



Zenith Pensions Custodian Limited

**COMMUNICATION AND
INFORMATION DISSEMINATION
POLICY**



Version Control

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1. Introduction

Communication is an essential part of a stakeholder engagement process involving the exchange of relevant information, sharing knowledge about issues and opportunities, progress and planning, and more importantly may be considered an indication of transparency.

An effective communication program is therefore desirable to bridge the gap between Zenith Pensions Custodian Limited (hereinafter 'ZPC' or 'Zenith Pensions') and its stakeholders, and to strengthen stakeholder confidence in the Board and Management.

2. Policy Administration

The Business Strategy and Corporate Governance Committee shall have the delegated authority of the Board to oversee the administration of this Policy. All departments and personnel who are responsible for communication with external stakeholders are within the purview of this Policy.

3. Objectives

This Policy articulates the goals, tools, processes and guiding principles of communication adopted by Zenith Pensions to engage its stakeholders about Zenith Pensions' corporate identity, products and services, customer initiatives and any other issue of relevance to Zenith Pensions. It aims to fulfill the following objectives amongst others:

- 3.1. Pursuing strong corporate reputation through transparency and consistency in communication with stakeholders.
- 3.2. Timely communication with stakeholders –with clarity, coherence, credibility and without unnecessary delays
- 3.3. Disseminating information through official information dissemination channels such as Zenith Pensions' website and social media platforms in real time.
- 3.4 Ensuring that all information disseminated to stakeholders are accurate, transparent and as open as possible, while considering the need to protect Zenith Pensions confidential information
- 3.5 Engaging in communication that must be consistent in style and message to build stakeholder's trust

4. Guiding principles

- 4.1. The guiding principles of the Communication and Information Dissemination Policy of Zenith Pensions are transparency, comprehensiveness, timeliness and relevance, with a view to making the stakeholders aware of Zenith Pension s' various activities, products and services
- 4.2. Zenith Pensions' stakeholders include the following:
 - Government
 - Investors
 - Customers
 - Employees
 - Service Providers
 - Public
- 4.3. Zenith Pensions aims to inform, persuade and involve all stakeholders in its activities and growth of Zenith Pensions through sustained, consistent and relevant information using a judicious mix of both internal and external communication tools.
- 4.4. Only Authorized persons shall be permitted to have formal engagements with external stakeholders via media engagements and press releases.
- 4.5. All information must be conveyed through the appropriate and approved communication channels to Zenith Pensions' stakeholders in a timely manner.
- 4.6. Regular feedback is encouraged from all Zenith Pensions stakeholders and will be applied towards ensuring better service delivery.
- 4.7. Zenith Pension shall communicate information in the official language of Nigeria, which is the English language, or may do so in the customers' preferred language, or any variant of the English language (e.g. Pidgin English) at its sole discretion.

5. Operational Practices

- 5.1. The Chief Executive Officer ("CEO") is the spokesperson for Zenith Pensions.
- 5.2. The CEO may authorize the Executive Directors to speak on behalf of Zenith Pensions.
- 5.3. Investor communication is the responsibility of the Group's Investor Relations. Company announcements are the responsibility of Group Communications.
- 5.4. Zenith Pension shall use the following modes of communication to clarify and inform the stakeholders.

- a. Press releases
 - b. Website
 - c. Speeches –Notifications
 - d. One on One clarifications
 - e. Briefings/interviews by top management
 - f. Interviews with the Chairman and Directors.
 - g. Meetings
- 5.5. Zenith Pensions shall project its image through sponsorship of events, charities, charitable works, sponsorship of eminent personalities associated with public causes etc. to enhance Zenith Pension’s image in the wider society.
- 5.6. All media/sponsorship activities/press conferences shall be coordinated by the Executive management Committee of Zenith Pensions.
- 5.7. Zenith Pensions’ guidelines on communication shall be made available on Zenith Pensions’ internet/intranet site for information to staff members and implementation at all levels.
- 5.8. All presentation/materials for external use must be reviewed by the CEO or as may be delegated by her prior to exposing these documents to the stakeholders to ensure brand compliance and accuracy of information related to Zenith Pensions
- 5.9. Communication with media is to be handled with the highest levels of sensitivity and professionalism and must always be handled by the CEO or as maybe delegated by Executive Management Committee. Only Authorized persons shall be permitted to grant interviews of any sort (print, TV, online) and be quoted with respect to Zenith Pensions stakeholders’ communication.

6. Major Communication Channels

Where identified appropriate and/or necessary, Zenith Pensions shall use the following channels for major communication:

- 6.1. **Advertising:** Zenith Pensions shall use advertising to promote its products, services and corporate brand values through a judicious mix of media vehicles including print, electronic, web and social media in line with regulatory requirement.
- 6.2. **Press Release:** All Press releases on launch of domestic and foreign campaigns, Corporate Social Responsibility initiatives, Customer service initiatives, regulatory/compliance related issues and other information of importance are to be issued by the MD/CEO or as may be delegated by her.

6.3. **Internet:** The official website of Zenith Pensions is www.zenithcustodian.com. Zenith Pensions shall endeavor to make the website up-to-date and reader friendly. Zenith Pensions may also maintain various accounts on various social platforms as the need arises.

6.3.1 Zenith Pensions shall have investors' portal on its website where communication

Policy, annual reports and other information shall be published

6.4. **Intranet:** Zenith Pensions may deploy intranet where all employees can access Zenith Pensions internal documents, relevant guidelines, circulars and notifications. The intranet will serve as the central platform for all internal information of Zenith Pensions.

6.5. **Annual Reports:** The annual report provides an official account of Zenith Pension's activities for the financial year. It is comprehensive in nature and serves as a future point of reference for stakeholders.

6.6. **Internal Memos /Newsletters:** Zenith Pensions has In-house Memos and Newsletters for internal circulation and communication.

7. Related Information

- Code of Business Conduct and Ethics
Zenith Pensions is bound to observe the code of ethics issued by PENCOP and hosted on the website.
- Whistleblower Policy
Zenith Pensions maintains a whistle blowing policy as hosted on the website.

8. Policy Review

This Policy shall be reviewed from time to time as required or where necessitated by changes to applicable laws and regulations. All changes shall be ratified by the full Board, and once approved, the Policy shall be made available on Zenith Pension's website and intranet.