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## **Corporate Communications Policy**

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**October 2016**

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## 1.0 POLICY

This Corporate Communications Policy (the “**Policy**”) sets out the guidelines governing communication with the internal and external stakeholders of FMDQ OTC Securities Exchange (“**FMDQ**”, the “**OTC Securities Exchange**” or the “**Company**”).

### 1.1 DESCRIPTION

This Policy is part of FMDQ’s Corporate Policies. It outlines the guidelines governing internal and external communications in FMDQ.

### 1.2 DEFINITIONS

For purpose of this Policy, the following definitions apply:

- a) “**Authorised Persons**” are (i) Managing Director/Chief Executive Officer (MD/CEO); (ii) Head, Strategy & Corporate Services Division; (iii) Head, Marketing & Business Development Division; (iv) Corporate Affairs Group; and (v) other individuals specifically approved by the MD/CEO from time to time for specific kinds of communications on behalf of the Company. Authorised 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 FMDQ, including its business, markets, products, services, finances, financing plans, operations, objectives, Members and other business relationships, personnel, and financial and operating results
- c) “**Confidential Company Information**” is any Company Information that has **not** been made publicly available by FMDQ, as well as information of third parties that the FMDQ 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; FMDQ Shareholders; Members; Issuers; Investors; Partners, other Exchanges; Media; Service Providers; the general public, etc.
- f) “**Internal Communication**” is the dissemination of information to internal stakeholders  
• “**Internal Stakeholders**” refer to FMDQ Staff, Management and Board of Directors
- h) “**Press Media**” are FMDQ’s media partners that focus on delivering news to the general public or a target public. These include print media (newspapers, news magazines), broadcast news (radio and television), and the Internet (online newspapers, news blogs, etc.)

### **1.3 PURPOSE**

The purpose of this Policy is to define and provide guidelines on the extent, quality and output of communication with FMDQ external stakeholders and on the adherence to and quality of internal communications in line with FMDQ-approved Standards.

### **1.4 POLICY STATEMENT**

FMDQ is committed to the dissemination of timely, accurate and quality information to its internal and external stakeholders. All internal and external communications should be aimed towards the achievement of FMDQ's vision and mission, and should be in line with its approved Strategy. All communication should be in line with FMDQ-approved standards. Only Authorised Persons are permitted to undertake FMDQ's internal and external communications.

#### **Guiding Principles**

FMDQ recognises that active communication with different stakeholders and the general public is an integral part of its Strategy. In order to reach its overall goals for communication, the following guiding principles should always be adhered to:

- a) Only Authorised 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 FMDQ's stakeholders in a timely manner. All requests for information by stakeholders shall be responded to by the relevant Group/Division 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
- c) As a securities exchange and self-regulatory organisation (SRO), all information disseminated to stakeholders shall be accurate, transparent and open as possible, while considering the need to protect FMDQ's confidential information
- d) All Groups/Divisions 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 FMDQ stakeholders and will be applied towards ensuring better service delivery
- g) All FMDQ communication must be consistent in style and message to build stakeholder trust

### **Guidelines for External Communication**

The support and participation of FMDQ's external stakeholders are crucial to its long-term success and is therefore always desired. All communication to external stakeholders should be anchored on this premise and aimed at making the stakeholders feel involved and not alienated. External communication should also promote overall knowledge and awareness of FMDQ, its markets, products, services etc., among the different external stakeholder categories.

All external communication must be approved by Corporate Affairs Group (COG), through the Head, Strategy & Corporate Services Division (SCD). The MD/CEO shall approve all communication with government representatives and FMDQ's regulators, as well as confidential or sensitive information. Exceptions may exist in situations where such communication is part of a Group's functions; for example, Business Origination Group's communication with its existing/potential Members and clients and Market Services Group's communication with existing FMDQ Members, to mention a few.

All presentations/materials for external use must be reviewed by COG 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 website.

FMDQ's relationship with the Press Media, particularly business reporters, is at the heart of its success. The media, which serves as the medium through which FMDQ reaches its external stakeholders, is accorded high priority in FMDQ. As such, communication with media is to be handled with the highest levels of sensitivity and professionalism and must always be handled by COG as this is the approved Group for communication and interface with the media. Only Authorised Persons shall be permitted to grant interviews of any sort (print, TV, online) and be quoted with respect to FMDQ's external communications.

### **Guidelines for Internal Communication**

FMDQ's internal communication is targeted at all its internal stakeholders, towards the achievement of its overall objectives. Furthermore, internal communication is aimed at strengthening the organisational culture and feeling of commitment among the internal stakeholders, thereby increasing active participation and team spirit.

Internal communication shall be handled by the Groups responsible for such correspondence, including Strategy, Corporate Affairs and Corporate Services Groups (for Staff members) and Legal & Company Secretariat Group (for Board of Directors).

Communication between and amongst Staff members must be professional at all times. Staff members are to be addressed by either their first names or by their initials in all written communication, except letters which must bear the full name of the Staff member. The use of titles, nicknames or any other names is strictly prohibited in written communication.

### Disclosure of Confidential Information

FMDQ 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 the FMDQ Confidentiality and Non-Disclosure Agreement which is signed by all Staff members upon assumption of duty. Violation of this Agreement may attract legal redress.

### Public Statements of Personal Opinion

FMDQ Staff members should refrain from making public statements of personal opinion regarding FMDQ, its markets and the Nigerian financial markets as a whole, and from presenting personal opinion regarding the OTC Securities Exchange as facts. Such public statements may include quotes given to media, contribution to blogs, published articles, etc. Any such public statements must be approved by the MD/CEO before publication.

### Stakeholder Communication Channels

**Table 1**

S/N	STAKEHOLDER	COMMUNICATION CHANNEL(S)
1.	Members	Seminars, bilateral contacts, website, letters, email correspondence, newsletter, media publications/interviews, corporate presentations, speeches, other publications, brochures, leaflets and advertisement
2.	Investors/General Public	Publications, road shows website, media publications/interviews, press releases, investor presentations, other publications, brochures, leaflets and advertisement
3.	Regulators Government and Authorities	Knowledge sharing sessions/Seminars, visits, website, newsletter, media, market reports, publications, Annual Report), brochures, leaflets and presentations
4.	Media	Press releases, interviews, speeches, workshops/seminars, website
5.	Staff	Intranet, emails, debriefings and information sessions, staff meetings, website, letters
6.	Board of Directors	Email, letters, Board and Committee meetings
7.	Shareholders	Email, letters, General Meetings