



STAKEHOLDER COMMUNICATION POLICY

FOR

PORTLAND PAINTS AND PRODUCTS PLC

Approvals

This Policy has been approved by:

Name	Representing	Signature	Date
Mrs. Bolarin Okunowo	Managing Director		
Engineer Dipo Ashafa	Chairperson, Risk and Governance Committee		
Mrs. Esosa Balogun	Chairperson, Board of Directors		

TABLE OF CONTENT

Pages

Introduction	4
Principles and Policy Objectives	4
Responsibility	4
Stakeholder Engagement	4
Stakeholder Enquiries	5
Policy Review	5

1. INTRODUCTION

This document sets out Portland Paints and Products Plc's ("PPPNP" or the "Company") policy on shareholder and broader stakeholder communication. This policy is made pursuant to the provisions of the Companies and Allied Matters Act 2020 ("CAMA"), the Company's Articles of Association, the Nigerian Code of Corporate Governance 2018 and the Securities and Exchange Commission's Corporate Governance Guidelines 2020 ("SCGG").

PPPNP's Board of Directors ("Board") recognises that stakeholders influence strategy and performance. PPPNP's stakeholders include but are not limited to shareholders, employees, suppliers, host communities and customers ("Stakeholder"). The Board is of the view that active stakeholder engagement is an important aspect of good corporate governance and aims to balance stakeholder interests.

The Company believes that it is not possible to achieve the social interest and develop a responsible and sustainable business model without the strong engagement of its Stakeholders, whose decisions and opinions have an influence on the Company and who, at the same time, are affected by the Company's activities.

The Company makes the commitment to involve its Stakeholders in the social dividend generated by its activities, which dividend is understood as the sustainable contribution of value, including the advancement of business communities which it participates in and leads, both from the economic viewpoint and from the perspective of business ethics, the promotion of diversity, equality, inclusion, the sense of belonging, and justice, and the encouragement of innovation and protection of the environment through the generation of quality employment that ensures equal opportunity and non-discrimination in people management, as well as leadership in the fight against climate change.

2. PRINCIPLES AND POLICY OBJECTIVES

Open communication, and accurate and fair disclosure are governing principles for PPPNP's stakeholder engagement. There is a focus on the integrity, timeliness and relevance of information provided. PPPNP aims to disclose information in accordance with the requirements of the exchanges on which its securities are listed, as well as, the provisions of relevant laws and regulations. Interaction with the media is aimed at enhancing PPPNP's reputation and providing relevant updates.

The objective of this policy is to provide guidelines for engagement between the Company and its stakeholders.

This Policy shall generally govern the Company's relations with its Stakeholders in all of its activities and operations, in order to:

- a) Continue encouraging the engagement of the Stakeholders in its business enterprise through a strategy of strong involvement in the communities in which it operates and the creation of shared sustainable value for all of them.

- b) Continue responding to the legitimate interests of the Stakeholders with which the Company interacts.
- c) Continue building trust among the Stakeholders in order to build long-lasting, stable and robust relationships.
- d) Encourage the recognition by all of its Stakeholders of the Company's commitment to diversity in the broad sense, particularly in all matters regarding the professional development of their members.
- e) Discover and address potential conflicts before they become risks by ensuring Stakeholders articulate concerns regarding activities of the Company in an early stage.

Notwithstanding the foregoing, the Board of Directors may approve other corporate policies addressing specific Stakeholders.

3. RESPONSIBILITY

The Board has oversight for stakeholder engagement and the Company's management ("Management") is responsible for day to day execution.

4. SHAREHOLDER ENGAGEMENT

4.1 Board of Directors

The primary forum for formal engagement between the Board and shareholders is the Company's general meetings, attended by shareholders, regulators, professional advisers and the media. General meetings provide opportunities for shareholders to interact with the Board, exercise ownership rights and express views and concerns about the affairs of the company. At general meetings, members of the Board ("Directors"), led by the Chairperson, respond to relevant questions from shareholders. Detailed particulars of business to be considered at general meetings is provided in notices for meetings. Shareholders unable to attend and vote at general meetings are encouraged to appoint proxies to attend in their stead. Shareholders are encouraged to contact the Board, when relevant, using the contact details below. Directors are expected to update the Board on shareholder discussions.

Board Contact Details

The Chairperson
Portland Paints and Product PLC
105A Adeniyi Jones Avenue, Ikeja
Lagos, Nigeria
Email: info@portlandpaintsng.com

4.2 Management

Other stakeholders may contact members of management as appropriate. PPPNP provides information to shareholders via the Company's annual report, quarterly financial statements, earnings calls, website, and presentations at investor and industry conferences. The Managing Director ("MD") has primary responsibility for shareholder and investor engagement. Other members of Management and employees may be required to engage with shareholders from time to time.

4.3 Engagement Process & Communication Guidelines

Before the Engagement

Before engaging Stakeholders, think through: - the objectives and scope of the engagement, - the engagement process, including timeline and chosen method(s) of engagement, - the participants and/or audience, - the boundaries of disclosure, and - the plan to document and communicate engagement outputs.

During the Engagement

During the engagement, aim to: - establish clear and effective ground rules (e.g. set clear expectations around confidentiality); - ensure a balanced contribution of all Stakeholders; - handle criticism constructively and accept Stakeholders' perspectives; and - avoid making promises to Stakeholders that the Company may not be prepared to keep.

After the Engagement

After the engagement, coordinate with Investor Relations to ensure that results are communicated internally and externally (as appropriate).

5. STAKEHOLDER ENQUIRIES

Stakeholders may communicate with PPPNP by mail, e-mail, or telephone using the contact details on the company's website – (www.portlandpaintsng.com)

The Investor Relations function has responsibility for stakeholder engagement. Communication regarding general business operations, financial results, strategic direction, business conduct, accounting, or other similar matters may be sent to the Investor Relations team using contact details on the investor relations section of the Company's website – www.portlandpaintsng.com/investors/

6. POLICY REVIEW

The Risk and Governance Committee shall review this policy as the need arises to ensure that it remains consistent with the law, applicable regulations, the Code of Corporate Governance and the SCGG.