
	<b>REALESTATE GROUP</b>		
	<b>Communication Policy</b>		
	Approved on	<b>Version 1.0</b>	

## APPROVAL

Date	5 January 2022
Approved by Board Representative	Kate Maphage
Reviewed by Executive Chairman	Guido Renato Giachetti
Reviewed by Chief Executive Officer	Jacopo Pari

## KEY STAKEHOLDERS

Governing Body	Board of Directors of RDC Properties Limited
Executive Chairman	Guido Renato Giachetti
Chief Executive Officer	Jacopo Pari
The Manager, The Management Company	Property and Asset Management Limited, so long as the current management agreement with RDC continues, and it's successor should it be terminated, and /or it's subsidiaries or outsourced service providers.
Management Team – “The Manager”	Management and Staff of the Manager

### 1. The Purpose

Communication policies of an organisation **set expectations and manage the flow of communication within and outside the organisation.**

### 2. Scope

Relevant to all the RDC Group, including its subsidiaries and direct service providers (Asset management Company). The policy covers all forms of communication – written, electronic and verbal.

### 3. The Effective Communication

#### 3.1 Purpose

RDC is a listed company and as a consequence it is under the obligation to promptly communicate any information to the public that could have a significant effect on the price of its securities, such as shares and bonds.

The RDC Communication Policy establishes a set of principles to ensure that communication across the RDC Group is effective and appropriate and responds to the diverse information needs of all our stakeholders. The purpose of this policy is to help preserve and enhance the Company's reputation, both internally and externally, and to help ensure that relevant information reaches the targeted audience in the right format and at the right time. It is key for every RDC Director and employee of the outsourced Asset Management Companies (“member”) to understand the value of effective communication. Accurate and timely communication with stakeholders is integral to a business' risk management process.

### 3.2 Principles

Communication at RDC is guided by the following principles:

- a) **Authorised spokespersons:** Communication with stakeholders, media and financial markets must be aligned with the Company's official stance and strategy and must only be done by duly authorised Company spokespersons. Any person not authorised to speak or write on behalf of the Company, asked by the media, shareholders (internal or external) or market analysts, or other stakeholders must decline to comment and refer them to the Senior Communication Officer to be appointed by the Board. Any member who does not follow this rule may be held personally liable for his/her actions.
- b) **Responsible individual behaviour:** All RDC members should, in their daily work, behave as if they were representatives and ambassadors of the Company. Therefore, each member should be committed to preserving and enhancing RDC's reputation. Any illegal or offensive behaviour or statement, including via social media accounts, which could cause damage to the Company should be avoided. The core values of Integrity, Accountability, Respect and Empathy, Inclusiveness, Competency and Entrepreneurship that underpin the RDC brand should be reflected in everything we say or do. Inside information may only be disseminated through an authorised channel (Company press releases). Each member should keep any inside information about RDC strictly confidential and not trade in RDC securities while in the possession of inside information in line with the BSE Dealing Regulations.
- c) **Transparency:** RDC is committed to providing the public with clear, accurate and reliable information at all times. We seek to establish close relationships with our stakeholders, both internal and external, through regular communication, integrity and transparency.
- d) **Two-way communication:** RDC believes in clear, accurate and reliable top-down and bottom-up communication through all levels of the organisation. Efficient two-way channels of communication ensure that members understand, are aligned with and help the Company achieve its business objectives. The communication with all stakeholders, internal and external, must proceed in line with the Company's official stance and strategy.
- e) **Presenting at conferences:** When speaking at conferences, the presentation should be checked with Senior Communication Officer (at this stage the person is the CFO), Investor Relations (RDC CEO is responsible) in advance.
- f) **Official language:** RDC recognises the rich linguistic diversity within the Group. However, English has been identified as the official language of the Group, and the learning and use of this language should be promoted.
- g) **Fair and prompt disclosure:** RDC recognises the value of communicating company-related information in a timely and non-selective manner. Publicly available information on company related matters should be released to all internal & external stakeholders and to the public simultaneously.
- h) **Confidentiality:** All RDC documentation, correspondence and company-related information, unless and until publicly available must be treated as confidential. Non-public information

from or concerning suppliers, customers, members, agents, consultants and other parties must also be protected in accordance with legal and contractual requirements, including the RDC Data protection procedure set up in the IT Policy, when applicable.

- i) **Compliance:** This policy should be read in conjunction with the RDC Code of Ethics. RDC is committed to complying with all applicable laws and stock exchange rules on the disclosure of financial and other information about the Company.

Furthermore RDC fully respects the legal rights of the members in all countries. In case of contradiction between this policy and applicable laws, applicable laws shall prevail.

#### 4. Monitoring

The Communication Policy will be monitored by the RDC Board who may also require other independent assurance on the effectiveness of the policy from time to time.

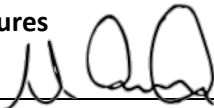

#### 5. Amendment of the Policy

This policy shall be subject to constant review, monitoring and amendment by the Governing Body who shall ensure all reviews are reduced to writing and records of such amendments clearly noted in the business of the day where such amendments are adopted.

#### 6. Approved, adopted and reviewed

This policy was approved and adopted by the Governing Body on the 5th day of January 2022

##### Approval Signatures

  
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**Governing Body Representative**  
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**Executive Chairman**  
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**Chief Executive Officer**