



Stakeholder Engagement Policy

Introduction

This policy provides a framework for engaging stakeholders in government, media, and the investment community to ensure compliance with relevant regulations. By fostering transparency, accuracy, and professionalism, the policy supports effective public relations (PR) strategies for energy sector clients.

1. Purpose and Scope

- To establish clear guidelines for interacting with government agencies to comply with regulatory requirements.
 - To maintain transparency and accuracy in media communications to protect the reputation of clients and avoid regulatory issues.
 - To ensure compliance with Securities and Exchange Commission (SEC) regulations when managing investor relations for publicly listed companies.
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2. Government Relations

2.1 Guidelines for Engagement with Government Agencies

- **Regulatory Compliance:** Ensure all interactions with government agencies, such as the Nigerian Electricity Regulatory Commission (NERC), comply with applicable laws and policies.
- **Professional Representation:** Assign trained representatives to interact with government officials to maintain professionalism and build trust.
- **Submission Protocols:** Follow proper channels and timelines for submitting documents, reports, and project updates to regulatory agencies.

2.2 Power-Related Projects

- **Permit Acquisition:** Support clients in obtaining necessary licenses and permits for power projects, ensuring compliance with NERC guidelines.
- **Stakeholder Consultations:** Facilitate discussions between clients and government bodies to align project objectives with national energy policies.

2.3 Advocacy and Policy Dialogue





- Engage in policy dialogues to represent client interests and contribute to the development of regulatory frameworks that support industry growth.
 - Avoid lobbying practices that could breach anti-corruption laws or ethical guidelines.
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3. Media Relations

3.1 Principles of Transparency and Accuracy

- **Fact-Based Communication:** Ensure all press releases, interviews, and public statements are accurate and backed by verified data.
- **Proactive Disclosure:** Communicate proactively about major developments, crises, or milestones to maintain public trust.
- **Crisis Communication:** Implement a crisis communication plan to respond to media inquiries swiftly and mitigate reputational risks during emergencies.

3.2 Avoiding Regulatory Backlash

- **Compliance with Media Laws:** Ensure all media interactions align with Nigerian broadcasting and press laws to avoid penalties.
- **Approval Processes:** Obtain necessary approvals from clients and relevant authorities before making public statements on sensitive issues.

3.3 Building Media Partnerships

- Develop long-term relationships with reputable media outlets to ensure accurate representation of client projects and initiatives.
 - Train spokespeople to handle media engagements effectively, ensuring consistency in messaging.
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4. Investor Communications

4.1 SEC Compliance for Investor Relations

- **Disclosure Standards:** Ensure all financial and operational disclosures meet the requirements of the Securities and Exchange Commission (SEC).
- **Confidentiality:** Protect sensitive information related to mergers, acquisitions, and financial performance until approved for public release.





- **Timely Reporting:** Assist publicly listed clients in meeting deadlines for submitting financial reports, earnings calls, and investor updates to the SEC.

4.2 Investor Engagement Strategies

- Develop clear communication strategies to keep investors informed about project progress, risks, and returns.
- Use transparent and consistent messaging to build investor confidence and strengthen relationships.

4.3 Avoiding Misrepresentation

- Ensure that all statements made to investors are factual and free of exaggeration to avoid regulatory scrutiny or litigation.
- Conduct regular audits of investor communication materials to ensure compliance with SEC guidelines.

5. Monitoring and Evaluation

5.1 Key Performance Indicators (KPIs)

- Number of successful engagements with government agencies.
- Percentage of media interactions conducted without corrections or backlash.
- Investor satisfaction ratings for communication quality and transparency.

5.2 Regular Reviews

- Conduct quarterly reviews of stakeholder engagement practices to ensure alignment with updated regulations and industry standards.
- Adjust communication strategies based on feedback from stakeholders, including government officials, media personnel, and investors.

6. Risk Management and Escalation

- Identify and mitigate risks associated with stakeholder interactions, including regulatory non-compliance and reputational damage.
- Establish escalation protocols for handling sensitive issues, ensuring timely involvement of senior management.

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7. Consequences of Non-Compliance

- Non-compliance with government, media, or investor relations policies may result in disciplinary action for employees or contractors.
- Repeated violations may lead to termination of contracts and potential legal consequences under relevant Nigerian laws.

8. Conclusion

This policy ensures ethical, transparent, and compliant engagement with key stakeholders in Nigeria's energy sector. By adhering to these guidelines, the firm aims to foster trust, safeguard reputations, and deliver value to clients and their stakeholders.
