



AXA MANSARD COMMUNICATION POLICY

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INTRODUCTION

This document defines the policies guiding communication both within AXA Mansard Plc and with other external parties (i.e. media, regulators, government, interest groups, market professionals and shareholders) by the Company and its representatives.

Key terms used in this Policy have the meanings set forth in the section entitled "Key Terms" appearing at the end of this document.

This Policy applies to all AXA Mansard employees, directors, officers, consultants and contractors. Any violation of this Policy should be brought to the attention of Head, Human Resources & Legal, and may constitute grounds for disciplinary action.

Responsibility

All staff and employees of entities working on behalf of AXA Mansard are subject to this policy.

Scope

For the duration of any staff's employment with AXA Mansard and even after the employee relationship has been terminated by either party.

POLICY

In a bid to guide the communications between AXA Mansard, members of staff, our customers and other third parties, the following guidelines have been developed. Please note that the guidelines below must be strictly complied with by all members of staff with no exceptions.

Confidentiality and Disclosure of Information

1. Employees shall not, except as authorised by his/her duties, reveal to any person or company any confidential information, trade secret or operation process concerning the Company business, finances, transactions or affairs which may come to his/her knowledge during his employment with the Company. This restriction shall continue to apply after the disengagement of the employee from the Company without limit in point of time but shall cease to apply to information or knowledge, which may come into the public domain.
2. Every circular, note, memorandum, report, data, program, review, letter or any other document or information prepared by the employee or which may be in his/her possession in the course of his/her employment shall remain the property of the Company, and the employee shall not use or permit to be used any such document or information otherwise than for the benefit of the Company.
3. To provide adequate protection for confidential information, staff should where practical:
 - Shred all documents containing confidential or sensitive information
 - Avoid displaying or leaving confidential information in unsecured places
 - Not discuss confidential information in public or outside the immediate work area
4. Where in the course of daily business, and confidential information has to be transferred to third parties, we must ensure that a Non-Disclosure Agreement (NDA) is signed by the said third party, and duly vetted by the Legal team.
5. Employees shall uphold the confidentiality of customer information. No information about customers should be disclosed to third parties, unless the disclosure is:
 - required by law/regulation;
 - required by professional responsibility;
 - authorized by the customer;
 - in response to an enforceable subpoena or summons.
6. Employees shall pass confidential customer information obtained in the ordinary course of business to the appropriate supervisory or management staff. Gratuitous disclosure to other staff should be avoided. Customers' non-public information must not be discussed in public places such as the elevator, lunch room, corridors, social functions, etc.

Internal Communications

1. AXA Mansard promotes open communications policy within the company. Open communication at company meetings where employees have the opportunity to share any concerns with senior management is encouraged.
2. All official communications within the organisation are to be of acceptable language, non-political, non-religious and factual.
3. Where written communication is used, such correspondence must be conveyed using the company's official font type(s) and document formats. All reports, presentations, memos, emails and all official correspondents must conform to these standards.
4. Official correspondents in electronic format (emails) must be sent through the company's electronic mail platform and signed off with the approved electronic signature.
5. Internal communications on behalf of the Company or intended for all staff must be can be circulated only by the Investor Relations & Communications unit or by the Human Resource unit, where such communications involve HR concerns.
6. All HR related information must be sent out via the Company's approved Human Resources email address, while non-HR related information must be sent out via the Company's approved Internal Communication email address.

Social Media Usage

1. AXA Mansard Social Media Usage Policy seeks to address reputational concerns around the potential risk of fraud and misrepresentation via incorrect, embargoed or illegal communication by members of staff in order to achieve the following objectives:
 - Centralized control of our social media strategy and conversation
 - Mitigate against reputational and financial risks
 - Improve protection of confidentiality & private data
 - Conform with AXA's social media policy requirements
 - Conform with best global practices for social media usage
2. All members of staff need to present themselves within acceptable levels of decorum in their personal social media space particularly if it is known by their followers or connections that they work for AXA Mansard.
3. AXA Mansard currently has social media presence on Facebook, Twitter, Instagram, LinkedIn, Google Plus and YouTube. The official AXA Mansard accounts across these platforms are as follows:
 - Facebook - AXAMansard
 - Twitter - @AXAMansard
 - Instagram - @AXAMansard_
 - LinkedIn - AXA Mansard

- Google Plus - +Axamansard
- YouTube - AXA Mansard

More accounts may be added at the discretion of the Marketing Team in line with AXA Group guidelines.

4. These accounts are the official accounts of our Insurance, Health, Investments and Pensions businesses and their respective products and services.
5. Only the official accounts are permitted to act in the social media space on behalf of AXA Mansard.
6. Employees are encouraged to follow and like AXA Mansard on as many platforms as they can.
7. Employees are encouraged to share, like, favourite and comment on AXA Mansard's posts as often as possible.
8. The Marketing team is responsible for the day-to-day posts and engagement on all our social media accounts and pages. The Chief Marketing Officer may delegate this responsibility to other units as necessary through written authorization. The Customer Service Teams have been authorized to respond to customer complaints and enquiries on our Social media accounts and pages.
9. Only the official accounts of AXA Mansard as outlined above are allowed to engage directly with third parties (prospective customers, existing customers, commercial partners etc.) on social media.
10. In the case of enquiries, complaints, assertions, claims etc. made by third parties on social media, employees are to redirect the third parties to the respective official AXA Mansard account and not engage with the third parties. Responding to an offensive or negative post by a customer is not permitted.
11. Employees are not to describe themselves as employees of AXA Mansard or any of the AXA Mansard entities in any of their social media account bios or profiles as only the CEO, Executive Directors and Chief Marketing Officer are permitted to do so. Employees are permitted to mention that they work for AXA Mansard during a conversation/engagement but further enquiries should be redirected to the official accounts as in Clause 10 above.
12. The rule in Clause 11 above does not apply to employees' LinkedIn accounts as workplace information is a necessary aspect of LinkedIn.
13. Content pertaining to sensitive company information should not be shared on any online community. Divulging information like the company's internal operations, legal matters, sales trends, strategies, forecasts and future promotional activities are prohibited. Also, giving out personal information about customers or employees is prohibited.
14. If employees are active on a social media platform where the company does not have an official presence or account, and enquiries as outlined in item IX above occur, the official contact information – email ccare@axamansard.com or call 0700AXAMANSARD – may be shared as a “FYI” and not engage with the contact.

15. AXA Mansard employees are encouraged to exert some level of proper conduct during normal day-to-day engagement on social media platforms especially if it is known that they are employees of AXA Mansard in said space. Ignoble content such as ethnic, sexual, religious, racial and physical disability slurs are not accepted.
16. Employees are encouraged to report to or reach out to members of the Marketing Team (marketingteam@axamansard.com) and/or the Customer Service Team (ccare@axamansard.com) in this regard should the need arise.

Communications with Investors

1. It is the Company's policy that all its communications with the investment community, comprising shareholders, investors, analysts, researchers, market regulators and other related stakeholders, comply with applicable law, and that Material Non-Public Information of the Company is publicly disseminated in a non-exclusionary and non-selective way.
2. Only authorized spokesperson(s) may engage in discussions about the Company with this group of stakeholders. Authorized spokespersons include the following:
 - Head, Investor Relations & Communications
 - Group Head, Strategy, Planning & Marketing
 - Company Secretary/General Counsel
 - Chief Finance Officer
 - Executive Directors
 - Chief Executive Officer
3. Any other insider who is contacted by a third party must refer the third party to an authorized spokesperson. Specifically, no insider, other than an authorized spokesperson, may communicate material non-public information of the Company to a third party.
4. An authorized spokesperson may only provide material non-public information to a third party if such information has been previously or is simultaneously publicly disseminated. This will typically be a press release or conference call that is open to the public.
5. Occasionally, employees may be contacted by outside sources or the media requesting information about the Company or its employees, directors or officers or operations. In order to avoid providing inaccurate, incomplete or material information to outside sources, all outside inquiries regarding the Company or its employees, directors or officers or operations must be referred to the Investor Relations & Communications unit.
6. In the event of non-intentional disclosure by an insider of information that might be of material importance, the insider must immediately inform an authorized spokesperson, who in turn may consult with Legal unit as to whether prompt public dissemination of this information is required. If required, the information must be publicly disseminated within 24 hours of the inadvertent disclosure.

7. Whenever an authorized spokesperson is uncertain about this policy or Nigerian securities laws, he/she may consult with the Legal unit to ensure compliance.
8. All complaints from Investors through the communication channels are being managed in line with the Company's complaints management policy.
9. Stakeholders and investors can make enquiries by sending mails to the company via InvestorRelations@axamansard.com email.

Release of Financial and Market Information

1. No insider may provide "guidance" to third parties on a selective basis, directly or indirectly, and may not disclose to third parties any information regarding the Company's internal projections of future operating results, business transactions, customer or supplier developments or other material information that has not been made available to the publicly, either in a press release, SEC filing or other appropriate method. Additionally, no insider shall comment on past guidance, even though it has been made public.
2. No insider shall comment on how the Company's share price will change over time, on whether people should buy or sell the Company's shares or whether he or she believes that the share price reacted or will react to a particular event (i.e. business transaction, Company press release, etc.).
3. No insider shall discuss financial or operational information about competitors. In the event of an enquiry, an authorized spokesperson should inform that the Company does not comment about its competitors and should suggest that the enquiring party call the competitor directly.
4. An authorized spokesperson may discuss market share figures and facts from competitors' earnings announcements.
5. Information relevant on AXA Mansard financials, annual reports and other investor relevant information will be made available on AXA Mansard website on the following pages:

<https://www.axamansardplc.com/investors>

<https://www.axamansardplc.com/about-us/insurance/financials>

<https://www.axamansardplc.com/downloads-financials>

Communications with Third Parties and Media

1. Employee's formal correspondence with external parties must be conveyed through the company's approved channels as is required in the usual course of business.
2. Official communication to media (i.e. publication of information on traditional and social media) must be conducted through the company's approved channels by dedicated spokespersons or any other officer as designated by the Investor Relations & Communications unit.
3. Staff members must be guided in their personal communications to the media, giving

due consideration potential to impact to the Company's corporate image and reputation.

4. All media enquires must be directed to the Investor Relations & Communications unit.
5. No employee, except the authorized company spokespersons, is authorised to speak to the media, without the express approval of any of the following:
 - Head, Investor Relations & Communications
 - Group Head, Strategy, Planning & Marketing
 - Executive Directors
 - Chief Executive Officer
6. Information to the media must be factual and must comply with applicable law regulating the industry. Also the information provided must be in consonance with already approved information for public dissemination.
7. All planned media interviews with any company executive must be reviewed by the Investor Relations & Communications unit prior to provide professional guide as well as prevent incidence that may result in negative media reportage.
8. The Company will issue press releases from time to time to disclose information that is important or of use to the public. Press releases will be prepared and reviewed in accordance with the Company's established procedures.
9. The Company may organise a formal engagement with the media to make an important announcement regarding the Company's activities or to provide clarity/defence on an issue requiring the Company's urgent feedback. The forum provides an opportunity for a designated spokesperson to take questions from the media in order to correct misconception, expatiate or provide relevant new information.
10. The Company may issue a well-articulated position statement to provide clarity/defence on an issue requiring the Company's urgent feedback. Given that press release is open to further editing by a Journalist, the Press Statement ensures that the content of the Company's position on an issue is published without alterations. The Press Statement which is placed in the media as a paid advert shall be initiated by the Investor Relations & Communications unit and must be duly approved by the Group Head, Strategy, Planning & Marketing, or the CEO.
11. In the event of any impromptu enquiries from the media and/or media participation by a staff member, the Investor Relations & Communications unit should be notified within 24 hours of such media contact.
12. No insider may comment on rumours. Any staff that comes across any information on AXA Mansard that is deemed to have potentially significant reputational and business impact should notify the Investor Relations & Communications unit immediately.

Enforcement

Employees are expected to fully comply with this policy. Breach of this policy will attract sanctions as determined by the Disciplinary Committee. Such breach, depending on the

severity of impact may be considered a violation of Nigerian securities laws and may result in immediate termination of employment and, potentially, a SEC enforcement action against the individual offender, the Company, and its officers and directors.

KEY TERMS

As used in this Policy, the following terms have the following meanings:

"Authorized Spokesperson" means the Chief Executive Officer; Executive Directors; Chief Financial Officer; Head, Investor Relations & Communications; Company Secretary or person(s) performing similar functions, or any other Company employee or representative who has been authorized by the Chief Executive Officer to speak with a third party with respect to a particular topic or on a particular occasion.

"Insider" means an employee, officer, director, consultant or contractor of the Company. All insiders subject to this policy are also subject to the Company's Securities Dealing Policy.

"Material Information" means information of which there is a reasonable likelihood that it would be considered important to an investor in making an investment decision regarding the purchase or sale of the Company's shares.

While it may be difficult under this standard to determine whether particular information is material, there are various categories of information that are particularly sensitive and, as a general rule, should always be considered material. Examples of such information may include:

- Financial results, financial condition, earnings pre-announcements, projections or forecasts
- Restatements of financial results or material impairments, write-offs or restructurings
- Changes in independent auditors or changes in reliance on certain audit report
- Business plans or budgets
- Creation of significant financial obligations or significant changes in financial obligation
- Impending bankruptcy or financial liquidity problems
- Significant developments involving business relationships
- Significant legal or regulatory developments, whether actual or threatened
- Major events involving the Company's securities
- Significant corporate events, such as a pending or proposed merger, joint venture or tender offer, a significant investment, the acquisition or disposition of a significant business or asset or a change in control of the Company

"Non-Public Information" means information that has not been Publicly Disseminated and is otherwise not available to the general public.

"Publicly Disseminated" means that information has been made available through the distribution of a press release, through a widely disseminated news or wire service, or by another non-exclusionary method of disclosure that is reasonably designed to provide

broad public access. Notably, information is generally not considered to be Publicly Disseminated if it has only been posted to the Company's website.

"Third Party" means securities market professionals (including, but not limited to, analysts, broker-dealers, investment advisers and fund managers), existing or prospective shareholders (including anyone who may be reasonably expected to trade on the basis of material, non-public information), reporters and any other party who is not bound by a duty of confidentiality to the Company.