



STAKEHOLDER MANAGEMENT AND COMMUNICATION POLICY

FOR

**SOVEREIGN TRUST INSURANCE
PLC**

PREPARED BY:
DCSL
DCSL Corporate Services Limited

Approvals

This Policy was approved by:

Name	Representing	Signature	Date
MR. OLUSEUN AJAYI	Chairman, Board of Directors		August 20, 2020
MR. ABIMBOLA OGUNTUNDE	Chairman, Board Finance, Investment and General Purpose Committee		August 20, 2020
MR. OLAOTAN SOYINKA	Managing Director/CEO		August 20, 2020

The sign-off of this document authorizes the immediate implementation of the Sovereign Trust Insurance Plc Stakeholder Management and Communication Policy.

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1. INTRODUCTION

The reputation of Sovereign Trust Insurance Plc ("STI Plc", or "The Company") amongst its key audience is critical to the organization's business success. STI Plc is committed to ensuring that appropriate policies, procedures and monitoring arrangements are in place to support good internal and external communication. The Company also recognizes the importance of developing two-way communication channels, acknowledging that its key stakeholders who can support the improvement of its products are those who actually use the products and those who deliver them. Maintaining good internal and external communication is important as it encourages a healthy, progressive work environment. Effective communication will help staff and other stakeholders understand the Company's mission, vision, values, objectives and aspirations and the reasons behind them.

This Stakeholder Management and Communication Policy is an important aspect of our efforts to build trust in the corporate brand. It has been approved by the Board of Directors to provide guidelines on how communication shall be conducted to ensure a proper projection of the Company's image aligned with its strategic goals and objectives.

This Policy provides guidelines on how our Management staff shall conduct themselves in their daily communication amongst themselves and with the general public, customers, shareholders, potential investors and other external stakeholders. The Policy primarily covers objectives, allocation of responsibilities and general guidelines for communicating with various target groups. It also provides guidelines regarding who can act as a spokesperson for the Company and addresses the rights of employees to be heard. Detailed guidelines are provided in the appendices.

2. GOALS

The main purpose of the Company's Stakeholder Management and Communication Policy is to establish guidelines for presenting the Company to its current and potential stakeholders, both internal and external. The Policy is aimed at increasing the level of understanding among all employees as to how STI Plc communicates with its stakeholders.

2.1. External Communication:

- Supports the Company in the pursuit of its overall goals as described in its vision and mission statements and its core values;
- Supports business initiatives and strategies;
- Enables the sharing of information on a regular basis with Investors and other stakeholders;
- Meets expectations regarding compliance with legislation, regulations and standards relating to communication of the Company's activities;
- Provides some consistency in the Company's image, its products, services and activities;

- Raises the Company's profile, promotes overall knowledge and creates greater awareness about the Company.

2.2. Internal Communication:

- Ensures that the Company's goals, policies and guidelines are communicated to all employees;
- Establishes viable channels for circulating information to all the Company's employees on need basis and to enhance commitment, build motivation, and support the achievement of corporate objectives;
- Communicate decisions and events that affect employees to them before (if possible) and never later than when information is communicated externally;
- Helps to strengthen organizational culture
- Provide clear and up-to-date information to employees on the Company's policies with regard to corporate branding (Corporate Identity).

3. GUIDING PRINCIPLES

STI Plc recognizes that active communication with different stakeholders and the general public is an integral part of good business and administration. In order to reach its overall goals for communication, the Company is guided by a set of guiding principles.

Efficiency

STI Plc uses modern communication methods in a timely manner to convey its messages to its audience. Synergies are sought when it comes to using different communication channels. It responds rapidly to information requests by its shareholders, stakeholders, the media and the general public.

Transparency

STI Plc strives in its official communication to be as transparent as possible, whilst acknowledging the need for discretion and confidentiality in certain instances. In being transparent in all our communication, we shall ensure that all circulations are issued to those entitled to receive them and that full and accurate details are provided in official correspondence, where needed.

Proactivity

STI Plc shall anticipate the information needs of its stakeholders based on the constantly evolving nature of the insurance industry and shall strive to communicate important information concerning their affairs and transactions with the stakeholders as such information becomes available.

Clarity

STI Plc aims at clarity, i.e., to send uniform and concise messages on key policy issues as they emerge. The Company shall avoid the use of esoteric language in its communication and shall ensure that its communication process is at all times routed through the standard official channels to avoid confusion. STI Plc reinforces clarity by adhering to a well-defined visual identity in its external communications.

Feedback

STI Plc actively and regularly seeks feedback on its image and communication activities both from the media as well as from its key target groups. This feedback is used to fine-tune the Company's communication activities.

4. ALLOCATION OF RESPONSIBILITIES**4.1. Responsibilities for External Communication**

External communication supports the process of maintaining current customer relations as well as attracting potential new customers. Customer relations (customer experience, branding, marketing) play an important role in the external relations activities of the Company.

The Chief Executive Officer (CEO) and the Head, Corporate Communications and Brand Management (CCBM) are ultimately responsible for ensuring that all activities concerning the Company's communication follow the Communication Policy. The CEO has delegated strategic responsibility for communication matters to the Head, CCBM who reports to the CEO.

All ongoing contacts with shareholders, analysts, business media and other relevant third parties are handled by the CEO and the Head, CCBM.

4.1.1. Spokespersons

The CEO is the principal spokesperson for the Company on all matters, including but not limited to the Company's financial position, business strategies and market position.

In addition to the CEO, the Head CCBM serves as the Company's main spokesperson to the media, shareholders, analysts and the general public and determines in consultation with the CEO suitable individuals to respond to specific questions from the media and the public.

4.2. Responsibilities for Internal Communication**Corporate Responsibilities**

The CEO has operational responsibility for internal communications.

4.2.1. Operating Unit Responsibilities

The Company's Operating Units are responsible for:

- Cooperating with the Head CCBM to facilitate internal communication flows.
- Ensuring that information material such as newsletters, other publications and information on the website – conform to the Company's guidelines as well as to legislation, regulations and standards.
- Internal information is published under the responsibility of the Operating Unit head

4.2.2. Employee responsibilities

Managers within STI Plc have an important responsibility to communicate in a professional manner. Communication should be integrated in strategic planning and implementation and the Manager should ensure that appropriate resources are allocated for this. If needed, the Manager should ask for advice from his or her communications contact.

5. EMPLOYEES

Employees should recognize that they have a communication responsibility – to take in information that is communicated, to share information as appropriate, and to contribute to dialogue restrictions and confidentiality.

Internal and external communication is subject to various restrictions resulting from legislation, regulations, standards and agreements relating to the stock market, customers and terms of employment as well as other applicable legislation governing securities markets, securities trading and financial reporting.

STI Plc's corporate culture is characterized by open and trusting communication at all levels of the organization and between all groups of employees. This helps employees to become more involved in and committed to the Company's development. However, employees are bound by professional confidentiality with regard to all information that is for internal use, relates to customers or competition, or could potentially be price-sensitive.

6. COMMUNICATION CHANNELS

To fulfil its objective of optimizing its communication channels, the Company employs a variety of communication tools. The most important of them are listed below. The officers responsible for utilizing each tool within the Company are also mentioned below.

Target Group	Communication Tools	Responsible Officer
Customers	Seminars, Webinars, Internet, newsletters, social and print media, corporate presentations, speeches, publications, brochures, leaflets, advertising	Managing Director
Investors	Publications, Internet, Social, Print and Electronic media, investor presentations, publications (in particular the Annual Reports), brochures, leaflets, advertising	Managing Director, Head Corporate Communications and Branding and Company Secretary
Regulators and Other Stakeholders	Institutional contacts, seminars, visits, Internet, newsletters, print media, publications (in particular the Annual Reports), brochures, leaflets	Head Corporate Communications and Branding and Company Secretary
Print & Electronic Media	Press releases, interviews, speeches, webinars and seminars	Head Corporate Communications and Branding and Managing Director
Staff	Intranet, debriefings, information sessions	Head Corporate Communications and

Newsletter

STI Plc shall periodically publish a Newsletter to inform key target groups about its activities. The Newsletter will also be published on the Company's website.

Annual Reports

The Annual Reports detail an official account of the Company's activities during a calendar year. They are comprehensive and serve as a future point of reference.

STI Plc's Website

The Website is the central platform for communicating all external information that STI Plc generates. Its contents are up-to-date, reader-friendly and it clearly communicates the Company's mission.

Intranet

The intranet is the most important channel for the Company's internal communication. STI Plc employees can easily find the information they need to perform their daily tasks on this resource. Internal information is disseminated using this medium.

Seminars & Webinars

STI Plc organizes and participates in seminars and webinars with key target groups. The Company also participates actively on panels, providing speakers or discussants for relevant sessions.

The Head, Corporate Communications and Branding is responsible for updating the calendar of forthcoming events, which is to be published both internally and externally.

Speeches

Top management staff are often invited to give speeches on various topics. The most important public appearances are to be announced on the website. To the extent possible, short summaries of the speeches are to be published on the website and distributed at the venue to interested parties (including the press).

Media activities

STI Plc periodically issues press releases on its activities. The Managing Director and the Head, Corporate Communications and Branding are responsible for the external communication and act as the spokespersons for the Company. Interviews, background talks and trips to the locations of important projects are also organized to inform the media of the Company's activities.

Advertising & Sponsorship

STI Plc also uses advertising and sponsorship media to support its actions and to reach its key target groups. Advertising and sponsoring should support the activities of the Company.

Social Media Platforms

The social media platforms (Facebook, Twitter, LinkedIn, Instagram, WhatsApp, etc.) offer veritable and wide-reaching communication platforms that any modern organization can only ignore at its peril. STI Plc has adopted this media as a tool for both internal communication to

facilitate ease of access in its operations and for external communication, to expand its reach and project its brand.

7. USE OF ELECTRONIC MAIL

Generally

7.1 Always use the email template which contains the appropriate disclaimer notice from the Company and do not amend this notice in any way.

7.1.1. Do not amend any messages received and, except where specifically authorized by the other person, do not access any other person's in-box or other email folders nor send any email purporting to come from another person.

7.1.2 It is good practice to re-read and check an email before sending.

7.1.3 If you copy an email to others, it may amount to a breach of duties of confidentiality if it reveals all the recipients' email addresses to each recipient (e.g. in the case of marketing and mailing lists). Accordingly, it may be appropriate to use the 'Bcc' (blind carbon copy) field instead of the 'Cc' (carbon copy) field when addressing an email to more than one recipient. If in doubt, seek advice from your [line manager/departmental head]

Business Use

7.2 Each business email should include the appropriate Company business reference.

7.2.1 If the email message or attachment contains information which is time-critical, bear in mind that an email is not necessarily an instant communication and consider whether it is the most appropriate means of communication.

7.2.2 If you have sent an important document, always telephone to confirm that the email has been received and read.

7.2.3 In every instance, file a hard copy of any email (including any attachments) sent to or received from the [customer/client] before filing or deleting the electronic copy. The same applies to all internal email transmissions concerning [customer/client] matters.

7.2.4 In light of the security risks inherent in some web-based email accounts, you must not email business documents to employees' personal web-based accounts. Employees may send documents to a [customer's/client's] web-based account if they have the [customer's/client's] express written permission to do so. [However, under no circumstances should an employee send price sensitive or highly confidential documents to a [customer's/client's] personal web-based email account, even if the [customer/client] asks him/her to do so.]

7.2.5 When you need to work on documents remotely they can be saved to a disk or retrieved over the internet.

Personal Use

7.3. Under no circumstances shall STI Plc facilities be used in connection with the operation or management of any business other than that of the Company or a [customer/client] of the

Company unless express permission has been obtained from a [line manager/departmental head/partner].

7.3.1 If personal emails you send from a Company facility must be marked "PERSONAL" in the subject heading, and all personal email sent or received must be filed in a separate folder marked "Personal" in your inbox should you wish to retain it after reading. Contact IT Support if you need guidance on how to set up and use a personal folder. All email contained in your inbox and your sent items box are deemed to be business communications for the purposes of monitoring. You must ensure that your personal email use:

7.3.1.1 not interfere with the performance of your duties;

7.3.1.2 not take priority over your work responsibilities;

7.3.1.3 is minimal and limited to taking place substantially outside of normal working hours (i.e. during any breaks which you are entitled to or before or after your normal hours of work);

7.3.1.4 not cause unwarranted expense or liability to be incurred by STI Plc;

7.3.1.5 not have a negative impact on STI Plc in any way; and

7.3.1.6 lawful and complies with this policy.

7.3.2 As with any correspondence made using the Company's electronic facilities, an employee may delete personal email from the live system, but they will have been copied (perhaps many times) onto the backup tapes and in that form will be retained indefinitely. It would be a very difficult, costly and time-consuming exercise to sift all those tapes in order to delete an individual's personal email, and if we were to agree to attempt this, it would be at our convenience, and only on the basis that all the very considerable costs involved were paid in advance by the person making the request.

7.3.3 By making personal use of our facilities for sending and receiving email, all employees signify their agreement to abide by the conditions imposed for their use and signify their consent to STI Plc monitoring your personal email in accordance with the terms of this Policy.

8. DATA PROTECTION

8.1 As an Employee, Consultant or Stakeholder of STI Plc who uses our communication facilities, you will inevitably be involved in processing personal data for STI Plc as part of your job. Data protection is about the privacy of individuals.

Some definitions of these terms according to our Policy are as follows:

8.1.1 "Data" generally means information which is computerized or in a structured hard copy form;

8.1.2 "Personal data" is data which can identify someone, such as a name, a job title, a photograph;

8.1.3 "Processing" is anything you do with data – just having data amounts to processing; and

8.1.4 "Data controller" is the person who controls the purposes and manner of processing of personal data – this will be the Managing Director of STI Plc (or his nominee), in the case of personal data processed for the business.

8.2 Whenever and wherever you are processing personal data for STI Plc you must keep it secret, confidential and secure, and you must take particular care not to disclose them to any other person (whether within or outside the Company) unless authorised to do so. Do not use any such personal data except as authorised by the Company for the purposes of your job. If in doubt get help from our Data Protection Officer or your [line manager/departmental head/partner].

8.3 While STI Plc is a data controller of all personal data processed for the purposes of our business, you will be a data controller of all personal data processed in any personal email which you send or receive. Use for social, recreational or domestic purposes attracts a wide exemption, but if, in breach of this policy, you are using our communications facilities for the purpose of a business which is not the Company's business, then you will take on extensive personal liability for the consequence of such use/misuse.

9. COORDINATION

In order for the Chairman, CEO as well as the Head, CCBM to be able to act with authority as spokespersons for external and internal communications, it is essential that these individuals are kept informed about pertinent activities in all parts of the Company, and about questions originating from external stakeholders. This procedure helps to ensure high-quality communication and identifies where in the organization the ultimate responsibility for information lies.

10. UPDATES

The CEO is responsible for ensuring that the Company's Communication Policy is developed, updated, distributed and complied with.

11. CRISIS COMMUNICATION

A crisis is a situation in which events beyond the Company's control threaten to damage STI Plc relations with its shareholders, customers and employees, or its reputation, financial position or other vital interests.

A Crisis Management Team is the Company's Board which will handle crises. Corporate Communications is responsible for managing all internal and external communication during a crisis situation that could adversely affect the Company.

12. ANNUAL REVIEW OF POLICY

Management will review and, if necessary, update this policy on an annual basis or as may be necessary to ensure compliance with changes in regulatory requirements.

APPENDIX 1 INTERNAL COMMUNICATION

Purpose

The purpose of STI Plc internal communication is to contribute to the Company's business objectives. It shall provide open and explanatory information aimed at informing employees of the Company's development, enhancing their knowledge of values, business objectives and strategies in order to strengthen their commitment, motivation, loyalty and sense of responsibility. Another important aim is to facilitate the recruitment of new employees by enabling STI Plc employees to act as effective "ambassadors" for the Company.

Target groups

All employees, including senior executives and managers.

Principles

Internal communication at STI Plc shall contribute to the Company's business objectives. To this end, internal communication shall:

- maintain a high quality;
- maintain continuity;
- utilize benchmarking – in other words, point to successful methods that can provide inspiration and examples of excellence in the organization's various operations; and;
- encourage two-way dialogue at all levels and develop possibilities for employees to give feedback and to be part of an open, inclusive communications climate;

Responsibility

The CEO bears the primary responsibility for creating an open communication culture that conforms to STI Plc core values and Code of Conduct and has the necessary organization and resources for distributing relevant information to employees.

Channels

In addition to daily contact between managers and employees, the main channels for distributing internal information are:

- In person communication, such as group meetings, which are a very efficient communications channel, and should be used whenever practicable, taking into account logistical and environmental considerations.
- The corporate website containing important information about the Company

APPENDIX 2: EXTERNAL COMMUNICATION

STI Plc external communications have many disparate target groups. Of these, the National Insurance Commission (NAICOM), the capital markets and the media occupy a special position due to the laws, regulations and standards that apply as a result of STI Plc being listed on the Nigerian Stock Exchange. It is of special importance that the Company's information and employees comply with these laws, regulations and standards.

1. Investor Relations

Purpose

To keep NAICOM and the capital markets continuously informed about STI Plc position, operations and development as may be required under the applicable law and regulations. The information provided by the Company's Investor Relations department also serves to broaden knowledge of and interest in the Company and thereby improve liquidity in trading of the Company's share, reduce risk from information deficits, and facilitate the raising of capital in the equity and debt markets.

Target Groups

Target groups are current and potential legal and physical shareholders, current and potential creditors, stockbrokers, financial analysts, financial and market journalists, the Nigerian Stock Exchange and NAICOM.

Principles

The information disclosed by STI Plc concerning its financial position and development shall at least meet the minimum requirements prescribed for companies listed on the Nigerian Stock Exchange. The following principles apply:

- **Reliability** - All information to the capital markets shall be factual, accurate and must not be misleading in any way.
- **Speed** - All information shall be issued as quickly as possible, so that the Company always retains the initiative to issue first-hand news.
- **Simultaneity** - All information to the markets shall be conveyed to all financial target groups simultaneously.
- **Long-term, consistent and proactive** – STI Plc shall always give correct and pertinent information to the markets in order, as far as possible, to avoid surprises that could reduce market trust in the Company and have a negative impact on the Company's capital market relations. Information must be fact-based and not speculative. Accordingly, STI Plc shall not comment on rumors and speculation, unless there are serious negative effects of not commenting.
- STI Plc also meets analysts, fund managers and investors on a continuous basis to create a better understanding of STI Plc and assist these representatives in making an accurate analysis of the Company.

Closed period

The nearer a reporting date approaches, the greater the interest in obtaining information and the greater the risk of leaks. To reduce this risk, STI Plc observes a "closed period" beginning 30 days

prior to publication of a year-end or interim report. During this period, representatives of STI Plc refrain from answering questions or commenting on financial developments, citing the closed period as the reason. Special care must be taken in contacts with investors, analysts and journalists. However, the closed period should not be interpreted as meaning it is forbidden to give any financial information at all. General clarification of facts and information about circumstances that are already known are permitted, but all future-oriented or economic and financial information that could be linked to the forthcoming quarterly report is forbidden.

The closed period does not affect the interpretation of the disclosure rules in the Nigerian Stock Exchange Listing Rules, the rules of which shall always be followed.

2. Media Relations

Purpose

Since the media are among the most important sources of information about the Company for customers, shareholders and employees and in the rest of the capital market, it is essential that information provided to the media by STI Plc creates awareness about the Company and its operations in such a manner that the media convey an objective, pertinent and accurate picture of STI Plc.

Target groups

Journalists in the press, radio, television and online media.

Principles

Representatives of STI Plc must be familiar with and respect the media's working conditions and integrity. STI Plc media relations shall be characterized by openness, objectivity, speed, clarity, a long-term approach, continuity and high ethical standards. To be of value to the Company, relations with the media must be long-term and based on mutual relationships. Due to competition and the thirst for news within the media, articles and radio and television features are sometimes based on rumors and incomplete information. Consequently, all contacts with the media must respect the restrictions that apply to listed companies. The basic rule is that all important information must be released simultaneously and with equivalent content.

Responsibility

The CEO and Head, CCBM have overall responsibility for all media contacts.

Channels

The Corporate website, annual report, interim reports, press releases, presentation materials, meetings with analysts and the press, conference calls, and individual contacts with journalists.

3. General Meetings

At all Annual General meetings and other meetings with shareholders, the Chairman of the Board is responsible for facilitating and encouraging participation of shareholders. STI Plc will consider using webcasting and live telecommunications to provide access to shareholders who are unable to attend on an annual basis.

The Company encourages participation of shareholders and provides proxy forms and opportunities for questions to be asked which will be answered in the meeting.

APPENDIX 3: CORPORATE WEBSITE

There shall be only one STI Plc Corporate website: www.stiplc.com. As a principal source of information about the Company, the website plays a strategic role in the Company's communication program. The Company's website should be a high-quality central medium serving both internal and external visitors. The Corporate website shall be systematic in its structure, easy to navigate in and set up in such a way that different stakeholder groups can easily find the information they are seeking.

The corporate website shall contain:

- a general description of the Company,
- financial information,
- all significant external information documents, such as press releases, annual reports, financial reports, presentations from meetings/telephone conferences with analysts as well as policies,
- information on the company's pipeline products
- share page with information about trading in the Company's shares and share-performance diagrams,
- a separate section devoted to corporate governance matters, such as the Company's current articles of association and the most recent governance report as well as updated information as regards members of the board, the chief executive officer and the auditor and a detailed account of each outstanding share- and share-price-related incentive scheme,
- agenda and timetable for publication of all financial information and for shareholder meetings, meetings with analysts and telephone conferences,
- facility for contacting the Chief Executive Officer and the Company Secretary via e-mail,
- frequently asked questions (FAQ),
- contact function,
- a site map.

Shareholders are encouraged to subscribe to shareholder email alerts via the website.