



Guaranty Trust Pension Managers

GUARANTY TRUST PENSION MANAGERS LIMITED

STAKEHOLDER MANAGEMENT AND COMMUNICATION POLICY



Title	Guaranty Trust Pension Managers Limited Stakeholder Management and Communication Policy		
Date Created	September 15, 2022		
	Title	Signature	Date
Prepared by	Head, Legal and Company Secretariat		October 3, 2022
Reviewed by	Managing Director		October 7, 2022
	Chairman, Board of Directors		
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1. INTRODUCTION

- 1.1 Guaranty Trust Pension Managers Limited ("GTPension" or "the Company") has always paid close attention to its engagement with its stakeholders.
- 1.2 Although the ultimate responsibility for stakeholder engagement rests with the Executive Management of the Company, the Company's various departments, business units and divisions are mandated to maintain inclusive, mutually beneficial relationships with their stakeholders and to be proactive in engaging with them in a transparent and on-going manner.
- 1.3 This Stakeholder Management and Communication Policy ("the Policy") aims to provide a clear guideline for GTPension employees in conducting business in line with the Mission Statement of the Company.
- 1.4 This Policy is in compliance with the Federal Reporting Council's Nigerian Code of Corporate Governance, 2018 and the National Pension Commission's (PenCom) Guidelines on Corporate Governance for Pension Fund Operators, 2021.

2. SCOPE

- 2.1 This Policy outlines our approach to engagement with our stakeholders and sets out the principles for engagement with our stakeholders.
- 2.2 This Policy forms part of the Company's operating philosophy, policies, standards and values and applies to all the Company's divisions, departments and business units, regarding all their activities and interactions with stakeholders.
- 2.3 This Policy supports and should be read in conjunction with the Company's Code of Ethics and Business Practices and Shareholder Engagement Policy.

3. PURPOSE

- 3.1 The purpose of this Policy is to:
 - a) Identify our stakeholders;

- b) Guide the building and maintenance of an open relationship between the Company and its stakeholders;
- c) Develop and promote a good understanding of stakeholder needs, interests and expectations;
- d) Offer guidelines on how the Company should be engaging with our stakeholders; and
- e) Reinforce our commitment to all stakeholders.

4. STAKEHOLDER IDENTIFICATION

- 4.1 Stakeholders are individuals, group of persons or organizations who are directly or indirectly impacted by our business operations, as well as those who may have interests in our Company's activities, products or services and associated performance. Stakeholders will also include those who have influence over the outcome of our business operations.
- 4.2 Stakeholders include customers, employees, clients, communities, shareholders, business partners, government agencies, intellectual leaders etc.

5. METHODS OF ENGAGEMENT

- 5.1 We engage our stakeholders through various channels and means of communication depending on the peculiarities of specific shareholder groups. These methods are meticulously outlined in the stakeholder matrix highlighted in Appendix 1 below.
- 5.2 The Managing Director is the chief spokesperson for the Company and will communicate with stakeholders as required. However, he may delegate certain responsibilities to different divisions, departments and business units.

6. STAKEHOLDER ENGAGEMENT FEEDBACK

Our stakeholder feedback is derived from surveys, client feedback mechanisms, relationship managers, stakeholder fora, social media, conferences and one-on-one meetings.

7. OWNERSHIP AND ACCOUNTABILITY

- 7.1 Stakeholder engagement is decentralized so there is not a single team that manages all relationships and queries or concerns from stakeholders.

- 7.2 This Policy is monitored primarily by the Head of Compliance and Head of Human Resources. However, all Heads of Department and business units are also responsible for monitoring compliance with this Policy.
- 7.3 The Managing Director exercises direct oversight across the Management team and is regularly briefed on the state of stakeholder relationships and stakeholder needs, interests and expectations, which serve as strategic input for planning and decision making. The Managing Director also periodically briefs the Board of Directors on the Company's communication with its stakeholders.
- 7.4 All employees are accountable for managing relationships and meeting expectations of both internal and external stakeholders within their areas of responsibility. Should a stakeholder not be satisfied with the service or assistance that they receive from their GTPension point of contact, such issues can be communicated (anonymously, if preferred) through the Company's official contact: complaints@gtpensionmanagers.com

8. PUBLICATION OF THIS POLICY

This Policy shall be published on the Company's website at <https://www.gtpensionmangers.com>

9. REVIEW AND AMENDMENT OF THIS POLICY

The Board shall review this Policy as the need arises. The review shall take into cognizance changes and developments in laws and regulations applicable to the Company and modifications to international guidelines and practices in corporate governance practices. The Board may delegate this power to the Board Governance, Nomination and Remuneration Committee.

APPENDIX 1
STAKEHOLDER ENGAGEMENT MATRIX

Reason for Engagement	Purpose of Engagement	Frequency of Engagement	Methods of Engagement
STAFF			
<ul style="list-style-type: none"> To ensure that we remain an employer of choice that provides a safe, positive and inspiring working environment. To understand and respond to the needs and concerns of our staff members. To provide staff with strategic direction and keep them informed about Company activities. 	<p>To provide us with the feedback and input that can help us improve their working environment experience as well as the performance of our business.</p>	<ul style="list-style-type: none"> Ongoing and daily engagement at all levels As required by staff 	<ul style="list-style-type: none"> A robust combination of face-face, written and broadcast communications. These include culture and engagement surveys, emails, intranet communications, employee engagement activities, magazines and relevant trainings.
CLIENTS/BENEFICIARIES			
<ul style="list-style-type: none"> To understand them, their businesses, aspirations and service needs better. To provide appropriate advice, proactive business solutions and value-adding services. To ensure that we maintain the high service levels they expect and deserve To inform product development and prioritization. To ensure accuracy of client personal and/or business information. 	<ul style="list-style-type: none"> To access innovative solutions and services To grow and protect client funds Convenient access to our services, less complexity and improved flexibility To enjoy protection of their information through secure IT systems and infrastructure. To resolve all complaints regarding our services. 	<p>Dependent on client needs and identified opportunities.</p>	<ul style="list-style-type: none"> Interactions through independent outlets Relationship managers and customer care centers complaint lines social media surveys and marketing and advertising agencies.
INVESTORS			
<p>Our engagement with Investors and Shareholders is guided by our Shareholders Engagement Policy.</p>			

REGULATORS

<ul style="list-style-type: none"> To maintain open, honest and transparent relationships and ensure compliance with all legal and regulatory requirements. To minimize our operational risk 	<p>To ensure regulatory compliance</p>	<p>Daily, weekly, monthly, quarterly and as required.</p>	<p>Meetings with the board and management including one-on-one discussions with various executive officials, onsite meetings and training sessions and annual examinations</p>
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COMMUNITIES

<ul style="list-style-type: none"> To create partnerships that serve to facilitate our sustainability activities. To obtain input from environmental experts, communities and non-governmental organizations (NGOs) regarding key focus areas. To create awareness of our sustainability commitment and initiatives. 	<p>To collaborate in a way that furthers social, environmental and other common agenda for the greater good.</p>	<p>Ongoing — as partnerships dictate or stakeholder needs require.</p>	<p>Stakeholder meetings etc.</p>
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GOVERNMENT

<ul style="list-style-type: none"> To build and strengthen relationships with government, both as a partner in the development of the country and as a key client. To provide input into legislative development processes that will affect the economy and our activities and operations. To reaffirm our commitment to public sector business development. 	<p>To be a key role player in The economic, social and environmental transformation of the country</p>	<p>As deemed necessary by either party</p>	<p>Engagements take place where there is a business-related invitation</p>
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<ul style="list-style-type: none"> To partner in increasing economic growth and reducing inequality and unemployment 			
MEDIA			
<ul style="list-style-type: none"> To leverage the reach and influence of media channels to share our business and story with stakeholders. To communicate with relevant stakeholders and the broader public with a view to having a positive influence on behavior that will lead to desired business results. To protect and manage our reputation. 	<ul style="list-style-type: none"> To educate and inform their audiences on developments in the pension industry. To gain insight into our contribution to the Nigerian economy via our products and services. 	<ul style="list-style-type: none"> Daily, in response to business-related media queries. As required in response to our various business and sustainability initiatives. 	<ul style="list-style-type: none"> Corporate Social Responsibility events and conferences and meetings, to which the media are invited. Discussions held on radio and television stations. Interviews with key business media on relevant reporting dates. Daily telephone and email interaction regarding media enquiries.
BUSINESS PARTNERS AND INDUSTRY BODIES			
<ul style="list-style-type: none"> To continue learning through interaction with the industry and cross-sectorial organizations. To leverage and build our strategic business partnerships for the maximum benefit of all our stakeholders. To use business associations as a forum through which we can promote our viewpoints on key industry issues. 	<ul style="list-style-type: none"> To deliver mutually beneficial learning. To influence and/or promote a common agenda. 	<p>As required or dictated by performance contracts and association or partnership membership agreements</p>	<ul style="list-style-type: none"> Sponsorship or Proactive participation at industry events and conferences. Regular meetings with various industry bodies
SUPPLIERS AND CONTRACTORS			
<ul style="list-style-type: none"> To obtain products or services required 	<ul style="list-style-type: none"> To provide products 	<p>Ongoing, as required</p>	<ul style="list-style-type: none"> Ongoing interaction with suppliers and

<p>conducting our business.</p> <ul style="list-style-type: none"> • To maintain an ideal and timeous supply of goods and services for our operations. • To encourage responsible practices across our supply chain, local procurement, supplier conduct and environmental considerations 	<p>and services.</p> <ul style="list-style-type: none"> • To negotiate pricing and contracts. • To promote new products and service offerings. • To respond to tenders. 		<p>contractors for procurement purposes.</p> <ul style="list-style-type: none"> • One-on-One negotiations and meetings.
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