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Client: Leadway Health Limited

Approvals

This document requires the following approvals:

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Dr. Tokunbo Alli	MD/CEO
Dr. Oladipupo Awosika	Chairman, Board of Directors

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Acronyms	
LAC	Leadway Health Limited
MD/CEO	Managing Director/Chief Executive Officer
ED	Executive Director
TLCS	Team Lead, Corporate Services
BCP	Business Continuity Plan
CFO	Chief Financial Officer
HS	Head of Strategy
Definitions	
Crisis	A situation with a high level of uncertainty that disrupts the core activities and/or credibility of an organization and requires urgent action
Authorized Spokesperson	Crisis Communications: MD/CEO, ED, TLCS General Communications: MD/CEO, ED, TLCS, Company Secretary or any other Company employee or representative who has been so authorized by the CEO.
Subject Matter Expert	The MD/CEO, ED, or any staff performing specialized functions whom, by virtue of their expertise may be authorized or delegated by the MD/CEO to speak with a third party with respect to a particular topic or on a particular occasion they are versed in.
Non-Public Information	Information that has not been Publicly Disseminated and is otherwise not available to the general public.
Publicly Disseminated	Information that has been made available through the distribution of a document e.g. press release, through a widely disseminated news or wire service, or by another non-exclusionary method of disclosure that is reasonably designed to or potentially can provide broad public access. Information disseminated via Internal Communications is considered Public.
Third Party	Securities market professionals (including, but not limited to, analysts, broker-dealers, investment advisers and fund managers), existing or prospective shareholders (including anyone who may be reasonably expected to trade on the basis of material, non-public information),

	reporters and any other party who is not bound by a duty of confidentiality to the Company.
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Insider	Employee, officer, director, shareholder who own 5% or more of any class of shares, members of the statutory audit committee, consultant or contractor of the Company and family members of the above
Material Information	<p>While it may be difficult under this standard to determine whether particular information is material, there are various categories of information that are particularly sensitive and, as a general rule, should always be considered material.</p> <p>Examples of such information may include:</p> <ul style="list-style-type: none"> • Financial and/or Analyst Information • Product and Company Information • Competitor Information • Business plans, strategy and/or budgets • Creation of significant financial obligations or significant changes in financial obligation • Impending bankruptcy or financial liquidity problems • Significant developments involving business relationships • Significant legal or regulatory developments, whether actual or threatened. • Major events involving the Company's securities • Significant corporate events, such as a pending or proposed merger, joint venture or tender offer, a significant investment, the acquisition or disposition of a significant business or asset or a change in control of the Company. • Any other significant information that may be considered sensitive in nature. <p>When in doubt, please consult the TLCS, Company Secretary, CFO or Head, Strategy.</p>

1.0. SCOPE & PURPOSE

- 1.1. This policy seeks to streamline stakeholder communications and describes the standards by which Leadway Health engages and communicates with its various stakeholders (media, investors, regulators, host communities, staff and general public). This is with the exception of shareholders whose mode of communication is succinctly covered in the Shareholders Engagement Policy.

Thus the policy provides a guide on how the Company will disseminate information, communicate and interact with stakeholders to keep them conversant with the activities of the Company and assist them in making informed decisions.

Adherence will support to;

- 1.1.1. Enable quick identification and management of possible issues when dealing with any of the aforementioned stakeholders.
 - 1.1.2. Manage stakeholders' expectations at all levels.
 - 1.1.3. Improve relationships and interactions with stakeholders through effective management and communication strategies
 - 1.1.4. Sustain a strong brand image through coordinated and tactical communication where necessary.
- 1.2. This Policy applies to all Insiders as defined in the policy.
 - 1.3. Any violation of this Policy should be brought to the attention of Heads of, Corporate Communications and Legal departments, and may constitute grounds for disciplinary action.
 - 1.4. If in doubt consult this Policy or the TLCS for further assistance and guidance. .

2.0. INTERNAL COMMUNICATIONS

- 2.1. It is the Company's policy that all its communications within the organization are Clear and Concise, avoiding misleading or subjective language.
- 2.2. Such communications must be conveyed using Leadway Fonts, the company's font type which may be amended from time to time for continued appropriateness. All letters, reports, presentations, memos, emails and official correspondence must conform to the font requirements as operationally approved by Executive Management. Change in font type will be communicated to staff via email and Leadway Share Point Portal.
- 2.3. Official correspondence in electronic format (emails) must be sent through the company's electronic mail platform and signed off with the sender's corporate e-mail signature.

- 2.4. Open Communication: Leadway Health promotes performance, teamwork and results through open communications. We encourage open communication during meetings in the company where employees have the opportunity to share any concerns with senior management. Leadway Health also supports an “open door” management policy. Employees are encouraged to raise work-related concerns with their immediate manager. If they are not the most appropriate person, they are encouraged to bring their concerns to the attention of the functional manager, Human Resources department or any senior manager, up to and including the MD/CEO.
- 2.5. Message Broadcast: Only the MD/CEO (or ED, acting on the MD/CEO’s behalf), TLCS and the HR Division are authorized to broadcast messages to all staff. Heads of Departments seeking to pass information to all staff will be required to route it through the HR Division. This is to ensure uniformity in tone and visual layout. Political or religious messages are prohibited from mass dissemination to Staff. Newsletters, presentations or news for all staff are to be broadcasted and routed through HR as well.

3.0 EXTERNAL COMMUNICATIONS

- 3.1 It is the Company's policy that all its communications outside the organization are Transparent, Relevant, Fact based, Consistent and Timely.
- 3.2 Speaking To The Media
 - 3.2.1 Authority to speak and grant Interview
 - a. The operating practice in place is that no staff members should speak with the media.
 - b. The authorized spokesperson for the Company is the TLCS, while the MD/CEO is the face of the brand. However, as part of the strategic initiative to position the senior management as thought leaders and subject-matter experts in their fields, senior management staff are allowed to speak to the press, grant interviews and present papers on behalf of the Company or its subsidiaries, with approval from the MD/CEO. The MD/CEO will inform the TLCS on approvals granted with details as approved.

The rule guiding this is that release of information to the public via media interview, speeches and stand in representation must be pre-reviewed by the TLCS and the Legal Team where necessary before approval by the MD/CEO. In granting interviews, the TLCS will recommend to the MD/CEO for approval along with the interview script/proposed questions submitted for preview ahead of the scheduled interview.

3.2.2. Media appearance & other Engagements

- a. Staff going for media appearance, whether live or recorded, radio or television must, as a measure of comfort have a written script reviewed by the Legal Department before sign off/approved by TLCS, and/or pass a basic media prep to be facilitated by members of the Corporate Services team (except otherwise ruled exempted or deemed not needed).
- b. The script must be ready at least two (2) working days before the scheduled appearance and the media prep conducted 24 hours beforehand.
- c. Staff appearing in an official capacity at events with media exposure such as media briefing, press conference, product launches, awards and other corporate events etc. must be attired in the approved official dress code and branded ties and lapel pins. At events such as launches where product branded T-shirts would be worn, senior management staff must always have a jacket worn over such T-shirts. They may wear Formula 1 styled shirts alone where provided.

3.2.3. Guidelines for Interviews/ public address or speeches

- a. As a guide, all media interaction must be guided and approved and staff should always endeavor to speak within the confines of what is approved and situated within their areas of competence. Only the MD/CEO and the Executive Management staff (approved by the MD/CEO) are authorized to speak on sensitive policy issues, topical industry topics or management decisions or other sensitive information or position. Other staff may comment on day to day issues within their job functions or subject-matters related to their fields.
- b. Staff cannot provide additional details on confidential policies and procedures, which may qualify as Non-Public Information.
- c. Senior management staff should always ensure that Information released publicly must be lawfully obtained and released in accordance with this policy and the Code of Conduct and Ethics. Staff must only access, use and/or disclose confidential information if required by their duties and authorized by the MD and TLCS. Interview script must be adhered to and care must be taken in order not to be swayed or derailed into making statements out of

contexts.

- d. All interviews and media appearances requests or contract shall be routed through the TLCS for approval.
- e. Request for publicity and media coverage by business units or subsidiaries must reach Corporate Services within 24 hours of receipt of such request.
- f. All Senior Management shall ensure that their publicity plans align with the approved policy.
- g. All staff that receive a call from the media and are not authorized or trained to handle the ensuing discussion SHOULD DO the following:
 - i. Do not give any details – not even name or be drawn into conversation (one can easily be drawn into saying what was not intended).
 - ii. Assure the journalist that you will pass the enquiry on at once, to an informed spokesperson who will call them back within 24 hours.
 - iii. Ensure you pass all media enquiries to the Corporate Services department immediately after such enquiries.
 - iv. Ensure to establish the name of the caller, the phone number, organization, designation, why they are calling and not respond with 'No Comment' as this would likely fuel speculation.

3.3. Crisis Communication

In an emergency or a crisis situation involving Leadway Health activity, operation or employee, our general policy shall be to provide internal and external publics with full, verifiable and accurate information as soon as possible. Such information must be consistent with the safety of all Leadway Health personnel as well as other assets.

In this situation, our BCP will be activated with an essential attitude of honesty, reasonableness and corporation. The BCP team, headed by a crisis command manager will serve as the primary coordinating body for dealing with crisis while TLCS serve as primary media contact and spokesperson for Leadway Health.

Procedure for Activating the BCP¹

¹ Subject to the BCP policy.

Following the Executive Director's call to activate the BCP, the Business Continuity Plan Team (BCP) will meet upon notification as soon as possible and members shall:

- a. Identify the cause of the incident or disruption
- b. Ensure the safety of staff
- c. Upon activation of the Business Continuity Plan, the BCP coordinator will be responsible for notifying the alternate site, if appropriate, of their impending arrival
- d. Establish continuity arrangement with alternate nearby branches or alternate site to house some of the prioritized activities.
- e. Involve HODs as appropriate in managing the incident and conveying necessary information to their team.
- f. Human Resource department creates awareness and enlighten staff on major information needed per time.
- g. Admin personnel will make available all necessary working tools to continue business operations for staff.
- h. I.T personnel will restore and connect staff to critical business applications
- i. In the event that the public needs to be addressed, information to be conveyed should come from the Team Lead, Corporate Services in line with the company's communication strategy.
- j. Communicate after the crisis ends to facilitate debriefing sessions for both internal and external stakeholders.
- k. Evaluate the responses to the incident from various stakeholders and make recommendations for improvements.

Note: Only an authorized Leadway Health spokesperson will meet or talk with the media on behalf of the company.

3.4. Communications with Third Party

Employees' formal correspondence with third parties must be conveyed through the company's approved electronic mail or documented on printed paper bearing the company's letter head with the consent and approval of the Head of the employee's department initiating the correspondence. Letters must also be co-signed with the exception of Legal & Company Secretariat documentations or alone by EXCO where deemed expedient.

All responses to letters must be executed within 2 business days, except in exceptional circumstances, with the approval of the Head of the relevant department/unit.

3.5. Communication with Policyholders

- 3.5.1 General Communication:
Our customers are the focal point of everything we do and a foundation block for long-term growth and profitability. Communication to them will be consistent, effective and honest, conveying our values and endorsing our credibility as an efficient and reliable financial services institution.

General communication will be through emails, calls and text messages (as provided in their KYC documents) as well as through traditional media, our website and digital channels. Other platforms include face-to-face/online meetings and events (as appropriate) as well as marketing materials such as brochures, newsletters, information about new products and related events, webinars and seminars. Request for information dissemination will be proposed by the head of the respective department within the business that wishes to disseminate information and approved by the TLCS.

- 3.5.2. Specific Communication:
Specific communication will be exclusively through letters printed with Leadway Health letterhead, emails, calls and text messages (as provided in their KYC documents).

Furthermore:

- Insurance advice to policyholders will be based on their individual situation and our assessment of what is most financially advantageous for the customer.
- We will include them in solutions and product development through regular surveys, questionnaires and cross-selling.
- We will provide feedback to stakeholders on how their interests/issues are addressed/resolved and keep a careful record of all aspects of policyholder communications that occur over time.

3.6. Approved Financial Report

- 3.6.1. Annual Reports: These are comprehensive reports detailing diverse aspects of the company's activities over a specified period. These reports are intended for use by internal and external stakeholders.

- 3.6.2. Investor Reports: This contains corporate information supplementary to the regulatory mandated corporate annual report. Such reports are presented in a way that it does not contain other information that may be considered unnecessary to the fund investors. This is made available to investors in the fund on a quarterly, bi-annual and/annual basis.

It discloses certain aspects of a fund's strategic focus, objectives, operations and financial condition. Such investor report, along with the fund's prospectus and statement of additional information, is a source of multi-year fund data and performance, which is made available to

current and prospective investors.

Authority for communication about the Financial Reports lie with the Company Secretary and the CFO.

4.0. SOCIAL MEDIA

Employee use of social media will be broadly understood to include blogs, wikis, microblogs, message boards, chat rooms, electronic newsletters, online forums, social networking sites, and other sites and services that permit users to share information with others in a contemporaneous manner as outlined in Leadway Social Media Policy (Please refer to Leadway Social Media Policy). All communications via social media are to be approved by the TLCs.

5.0. GUIDE ON INTERDEPARTMENTAL COMMUNICATION FUNCTION

To further strengthen our stakeholder communication policy post-consolidation, it is pertinent to note that a number of departments within the business have cross functional dependencies whereby oversight roles under Corporate Services Department are executed by other departments. To agree clarity, garner cooperation, identify areas of overlap where precedence or function ownership lies, this has been identified as a key reputational risk which has the risk of exposing the brand to reputational damage. As a result, these departments have been identified and the functions which are cross-functional listed out while highlighting the risks within the overlap and the best practice to adopt while mitigating against these risks.

Departments with cross functional roles on the stakeholder's communication policy include;

- Human Resources
- Retail
- Digital Marketing
- Administration
- Facilities

The table below shows the cross functional departments and the risks involved as well as the guideline to foster smooth operational conduct while mitigating against the identified risks.

Department	Cross Function/ Observation	Risks within the overlap	Best Practice
Human Resources	Job advert placement	There is the risk of job applicants perceiving the job adverts as fraudulent thereby	Job advert materials to be placed externally to be shared with CS for proper brand alignment

		portraying the brand in negative light.	
	Internal communications	There is the risk of misalignment in branding for internal communication materials as well as the risk of the materials falling below the standard for the brand.	Internal communications materials should be sent to CS for design or existing materials should be vetted by CS before dissemination to staff.
	Staff Engagement Activities (Online/Offline)	The use of branding during staff engagement activities could be at the risk of infringement on the brand guidelines and standards.	Staff engagement initiatives and execution should be shared with CS or where it has to be committee oriented should have a member of the CS team on board to guide on brand related ideas.
Retail/Agency	Flyer production	There is the risk of brand misalignment or falling below standards	All requests for flyers and marketing materials should be sent to CS
	Activations	There is the risk of contravening regulatory guidelines for unapproved activations. In addition, there is also the risk of having a loss of social capital through wrongly executed activations.	Requests for activation should be sent to CS for review and guide on execution.
	Merchandising & Souvenir production	The brand is exposed to the risk of brand proliferation through unauthorized production of souvenirs and merchandising.	All requests for production of souvenirs and merchandising should be forwarded to CS.
Digital Marketing	Events (offline & online)	There is the risk of reputational damage with events (offline & online) that do not match brand guidelines and are not in line with the overarching brand strategy.	All proposed events to be forwarded to CS for approval before execution.

	Branding	There is the risk of the brand misalignment with central brand strategy and guide.	All brand materials and activities to be preapproved by CS before dissemination.
	External communication (online & offline)	There is the risk of reputational damage to the brand by means of dissemination of unauthorized communication materials including social media posts, emails, articles, video content among others. This also covers media engagements and interaction with the press.	All external communication materials to be preapproved by CS before dissemination.
	Brand ambassador/Influencer engagement	There is the risk of brand misalignment by means of engaging a brand ambassador who speaks or acts on behalf of the brand.	All third party engagements on behalf of the brand are to be reviewed by the CS team for brand alignment.
Administration	Production of Branded Stationeries	There is the risk of brand misalignment in the production of materials bearing the brand insignia which fall below the brand standards	Sample of branded stationeries to be shared with CS for approval before production
Facilities	Office branding	There is the risk of reputational damage by means of an office location/building/facility /branding which falls below brand guidelines and expectation.	CS to be consulted in the selection of an office space and the branding of such space to meet brand guidelines before approval for use.

For the group remains owner of the brand, other digital transformational channels and platforms. Therefore, all brands communications and its associated strategy for direction remains under the purview of corporate services as per best practice.

6.0. LAUNCH OF LEADWAY INVESTORS' PORTAL

The policy shall provide for the establishment and maintenance of an investors' portal on the company's website where contents relevant to investments, company's performance, approved annual accounts, tax documents, monthly newsletters and other important information that can help investors make informed decisions and conversations are uploaded

7.0. PERSONAL OPINIONS AND PRIVATE MEDIA APPEARANCES

- 7.1 Every staff has the right to express an opinion in public debates, letters to the editor, calls to talkback radio, on social media etc. Employees also have the right to join political parties and hold and express political views as any other Nigeria citizen.
- 7.2 However, personal opinions and political activities must be expressed or undertaken in the capacity of a private citizen and not as an employee of Leadway. Any comments made must not be seen to represent the official view of Leadway or to compromise your ability to discharge your duties or be loyal to the Management in a politically neutral manner
- 7.3 Do not refer to your position when expressing an opinion or participating in public debates in a private capacity. Do not wear the company's approved merchandise such as promo T-shirts, Ties or lapels when expressing private opinions. In situations when public comment, although made in a private capacity, may appear to be an official comment on behalf of the company, staff should state that the comments are made in a private capacity and do not represent the official view of the company.

In expressing opinions or undertaking political activities in a private capacity, Staff must also ensure that there is no conflict of interest with their role as an employee of Leadway.

8.0. VIOLATION OF THIS POLICY

- 8.1 Selective disclosure of Material, Non-public Information in any forum other than the approved methods listed above, and by any individual other than an Authorized Spokesperson, and without the express approval of the MD/CEO or Executive Management is considered a violation of this Policy. A violation of this Policy may result in disciplinary actions as prescribed in the HR Staff Disciplinary Policy.
- 8.2 In the event of non-intentional disclosure by an Insider of information that might be of material importance, the Insider must immediately inform an Authorized Spokesperson, who in turn may consult with the Corporate Services and the Legal Departments as to whether prompt public dissemination of this information is required. If required, the information must be publicly disseminated within 24 hours of the inadvertent disclosure.

9.0. ADMINISTRATION OF THIS POLICY:

The Corporate Services Department in liaison with the Legal Department and Executive management shall be responsible for the administration of the Policy.

10.0. REVIEW OF THIS POLICY:

The Nomination, Remuneration and Governance Board Committee and where the Committee is not in place, the Board shall review the Policy every three (3) years to ensure its continued appropriateness and applicability and recommend any changes to the Leadway’s Board for approval.

Any changes to the policy shall be communicated immediately to all Board members.

11.0. APPROVAL MATRIX FOR COMMUNICATION CHANNELS:

Communication Channel	BoD	CEO	CFO	TLCS	AD	RBU	LD
Annual Report	A	R	R	C	R	C	C
Investor Reports	A	A/R	C	R/C	R/C	C	R
Press Releases, Media Relations, Agency Management and Advertising, Website (update), Electronic Email, Phone Call Script and Text Messages	I	A	I/C	R	C	R/C	C

Legend:

CEO - Chief Executive Officer

BOD - Board of Directors

CFO - Chief Financial Officer

AD - Approved Delegates

RBU - Relevant Business Units

TLCS – Team Lead, Corporate Services

LD - Legal Department

R – Responsible Person

A - Approval

Final

C - Consulted

I - Informed



12.0. APPROVAL/SIGNATURES



Team Lead, Corporate Services

26-04-2022

Date



Managing Director/Chief Executive Officer

26-04-2022

Date



Chairman, Board of Directors

26-04-2022

Date