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1. INTRODUCTION

Effective communication is essential for proper management of the Company on a transparent and accountable basis. It is also vital for any organization which strives to provide high, quality and consistent service to its customers and to fulfill the standards of service set by such company.

Communication plays a key role in how we conduct our business at FCMB Pensions, as it reflects on our image and reputation. It is, therefore, important to provide a policy which guides how information is disseminated within the Company (internal), as well as to outside parties (external).

2. SCOPE

This Policy shall be applicable to all forms of communication within the Organization. Both internal and external communications shall be subjected to the principles of this Policy. Every other Policy and Procedure in FCMB Pensions on communications must align with this Corporate Communications Policy.

3. PURPOSE

The purpose of this policy is as follows;

- To set out guidelines and principles to ensure quality, accuracy, timeliness of all communication output in compliance with relevant regulatory and policy requirements.
- Ensure that the Company's goals, Policies and Guidelines are communicated to employees to increase their level of understanding, inspire commitment, and motivate them to support the company's goals.
- To communicate clearly, timely and adequately to all stakeholders of FCMB Pensions, all necessary and relevant information needed for them to effectively carry out their own responsibility.

4. GUIDING PRINCIPLES

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

- a. Transparency:** FCMB Pensions is committed to providing the public with clear, accurate and reliable information at all times. We seek to establish close relationships with our stakeholders, through regular communication, integrity and transparency.

- b. **Fair and Prompt Disclosure:** Publicly available information on company related matters should be released to all internal & external stakeholders and to the public simultaneously.
- c. **Confidentiality:** All FCMB Pensions' documentation, correspondence and company-related information, unless and until publicly available must be treated as confidential. Non-public information from or concerning suppliers, customers, employees, agents, consultants and other parties must also be protected in accordance with legal and contractual requirements, including the FCMB Pensions Data Protection Procedure, where and when applicable.
- d. **Official Language:** Whilst English remain the official language of the company, other local languages including 'pidgin' can be used depending on the audience.
- e. **Two-way Communication:** FCMB Pensions believes in clear, accurate and reliable top-down and bottom-up communication through all levels of the Organization. Efficient two-way channels of communication ensure that employees understand help the Company achieve its business objectives. The communication with all stakeholders, internal and external, must proceed in line with the Company's policy and procedure. Regular feedback is encouraged from all FCMB Pensions stakeholders and will be applied towards ensuring better service delivery
- f. **Authorized Spokespersons:** Communication with stakeholders and the general public must be aligned with the Company rules and procedures, and must only be done by duly authorized Company spokesperson(s). Any Employee who does not follow this rule shall be held liable for his /her actions and sanctions accordingly.
- g. **Responsible Individual Behavior:** All FCMB Pensions employees should, in their daily work, behave as if they were representatives and ambassadors of the Company. Therefore, each employee should be committed to preserving and enhancing the Company's reputation. Any illegal or offensive behavior or statement, including via social media accounts, which could cause damage to the Company, should be avoided.
- h. **Publishing of Annual Report / Financial Results and Statement of Affairs:**
It shall be the responsibility of the Head, Finance and Head, Legal Departments respectively to ensure that the company's financial statements and statement of affairs fairly present the true state of the Company as at the end of the financial year and that of the profit or loss and cash flows for that period.

- i. **Compliance:** All presentations/materials for external use must be reviewed by Chief Compliance Officer (CCO) prior to exposing these documents to the stakeholders to ensure compliance and accuracy. This includes presentations to external stakeholders at meetings, seminars, conferences, etc. and materials to be uploaded to the website.
- j. **Accessibility:** The control arms of FCMB Pensions shall have unfettered access to the Board of directors.
- k. **Communication with Staff:** Heads of Departments (HOD) shall ensure communication to staff are in line with relevant policies and shall provide the required approval for communications going out to other Departments. All communications with the Executives shall originate from the various HODs and vice-versa. Communication across Departments shall be directed to the concerned HOD.
- l. **Marketing Communication:** All Marketing and Communication assets such as newsletters, audio visual and video communication briefings, and internal directories in relation to FCMB Pensions must be approved by the Executive Director in charge of Business Development.
- m. **Communication among Staff:** 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 nicknames or any other names is strictly prohibited in written communication which must follow the Company's approved font.

5. Communication with Different Stakeholders

We have a varied audience with whom we communicate differently.

The table below shows the FCMB Pension's main method of communication with different stakeholders.

S/N	Audience	Communication Channels
1.	Shareholders	<ul style="list-style-type: none"> • General Meetings • Email • Letters • Website • General Publications
2.	Board of directors	<ul style="list-style-type: none"> • General Meeting • Board and Committee meetings/Papers • Emails

		<ul style="list-style-type: none"> • Letters • Website • General Publications
3.	Management	<ul style="list-style-type: none"> • Executive Management Committee (EMC) Meeting • General Executive Management Committee (GEMCO) Meeting • Reports from HODs • Specialized Meeting
4.	Existing and prospective Customers	<ul style="list-style-type: none"> • Quarterly Statements/welcome letters • Newsletters • Mobile App • Website • Toll free services • Presentations • Statutory Notification • Face to face meetings • Annual Report • SMS/Email • Pre-retirement seminars • Advertisement
5.	Regulatory Authorities e.g., PenCom, FRCN etc.	<ul style="list-style-type: none"> • Website • Seminars • Forum • Emails • Letters • Periodic Reports
6.	FCMB Pension Staff	<ul style="list-style-type: none"> • induction seminars • Staff handbook • Intranet • Website • Staff training (internal) • Email • Departmental Meeting and Briefs
7.	Pension Fund Custodian	<ul style="list-style-type: none"> • Letters/Memos • Website • Email • General Publications
8.	General Public	<ul style="list-style-type: none"> • Media publications • Publications • Advertisement

		<ul style="list-style-type: none"> • Website • General Publications • Social media
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6. Methods of Communication

We make use of different methods to communicate with our audience

6.1 Website

Our website gives access to all the necessary information you want to know about Contributory Pension Scheme as required by PenCom. We ensure timely, up to date and easy to access information for all our audience. The site also has links to other organizations relevant to our customers e.g., PenCom, Pension funds Custodian etc.

6.2 Toll-Free Service

We have deployed a toll-free service which allows existing and prospective customers to call our customer services representatives at no cost.

6.3 Mobile App

With the FCMB Pensions' Mobile App you can do the following;

- Check your RSA balance
- View pension contributions
- Use your Pension calculator
- View contact details of your relationship Officer
- Access your personal details
- And Many more

6.4 Live Chat

Our live chat shall be available between 8:00am and 5:00pm on work days. Customers are guaranteed prompt response to their chat enquiries through our standby live chat agents.

6.5 Annual Report and Account

We are required by regulation to produce and publish Annual Report and Account detailing our financial management and performance during the financial year.

6.6 RSA Statement.

We provide individual statements to both our funded and unfunded RSA holders every quarter. We send E statement to clients with registered addresses and deliver hard copy RSA statements to clients without registered email addresses.

6.7 SMS Notification

We send SMS notification on any remittance made into Retirement Savings Accounts as they may occur.

6.8 Customer Forum

We hold customer forum each year which focuses on sensitizing our customers on Contributory Pension scheme, how their fund is being managed and address any issue/complain or enquiry from them.

6.9 Newsletters

Newsletter shall be issued periodically to inform concerned stakeholders of the necessary development and or relevant information either operational or administrative.

6.10 Staff Meetings

Staff meetings shall be held monthly at Departmental levels, to provide an update on strategic and operational matters, including any changes to working procedures. HODs are also encouraged to brief their subordinate on any new development discussed at GEMCO. Members of Staff are also encouraged to identify any issues if any and suggest potential service improvement.

6.11 Trainings

The Company shall as part of our commitment to deliver professional Pension service to stakeholders, Members of staff are encouraged to study for additional skills in related field and receive continuous in-house training for effectiveness and efficiency.

6.12 Pre-Retirement Seminars

We shall, periodically conduct workshops for members who are close to retirement. The workshops shall be designed to educate them on the necessary requirements for accessing their account and their own personal financial plan for retirement.

6.13 Social Media

FCMB Pensions recognizes the growing importance for organizations to have an online presence, currently we have Instagram, Twitter Facebook and LinkedIn handles

primarily used to raise our online profile in a business to business environment and build relationship with other professional bodies within the pension industry. It is also an avenue to make enquires and enhances information sharing.

7 Data Protection

FCMB Pensions shall always guarantees adequate protection and privacy of information (be it personal or otherwise) in line with the Nigeria Data Protection Regulation (NDPR) and will always ensure that the Information/ Data collected (online or offline) will only be used for lawful purposes.

8 Amendment and Review of Communication Policy

- i)* The Chief Compliance Officer shall ensure enforcement of the provisions of this manual.
- ii)* Amendment and review of this Communication Policy shall be carried out after every 2 years or as may be required.
- iii)* Every Regulation, Guideline, Framework and Circular released by the Commission automatically becomes a working guide and reference document for compliance functions.