations (Statutes, Codes, Policies, Procedures and Rules).

This information is maintained on the website by IRD and updated after each change/edit. The changes and/or revisions themselves are initiated and approved by Sirma's Board of Directors. The normatively required elements of corporate governance information are included in the company's quarterly reports, along with links to the company's website and the full content.

### Information on markets

Market information is **necessary** for stakeholders to help them form their expectations for the development of SGH in the context of the markets where the company is active. The lack of market information disseminated by SGH would lead to the risk of mis-positioning of SGH or its companies by investors. Market information is also provided to SGH's management so that investors and management have a unified view of SGH's operations, markets, and emerging changes and expectations.

Information about the various markets is collected from the relevant marketing departments of the various units and companies of SGH by IRD or, in the absence of such information, is collected from independent, reputable information sources by IRD. Independent sources should be accurately cited in relevant references, reports, and publications.

Market information contains the following levels:

- Global macroeconomic framework with a focus on major market countries for Sirma
- Macroeconomic framework in Europe
- Macroeconomic framework in Bulgaria
- Global ICT market
- Global ICT market in Sirma's sectors and verticals of specialization

Market information is updated quarterly or more frequently upon access to specific new information that was not available before, or sharp market fluctuations.

Information on market conditions is included in Sirma's quarterly activity reports.

### Information on SGH

Timely disclosure of all types of material information about SGH is **necessary** for investors and stakeholders to form an informed opinion about SGH, and accordingly make an informed decision about their interaction with Sirma.

Information on SGH includes:

- Information on the economic condition of SGH;
- Information on the plans and estimated development of SGH;
- Information on general meetings of shareholders and decisions on dividend payments by SGH;
- Information on significant transactions of SGH;
- Internal information about SGH;
- Non-financial information about SGH;
- Other regulated information about SGH.

The information on SGH is summarized by the financial and accounting department of the company and is made public by IRD in legally defined terms and in the previously announced media (BSE, FSC, Extri News, and Infostock).

A copy of each disclosed piece of information is also published in the investment section of the company's website under the heading "Financial Calendar". This information is kept on the site for a minimum of 5 years from the moment of publication, in compliance with the legal requirements.

## Types of communication channels with stakeholders and investors

### The investor section of SGH's website

The investor section on the SGH website provides the basis for SI communication.

**Objectives:**

- Compliance with the requirements of the Corporate Governance Code
- Compliance with regulatory requirements for the disclosure of information
- Providing an easy way to access new and historical data and information about SGH
- Concentrating complete investment information for SGH in one place

**Implementation:** The investor section is supported by the IRD or his sub-contractors. The IRD monitors the fulfillment of all goals before the section described above. The IRD ensures that all information in the section is **absolutely current** (regulatory requirements or up to 3 days from the event), as well as maintaining free access to **historical records** according to regulatory requirements.

### Regular disclosure of regulated information

**Objectives:**

- Compliance with regulations
- Informing stakeholders about the main events, financial results, and ratios of SGH

**Means:**

- The disclosure of the information is carried out through the platform of Extri News (Obslucane financial markets JSC), which at the same time forwards the information to BSE, FSC and publishes it on their platform for free access. Based on this leading medium for disclosure, Sirma publishes information in parallel on Infostock's analogous platform, for the benefit of investors who prefer this second platform;
- By disclosing the information in the Investor Section of the SGH website;
- If it is necessary to familiarize a wider circle of stakeholders, it is also possible to use additional platforms for disclosing the information (Investor.bg, Infostock.bg, social networks, and the like).

**Deadlines:** according to the regulatory requirements, the relevant disclosure dates are published in advance, at the beginning of the year for the entire year, in the section: "Financial calendar" on the SGH website.

**Implementation:** IRD, after receiving the necessary information from the relevant departments of SGH (accounting, finance, etc.).

**Accountability, access, and control:**

The IRD maintains an electronic register of all disclosures, containing the specific disclosed files and the files with used information. The Board of Directors of SGH has access to the register and detailed files with the disclosures and the evidence that they have been made in a timely manner, for the purpose of control. The management of SGH receives the whole or an extract of the register for

a certain period on request (usually associated with the quarterly reports of SGH). An extract from this register is made public together with the company's quarterly reports.

The IRD maintains a public copy of the Register in the "Financial Calendar" section, as well as the disclosed files themselves in the relevant "Investors" sections of the SGH website. "Financial Calendar" entries are linked to the corresponding files to ensure easy access to them by stakeholders. Access to them is public for all stakeholders.

### Disclosure of internal information

#### **Objectives:**

- Compliance with regulations
- Informing investors of internal information which may influence their investment decisions

#### **Means:**

- The disclosure of the information is carried out through the platform of ExtriNews (Obsluwane financial markets JSC), which simultaneously forwards the information to BSE, FSC and publishes it on their public platform;
- By disclosing the information in the Investor Section of the SGH website
- If it is necessary to familiarize a wider circle of investors, it is also possible to use additional platforms for disclosing the information (Investor.bg, Infostock.bg, and the like) and provide more detailed explanations.

**Deadlines:** according to regulatory requirements - usually measured in days after the event.

**Implementation:** The IRD, after receiving the necessary information from the relevant departments of SGH (accounting, finance, etc.).

#### **Accountability, access, and control:**

The IRD maintains an electronic register of all disclosures, containing the specific disclosed files and the files with used information. The Board of Directors of SGH has access to the register and detailed files with the disclosures and the evidence that they have been made in a timely manner, for the purpose of control. The management of the SGH receives the entire register or an extract from the register for a certain period upon request (usually associated with the quarterly reports of the SGH). An extract from this register is made public together with the company's quarterly reports.

The IRD maintains a public copy of the Register in the "Financial Calendar" section, as well as the disclosed files themselves in the relevant "Investors" sections of the SGH website. Financial Calendar entries are linked to their respective files for easy access. Access to them is public for all stakeholders.

### Investment news and press-releases

The IRD maintains an "Investment News" section on the company's website, generating press releases on his own or by order of the management of SGH, which it subsequently publishes on the website. In addition to the news generated in the above way, the IRD monitors for relevant content for markets, products, services, etc., which he also collects in the "Investment News" section. It is possible to publish news in other categories of the site - "Products", "Companies", "Markets", etc., which in turn are supported by the Marketing Department of the company.

#### **Objectives:**

- Concentration of all SGH news on the site
- Promotion of SGH development
- Promotion of information about SGH's products, services, and markets

**Means:**

- Preparation of a press release and its distribution to the media, directly by the IRD or by the Marketing Department
- Preparing an article, presentation, video, or other content and distributing it through specific media partners
- Search for relevant content to share on the SGH site.

**Periodicity:**

- Weekly for the Bulgarian content
- Monthly for the English content.

**Execution:** employees of the Marketing Department, the IRD, or sub-contractors controlled by them.

**Accountability, access, and control:**

Access to such information is free and public.

**Accountability of expenses:** included in the annual budget or approved on an ongoing basis by the CEO or CFO of SGH.

## Interviews

The marketing department and/or DVI organize interviews with SGH executives and experts in appropriate media.

**Objectives:**

- Promotion of SGH managers and experts
- Promotion of SGH products and services
- Popularization of the results of the activity of SGH
- Communicating targeted messages to investors
- Public response to popular questions (if media and format allow)

**Periodicity:** at least once every six months. If financial opportunities are available - once a quarter.

**Suitable media:**

- related to the investment community (see "Investor Information") of the existing investors;
- related to the investment community of target investors
- related to SGH's target markets (see "Information about the markets")

**Implementation:** The Marketing Department or the IRD offer, and the Executive Director accepts interviews, identifying the SGH representatives. The participation itself, advertising materials, presentations, and others are organized or prepared by the Marketing Department.

**Accountability, access, and control:** where possible, copies of the interview are kept on SGH's Youtube channel, and links to them are shared in "Investment News" on the SGH website and the company's Facebook page. Copies of written interviews are kept in the Investment News section of the SGH website. Access to them is free and public.

**Accountability of expenses:** included in the annual budget or approved on an ongoing basis by the CEO or CFO of SGH.



## Participation of SGH at events

SGH participates in events to promote its brand, products, and experts. SGH's participation in events is focused on the target investment community /see "Investor Information"/.

### **Objectives:**

- Promotion of SGH managers and experts
- Promotion of SGH products and services
- Popularization of the results of the SGH
- Communicating targeted messages to investors
- Possible feedback from the investment community (if the forum allows)

**Periodicity:** at least once every six months. If financial opportunities are available - once a quarter.

### **Eligible Events:**

- related to the investment community (see "Investor Information") of the existing investors;
- related to the investment community of target investors
- related to SGH's target markets (see "Information about the markets")

**Implementation:** The Marketing Department and the IRD propose, and the Executive Director adopts, a plan and budget for annual partnerships and participation in relevant events at the end of each year for the following year. The participation dates are published in the "Financial Calendar" section of the SGH website, after their approval at the beginning of the year for the entire year. The participation itself, advertising materials, presentations, and others are organized, prepared and distributed by the Marketing Department.

**Accountability of expenses:** included in the annual budget or approved on an ongoing basis by the CEO or CFO of SGH.

## Subscription and direct mailing

SGH uses subscriptions and direct mailing to provide direct contact with competent persons on the part of investors or other interested persons and to share targeted messages with them.

### **Purpose:**

- Creation and maintenance of a database with communication data of investors and stakeholders, which provides opportunities for direct mailing;
- Provision of a direct mass channel for communication with investors and stakeholders;
- Monitoring and control of the interest of individual investors in the announcements of SGH;
- Advance communication with stakeholders of important messages from SGH;

### **Types of direct mail messages:**

- Invitations to events;
- Information about a new issue of the investment bulletin;
- Sharing inside information;
- Sharing of specific messages from the management of SGH to investors and interested parties

**Frequency:** once a month, if possible, on the 15th or the first working day thereafter. More often only in extraordinary circumstances and "special" announcements.

**Technique:** SGH maintains a technical possibility for independent "subscription" by investors and stakeholders on its website via a button. In parallel, IRD supplements the list and data of subscribers with investors or stakeholders who have not subscribed independently, but wish to do so. Access to the list and subscriber data is shared only with company management upon request.

**Execution:** personal by the IRD, paying special attention to business and professional graphic design.

**Accountability, access, and control:** Access to the list of investors and stakeholders is limited to IRD and management of SGH. Access to the database or to inquiries about individual campaigns is provided by the IRD at the request of the management of SGH. Statistics for all campaigns are stored on an electronic platform for further analysis as needed.

**Accountability of expenses:** included in the annual budget or approved on an ongoing basis by the CEO or CFO of SGH.

### Investor bulletin

SGH prepares a quarterly investment bulletin.

**Objectives:**

- Popular and accessible presentation of investment information;
- Creating a reason for the "subscription" of investors and interested parties;
- Building expectations among investors and interested parties to receive the Investment Bulletin;
- Advance communication of important messages from SGH, supplemented with other information;
- Ability to communicate specific information that cannot find a place in other SI channels (for example, proxy forms, remote voting forms, lists of bank branches for receiving dividends, etc.);

**Types of messages, information in the Investment Bulletin:**

- Infographics about the results of SGH for a certain period;
- Interviews with managers and experts from SGH;
- Sharing of important events from the activities of SGH;
- Sharing of specific messages from the management of SGH to investors and interested parties

**Frequency:** once per quarter. More often when possible and in extraordinary circumstances and "special" announcements.

**Technique:** the IRD prepares the texts and data for the Bulletin. A subcontractor artistically designs the Bulletin. The newsletter is sent by e-mail to the listed subscribers: investors and stakeholders.

**Execution:** DVI personally and subcontractors are under his supervision, paying special attention to business and professional graphic design.

**Access, control, and accountability:** access to the Investment Bulletin is public.

**Accountability of expenses:** included in the annual budget or approved on an ongoing basis by the CEO or CFO of SGH.

### Internal newsletter

SGH prepares a monthly internal newsletter intended for the company's employees.

**Objectives:**

- Building a corporate identity
- Uniting the Sirma team
- A popular and accessible presentation of information about the company
- Advance sharing of information with the team about important events
- Ability to communicate specific information that cannot find a place in other channels

**Types of messages communicated with the internal bulletin:**

- Photos, text, and video content;
- Introducing various Sirma team colleagues
- Interviews with managers and experts from SGH;
- Sharing important events (past or upcoming) from life at SGH;
- Sharing of specific messages from SGH Management to employees

**Frequency:** once a month. More often when possible and in extraordinary circumstances and "special" announcements.

**Technique:** The marketing department prepares the content of the Newsletter. The entire content of the newsletter is in English, in order to overcome the language barriers of the various offices of Sirma. The newsletter is sent via email to all employees at Sirma.

**Implementation:** The marketing department and subcontractors under its direction, with special attention to business and professional graphic design.

**Access, control, and accountability:** access to the internal newsletter is free for all employees.

**Accountability of expenses:** included in the annual budget of the Marketing Department or approved on an ongoing basis by the CEO or CFO of SGH.

## Presentations

SGH prepares graphic presentations to present results, strategies, policies, products, etc. to investors and interested parties.

**Objectives:**

- Popular and accessible presentation of information that concerns the addressee of the presentation;
- Convincing the addressee of the thesis presented by SGH;
- Visual assistance during oral presentations of SGH representatives to stakeholders;
- Sharing a lot of information in a limited time - mainly through infographics in the presentations;

**Types of information shared through presentations:**

- Presentation of SGH: companies, structure, products, services, etc.;
- Infographics about the results of SGH for a certain period;
- Quotes from managers and experts from SGH;
- Sharing of important events from the activities of SGH;
- Sharing market information;
- Sharing of specific messages (strategy, tactics, policy, changes, stock market and the like).

**Frequency:** as needed, but not less than once a month.

**Technique:** The marketing department and/or the IRD prepare the texts and data for the presentation. A subcontractor artistically shapes the Presentation. All materials are stored on the SGH server with limited access for future reuse.

**Implementation:** The marketing department or the IRD and subcontractors under their direction, paying special attention to business and professional graphic design.

**Access, control and accountability:**

Employees of the Marketing Department, IRD and the Management of SGH have access to the presentation database.

**Information shared through presentations should already be public! In the event that it is necessary to present data to a third party that is not yet public, ensure their public disclosure through some of the other SI channels before or immediately after the presentation itself.**

**Accountability of expenses:** included in the annual budget or approved on an ongoing basis by the CEO or CFO of SGH.

## Webinars

SGH conducts live streaming and saves recordings of webinars to present results, strategies, policies, products, etc. to investors and interested parties.

### **Purpose:**

- Giving the stakeholders the opportunity to hear, see, and enter into communication with managers of SGH;
- Provision of data to/for the analysts by the interested parties;
- Popular and accessible presentation of information that concerns the addressee of the webinar;
- Sharing a lot of information, in a limited time, with the help of presentations, video, audio and others;
- Ability to ask questions from participants and have them answered immediately.

### **Type of information shared through webinars:**

- Sharing of quarterly/annual results of the activity of SGH;
- Presentation of SGH's strategy and plans;

**Periodicity:** once per quarter or as needed, but not less often than once a year.

**Technique:** The webinar is led by SGH managers. The IRD prepares or collects the texts and data for the presentation. A subcontractor artistically shapes the Presentation. The IRD subcontracts filming and streaming and publicizes the webinar through direct mail and other media. Subsequently, the recording of the webinar is stored on the SGH Youtube channel, where it is publicly available.

**Implementation:** Heads of SGH, Marketing Department, IRD and subcontractors under their leadership, paying special attention to business and professional video layout.

### **Access, control, and accountability:**

Access to the webinar recording database - publicly available and public.

**Accountability of expenses:** included in the annual budget or approved on an ongoing basis by the CEO or CFO of SGH.

## Social media

SGH prepares social media to attract attention to various achievements of the Holding or its subsidiaries - financial results, employees, participation in events, products, concluded deals, received awards, etc.

### **Purpose:**

- Popular, short, and accessible presentation of information;
- Promotion of information from SGH;
- Attracting interest to the relevant sites of SGH or subsidiary companies;
- SEO;

### **Types of information shared through social media:**

- Presentation of subsidiaries, their structure, employees, products, services, participations, awards, etc.;

- Infographics about the achieved results of the SGH for a certain period;
- Links to news from SGH;
- Links to news from subsidiaries.

**Frequency:** weekly, if possible, daily.

**Technique:** The marketing department prepares or collects the texts, images, videos, or links to content and publishes them on the social media used by the company in the relevant channels.

**Implementation:** The Marketing Department or IRD as a substitute.

**Access, control, and accountability:**

Mass and public, aiming to increase the number of interested parties.

## Video and audio content

SGH prepares video and audio content for presenting its products and companies in an accessible manner to investors and interested parties.

**Purpose:**

- Popular and accessible presentation of information that concerns the addressee of the content;
- Visual assistance during oral presentations of SGH representatives to interested parties;
- Ability to communicate complex information in an accessible manner.

**Types of information shared via video or audio:**

- Presentation of SGH - events, interviews, participation in TV shows, etc.;
- Presentation of managers of SGH and subsidiaries, through their participation;
- Presentation of products, services, and technologies of SGH companies;
- Explanation of complex technological terms that are related to the activity of SGH - big data, semantics, AI and the like.

**Frequency:** as much as possible, if possible, video for each product and service.

**Technique:** The marketing department prepares scripts. A subcontractor shoots and edits the video, which is then distributed to appropriate media. All materials are stored on the SGH server with limited access for future reuse.

**Implementation:** The marketing department and subcontractors under its direction, with special attention to business and professional graphic design.

**Access, control, and accountability:**

Archive copies of recorded video and audio materials are stored on the company's central server. Access to them is limited to authorized persons. Some of the video materials are published on the YouTube channel of SGH and have free and unrestricted access.

**Accountability of expenses:** included in the annual budget or approved on an ongoing basis by the CEO or CFO of SGH.

## "Q&A" section

SGH maintains the section "Q&A" in the investor section of the Bulgarian version of the company's website, [www.sirma.bg](http://www.sirma.bg). There are published more interesting questions (and corresponding answers), which were asked to IRD and could be of interest to other interested persons (other than the person asking the question). It is also possible to publish information in the form of a question and answer, that SGH deems necessary to share with the audience.

**Purpose:**

- Popular to interesting questions and answers related to SGH;

- Sharing, in a highly casual manner, information that we would like to share with the investment community;
- Ability to communicate complex information in an accessible manner
- Increase efficiency in information sharing.

**Types of information shared through questions and answers:**

- Information on the activities of the SGH;
- Detailed information on the payment of dividends;
- Clarifying complex issues regarding financial results, products, technologies, services, and the like.

**Frequency:** as needed, but not less often than once every two months.

**Technique:** the IRD selects the question and answer that are interesting, or that they want to share with a wider audience. The IRD publishes them in the website section.

**Execution:** IRD.

**Access, control, and accountability:**

All questions and answers are stored in the relevant section of the site. Access to them is free and unlimited.

**Accountability of expenses:** no expenses.

## File sharing

Investors perform a financial analysis of Sirma Group - initially and periodically. Sirma Group is required by law to disclose financial information regularly. The disclosed files should facilitate the subsequent processing of the data by the investors.

**Purpose:**

- Facilitating the processing of disclosed data by interested parties;
- Increasing investor satisfaction with Sirma Group.

**Periodicity:** at each disclosure of information subject to analysis.

**Technique:** Take care in any disclosure to use files that allow easy post-processing of the data. The files are published on the company's website or in the official media (X3News, Infostock, BSE, etc.).

**Completed examples:**

- When publishing historical financial data, do not use the pdf file format, but Excel, which allows easy processing and analysis of the published data;
- When sharing the power of attorney sample that needs to be used, it should not be in pdf format, but in word format, which allows for easy preparation of the required power of attorney.

**Execution:** IRD personally and subcontractors under his supervision, paying special attention to business and professional graphic design.

**Access, control, and accountability:**

Access to shared files is public.

## Campaigns

Campaigns are communication events that combine several of the listed communication forms.

**Purpose:**

- **Reaching a given information or message to the widest possible range of users;**
- Recycle content to reach new users and reduce content generation costs;
- Comprehensiveness of the message and satisfaction of the needs of different communication forms of the users;
- SEO.

**Periodicity:** whenever possible (financial and time), each form of communication is combined with as many other forms as possible.

**Technique:** After preparing a given form of communication, the Marketing Department or the IRD prepare, or use subcontractors to prepare, the same content in another form. Different communication forms are usually disclosed simultaneously in their specific channels. All materials are stored on the SGH server with limited access for future reuse.

**Completed examples:**

- Direct mailing with an invitation to participate in a webinar /MailChimp/, conducting a webinar, recording a video from the webinar /YouTube/, sharing a presentation from the webinar /site/, written answers to more interesting questions from the webinar /Q&A section/, file sharing discussed in the webinar. Used in every webinar.
- Direct mailing with an invitation to meetings with investors, holding of meetings (bilateral or other), presentation of the topic of the meetings, announcement of the results and/or presentation of the meetings, press release about the meetings held (advance or with the results), publication of the presentation, publication of used files. Used in the Strategy Update campaign.

**Implementation:** The marketing department, or the IRD and subcontractors under their direction, paying special attention to business and professional graphic design.

**Access, control, and accountability:**

Access to disclosed campaigns is public. Access to the database with materials for the campaigns is available to the DVI and the Management of the SGH.

\* \* \*