



Corporate Communications Policy

October 2023

Table of Contents

1.0. Introduction.....	3
1.1. Description	3
1.2. Definitions	3
2.0 Purpose	4
3.0 Policy Statement	4
3.1 Guiding Principles	4
3.2 Guidelines for External Communication	5
3.3 Guidelines for Internal Communication	5
3.4 Disclosure of Confidential Information.....	6
3.5 Public Statements of Personal Opinion	6
3.6 Guidelines for FMDQ Social Media Handles.....	6
3.7 Stakeholder Communication Channels	6
4.0 Scope	8
5.0 Responsibilities	8
6.0 Reference	9
7.0 Review and Amendment.....	9

1.0. Introduction

Policy

This Corporate Communications Policy (the “Policy”) sets out the procedures and guidelines for the management, enhancement and preservation of the corporate brand identity of **FMDQ Group PLC** (“**FMDQ Group**”, “**the Group**” or the “**Company**”) and its subsidiaries (**all together referred to as “FMDQ”**).

1.1. Description

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

1.2. Definitions

- a) “**Authorised Persons**” are (i) Group Managing Director/Chief Executive Officer (GMD/CEO); (ii) Group Chief Operating Officer (GCOO); (iii) Managing Directors and Chief Operating Officers of FMDQ subsidiaries – FMDQ Securities Exchange Limited (FMDQ Exchange), FMDQ Clear Limited (FMDQ Clear), FMDQ Depository Limited (FMDQ Depository), FMDQ Private Markets Limited (FMDQ Private Markets) and iQx Consult Limited (iQx Consult) (iv) Head, Marketing Communications Division; (v) Communications Group; and (vi) other individuals specifically approved by the GMD/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 FMDQ stakeholders
- e) “**External Stakeholders**” refer to Regulators, Government and other Authorities; FMDQ Shareholders; Members; Issuers; Investors; Partners, other financial market stakeholders; Media; Service Providers; the general public, etc.
- f) “**Internal Communication**” is the dissemination of information to FMDQ Staff, Management and Board of Directors
- g) “**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.)

2.0 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.

3.0 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 Group's broad 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.

3.1 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, press releases and virtual events
- 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, in line with the approved turnaround time of each Group/Division
- c) As an integrated financial market infrastructure Group, all information disseminated to stakeholders shall be accurate, transparent and as open as possible, while taking into account the need to protect FMDQ's confidential information
- d) All Groups/Divisions shall proactively develop contacts with their target stakeholder groups and ensure timely, open and constant communication in line with the FMDQ standard of written and spoken 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
- h) All press releases and news briefs must be approved by the GCOO before circulation/dissemination to media partners. Releases shall be monitored for facts, consistent message, consistent brand representation and positive projection of FMDQ and its subsidiaries
- i) As soon as the Company discovers a Company statement that was reported inaccurately, immediate action must be taken by the Communications Group (CMG) to correct or retract same, where necessary

3.2 Guidelines for External Communication

The support and participation of FMDQ's external stakeholders are crucial to its long-term success and are 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 the GCOO or an approved designate. The GMD/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/Division's functions; for example, Business Development Division's communication with existing/potential Members and clients of FMDQ Exchange and FMDQ Clear's communication with FMDQ Members, to mention a few.

All presentations/materials for external use must be sent to CMG for post-mortem review to ensure brand compliance. This includes presentations to external stakeholders at meetings, seminars, conferences, etc. and materials to be uploaded to the corporate 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 the media is to be handled with the highest levels of sensitivity and professionalism and must always be handled by CMG or Marketing Group as these are the approved Groups 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.

3.3 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/Divisions responsible for such correspondence, including Communications Group, General Internal Services Division, Human Resources Division, etc. (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.

3.4 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.

3.5 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 opinions regarding the the Group and its subsidiaries as facts. Such public statements may include quotes given to media, contributions to blogs, published articles, social media posts, etc. Any such public statements must be approved by the GCOO and/or GMD/CEO (where necessary) before publication.

3.6 Guidelines for FMDQ Social Media Handles

FMDQ Social media handles are official platforms for the communication of approved messages about FMDQ’s franchise, markets and subsidiaries. Staff mandated to operate these handles shall not post any message (text or image) without the prior approval of the GCOO or an approved designate. Staff shall not engage in any form of banter with the public through the Company’s social media handles. Any member of the public with a grievance/inquiry shall be politely advised to channel them to the appropriate provided email address.

3.7 Stakeholder Communication Channels

Table 1

S/N	STAKEHOLDER	RESPONSIBILITY	COMMUNICATION CHANNEL(S)
1.	Members	Responsible Groups/Divisions in FMDQ Exchange, FMDQ Clear, FMDQ Depository and FMDQ Private Markets; Subsidiaries Managing Directors, Chief Operating Officers and their approved designate; the GCOO and the GMD/CEO	Seminars, bilateral contacts, website, letters, email correspondence, newsletter, media publications/interviews, corporate presentations, speeches, other publications, brochures, leaflets and advertisement
2.	Investors/General Public	Responsible Groups/Divisions in FMDQ Exchange, FMDQ Clear, FMDQ Depository and FMDQ Private	Publications, roadshows, website, social media, media publications/interviews, press

		Markets; CMG; Subsidiaries Managing Directors, Chief Operating Officers and their approved designate; GCOO and the GMD/CEO	releases, investor presentations, other publications, brochures, leaflets and advertisement
3.	Regulators, Government and Authorities	External Relations Division, Market Architecture Division, Risk & Compliance Group, Legal & Company Secretariat Group (LCG), CMG and the GCOO	Knowledge sharing sessions/Seminars, visits, website, newsletter, media, market reports, publications, Annual Report), brochures, leaflets and presentations
4.	Media	CMG, MAG and the GCOO	Press releases, interviews, speeches, workshops/seminars, website
5.	Staff	CMG, Human Resources Division, General Internal Services Division, the GCOO and the GMD/CEO; Other Groups as may be required	Intranet, emails, debriefings and information sessions, staff meetings, website, letters
6.	Board of Directors	LCG, Subsidiaries Managing Directors, the GCOO and the GMD/CEO	Email, letters, Board and Committee meetings
7.	Shareholders	LCG, Subsidiaries Managing Directors, the GCOO and the GMD/CEO	Email, letters, General Meetings