

Climate Change Policy

Owner: TGH SD Team

Endorsed by TGH CGSD Committee on March 20, 2026

Approved by TGH Board of Directors No.2/2026 on March 26, 2026

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1. Introduction

Climate change has been recognized as one of the most serious global risks. It poses threats and impacts on social systems, the environment, and the economy. Rising temperatures have led to various phenomena, including sea level rise, increased frequency and severity of natural disasters and extreme weather events. The global response to the threats posed by climate change has led to movements and collaborations among the international community, such as reducing greenhouse gas (GHG) emissions and implementing adaptation programs for economic transition. These initiatives have had widespread impacts on global economic mechanisms, structures, and financial systems. Therefore, climate risk is a global concern and presents a critical challenge that requires the attention and cooperation of countries and companies around the world to develop effective solutions.

Thailand's geographical location makes it particularly vulnerable to the impacts of climate change, necessitating an urgent transition toward a more sustainable economy. To align environmental policies with national goals, the financial sector has begun to play a crucial role in addressing climate change challenges. The Thai insurance regulator OIC has emphasized the role of the insurance system in supporting sustainable economic and social development. It aims to position the insurance sector as an active contributor to sustainability in environmental, social, and governance (ESG) dimensions. Insurance companies, as both risk underwriters and major institutional investors, are increasingly exposed to climate-related risks. Recently, OIC has issued ESG Guidelines and Climate Risk Management Guidelines, which have been used as a basis for this policy.

Thai Group Holdings Public Company Limited and its subsidiaries recognize the importance of protecting the climate as a global challenge with significant implications on the economy, society and the environment. In line with its commitment to leadership in sustainable development, the company has established this policy to guide climate action across all areas of its operations by integrating sustainable resource management with low-carbon business models.

2. Purpose of the policy

The TGH Climate Change Policy has the following purposes:

- To effectively reduce negative impacts from climate change, create positive environmental impacts, and build long-term confidence among all stakeholder groups by promoting greenhouse gas (GHG) emission reduction, improving energy efficiency, using natural resources sustainably, and undertaking actions that minimize environmental impacts.
- To transition towards long term goals of net zero greenhouse gas emissions, in alignment with the Paris Agreement by embedding climate considerations across its operations and decision-making processes, and in accordance with the Principles for Sustainable Insurance (PSI) and the United Nations Sustainable Development Goals (UN SDGs)
- To enhance preparedness and resilience to climate change across all aspects of the business.
- To support effective supply chain management and collaborate with business partners and suppliers to reduce negative impacts and create positive impacts related to climate change in accordance with international standards.

3. Scope of the policy

This policy is applicable to TGH and all subsidiaries. The company emphasizes collaboration with all parties in the supply chain to promote operations that reduce negative climate impacts, support greenhouse gas emission reductions, and encourage efficient resource utilization to protect the environment in the long term and drive sustainable business operations in all dimensions.

4. Owner and governance structure of the policy

Policy Owner: TGH SD team

Policy Endorser: TGH Corporate Governance & Sustainable Development (CGSD) Committee

Policy Approver: TGH Board of Directors (BoD)

5. Revision and implementation of the policy

5.1 Policy revision

This policy will be submitted every year for review and endorsement to the TGH CGSD Committee, and for approval to the TGH Board of Directors.

5.2 Policy Implementation

The policy shall be effective on 1 April 2026.

6. Definitions

Term	Definition
Climate Change	Refers to long-term changes in the Earth's climate, including shifts in temperature, rainfall, sea level, and other weather patterns occurring over extended periods. These changes can be caused by natural processes or human activities — especially the increased emission of greenhouse gases from fossil fuel combustion, deforestation, and agriculture — leading to significant global climate alterations.
Climate and Environmental Risk (Climate-Related Risk)	Refers to risks arising from climate change that may affect the economy, society, and environment. These risks are generally categorized into two main types: <ul style="list-style-type: none"> - Physical Risk - Transition Risk
Physical Risk	Refers to risks directly caused by climate change that impact infrastructure, assets, and economic activities. Physical risks are divided into two main types: <ul style="list-style-type: none"> - Acute Physical Risks: Sudden, severe events such as storms, floods, droughts, and wildfires. - Chronic Physical Risks: Gradual changes such as rising sea levels, shifting temperatures, and altered rainfall patterns.
Acute Physical Risk	Refers to risks arising from sudden and severe natural or environmental events that have short-term impacts, such as floods, earthquakes, or wildfires. These events often cause immediate damage to assets and disrupt business operations. While typically abrupt and unexpected, such events may be triggered or intensified by chronic underlying climate factors. Risk assessments should consider both sudden incidents and long-term contributing factors.
Chronic Physical Risk	Refers to risks arising from long-term and gradual environmental or climatic changes, such as sea-level rise, coastal erosion, or gradual temperature shifts. These risks can impact assets and operations over the long term and may also act as chronic factors contributing to the occurrence of acute natural disasters or other sudden risk events in the future.
Transition Risk	Refers to risks stemming from the transition towards a more sustainable and low-carbon economy, which may affect organizations and economic activities. Transition risks can arise from several factors, including changes in environmental policies and regulations, advancements in clean energy technologies, shifts in market demand toward environmentally friendly products, and evolving social norms or stakeholder expectations. Such risks may lead to increased costs, reduced asset value, or structural changes in business operations. Examples include: <ul style="list-style-type: none"> - Regulatory Impact: The implementation of environmental regulations or carbon taxes could increase operating costs for insurance companies reliant on fossil fuel-based industries. - Technological Impact: The development of clean energy technologies may result in fossil fuel-related assets becoming stranded or obsolete. - Market Impact: Changes in consumer preferences toward sustainable products may reduce demand for insurance products that do not align with ESG standards.

Climate Risk Management	The process of integrating climate-related risk considerations into an organization's overall enterprise risk management. This includes identifying, assessing, monitoring, and managing risks associated with climate change and its environmental impacts. The process covers both physical risks and transition risks resulting from changes in policies, laws, and technologies during the transition toward a low-carbon economy. Effective climate risk management helps ensure organizational resilience, reduces negative business impacts, and supports long-term sustainable growth in line with international standards.
Sustainable Finance	Refers to the mobilization and utilization of financial resources to support projects with positive environmental, social, and economic impacts. Sustainable finance encompasses various types of investments in environmental and sustainability-focused initiatives, including: <ul style="list-style-type: none"> - Green Bonds: Debt instruments that fund projects with environmental benefits, such as renewable energy or water infrastructure development. - Social Bonds: Bonds issued to finance projects with positive social impacts, including health, education, and housing initiatives. - Sustainability Bonds: Instruments that combine both environmental and social investments in a single project. - Sustainability-Linked Bonds (SLBs): Bonds tied to the issuer's achievement of predefined sustainability targets
ESG Investing:	Investment strategies that incorporate Environmental, Social, and Governance (ESG) criteria to promote long-term sustainable business practices
Low-Carbon Economy	An economic system focused on reducing carbon dioxide and other greenhouse gas emissions through the adoption of environmentally friendly technologies and policies. The objective is to mitigate the impact of climate change and ensure long-term economic sustainability. This includes promoting renewable energy usage, improving energy efficiency, increasing the use of recycled materials, and supporting emission reduction policies across various sectors such as transportation, industry, and agriculture.
Greenhouse Gases (GHG)	Atmospheric gases capable of absorbing and emitting infrared radiation, thereby contributing to the greenhouse effect and global warming. GHGs include carbon dioxide (CO ₂), methane (CH ₄), nitrous oxide (N ₂ O), and various fluorinated compounds. Most emissions are caused by human activities, such as fossil fuel combustion in energy and transport sectors, agriculture, deforestation, and industrial production. Reducing and controlling GHG emissions is essential for mitigating climate change and protecting the environment in the long term.
Fossil Fuels	Energy sources formed from ancient biological matter subjected to geological processes over millions of years. These include crude oil, coal, and natural gas. When combusted, fossil fuels release greenhouse gases like CO ₂ and CH ₄ into the atmosphere, contributing significantly to climate change. While widely used for electricity generation, transportation, and industrial purposes, fossil fuels have high environmental impacts compared to clean energy alternatives.
Clean Energy	Energy derived from sources that produce low or zero emissions of pollutants and greenhouse gases during generation or use. Clean energy includes renewable sources such as solar, wind, hydropower, biomass, and geothermal, as well as low-emission sources like nuclear energy, which do not emit carbon dioxide during production. Clean energy plays a vital role in reducing the impact of climate change and is critical for environmental sustainability. Insurance organizations should consider supporting and investing in clean energy to foster long-term environmental resilience.
Climate Scenario Analysis	Analysis to assess the resilience of the business strategy under different climate-related scenarios, including different temperature increase scenarios.

7. Roles and responsibilities of related parties

7.1 TGH Board of Directors

The TGH Board of Directors is responsible for:

- Establish a "Corporate Governance & Sustainability Committee" responsible for overseeing and advising on sustainability development and climate change in alignment with sustainable development goals, GHG reduction targets, carbon neutrality, and long-term direction towards Net Zero goals, ensuring the inclusion of personnel with the necessary expertise to support effective governance in this area
- Approve and oversee the Climate Change Management Policy in line with the company's business nature and objectives.
- Approve ESG-related KPIs for senior management and GHG reduction targets and climate resilience strategies and oversee their integration into performance management of senior executives.
- Assign accountability for the oversight of climate-related risk management to the relevant board sub-committee.

7.2 TGH Corporate Governance & Sustainable Development (CGSD) Committee

The CGSD Committee is responsible for:

- Oversee and advise on sustainability development and climate change in alignment with sustainable development goals, GHG reduction targets, carbon neutrality and long-term direction towards Net Zero goals.
- Endorse and monitor compliance with the Climate Change Management Policy. Review the policy at least once per year or when significant changes occur.
- Endorse GHG reduction targets and climate resilience strategies.
- Monitor progress and provide guidance regarding climate protection efforts and related risks.
- Integrate environmental performance into senior management and employee evaluations.
- Ensure alignment with national and international standards and targets such as the Paris Agreement.
- Report on progress to the TGH Board of Directors.

7.3 TGH Sustainable Development Management Committee (SDMC)

The SDMC Committee is responsible for:

- Sustainability development and climate change management, to drive GHG reduction, carbon neutrality and Net Zero targets.
- Define clear measures and action plans for GHG reduction and implement these action plans.
- Allocate appropriate resources (personnel, technology and budget).
- Collaborate with partners and external organizations and support climate-related initiatives
- Manage resources, energy, fuel, water, waste, and pollution across all operations.
- Apply environmentally friendly materials in office construction and renovation.
- Promote green technologies and innovations aligned with international standards.
- Transparently disclose direct and indirect GHG emissions in accordance with TCFD and GRI standards.
- Report on progress to the TGH CGSD Committee.

7.4 TGH SD Team

The TGH SD Team is responsible for:

- Own, maintain and review the Climate Change Policy on annual basis.
- Provide training and communicate the policy to all stakeholders.
- Continuously monitor and evaluate policy communication effectiveness.
- Coordinate the climate change efforts within Thai Group and its subsidiaries.
- Monitor the progress of climate change efforts and report to the SDMC and CGSD Committee.
- Prepare climate risk management disclosures.

7.5 Subsidiary MD (for SE Life, INSURE and SECAP/SEM/SEMR)

The Subsidiary MD is responsible for:

- Develop and implement an operational plan for managing climate and environmental risks in alignment with the strategy or policies set by the subsidiary Board of Directors.
- Plan and deliver the climate-related activities to achieve sustainable development goals, GHG reduction targets, carbon neutrality and Net Zero goals, agreed with the subsidiary Board, SDMC and TGH CGSD Committee. This includes the agreed ESG related KPIs and agreed actions such as reduction of carbon emission and reduction of paper usage.
- Report on the status of climate and environmental risk management operations to the Board of Directors or the relevant subcommittee and provide advice to the Board on the formulation of strategies and policies related to climate and environmental risks at least once a year.

7.6 Group-C Executives

The Group-C Executives are responsible for:

- Plan and deliver the climate-related activities within their domain, to achieve the sustainable development goals, GHG reduction targets, carbon neutrality and Net Zero goals, agreed with the SDMC and TGH CGSD Committee.
- Ensure that office buildings and IT infrastructure contribute to achieving the environmental goals set by TGH Board of Directors and TGH CGSD Committee.
- Ensure that the central procurement process encourages third parties used by TGH and subsidiaries comply with relevant ESG principles.

7.7 TGH Risk Management function

As part of the 2nd line of defense, TGH Risk Management is responsible for

- Include ESG and climate risk related activities in the Enterprise Risk Management framework, documented in the TGH Group Risk Management Policy. This includes adding ESG and climate risk management activities into Risk & Control Self-Assessments (RCSAs), risk appetite statements, risk appetite monitoring and business continuity management, as well as any capital stress testing and scenario analyses required by regulators.
- Report on ESG and climate related risks to TGH ROC.

7.8 Subsidiary Risk Management function (for SE Life, INSURE and SECAP/SEM/SEMR)

As part of the 2nd line of defense, the subsidiary Risk Management function is responsible for:

- Include ESG and climate risk related activities in the Enterprise Risk Management framework, documented in the subsidiary Risk Management Policy and Framework. This includes adding ESG and climate risk management activities into Risk & Control Self-Assessments (RCSAs), risk appetite statements, risk appetite monitoring and business continuity management, as well as any capital stress testing and scenario analyses required by regulators.
- Advise the subsidiary RMC and/or the subsidiary BoD on any key risk indicators and risk appetite / risk tolerance limits related to ESG and climate risks.
- Report on ESG and climate related risks to the subsidiary RMC and/or subsidiary BoD.

The risk management functions of SE Life and INSURE must also comply with any mandatory ESG and climate risk management related requirements issued by OIC:

- As indicated by OIC in the Climate Risk Guidelines, the company must integrate risks related to climate and environmental factors into the enterprise risk management (ERM) framework and the Own Risk and Solvency Assessment (ORSA) process. This includes assessing the impacts of climate change on assets, liabilities, and key operational activities, particularly those related to insurance operations and other business investments.
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7.9 Subsidiary Compliance function (for SE Life, INSURE, SECAP/SEM/SEMR)

Compliance departments are responsible for advising on, reviewing, and ensuring compliance with laws and regulations related to climate and environmental risks, keeping track of relevant legal requirements issued by regulators or government authorities, and ensuring the company complies with these standards.

7.10 Operational departments in main subsidiaries (SE Life, INSURE, SECAP/SEM/SEMR)

Operational departments (e.g. Product Development, Sales, Underwriting, Reinsurance, Claims and Investment Management) in the main subsidiaries are responsible for the core activities of the insurance and finance business. These departments must continuously consider climate and environmental risk factors that may affect their operations, identifying and assessing whether these risks are material to their activities. This enables them

to adjust their risk management processes in line with the company's overall risk profile and the risks faced by customers and policyholders.

7.11 Internal Audit

Internal audit is responsible for independently reviewing and evaluating the policies and effectiveness of the climate and environmental risk management processes. They must ensure that the company is implementing policies and measures to manage climate and environmental risks appropriately and effectively.

8. Policy Statements

This Chapter provides an overview of all mandatory climate risk management activities to be performed by Thai Group Holdings and subsidiaries.

8.1 Climate Commitment

To align with the Paris Agreement, the Company commits to aligning its operations with the goals of the Paris Agreement, and establishes clear, public climate commitments supported by measurable targets and action plans.

The company commits to align all future capital expenditures with the Paris Agreement's goals.

8.2 Climate-related strategy

Senior management should consider climate and environmental factors when formulating business strategies, referring to the following guidelines:

- Integrate climate and environmental factors as key considerations in the process of developing and reviewing the company's business strategies. These factors should be identified and assessed to determine whether they are material to specific operational strategies within the company. This assessment should cover both short, medium, and long-term periods.
- The development of business strategies related to climate and environmental risks should consider the opportunities and risks arising from changes in climate factors and their potential impacts on the business and stakeholders.
- Companies should assess the impact of climate and environmental risks on their existing business strategies.
- Companies should develop action plans related to climate risk and track progress toward related goals. These plans should be reviewed at least annually or whenever the outcomes of operations deviate from set targets, to improve the effectiveness of climate-risk-related measures.

8.3 Climate-risk, Climate risk identification, assessment and integration

Companies should systematically identify, assess, and integrate climate related risks and opportunities into corporate strategy, financial planning, and investment decision-making processes to enhance long-term resilience and value creation. For example:

- Insurance risk: Increasing frequency and severity of natural disasters directly impact the insurance industry by leading to higher claims and losses. Life insurers may face impacts from climate change (e.g., rising temperatures, increased CO2 levels) leading to higher rates of morbidity and mortality. If not adequately considered, these impacts could lead to underestimating the risk, resulting in financial damage such as insufficient premiums or inadequate reserve levels.

- Credit risk: Climate and environmental risks can affect finances in various ways, including reduced profits, higher claims, or asset devaluation, potentially preventing debt issuers or counterparties from fulfilling their obligations.
- Market risk: Insurers may face declining asset values and increased volatility if their investment portfolios do not align with the changing business environment, such as moving away from non-renewable energy investments which may become "stranded assets" in a low-carbon economy.
- Liquidity risk: Insurers could struggle to liquidate assets impacted by the transition to a sustainable economy due to changing investor preferences, such as divesting from companies with negative environmental impacts. Long-term insurance contracts may expose the company to risks from not accounting for the long-term impacts of climate risks, potentially leading to asset-liability mismatches and financial instability.

Companies should identify business sectors with significant climate and environmental risks and establish risk criteria to prioritize those sectors. These criteria might include greenhouse gas emissions, vulnerability to climate change or flooding, and unsustainable energy practices. The company should then create specific policies and communicate expectations to clients or policyholders in those sectors, both for existing and new clients.

Companies should identify and assess the climate risks associated with counterparties such as reinsurance companies, external service providers, and business partners. The assessment should consider both physical and transition risks arising from climate and environmental changes. This includes evaluating the financial status, business strategies, and associated risks of these counterparties to determine the significance, likelihood, and concentration of such risks. This will support the development of business strategies related to counterparties and help mitigate future risks, thus ensuring the company's financial stability and sustainability.

8.4 Climate-risk mitigation

Companies should continuously establish processes to control and manage climate and environmental risks. These processes should cover at least operations that have been identified and assessed as material issues related to the company's climate risks. This aims to reduce or avoid operations or activities that could severely negatively impact on the climate and environment or are likely to conflict with new environmental regulations that may arise in the future.

Companies may consider incorporating the results of risk identification and assessment of customers, policyholders and counterparties in the development of measures or policies to control risks or encourage policyholders and counterparties to improve their environmental risk profiles or adjust their business operations or behavioral patterns in line with future changes in climate or the economy and society.

Companies should establish risk indicators that cover various dimensions, from business risks within the company to risks from customers, policyholders and counterparties. Additionally, companies should develop measures or policies to control risk levels in line with the acceptable risk appetite and business strategies, such as increasing investments in environmentally friendly assets or controlling the concentration of coal energy in its insurance portfolio.

8.5 Climate-risk monitoring and reporting

Companies should establish continuous monitoring related to climate issues, such as greenhouse gas (GHG) emissions from customers and policyholders and the impact of climate change on the subsidiary's current operations. This should be linked to the company's business plans or strategies and reported to the Board of Directors, relevant sub-committees and senior management.

Companies should establish reporting mechanisms for environmental risk management information, particularly material issues, to the Board of Directors, relevant sub-committees, and senior management on an ongoing basis. This includes reporting whenever events related to climate and environmental risks have significant impacts on the company's business strategies, to track risk levels within the acceptable risk appetite and to inform future business strategies.

Companies may consider developing tools and indicators for early warning signals and thresholds for climate and environmental risk impacts on business strategies or financial status. These tools can help take proactive measures and manage climate-related risks efficiently by quickly detecting and responding to potential risks.

8.6 Scenario analysis and stress testing for climate related risks

Companies should conduct scenario analysis and stress testing as tools to assess the resilience and readiness of their business strategies to cope with climate and environmental risks. This should consider the complexity and changing nature of risks. The results of scenario analysis should be used to improve the company's risk profile.

The purpose of scenario analysis is to identify and assess the impact on the company's financial resilience from various climate and environmental events. This helps the company assess the resilience of its business strategy and the suitability of its insurance, finance and investment portfolios under various climate scenarios, including extreme climate events.

The scenario analysis is most likely to be performed by a multi-functional task force, with involvement of Actuary, Underwriting, Reinsurance, Investment Management, Finance, SD team, Strategy team and Risk Management. Insurance companies may use financial models from external providers (e.g. Nat Cat model from brokers for the calculation of the Potential Maximum Loss of their portfolio).

Capital stress testing must be performed based on requirements from regulators. OIC has included climate risks in their capital stress test requirements.

8.7 Developing climate and environmental risk related business strategies

Companies should assess the environmental risks of each customer and policyholder, especially commercial line clients who belong to sectors affected by climate and environmental risks, as part of the core evaluation process.

Companies can develop risk criteria to prioritize high-risk sectors and use these as factors in assessing climate and environmental risks for customers and policyholders. Furthermore, when evaluating such risks, the subsidiary can consider adding processes to analyze the customer's and policyholder's historical risk control practices, their capacity, and willingness to manage risks, so the subsidiary can recommend appropriate risk-reducing measures.

Companies can refer to environmental performance ratings issued by credible national or international organizations to develop methodologies for assessing and rating customer and policyholder risks. Companies may consider defining insurance or finance terms for policyholders or other customers who have high climate and environmental risks or those whose business practices do not support sustainable business transitions. These terms may include implementing environmental risk management within an acceptable timeframe, developing sustainable business strategies, and complying with international standards. Companies can work with policyholders and customers to set goals for sustainable environmental operations, such as carbon

emission reductions or improving energy efficiency. In cases where policyholders or customers cannot adequately manage climate and environmental risks, companies can consider alternative measures for mitigating risk, such as reflecting the increased risk costs in premiums and loan rates, using policy conditions to limit coverage, or considering non-renewal of the insurance contract.

8.8 Investment Management

Companies should establish processes for assessing, managing, and continuously monitoring risks and impacts arising from climate and environmental risks on their investment portfolios.

Companies should develop or enhance mechanisms to track or measure inherent environmental risks in their investment portfolios and monitor changes in these risks to assess their impact. This will allow them to create effective risk management plans aligned with these risks.

Companies should review and adjust investment policies and strategies in line with evolving climate and environmental risks to mitigate significant impacts on their investment portfolios.

8.9 Climate risk management disclosure

TGH should disclose information related to climate and environmental operations in alignment with international standards. This ensures that customers, policyholders and other stakeholders can use the information to make informed decisions regarding service usage or investments in the company.

The disclosed information should at least cover the governance structure, strategies, and action plans related to climate-related risks, including indicators, targets, and opportunities or uncertainties related to climate risks. This should also include scenario analysis to climate risks and updated reports in line with the development of information.

The disclosure of climate and environmental risk information should consider the disclosure requirements of relevant regulatory bodies and avoid revealing proprietary or commercially sensitive information that could harm the company's competitive position. Such disclosures should occur at least once a year through various communication channels, such as annual reports, sustainability reports, or website publications. Information should be updated regularly to reflect changes in the context.