



Stakeholder Management & Communication Policy

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1. Purpose

This Company's Stakeholder Management & Communication Policy establishes guidelines for UPDC Plc and its subsidiaries ("UPDC" or "Company") for communications with stakeholders and the general public. It covers the release of information about the Company, its management or operations to the general public, regulators, investors, media, customers, financial community and other stakeholders.

Compliance with this Policy is important both for business reasons and to meet UPDC's legal and regulatory obligations as a Company quoted on the Nigerian Stock Exchange.

2. Scope

This Policy applies to all personnel with respect to any information (general, confidential, or material) in whatever form or means, regarding the Company that is shared between the Company, personnel, and other parties.

UPDC views all employees as reputation managers not only for themselves, but for their employer and clients as well.

3. Objectives

UPDC recognizes the value of transparent and open communications with its stakeholders consistent with commercial confidentiality and regulatory considerations.

The objective of the Policy is:

- To provide shareholders and the financial community with equal and timely information which may influence the share price.
- To ensure that Company reports and other communications to shareholders and other stakeholders are in clear and easily understood language, readable and understandable and consistent with previous reports;
- To ensure that communication with stakeholders and the general public is governed by the principle of timely, accurate and continuous disclosure of material information on the activities of the Company so as to give a balanced and fair view of the Company, including its non-financial matters.
- To ensure that shareholders and stakeholders have equal access to the Company's information by posting on the Company's investor's portal and website.
- To present to the investment community, a balanced and complete view of the Company's performance and encourage feedback on the Company's activities.

UPDC has an obligation to ensure that all material information regarding the business affairs of the Company is disclosed to the public in an appropriate manner. This Policy will assist UPDC in satisfying the objectives above and in assigning responsibility for the implementation and oversight of these policies and procedures.

4. Responsibility of the Board

The Board of Directors shall ensure that shareholders have equal access to Company information and shall ensure that websites, investor relation portals, annual reports and other relevant information about the Company are made accessible to the public and are in plain language, readable and understandable.

5. Media Relations, Public Comments and Designated Spokespersons

Employees shall not be permitted to make public or press statements on behalf of the Company, verbal or written, without being explicitly authorized to do so by the Chief Executive Officer/Managing Director of the Company.

Employees invited to make speeches or presentations about the Company or its services to industry groups, conferences, or public meetings as part of their normal areas of responsibility are required to obtain approval from their Line Managers before accepting such invitations.

Employees should refrain from making public statements of personal opinion regarding the Company and from presenting personal opinion regarding the Company as fact.

Employees will not make political or policy pronouncements in their official capacity where the same can be construed as Company's position or opinion

Communication with stakeholders shall be by authorised personnel of the Company in line with existing policy on granting interviews and communicating with stakeholders.

6. Release of Information

6.1 Principles of Material Information Disclosure

When releasing material information, the Company shall adhere to the listing rules of the Nigerian Exchange Limited as it relates to:

- Disclosure of price sensitive information.
- Disclosure of significant occurrences.

6.2 News Releases

News releases containing material information will be issued as soon as practicable to major print and electronic media and published on the Company's website. In addition, such news releases may be released on social media if the Company considers it useful.

6.3 Routine Information Requests

- Enquiries from the public for general and routine information may be answered by an appropriate employee if the information requested is contained in public records or publications previously released for public distribution.
- Enquiries from the public shall not be answered if the enquiry concerns Company activities considered confidential. If such an enquiry is made, employees must respectfully decline the request as containing confidential or proprietary information.

6.4 Dealing with Rumours

In general, no comment may be made in response to rumours or speculation regarding the Company and its activities. However, certain exceptions may be made under the direction of the Chief Executive Officer/Managing Director.

Whenever the Company becomes aware of any rumor or report, true or false, in the press or the media, which is likely to have a bearing on an investor's investment decisions and the value of the shares and such information is of a different essence than the information previously disclosed to public by its representatives via material disclosures, prospectuses, circulars, announcements approved by the Nigerian Exchange Limited, financial reports and other public disclosure documents, an authorized spokesperson shall make a public statement to clarify the Company's position as promptly as possible under the direction of the Chief Executive Officer/Managing Director.

6.5 Announcements

Where the Company is required to make an announcement but is not yet in a position to confirm the implications of such announcement but believes that the information has been or is likely to be leaked, an authorised spokesperson shall make an interim announcement and the Company shall ensure that the interim announcement:

- provides as much detail of the subject matter as possible;
- sets out the reasons why a more comprehensive announcement cannot be made; and
- contains an undertaking to announce further details without delay as soon as the details are available.

7. Disciplinary Action and Violations of Law

Violations of this Policy or with the laws, rules and regulations applicable to UPDC's business, could subject an employee to appropriate disciplinary action. In addition, violations of the laws, rules and regulations applicable to UPDC could subject a director or an employee of the Company to individual civil or criminal prosecution, with accompanying potential damages, fines and imprisonment.

8. Policy Review

This Policy shall be reviewed as deemed necessary but not later than every five years.

**Approved by the Board of Directors of UPDC Plc
18th day of October 2022**



Chairman