Access Holdings

Stakeholder Communication Policy

October 2026

Risk Rating: Above Average

RETURN THIS POLICY/FRAMEWORK TO CONDUCT & COMPLIANCE AFTER APPROVAL

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DOCUMENT INFORMATION

Document Owner

This document is owned by the undersigned. The Document Owner is responsible for ensuring that this Policy is implemented, communicated, monitored and reviewed in line with the requirements of the Policy Approval, Broadcast and Administration Framework and all applicable governance standards of Access Holdings PLC.

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Authors	Version	Date	Comment
Chiamaka Nwandu	1.0	October 2026	This is the maiden edition of the Stakeholder Communication Policy for Access Holdings Plc. The Policy gives effect to Section 24.0 of the CBN Corporate Governance Guidelines for Financial Holding Companies in Nigeria. It establishes standards for official communication channels, Board development and website publication of the Policy, and stakeholders' freedom to communicate concerns about illegal or unethical practices to the Board or complain to the CBN about Board activities. The Policy complements the existing Stakeholder Engagement Policy and provides accountability for accurate information, accessible reporting channels, responsible responses and monitoring of compliance.

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1.0 INTRODUCTION

1.1 Policy Background

Access Holdings Plc ("Access Holdings", "the Company" or "the Group") operates across diverse markets and maintains relationships with a broad range of stakeholders whose perspectives, decisions, interests and expectations are important to the Group's ability to create sustainable value.

The Group recognises that effective stakeholder communication is essential to transparency, accountability and trust. Stakeholders shall have access to appropriate information and the freedom to communicate concerns about illegal or unethical practices to the Board.

This Stakeholder Communication Policy implements Section 24.0 of the Central Bank of Nigeria's Corporate Governance Guidelines for Financial Holding Companies in Nigeria, issued in July 2023. It addresses official communication channels, website publication and communication of stakeholder concerns to the Board and the CBN.

This Policy complements the existing Stakeholder Engagement Policy, which governs relationship management, stakeholder prioritisation, consultations and engagement activities. This Policy governs the exchange of information and reporting of concerns.

1.2 Purpose and Objectives

This Policy gives effect to Section 24.0 through a Board-approved communication policy hosted on the Company's official website. Its objectives are to establish consistent Group-wide standards for accurate, timely and appropriately authorised stakeholder communication; maintain accessible official channels; clarify accountability for communication, referral, response and escalation; protect confidential and sensitive information; preserve stakeholders' ability to provide feedback and report concerns to the Board or the CBN, as applicable; and support compliance, monitoring and continuous improvement.

1.3 Scope and Applicability

This Policy applies to Access Holdings Plc as a financial holding company and establishes communication standards for its subsidiaries, operating companies, affiliates and representative offices, subject to applicable local laws and regulatory requirements. Each regulated entity remains responsible for its own regulatory obligations.

The Policy applies to stakeholder communication undertaken on behalf of the Group by Directors, Executive Management, employees, contractors, consultants, agents, representatives and third parties authorised to act on behalf of the Group.

It covers communication with internal and external stakeholders through:

1. Direct meetings and consultations;
2. Formal correspondence;
3. Stakeholder forums and events;
4. Corporate publications and reports;

5. Investor and shareholder communication channels;
6. Government and regulatory correspondence;
7. Customer communications and feedback channels;
8. Community information and feedback channels;
9. Media enquiries and statements;
10. Websites and digital platforms;
11. Social media;
12. Surveys and other feedback mechanisms; and
13. Other appropriate official communication channels.

Relationship management, stakeholder selection and prioritisation, engagement planning, partnerships and social-impact programmes are governed by the Stakeholder Engagement Policy and other applicable policies. They are outside the scope of this Policy.

1.4 Application of Local Laws and Requirements

Access Holdings operates across multiple jurisdictions and recognises that stakeholder communication is subject to different legal, regulatory, cultural and institutional environments.

The Group shall comply with applicable laws, regulations, regulatory directives and recognized local requirements in each jurisdiction in which it operates.

Where a local requirement imposes a higher or more specific standard than this Policy, the applicable local requirement shall be observed.

Where a conflict arises between this Policy and applicable local law, the applicable law shall prevail and the relevant Group functions shall be appropriately notified and consulted.

1.5 Policy Statement

Access Holdings shall maintain an official website in addition to traditional means of communication and shall use the website and other official channels to communicate with stakeholders as appropriate.

The Board shall develop and approve this Stakeholder Communication Policy and ensure that the approved Policy is hosted on the Company's official website.

Stakeholder communications issued on behalf of the Group shall be accurate, timely, ethical, respectful and appropriately authorised. These requirements shall not restrict a stakeholder's freedom to report concerns to the Board or the CBN.

No employee, representative or third party acting on behalf of the Group shall make unauthorized commitments, representations, statements or undertakings on behalf of Access Holdings or any Group entity.

The Board shall ensure that stakeholders have the freedom to communicate concerns about illegal or unethical practices to it. Where concerns relate to the activities of the Board, stakeholders may present a complaint directly to the CBN.

Information disclosed by the Group shall comply with applicable confidentiality, privacy, security and market-disclosure requirements. These safeguards shall not be used to prevent lawful reporting of concerns to the Board or a competent regulator.

2.0 DEFINITIONS AND ACRONYMS

For the purpose of this Policy, the following terms apply:

Term / Acronym	Definition
Access Holdings / the Group	Access Holdings Plc and its subsidiaries, operating companies, affiliates and representative offices.
Stakeholder	Any individual, group, institution, authority, organisation or community that can affect, is affected by, or reasonably considers itself affected by the Group's activities, decisions, conduct, products, services, objectives or reputation.
Stakeholder Communication	The provision or exchange of information by or on behalf of the Group with stakeholders through appropriate communication channels.
Board Concern	A stakeholder's report to the Board concerning illegal or unethical practices.
Official Communication Channel	A website, correspondence address, telephone line, publication or other channel approved by the Company for stakeholder communication.
Relationship Owner	An officer designated under the Stakeholder Engagement Policy who supports communications within the relevant business or functional mandate.
Material Stakeholder Matter	A stakeholder-related issue, concern, opportunity, commitment or communication that may have a significant legal, regulatory, financial, operational, reputational, social or strategic impact on the Group.
Confidential Information	Information that is not publicly available and is subject to legal, contractual, regulatory, commercial, privacy, security or other restrictions on its use or disclosure.
Market-Sensitive Information	Non-public information that could reasonably affect the price or value of securities or influence investment decisions if improperly disclosed.
CBN	Central Bank of Nigeria, to which stakeholders may present a complaint where concerns relate to the activities of the Board.
OpCo	An operating company within the Access Holdings Group.
GSM Function	The Government and Stakeholder Management Function responsible for supporting stakeholder governance, coordination, guidance, monitoring and consistency across the Group.
Authorised Representative	An individual authorised to issue official communications or representations on behalf of Access Holdings or a Group entity within an approved scope. This requirement does not restrict stakeholder concern reporting.

Correspondence Service Standard	The applicable timeframe or service expectation for acknowledging and addressing stakeholder correspondence, having regard to the nature, urgency, complexity and regulatory requirements applicable to the matter.

3.0 OUR COMMITMENT AND GUIDING PRINCIPLES

3.1 Our Commitment

Access Holdings recognises accessible and responsible communication as essential to transparency, accountability and stakeholder trust. Guided by its values of Excellence, Integrity, Service and Innovation, the Group shall maintain accessible official channels; communicate accurately and responsibly; listen and respond to stakeholders; protect information; preserve the right to raise concerns with the Board or the CBN, as applicable; and continuously improve its communication practices.

3.2 Transparency and Accessibility

The Group shall communicate openly, accurately and appropriately, providing information that stakeholders are entitled or reasonably expected to receive, subject to applicable legal, regulatory, confidentiality, privacy, commercial and security requirements.

Where reasonably practicable, communication shall take account of relevant language, cultural, accessibility and other legitimate circumstances.

Transparency does not require or permit disclosure of information that the Group is required or entitled to protect.

3.3 Integrity, Respect and Inclusion

The Group shall conduct communication honestly, professionally, ethically and respectfully, recognising stakeholders' dignity, legitimate interests and differing perspectives.

The Group shall not knowingly provide materially false or misleading information or use communication to improperly influence stakeholders.

3.4 Timeliness and Responsiveness

The Group shall seek to communicate and respond appropriately, having regard to the nature, significance and urgency of the matter and applicable legal and regulatory requirements.

Where information requires verification or further consideration, the Group shall communicate appropriately once sufficient information is available, subject to applicable requirements.

Detailed response timelines may be established through applicable procedures or service standards.

3.5 Accountability and Coordination

Stakeholder communication shall be undertaken by appropriately authorised representatives within their areas of responsibility.

The Group shall seek to maintain coordinated and consistent communication while allowing appropriate adaptation to different jurisdictions, stakeholder circumstances and communication channels.

3.6 Confidentiality and Information Protection

The Group shall protect confidential, personal, proprietary, privileged, restricted, security-sensitive and market-sensitive information.

Information shall only be shared where there is an appropriate basis to do so and in accordance with applicable legal, regulatory, privacy, security, contractual and Group requirements.

3.7 Two-Way Communication

Stakeholder communication shall provide opportunities to receive information, seek clarification, provide feedback and raise concerns.

Concerns about illegal or unethical practices shall have a clear route to the Board. Stakeholders may complain directly to the CBN where their concerns relate to Board activities.

3.8 Website Publication and Access

The approved Stakeholder Communication Policy shall be publicly accessible on the Company's official website without a login or other unnecessary access restriction.

The published Policy shall be kept current. Official contact details and guidance for submitting concerns to the Board and complaints to the CBN shall be accessible through the website.

4.0 STAKEHOLDER COMMUNICATION REQUIREMENTS

4.1 Stakeholder Categories

The Group communicates with diverse stakeholders whose information needs and rights are relevant to its activities.

Stakeholders may include:

1. Customers and clients;
2. Employees and prospective employees;
3. Shareholders, investors and capital-market participants;
4. Board members, Directors and governance bodies;
5. Governments, regulators and public authorities;
6. Communities and community representatives;

7. Business partners, suppliers and service providers;
8. Industry and professional associations;
9. Media organizations and other information intermediaries;
10. Civil society organizations and non-governmental organizations;
11. Multilateral, development and international institutions;
12. Rating agencies and relevant market participants;
13. Academic and research institutions; and
14. Other stakeholders whose interests, activities or decisions may materially affect or be affected by the Group.

Communication shall reflect stakeholders' information needs and applicable disclosure obligations. Access to reporting channels shall not depend on relationship value, influence or priority.

4.2 Communication Needs and Channel Selection

The Group shall determine the appropriate information, format and channel by considering:

1. The stakeholder's information needs and access to official channels;
2. The purpose and subject of the communication;
3. The potential impact of the matter on the stakeholder or the Group;
4. Legal and regulatory requirements;
5. The urgency and sensitivity of the matter;
6. Information protection and disclosure obligations; and
7. The legitimate interests and concerns of affected stakeholders.

4.3 Access to Information and Reporting Channels

Stakeholders shall be able to obtain relevant public information through the official website and other appropriate communication channels.

The website shall explain how stakeholders may submit feedback, seek clarification and communicate concerns about illegal or unethical practices to the Board. It shall also identify the option to complain to the CBN about Board activities.

Access to these channels shall not require stakeholder classification or selection under the Stakeholder Engagement Policy.

5.0 GOVERNANCE FRAMEWORK AND ACCOUNTABILITY

5.1 Board Oversight

The Board of Directors shall be accountable for the development, approval and oversight of this Policy in accordance with Section 24.0 of the Corporate Governance Guidelines for Financial Holding Companies in Nigeria.

The Board shall:

1. Develop and approve this Policy and material amendments;

2. Ensure the Company maintains an official website and appropriate communication channels;
3. Ensure the approved Policy is hosted on the Company's official website;
4. Ensure stakeholders are free to communicate concerns about illegal or unethical practices to the Board; and
5. Oversee reporting arrangements, including stakeholders' option to complain to the CBN about Board activities.

The Board may delegate implementation and administration while retaining accountability for these requirements.

Company Secretariat shall facilitate receipt and referral of concerns to the Board or an appropriate Board Committee. Persons implicated in a concern shall not control its referral or handling.

5.2 Group Chief Executive Officer and Executive Management

The Group Chief Executive Officer shall provide executive leadership for stakeholder communication across Access Holdings.

The Group Chief Executive Officer and Executive Management shall:

1. Promote responsible communication and freedom to report concerns;
2. Ensure official communication channels operate effectively;
3. Ensure material stakeholder matters receive appropriate management attention;
4. Support timely publication and maintenance of the approved Policy; and
5. Ensure Group entities operate consistently with this Policy.

5.3 Country and Operating Company Leadership

Country CEOs and Operating Company CEOs shall be accountable for implementation of the applicable communication standards within their respective jurisdictions and businesses.

They shall:

1. Maintain effective official communication channels;
2. Ensure implementation of this Policy within their areas of responsibility;
3. Ensure relevant regulatory and stakeholder information is communicated appropriately;
4. Support timely responses to stakeholder correspondence; and
5. Escalate material stakeholder matters through appropriate governance channels.

5.4 Communication Responsibilities

Relevant business and functional leaders shall be accountable for the accuracy, authorisation and handling of stakeholder communications within their areas of responsibility.

Existing Relationship Owners shall support communications within their mandates under the Stakeholder Engagement Policy.

Relevant officers shall ensure that communications:

1. Have a clear purpose;
2. Are appropriately authorized;
3. Are aligned with Group strategy and approved corporate positions;
4. Are conducted ethically and professionally;
5. Are appropriately documented where required;
6. Have clear response or referral arrangements where applicable; and
7. Do not result in unauthorized commitments or representations.

5.5 Government and Stakeholder Management Function

The Stakeholder Management Function shall coordinate administration of this Policy and communication standards within its mandate.

Its responsibilities include:

1. Supporting development and maintenance of this Policy;
2. Providing guidance on stakeholder communication requirements;
3. Coordinating relevant functions on material stakeholder communications;
4. Supporting accessible feedback and concern-reporting arrangements;
5. Monitoring regulatory developments affecting stakeholder communication;
6. Supporting appropriate documentation, monitoring and reporting;
7. Promoting consistent communication standards; and
8. Supporting awareness of this Policy and official reporting channels.

The Stakeholder Management Function shall not act as a mandatory gatekeeper for concerns addressed to the Board or complaints presented to the CBN.

5.6 Corporate Communications and Control Functions

Corporate Communications shall coordinate official messaging and, with Technology, maintain the website and publish the approved Policy. Company Secretariat shall facilitate communication of concerns to the Board. Compliance and Legal shall advise on regulatory obligations and protected reporting. Investor Relations and other specialist functions shall manage communications within their respective mandates.

Such functions shall collaborate where stakeholder matters have cross-functional implications.

5.7 All Employees and Representatives

All employees and representatives acting on behalf of the Group are responsible for:

1. Complying with this Policy and relevant supporting policies;
2. Communicating only within their authority;
3. Protecting confidential and restricted information;
4. Avoiding unauthorised commitments or representations;
5. Escalating material stakeholder matters appropriately; and
6. Maintaining professional and ethical conduct in all stakeholder interactions.

5.8 Board Communication and Referral Protocols

For concerns about illegal or unethical practices:

1. The website shall identify an official route for communicating concerns to the Board;
2. Company Secretariat shall ensure concerns addressed to the Board reach the appropriate Board recipient;
3. Concerns shall be referred independently of any person implicated in them;
4. Stakeholders shall not need prior management permission to communicate concerns to the Board;
5. Where concerns relate to Board activities, stakeholders may complain directly to the CBN;
6. Receipt, referral and follow-up shall be recorded securely; and
7. Confidentiality and protection from retaliation shall be applied under applicable law and the Whistleblowing Policy.

6.0 STAKEHOLDER COMMUNICATION FRAMEWORK

6.1 Correspondence and Communication Standards

The Group shall seek to acknowledge and address stakeholder correspondence promptly, respectfully and through appropriate channels.

Response timelines shall have regard to:

1. The nature and urgency of the matter;
2. Applicable legal and regulatory deadlines;
3. Materiality and potential impact;
4. Complexity of the issue;
5. The need to verify facts;
6. Confidentiality and information restrictions; and
7. Applicable service standards or procedures.

Detailed correspondence service levels may be established through relevant procedures, service standards or operating guidelines.

Where a response cannot be provided within the applicable timeframe, the relevant stakeholder should, where appropriate, be provided with an interim update or acknowledgement.

6.2 Website Publication and Communication Coordination

Following Board approval, Corporate Communications shall arrange publication of this Policy on the official website in coordination with the Policy Owner, Company Secretariat, Compliance and Technology.

Publication and ongoing maintenance shall ensure:

1. The published Policy reflects the version approved by the Board;
2. The title is Stakeholder Communication Policy;

3. The approval date and version are identifiable;
4. The Policy is easy to locate and read or download;
5. The Policy is accessible without a login;
6. Official contact details for stakeholder correspondence are current;
7. The route for communicating concerns to the Board is clearly explained;
8. The option to complain to the CBN about Board activities is clearly stated; and
9. Revisions are published promptly following approval.

Publication and channel checks shall be documented. Incorrect information, broken links or unavailable reporting channels shall be corrected promptly and escalated where necessary.

6.3 Communication Records and Follow-Up

Material stakeholder communications, concerns, referrals and responses shall be documented appropriately.

Relevant functions shall assign responsibility for responses and monitor outstanding correspondence and referrals.

Documentation shall be maintained in accordance with applicable records-management, confidentiality, privacy, information-security and retention requirements.

7.0 STAKEHOLDER-SPECIFIC COMMUNICATION

7.1 Government and Regulatory Communication

Government and regulatory communications shall be accurate, appropriately authorised and managed through the relevant specialist functions.

The Group shall:

1. Communicate with government and regulatory stakeholders professionally and responsibly;
2. Comply with applicable laws, regulations, regulatory requirements and ethical standards;
3. Provide accurate information where required;
4. Ensure appropriate internal authorization for material communications;
5. Maintain appropriate records of significant communications and commitments;
6. Avoid improper influence or conduct; and
7. Escalate material regulatory or governmental matters through appropriate governance channels.

Communications involving public officers shall comply with applicable anti-bribery, corruption, gifts and hospitality and conflicts-of-interest requirements.

7.2 Investor, Shareholder and Capital-Market Communication

The Group is committed to transparent, accurate and timely communication with shareholders, investors and capital-market stakeholders.

Investor and shareholder communication may include:

1. Annual General Meetings;
2. Financial and corporate disclosures;
3. Investor briefings;
4. Results communications;
5. Roadshows;
6. Corporate presentations; and
7. Other authorized communication channels.

Material information shall be communicated through authorized channels and in accordance with applicable securities, listing, corporate governance and market disclosure requirements.

The Group shall not selectively disclose material non-public or market-sensitive information contrary to applicable requirements.

7.3 Customer Communication

Customers are important stakeholders of the Group.

The Group shall seek to understand customer needs, expectations and concerns and provide appropriate channels for communication, feedback and complaints.

Customer communications shall be:

1. Clear;
2. Fair;
3. Accurate;
4. Appropriate to the products and services concerned; and
5. Consistent with applicable regulatory and customer-protection requirements.

Customer information and personal data shall be handled in accordance with applicable privacy, data protection, confidentiality and information security requirements.

Detailed customer complaint-handling processes shall be governed by applicable customer service, complaints management and other relevant policies and procedures.

7.4 Employee and Internal Stakeholder Communication

Employees are important internal stakeholders and contributors to the Group's performance, culture and reputation.

The Group shall promote open, responsible and appropriately coordinated internal communication and provide relevant channels through which employees may:

1. Receive information relevant to their roles and responsibilities;
2. Provide feedback and perspectives;
3. Seek clarification;
4. Raise legitimate concerns; and
5. Participate in appropriate organizational dialogue.

Internal communication shall support transparency, inclusion, respect, ethical conduct and alignment with the Group's strategy and values.

Information intended for internal use shall be appropriately classified and protected against unauthorized disclosure.

7.5 Community and Sustainability Communication

The Group shall provide appropriate information and feedback channels for communities affected by its activities.

Community and sustainability communication shall support:

1. Mutual understanding and respect;
2. Responsible business practices;
3. Clear reporting of relevant commitments and outcomes;
4. Accessible information on approved programmes; and
5. Positive community relationships.

Communication may use notices, publications, community information channels and responses to enquiries, taking account of local accessibility needs.

Community programmes, consultations and commitments remain governed by the Stakeholder Engagement Policy and applicable sustainability policies.

Community concerns that may materially affect people, operations, reputation or the Group's license to operate shall receive appropriate attention and escalation.

7.6 Business Partners, Suppliers and Third Parties

Communications with business partners, suppliers and service providers shall be professional, accurate and consistent with approved contractual arrangements.

Communication shall be conducted in accordance with applicable:

1. Contractual requirements;
2. Procurement requirements;
3. Anti-bribery and corruption requirements;
4. Conflicts-of-interest requirements;
5. Confidentiality obligations;
6. Information security requirements; and
7. Other relevant Group policies.

Third parties acting on behalf of the Group shall not publicly represent Access Holdings or any Group entity, make commitments or issue statements on behalf of the Group unless appropriately authorized.

Where appropriate, contracts and agreements should clearly define communication responsibilities, confidentiality requirements, authorized representatives, use of the Group's brand, publicity arrangements and escalation requirements.

7.7 Media Communication

The Group recognizes the important role of the media in informing the public and shaping understanding of its activities.

Media communication shall be undertaken by appropriately authorised representatives and coordinated in accordance with applicable Group communication requirements.

The Group shall seek to provide accurate, responsible and appropriately approved information.

Material or sensitive media enquiries shall be referred to the appropriate Corporate Communications or authorized spokesperson.

Confidential, privileged, personal, market-sensitive or otherwise restricted information shall not be disclosed without appropriate authority.

Employees shall not represent themselves as authorized spokespersons of the Group unless expressly authorized.

7.8 Digital and Social Media Communication

The Group may use websites, digital platforms, social media, webinars, virtual meetings, surveys, online forums and other appropriate channels to improve accessibility, reach and stakeholder participation.

Digital and social media communication shall be subject to the same standards of:

1. Accuracy;
2. Integrity;
3. Professionalism;
4. Confidentiality;
5. Privacy;
6. Information security; and
7. Authorization

Only authorized persons may communicate official Group positions through official Group digital or social media platforms.

Confidential, restricted or market-sensitive information shall not be disclosed through digital or social media channels.

7.9 Industry, Professional and Other Institutional Communication

Communications with industry associations, professional bodies, academic institutions, civil society organisations, development institutions, multilateral organisations and diplomatic missions shall be handled by the relevant authorized functions.

Such communications shall be conducted transparently, ethically and in accordance with applicable legal, regulatory, competition, anti-bribery and other relevant requirements.

8.0 ETHICAL AND RESPONSIBLE COMMUNICATION

8.1 Anti-Bribery and Corruption

Access Holdings has zero tolerance for bribery and corruption.

Stakeholder communication shall not be used to offer, promise, request, authorise or accept any improper payment, benefit, advantage or thing of value.

Communications involving government officials, regulators, public officers or other public institutions shall receive appropriate consideration under applicable anti-bribery and corruption requirements.

8.2 Conflicts of Interest

Employees and representatives shall identify and appropriately manage actual, potential or perceived conflicts of interest arising from stakeholder relationships or communications.

Conflicts shall be disclosed and managed in accordance with applicable Group requirements.

8.3 Gifts, Hospitality, Sponsorships and Donations

Gifts, hospitality, sponsorships, donations or other benefits shall not be offered, provided, requested or accepted for the purpose of improperly influencing a stakeholder or decision.

Communications involving government officials, regulators and public officers shall be subject to applicable restrictions and enhanced scrutiny.

All relevant activities shall comply with applicable Group policies and local requirements.

8.4 Professional Conduct

Stakeholder representatives acting on behalf of the Group shall:

1. Act honestly and in good faith;
2. Accurately represent their authority and role;
3. Respect applicable laws and institutional protocols;
4. Avoid improper pressure or influence;
5. Protect confidential and restricted information; and
6. Appropriately document or report material commitments and matters arising from communications.

9.0 ACCESSIBILITY, FEEDBACK AND GRIEVANCE MANAGEMENT

9.1 Accessibility and Inclusion

The Group shall provide appropriate opportunities for stakeholders to access relevant information, submit feedback and communicate concerns.

Where reasonably practicable, communication shall take account of language, cultural context, disability, technological access and other legitimate accessibility considerations.

9.2 Stakeholder Feedback

Access Holdings values stakeholder feedback as an important source of insight and continuous improvement.

The Group shall provide appropriate channels through which stakeholders may express views, provide feedback, raise concerns or seek information relevant to the Group's activities.

Stakeholder feedback may be considered in:

1. Assessing stakeholder expectations;
2. Improving services and communication;
3. Identifying emerging issues;
4. Strengthening relationships; and
5. Informing relevant business decisions.

9.3 Concerns to the Board and Complaints to the CBN

The Board shall ensure that stakeholders have the freedom to communicate concerns about illegal or unethical practices to it through the Board reporting channel identified on the Company's website. Company Secretariat shall facilitate receipt and referral without requiring prior management approval.

Where concerns relate to the activities of the Board, stakeholders may present a complaint directly to the CBN. This option shall be communicated on the website and shall not depend on first using or exhausting the Company's internal processes.

Customer, employee and other routine complaints shall follow the relevant specialised procedures. Such routing shall not prevent communication of illegal or unethical practices to the Board. Concerns shall be recorded, referred securely and handled fairly under applicable law and the Whistleblowing Policy.

9.4 Protection from Retaliation

The Group shall not tolerate retaliation against stakeholders who raise concerns in good faith with the Board or the CBN. Internal approval requirements for official Group statements do not apply to such reporting.

10.0 PRIVACY, INFORMATION PROTECTION AND RECORD MANAGEMENT

10.1 Confidentiality

The Group shall protect confidential information obtained from or shared with stakeholders.

Confidential information shall only be accessed, used or disclosed for legitimate purposes and in accordance with applicable authorisation and information-handling requirements.

10.2 Personal Data and Privacy

Access Holdings shall respect applicable data protection and privacy requirements in the collection, use, storage, transfer and disclosure of personal data.

Personal information shall be handled responsibly and only for legitimate and appropriate purposes.

10.3 Information Security

Stakeholder information shall be protected against unauthorised access, use, disclosure, alteration, loss or destruction through appropriate information security measures.

Employees, representatives and third parties shall exercise appropriate care when communicating or sharing stakeholder information through digital or other channels.

10.4 Records and Retention

Material stakeholder communications, concerns, referrals and responses shall be documented and retained to support accountability, regulatory compliance, continuity, follow-up, issue resolution and organisational learning.

Records shall be maintained and retained in accordance with applicable legal, regulatory, privacy, information security and records-management requirements.

Access to sensitive stakeholder records shall be appropriately restricted.

11.0 MATERIAL STAKEHOLDER MATTERS, ESCALATION AND CRISIS COMMUNICATION

11.1 Material Stakeholder Matters

The Group shall maintain appropriate mechanisms for identifying stakeholder matters that may have a material impact on:

1. Operations;
2. Customers;
3. Employees;
4. Reputation;
5. Regulatory standing;
6. Financial position;
7. Strategic objectives;
8. Stakeholder relationships; or
9. The Group’s licence to operate.

Material stakeholder matters may include:

1. Significant regulatory or governmental developments;
2. Serious stakeholder grievances;
3. Material legal matters;
4. Significant community concerns;
5. Material investor or shareholder issues;
6. Major reputational developments;
7. Significant media issues;
8. Major stakeholder disputes;
9. Material commitments or undertakings; and
10. Other matters requiring senior management attention.

11.2 Escalation of Material Stakeholder Matters

Material matters shall be escalated through appropriate governance, risk, legal, compliance, communications or executive channels, having regard to their significance, urgency, sensitivity and potential impact.

Relevant functions shall ensure material communications and concerns reach the appropriate specialist or decision-making body. Concerns addressed to the Board shall follow the arrangements in Sections 5.8 and 9.3.

Where a matter has cross-functional implications, the relevant functions shall coordinate their response to ensure consistency and appropriate management.

Material commitments, decisions, communications and agreed actions shall be appropriately documented and monitored.

Internal escalation procedures shall not restrict stakeholders' freedom to report illegal or unethical practices to the Board or complain to the CBN about Board activities.

11.3 Crisis Communication

Where a stakeholder matter develops into or contributes to a crisis, communication shall be managed in accordance with the Group's applicable Crisis Management Policy and Crisis Management Playbook.

Crisis communication shall be guided by the following principles:

1. Communication shall be timely and proportionate to the circumstances;
2. Information communicated shall be fact-based and appropriately verified;
3. The Group shall avoid speculation or unsupported statements;
4. Applicable legal and regulatory obligations shall take priority;
5. Communications shall be appropriately authorised and coordinated;
6. Material stakeholder concerns shall be acknowledged and addressed responsibly;
7. Internal and external communications shall be appropriately aligned;
8. Relevant stakeholders shall receive appropriate updates where required; and
9. Significant decisions and communications shall be appropriately documented.

12.0 TRANSPARENCY AND DISCLOSURE

12.1 Accurate and Timely Communication

The Group shall seek to ensure that material communications made on its behalf are accurate, clear, appropriately balanced and provided in a timely manner.

The Group shall not knowingly publish or communicate materially false or misleading information.

Where information is subject to ongoing verification, investigation or regulatory consideration, communication shall reflect facts appropriately established and avoid speculation.

12.2 Regulatory and Legal Disclosure

The Group shall make disclosures required by applicable law, regulation, listing requirements and other relevant obligations.

Regulatory and legal communications shall be managed through appropriate authorised channels and, where necessary, with relevant Legal, Compliance, Company Secretariat, Investor Relations or other specialist functions.

Nothing in this Policy limits or replaces any statutory, regulatory or contractual disclosure obligation.

12.3 Confidential and Market-Sensitive Information

The Group shall not disclose confidential, restricted or market-sensitive information except where appropriately authorized or otherwise legally required.

This includes, as applicable:

1. Confidential customer and employee information;
2. Personal data;
3. Proprietary and commercially sensitive information;
4. Privileged legal advice;
5. Internal deliberations;
6. Confidential regulatory or investigative information;
7. Security-sensitive information;
8. Unpublished financial or market-sensitive information; and
9. Other information subject to legal, contractual or fiduciary restrictions.

13.0 MONITORING, REPORTING AND CONTINUOUS IMPROVEMENT

13.1 Monitoring

The Group shall monitor compliance with this Policy and the effectiveness of its communication and concern-reporting channels.

Monitoring may consider:

1. Stakeholder feedback;
2. Availability of the official website and the published Policy;
3. Accuracy and currency of website contact details;
4. Issue identification and resolution;
5. Access to the Board reporting channel;
6. Regulatory and policy developments;
7. Handling of concerns about illegal or unethical practices;
8. Communication incidents; and
9. Other relevant indicators.

Monitoring shall focus on website publication, channel accessibility, communication quality and referral of concerns.

13.2 Reporting

The Policy Owner, Corporate Communications, Company Secretariat and Compliance shall report relevant compliance matters through appropriate governance channels.

Reporting may include:

1. Publication status and approved version of the Policy;
2. Emerging stakeholder issues and concerns;
3. Website or reporting-channel failures;
4. Outstanding correspondence and referrals;
5. Significant escalations;
6. Concerns relating to Board activities; and
7. Relevant trends and recommendations.

The frequency and level of reporting shall be determined by the nature and materiality of the stakeholder matter.

13.3 Performance Measurement

The effectiveness of stakeholder communication shall be assessed through relevant compliance and service measures.

Relevant measures may include:

1. Availability and accessibility of the official website;
2. Availability of the current approved Policy;
3. Quality of stakeholder feedback;
4. Effectiveness of issue identification and resolution;
5. Prompt and appropriate referral of concerns to the Board;
6. Communication incidents;
7. Consistency and quality of communication;
8. Regulatory and compliance outcomes;
9. Stakeholder access to information and reporting channels; and
10. Effectiveness of escalation and response mechanisms.

13.4 Capability and Awareness

The Group shall promote appropriate stakeholder communication capability among employees, executives and other relevant representatives.

Relevant personnel may receive training or guidance on:

1. The requirements of this Policy;
2. Website publication and maintenance;
3. Freedom to report concerns to the Board and the CBN;
4. Communication;
5. Conflicts of interest;
6. Anti-bribery and corruption;
7. Confidentiality;
8. Privacy and data protection;
9. Information security; and
10. Crisis communication.

14.0 COMPLIANCE AND NON-COMPLIANCE

14.1 Compliance Requirements

Access Holdings is committed to conducting stakeholder communication in accordance with applicable laws, regulations, regulatory requirements and recognised standards in each jurisdiction in which it operates.

Nothing in this Policy shall be interpreted as limiting or replacing any legal, regulatory, contractual, fiduciary or other obligation applicable to the Group or any of its entities.

Employees and representatives acting on behalf of the Group are expected to understand and comply with this Policy and applicable supporting policies, standards and procedures.

14.2 Examples of Non-Compliance

Examples of non-compliance may include:

1. Unauthorized external communication;
2. Unauthorized commitments or representations;
3. Unauthorized disclosure of confidential or market-sensitive information;
4. Providing false or misleading information;
5. Failure to publish or maintain the approved Policy on the website;
6. Obstruction or improper handling of concerns addressed to the Board;
7. Unauthorized media communication;
8. Restrictions on complaints to the CBN about Board activities;
9. Retaliation against stakeholders who raise concerns in good faith; and
10. Failure to maintain required stakeholder records.

14.3 Management of Breaches

Actual or suspected breaches shall be addressed through appropriate governance, compliance, risk, legal, human resources or reporting channels.

Breaches may result in corrective or disciplinary action in accordance with applicable Group policies and procedures.

15.0 POLICY GOVERNANCE AND ADMINISTRATION

15.1 Policy Ownership

The Government and Stakeholder Management Function shall be responsible for the administration and coordination of this Policy, working with relevant Group functions and business leadership.

The Policy Owner shall support implementation, interpretation, monitoring and periodic review of the Policy.

15.2 Approval

The Board shall develop and approve this Policy in accordance with Section 24.2 of the CBN Corporate Governance Guidelines for Financial Holding Companies in Nigeria and the Group's policy-approval framework.

Material amendments shall be approved by the Board. The approved Policy and subsequent approved revisions shall be hosted on the Company's official website.

15.3 Supporting Procedures and Tools

Supporting procedures, standards and tools may be developed to facilitate implementation of this Policy, including:

1. Website Publication and Maintenance Procedure;
2. Stakeholder Communication Procedure;
3. Official Communication Channel Register;
4. Board Concern Referral Procedure;
5. Correspondence and Response Template;
6. Communication Approval Matrix;
7. Website Publication and Channel Check Record;
8. Escalation Protocol;
9. Media Referral and Response Protocol;
10. Crisis Communication Procedure; and
11. Stakeholder Communication Dashboard.

15.4 Related Policies and Documents

This Policy should be read in conjunction with applicable Group policies and frameworks, including:

1. Stakeholder Engagement Policy and Corporate Communications Policy;

2. Whistleblowing Policy, Crisis Management Policy and Crisis Management Playbook;
3. Code of Conduct;
4. Anti-Bribery and Corruption Policy;
5. Conflicts of Interest Policy;
6. Gifts and Hospitality Policy;
7. Investor Relations and Disclosure requirements;
8. Data Protection and Privacy Policy;
9. Information Security Policy;
10. Records Management Policy;
11. Sustainability/ESG Policy;
12. Customer Service and Complaints Management Policy; and
13. Other applicable Group or entity-level policies and procedures.

16.0 POLICY REVIEW

This Policy shall be reviewed periodically to ensure that it remains appropriate to the Group's business, stakeholder environment, regulatory obligations and governance standards.

The Policy may be reviewed earlier where there are:

1. Changes in applicable laws or regulations;
2. Material changes to the Group's business or operating environment;
3. Significant stakeholder or governance developments;
4. Changes to relevant Group policies or frameworks;
5. Material incidents or stakeholder-related developments; or
6. Lessons arising from stakeholder correspondence, concerns or communication incidents.

The Policy Owner shall coordinate review and submit material amendments to the Board for approval. Corporate Communications shall publish approved revisions and retain evidence of website publication.