

ARADEL HOLDINGS PLC CORPORATE COMMUNICATION POLICY



Executive Summary

In the era of enlightened stakeholders, effective communication with all constituent stakeholders of Niger Delta Exploration & Production Plc (NDEP Plc.) and its subsidiaries is not only desirable but also requires skillful management.

NDEP conducts its operations to the benefit of all stakeholders and with the least negative impact on the environment. This translates that community relations, overall development as well as adherence to global best practices are at the heart of this Communications Policy.

As part of its core values of making the oil & gas sector accessible for Nigerians and advancing a level playing field in Nigeria's single most important sector – the oil and gas, NDEP is using the best possible communications and outreach techniques to engage internal and external stakeholders.

This Policy describes the approach to be used to communicate with, and provide outreach to, key stakeholders of NDEP Plc.

Our communications approaches include static, dynamic, and multi-directional information exchanges with employees, local community, media, regulatory and government stakeholders. These exchanges are aided by mainstream and digital communications tools, such as our website, subtle social media outreaches (in view), media pitches, public tours, Corporate Social Responsibility (CSR) and methods to receive input from internal and external stakeholders.

The integrated approaches to diverse communications and outreach techniques laid out in this policy ensure a clear path for robust stakeholder engagement with NDEP and its subsidiaries now and in the future.



Table of Contents

Introduction

Policy Goal and Objectives

Distribution of Communications Policy

Target Audiences of Communications Policy

General Guiding Principles

General Communication Channel: The Website

Media Relations and Outreaches

Social Media

Government Relations

Corporate Social Responsibility (CSR)

Internal Communication

Staff are NDEP Brand Ambassadors

Evaluation and Reporting

Branding/Internal Memoranda

Crisis Communication

Disclosure of Confidential Information

Sanctions and Breaches



Introduction

This Policy offers strategic communication guidelines and solutions to help the NDEP brand support Management in attaining its goals and objectives.

In today's environment, everything communicates – the stated and the unstated. We must, therefore, define ourselves and prevent our publics from defining us at will.

Communication has emerged in the modern Information Age as a key success factor for effective management of organizations. It is only natural that discerning businesses understand and proficiently utilize all media tools to align stakeholders towards a favourable perception of NDEP Plc.

The Company's most valuable assets include its staff, and approach to doing things differently to the benefit of Nigerians. Additionally, NDEP has the attributes of integrity, professionalism, fairness, and a 'can do' resourcefulness. It is imperative to recognize that actions are the foundation of our reputation and in recognition of this, the contents of this Policy should always be adhered to. This will ensure that our respective stakeholders will receive timely and adequate information that is necessary in cementing our relationship in a mutually beneficial manner.

All non-public information should be considered confidential and should never be used outside or for personal gains.

You are required to familiarize yourself and comply with the provisions of this Communications Policy.



Policy Goal and Objectives

Our overarching goal is to create strong buy-in and bond with all our publics via open and factual communication, by using pro-stakeholder engagement communication channels.

We will achieve this goal by meeting the following objectives:

- To establish a consistent message platform that is flexible enough to ensure that NDEP Plc is visible, accessible and accountable to all categories of its publics
- To create reliable and recognized channels for sharing information, success stories, and technical details with concerned stakeholders
- Ensure support for the company as well as commitment and buy-in to management's plans by all staff and other primary target audiences
- To manage all communication and information sharing systems and ensure minimal negative repercussions.
- To follow global best practice
- To provide sanctions in cases of any breach of the provisions of the Policy.



Distribution of Communications Policy

It is the sole responsibility of these departments and units to disseminate this Policy:

- Marketing/Brand Communications
- Human Resource Management

With the support of Audit and Legal Units

These groups shall ensure receipts and compliance of this Communications Policy by all concerned members of Company publics

Target Audiences of Communications Policy

With this Policy, we seek to reach the following priority audiences with outreach activities as appropriate.

- Employees
- Potential and existing customers
- Media
- Competition
- Trade Organisations (when applicable)
- Business partners
- Vendors/suppliers/
- Contract staff/contractors/consultants
- The academia



- Regulators & Government leadership
- Host communities
- Shareholders and potential investors
- The NDEP Board

General Guiding Principles

The following specific guiding principles shall be our criteria:

- Only authorized persons and designated departments/Groups are permitted to speak or write to the media no matter how critical the case/issue may be
- All information must be conveyed through the appropriate and approved communication channels
- Communication between and amongst Staff members must be professional at all times
- All information leveraged to stakeholders shall be accurate and in line with the primary objective of increasing the reputation quotient of NDEP Plc at all times
- Internal and external communications shall be handled only by the Groups responsible for such correspondence
- Before disseminating with all communications, think it through, plan and be deliberate



- All handling of external communications must be proactive and should promote goodwill to NDEP
- NDEP shall ensure a strategic and deliberate effort to create understanding between itself as a brand and the external publics for a robust reputation and relationship
- All staff members should refrain from making public statements of personal opinion regarding NDEP Plc, the industry, markets and the Nigerian Oil and Gas or Energy markets as a whole, and from presenting all manner of personal opinions as facts. Such public statements may include quotes given to the media (mainstream, digital, social media)
- All members of staff are not authorized to make press/media comments and statements. Kindly refer all press or media inquiries and correspondences to the relevant persons and departments.
- On language and presentation, the use of foul, vulgar, obscene, threatening, harassing language or content, defamation, hate speech, other costly jokes are highly against the NDEP Communications Policy and Social Media Policy.
- Regular feedback is encouraged from all stakeholders. Results will be considered duly and applied towards ensuring better service delivery.

General Communication Channel: The Website

NDEP Plc has many internal and external communications tools to assist in engaging and bonding with all our stakeholders. But we use our dedicated external website,



with the domain name, ngdelta.com as a tool to disseminate information relevant to all our target audience categories.

Every stakeholder of NDEP is encouraged to visit the website on a regular basis for updates. Viewing requires no account or authentication. Our website is fully enabled and adjustable to disseminate a large variety of multimedia products, including web content, videos, audio and documents.

In the future, and if demand dictates, the website can house notifications of upcoming funding opportunity announcements, select NDEP data sets, employment opportunities and a wider variety of resources.

Media Relations and Outreaches

Strategic communication with all stakeholders and the general public is an integral part of the NDEP strategy. To position NDEP Plc as a prominent driver of development and a people-oriented organization, we shall always seek and sustain media (mainstream and digital) favourability for the brand. This will feedback into more positive content and positive perceptions from media consumers

The media are critical to the success of the NDEP effort and its overall communications strategy.

The media are

- 1. A stakeholder group in their own right
- 2. A channel for reaching several other stakeholder groups

It is important to note that in the age of social media, more difficult to manage information flows through the media.



Media Guidelines

- Overall media strategy would be to brief targeted press, release documents and drip feed with perspectives on developments.
- To only hold a Press Conference when required to avoid the back and forth of Question & Answers (Q&As).
- Subsequently provide news releases that amplify Press Statements.
- All communication with the media will be through the official company designated spokespersons including the Chairman of the Board, Managing Director/Chief Executive Officer and other authorized senior Managers, e.g. General Manager, Public Affairs or Head, Communications.
- Embark on media visits as need arises
- News reports and Feature must be strategic enough and written in a way that answers possible questions anyone may come up with.
- Staff of NDEP Plc are not authorized to speak to the media on issues pertaining the brand without prior approval or clearance
- For the interest of the brand, NDEP does not have to grant every request for media interviews or participation in media reports and events
- In responding to media enquiries, relevant personnel shall confirm matters about which they have no expert knowledge from the relevant units/departments to avoid misleading information sharing. Such units/departments shall assist to provide the required information for a timely leveraging
- Media parlays and gate keepers forums shall be organized from time to time for a proficient relationship with the media
- All speaking engagements and press releases must be cleared with the MD/CEO and legal department for proper strategy, coordination and adequate leverage.
- The MD/CEO and Head of the Communication team shall be designated official Company Spokespersons responsible for press releases, press statements and press conferences and other relevant external communication materials.



Social media

Social media users should keep in mind that they are personally responsible for what they post online and be mindful that what they say will be available publicly for a long time if not forever.

Specific guiding principles:

- All communications not intended for public knowledge should not be posted on social media sites
- Employees must not use social networks to disclose any confidential or proprietary information about NDEP, its management, employees, customers or business partners
- If possible, employees should not disclose their relationship with NDEP in their online posts, headlines and timelines
- All employees should refrain from speaking on behalf of NDEP Plc. when not authorized.
- Staff should refer to the NDEP Plc Social Media Document.

Government Relations

 NDEP PIc shall ensure a healthy, robust relationship with the government of the day.



- NDEP Plc is a good corporate citizen that respects the laws of the land and all other laws governing its operations in the industry.
- The Executive level (top executives), the NDEP Board as well as the Management Team shall ensure cordial relations with key policy makers and other top government officials and regulators.
- NDEP as a corporate personality shall not participate, nor be dragged into party politics or issues that could impact negatively on the company's reputation
- The brand is not authorized to sponsor a political party, political figures or religious groups or figures.
- NDEP may, in the interest of the business, host key government officials of the day to relationship-building events which are not overtly political. The business needs shall be justified/documented for Audit purposes.

Corporate Social Responsibility (CSR)

- NDEP shall continue to conduct corporate citizenship initiatives to connect with its external publics emotionally
- The brand shall maintain high standards of integrity in relations to State and Communities
- The brand shall lead in identifying with host communities regarding strategic areas of concern
- NDEP manage the entire process of community relations and every reputation challenge by managing information flow and orchestrating positive events
- The brand shall deploy the platform of the corporate citizenship to grow affinity with the host communities
- In times of crisis, NDEP shall deploy strategic brand initiatives to changing the agenda and conversation very quickly.



Internal Communication

Public relations deals with the relationship between institutions and all of its publics on whom its success or failure depends. Public relations is often considered as communicating with external publics. However, the employees or staff members are one of, if not the most important publics.

The NDEP Plc recognizes that its employees are necessary to the business success. Therefore, it is critical to carry all categories of staff along, every step of the way.

There arises a strong need:

- To enhance performance and deliver on synergies
- For timely, strategic and regular flow of information, internally
- To build 'One NDEP PLC' and have one enduring organizational culture
- To manage information flow. To avoid speculations and rumours
- To serve as a mechanism to listen to staff concerns.
- To promote staff motivation and avoid lack of interest or enthusiasm
- To reinforce the vision and culture of NDEP Plc
- To reduce resistance to change; build commitment and buy-in from stakeholders.

Internal Communication Goal and Objectives



Goal:

To provide clear, informative and engaging two-way communication between the leadership of NDEP and its employees in order to create "One NDEP Plc."

Objectives:

- To ensure that every employee is properly informed in a timely manner
- To ensure proper understanding of our core values by all employees
- To make performance, self-development, health & safety entrenched values for all employees
- To ensure that every employee understands our resolve to become a performance-driven organization
- To encourage staff cohesion and team bonding
- To create NDEP ambassadors
- To gain insightful feedback from employees.

Internal Communications: Channels and Tools

- 1. Newsletters and other publications
- 2. Timely and well-coordinated mass emails
- 3. The intranet
- 4. Company intercoms/ phone network
- 5. Briefing sessions and technology
- 6. Notice boards, Posters, Table cards, Banners, Screen Savers, Pop-ups, Videos
- 7. Company website
- 8. Town Halls, Team meetings, Surveys, Focus Group Discussions, Employee Forums.



Staff are NDEP Brand Ambassadors

- It is not an HR exercise, but it's imperative that every staff see him/herself as the company's brand ambassador, maintaining integrity and not doing anything to tarnish the brand's hard-earned reputation
- Be credible. Be candid. Share facts only. It's the global best practice
- Manage information flow in such a manner that dispels rumours, speculations and innuendoes
- Be compassionate. Act with dignity and integrity. Do more than you have to and strive for excellence.
- Study the NDEP Mission, Vision and ultimately the company's core values and live them even while asleep!

Branding/Internal Memoranda

- All official communication, interaction and information sharing, whether verbal or written, shall be in formal English language
- Language must be clear, concise and easy to understand
- To ensure clarity and consistency, plain language and proper grammar must be used in all communication with the public. No juvenile errors
- Correct use of the NDEP logo and branded materials are to be ensured at all times
- The NDEP logo is NOT subject to modification. If in doubt, please refer to the Communications Team or request the Brand Guidelines document.
- The company letterhead is centrally-sourced. Therefore, members of staff and the Management are prohibited from printing their own letterheads. Kindly request official company letter heads from relevant departments
- Kindly refer to the Corporate Communications units before all logo modifications, reproduction and any other clarification on company logo and branded materials



At all times, the logo and other official company materials must remain in the same format and colour scheme and must be used properly for company businesses only.

Crisis Communication

Policy and guidelines on Crisis Management section is in a separate Crisis Management Guide.

Disclosure of Confidential Information

- All stakeholders of this Policy are expected to guard jealously, every sensitive company information they are entrusted with
- All information and other sensitive materials not meant for the public should not be shared on social media for any reason
- Every member of staff is to refrain from answering media inquiries. All inquiries are to be directed to the authorized communications leads
- Employees should avoid disclosing their relationship with NDEP in their online posts, comments, headlines, timelines and other social media engagements
- All employees should refrain from speaking on behalf of NDEP Plc. when not authorized



- NDEP Plc is committed to providing timely, accurate, and complete disclosure of its company information as and when due.
- Disclosure of confidential information is strictly prohibited and shall attract adequate sanctions.

Sanctions and Breaches

Where it is established beyond doubts that a staff member of NDEP Plc overtly or covertly contravenes any provision of this Corporate Communications Policy, the sanctions stipulated in the Management's Personnel Policies shall apply.

Copyright

NDEP Plc is the owner of all its publicity material whether earned or paid for. Therefore, the reproduction of any such material requires the Company's authorization and approval. Copyright solely belongs to NDEP. NDEP holds the right to or not to allow service providers or other individuals use such material.



Approved by the Board of Directors of Niger Delta Exploration & Production Plc (NDEP)

Dated thisday of

CHAIRMAN

COMPANY SECRETARY



EMPLOYEE SIGNOFF REQUEST

I hereby acknowledge Communications Policy. I abide by in my daily work	accept	the Po			-
Employee Name					
Employee Signature					
 Date					