



**MRS OIL NIGERIA PLC  
CORPORATE COMMUNICATION POLICY**

**This Policy is issued pursuant to the Nigerian Communication Act, 2003, the National Policy on Telecommunication, 2000, the Data Protection Regulation, 2019 and International Best Practices.**

<b>Review Frequency</b> This document is reviewed biennially.
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<b>Document Author:</b> Mrs. Oluwakemi M. Jafojo <b>Designation:</b> Company Secretary
<b>Document Owner:</b> Mrs. Oluwakemi M. Jafojo <b>Designation:</b> Company Secretary

MRS Oil Nigeria Plc's Record of Change to the Communication Policy

MRS Oil Nigeria Plc. ("the Company") records planned updates under this section. The version number, author's name and date, approver's name and date, change type (i.e., high-level descriptor such as: 'Contact List Updates'), and a brief summary of the changes to the plan should be provided in the appropriate columns. For reviews that did not result in any updates, record 'No Updates' in the 'Summary of Changes' column.

MRS Oil Nigeria Plc's Record of Change to the Communication Policy				
1.0			Plan Creation	Created the Incident Response Plan

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## 1. Introduction

This Corporate Communication Policy (the “**Policy**”) sets out the guidelines governing communication with internal and external stakeholders of MRS Oil Nigeria Plc. (the “**Company**”).

## 2. Definitions

- a) “**Authorized Persons**” are (i) the Managing Director (MD); (ii) the Company Secretary or any other individual specifically approved by the MD to communicate to stakeholders on behalf of the Company, for specific purposes. Authorized persons are also those whose approved job description demands communication with employees and external stakeholders.
- b) “**Basic Company Information**” is any information about the Company, including its business, markets, products, services, financial reports, financing plans, operations, objectives, shareholders, personnel and other business relationships.
- c) “**Confidential Company Information**” is any Company Information that is not in the public domain, or any information of third parties that the Company is obligated to keep confidential;
- d) “**External Communication**” is any information of the Company disseminated to external stakeholders;
- e) “**External Stakeholders**” refers to the Company's Customers, Vendors, Regulators, Government and other Authorities; Shareholders; Investors, Business Partners, Media; Service Providers; the general public, etc.
- f) “**Internal Communication**” is any information of the Company disseminated to internal stakeholders;
- g) “**Internal Stakeholders**” refer to the employees of the Company, Management and the Board of Directors;
- h) “**Press Media**” are the print media (newspapers, news magazines), broadcast news (radio and television), and the Internet (online newspapers, news blogs, etc.)

## 3. Purpose

The purpose of this Policy is to establish a guideline on the extent, quality and type of information that the Company's internal and external stakeholders are provided with. The information to be provided would be the approved standard of Communication by the Company.

## 4. Policy Statement

The Company is committed to the dissemination of any information of the Company in a timely manner. The Company affirms that information emanating from any Authorized Person on its behalf to the stakeholders is accurate, of quality and in alignment with its approved Strategy. It is targeted at achieving the Company's vision and mission and must be disseminated in line with Company-approved standards.

## **5. The Company's Guiding Principles for Communication**

Communication with the Company's stakeholders is an integral part of the Company's strategy and it is important to abide by the following guiding principles:

- a) The Company communicates with its employees first, on employee related decisions and the Company's business strategies;
- b) The Company as a responsible citizen operate in an ethical manner and must oblige to reasonable request for information by its stakeholders;
- c) Only Authorized Persons shall be permitted to have any form of formal engagement with external stakeholders;
- d) All information must be conveyed through the appropriate and approved communication channels in a timely manner to the Company's stakeholders. The Company shall respond to any requests for information by stakeholders within three (3) working days and where the request require more delivery time, the acknowledgement response will indicate that fact and the expected response time.
- e) All communication must be clear, concise and credible.
- f) Regular feedback is encouraged from the Company's stakeholders, which will be applied towards ensuring better service delivery.
- g) All communication by the Company must be consistent in style and the message must be such to build stakeholder trust.

## **6. The Company's Guidelines for External Communication**

The Company understands the role of its stakeholders in the achievement of its long term goals and ensures that all communication to its external stakeholders is premised on stakeholder involvement and collaboration. The Company's external communication also seeks to promote overall knowledge and awareness of the Company's markets, products, services etc., amongst various stakeholder groups.

All external communication must be approved by the Managing Director, through the Company Secretary. All presentations/materials for external use must be reviewed by the Managing Director to ensure brand compliance and accuracy of the information to be disseminated. This includes presentations to external stakeholders at meetings, seminars, town hall meetings, conferences, etc. or information to be uploaded to the website or released to the general public through the media.

The Company appreciates its relationship with the Media, and understands that the media serves as the medium through which the Company reaches its external stakeholders. The Company therefore handles its communication with media with the highest levels of sensitivity and professionalism and ensures that the Company's interface with the media remains the Managing Director. Only Authorized Persons shall be permitted to grant interviews of any sort (print, TV, online) and be quoted with respect to Company's external communications.

## 7. The Company's Guidelines for Internal Communication

The Company also seeks to communicate with its internal stakeholder to achieve its overall objectives, strengthen the organizational culture, obtain employees buy-in to its strategies and ensure teamwork amongst the workforce in the realization of its short and long term goals.

All internal communication is handled by the Human Resource Department for all employees or the Company Secretary for correspondences relating to the Board of Directors. It is important that all communication amongst employees remain professional at all times and Managers are addressed by Sir or Madam, except where a Manager requests to be addressed by either their first names or by their initials in all written communication.

Letters addressed to individual employees must bear the full name of the employee. The use of nicknames or any other names is strictly prohibited in written communication.

## 8. Disclosure of Confidential Information

The Company is committed to provide timely, accurate, credible and complete disclosure of its basic company information in an appropriate and Management approved manner. Disclosure of confidential information is prohibited; all employee who handle sensitive tasks must execute a Confidentiality and Non-Disclosure Agreement upon assumption of duty or such task. A breach of this provision may lead to disciplinary action taken against the employee or legal redress where an actual damage is incurred by the Company.

## 9. Public Statements of Personal Opinion

The Company prohibits its employees from making public statements of personal opinion regarding the Company, its products and services, market segments, customers, etc. Such public statements must be approved by the MD before publication. The Company Secretary shall handle the publication of such public statements, which may include quotes given to media, contribution to blogs, published articles, amongst others.

## 10. Stakeholder Communication Channels

Table 1

S/N	STAKEHOLDER CATEGORY	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.	Customers, Vendors, General Public	Publications, road shows, website, media publications/interviews, press releases, other publications, brochures, leaflets and advertisement.
3.	Regulators and Government Authorities	Letters, emails, meetings, website, newsletter, media, market reports, publications, Annual Report), brochures, leaflets and presentations.
4.	Media	Press releases, interviews, speeches, workshops/seminars, website
5.	Employees	Intranet, emails, debriefings and information sessions, staff meetings, website, letters.
6.	Board of Directors	Email, letters, Board and Committee papers.
7.	Shareholders	Email, letters, Annual Reports and Accounts.

## **11. Breach**

Any individual who breaches this Procedure set out above may be subject to internal disciplinary action (up to and including termination of their employment) and may also face civil or criminal liability if their action violates the Law.

## **12. Policy Review**

This Policy shall be subject to review every two (2) years or as deemed necessary, in line with applicable laws.

**Approved by the Board  
On May 27, 2020**