



## Corporate Communications Policy

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December 2020

## 1.0 Policy

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This document sets out the guidelines governing communication with the internal and external stakeholders of AllCO Pension ("the Company").

This policy is part of AllCO Pension's corporate policies. It outlines the guidelines governing internal and external communications in the Company.

In recognition of the Company's mission, vision and values, this Communication Policy supports the standardization of practices, expectations and roles to ensure clear, consistent and accurate messaging from AllCO Pension at all times.

## 1.1 Definitions

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For purpose of this Policy, the following definitions apply:

- a. "Authorized Persons" are (i) Managing Director/Chief Executive Officer (MD/CEO); (ii) Head, Strategic Planning & Corporate Communications and (iii) other individuals specifically approved by the MD/CEO from time to time for specific kinds of communications on behalf of the Company. Authorized persons are also those whose communication with staff members and external stakeholders fall within their approved job description
- b. "Basic Company Information" is any information about AllCO Pension, including its business, products and services, finances, financing plans, operations, objectives, members and other business relationships, personnel, and financial and operating results.
- c. "Confidential Company Information" is any information about the business of the Company that has not been made publicly available by AllCO Pension, as well as information of account holders and other third parties that the Company is obligated to keep confidential
- d. "External Communication" is the dissemination of information to external stakeholders
- e. "External Stakeholders" refer to Regulators, Government and other Authorities; AllCO Pension Shareholders; account holders; Media; Service Providers; the general public, etc.
- f. "Internal Communication" is the dissemination of information to internal stakeholders

- g. "Internal Stakeholders" refer to Staff, Management and Board of Directors of the Company
- h. "Press Media" are media organizations that focus on delivering news to the public or a target segment of the general public. These include print media (newspapers, news magazines), broadcast news (radio and television), and the Internet (online newspapers, news blogs, etc.)
- i. "Insider" means an employee, officer, director, consultant or contractor of the Company.

## 1.2 Purpose

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The purpose of this Policy is to define and provide guidelines to ensure effective communication with AIICO Pension's internal and external stakeholders.

## 1.3 Policy Statement

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AIICO Pension is committed to the dissemination of timely, accurate and quality information to its internal and external stakeholders.

All internal and external communications should be in line with the Company's approved standards disseminated ONLY by Authorized Persons.

## 1.4 General Policy

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The Company recognizes that active communication with different stakeholders and the general public is an integral part of its corporate strategy. To achieve its overall goals for communication, the following guiding principles should always be adhered to:

- a. Only Authorized Persons shall be permitted to have formal engagements with external stakeholders via media engagements and press releases
- b. All information must be conveyed through the appropriate and approved communication channels to the Company's stakeholders in a timely manner. All requests for information by stakeholders shall be responded to without unnecessary delays. A turnaround time of two (2) working days shall apply to all requests; where the information sought may require more time to deliver, an

acknowledgement of the request must be made within the stipulated time period and an expected response timeline communicated as well.

- c. All information disseminated to stakeholders shall be accurate, transparent and open as possible, while considering the need to protect the Company's confidential information
- d. The Company shall proactively develop contacts with its target stakeholder groups and ensure timely, open and constant communication
- e. All communication must be clear, concise and intentional
- f. Regular feedback is encouraged from all stakeholders and will be applied towards ensuring better quality of future communications.
- g. All communication from the company must be consistent in style and message to build stakeholder trust

## 1.5 Guidelines for External Communications

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The Company requires that its communications with Third Parties comply with applicable law, and that Material, Non-Public Information of the Company be publicly disseminated in a non-exclusionary and non-selective way. Only an Authorized Person may engage in discussions about the Company with Third Parties. No other individual is authorized to speak on behalf of the Company. Any other Insider who is contacted by a Third Party must refer the Third Party to the Strategic Planning and Corporate Communications Department.

### **Corporate Presentations**

All presentations/materials for external use must be reviewed by Strategic Planning and Corporate Communications Department prior to exposing these documents to the stakeholders to ensure brand compliance and accuracy of information related to the Company. This includes presentations to external stakeholders at meetings, seminars, conferences, etc. and materials to be uploaded to the Company website.

### **Press Releases**

The Company will issue press releases from time to time to disclose information that is important or of use to the public. Press releases will be prepared and reviewed in accordance with the Company's established practices, including review by the Company's

legal counsel, if appropriate. Press releases will be approved by and issued under the supervision of an Authorized Person.

### **Financial Information**

No Insider may provide "guidance" to Third Parties on a selective basis, directly or indirectly, and may not disclose to Third Parties any information regarding the Company's internal projections of future operating results, business transactions, customer or supplier details or other Material Information that has not been Publicly Disseminated, either in a press release, or other appropriate method. Additionally, no Insider shall comment on past guidance, even though it has been publicly disseminated.

All approved communication on the financial information of the Company will be posted in the appropriate section of the Company website.

### **Personal Opinion**

Insiders should refrain from making public statements of personal opinion regarding the Company. Such public statements may include quotes given to media, contribution to blogs, published articles, etc. Any such statements must be approved by the MD/CEO before being made public.

## **1.5 Guidelines for Internal Communications**

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The Company recognizes the fact that it has a diverse group of staff members with different working patterns, hours, location, tenure and type of work and is committed to identifying the best methods of communication to suit and reach every member of its workforce.

All our communication to staff members will be:

- Purposeful
- Tailored to the audience (both in delivery and content)
- Timely
- Consistent

**Disclosure of Confidential Information**

The Company is committed to providing timely, accurate, and complete disclosure of its basic company information in an appropriate manner. Disclosure of confidential information is however strictly prohibited as detailed in its Confidentiality and Non-Disclosure Agreement which is signed by all Staff members upon assumption of duty. Violation of this Agreement may attract legal redress.

1.6 Requests for Information

All requests for information concerning the Company or seeking clarity with respect to the contents of this document are to be communicated using the channels provided below:

Post	AIICO Pension Managers Limited Plot 2, Oba Akran Avenue, Ikeja Lagos, Nigeria
Email	<a href="mailto:strategy@aiicopension.com">strategy@aiicopension.com</a>