




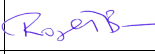

Security Classification: **Restricted**

SEP-COM-GEN-EC07-00001

CORPORATE COMMUNICATIONS POLICY

EXECUTIVE SUMMARY

OCTOBER 2025

Rev	Date	Description	Issued by	Checked by	Approved by
					
A02	27-10-2025	Issued for Approval	C. Afe	R. Brown	U.U. Udoma

ADDITIONAL APPROVAL / REVISION HISTORY TABLE


Party	Name	Sign	Date

Revision Philosophy

- All documents for review will be issued at R01 as required, with subsequent R02....
- If the document is for information, it will also be issued as A01.
- All revisions Issued for Approval/Implementation will be issued at A01, with subsequent A02, A03, etc. as required.
- All revisions approved for design will be issued at D01, with subsequent D02, D03, etc. as required.
- Documents approved for Construction will be issued at C01, C02, and C03 respectively.
- Documents or drawings revised as "As built" will be issued as Z01, Z02 Z03 etc.
- Narrative sections revised from previous approved issues are to be noted in the table below and/or highlighted in the RH margin (using the appropriate revision status) thus: | A02.
- Previous revision highlighting to be removed at subsequent issues.
- Drawings/diagrams revised from previous approved issues are highlighted by 'clouding' the affected areas and by the use of a triangle containing the revision status.

Revision History

Revision No.	Date of issue	Reason for change
A02	29-10-2025	Company-wide Policy Review
A01	13-08-2013	Issued for Approval/Implementation

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1. INTRODUCTION

1.1. Policy Statement

- a. SEPLAT Energy Plc (“**Seplat Energy**” or “**the Company**”) has an obligation to ensure that all its communication of “material information” is factual, accurate, credible, and in compliance with the applicable legal requirements of the various regulatory agencies which the Company is subject to. Being a dual-listed company in Nigeria and the United Kingdom, it is important to disclose information in compliance with the law to avoid incurring significant liabilities and penalties.
- b. The Policy outlines objectives, responsibilities, and guidelines for internal and external communications, ensuring alignment with Seplat Energy's interests. It governs the disclosure of Company information through various channels, designates Authorized Spokespersons, and prohibits unauthorized individuals from responding to inquiries from the media, investment community, or industry analysts.

1.2. Objectives

- a. The goal of this Policy is to develop and sustain a culture of effective communication and thereby ensure that Seplat Energy achieves its communication targets and complies with the relevant regulations.

1.3. Applicability

- a. This Policy applies to the Seplat Energy Workforce and the Board of Directors.
- b. This Policy governs the procedure for disclosing Company information via News media, Speeches and presentations by Company representatives, Company correspondence, Publications, Discussion of material, non-public information in public or quasi-public areas outside of the workplace, Publication on the Internet, and Internal communication platforms.

2. RELATED DOCUMENTS

This document serves as an Executive Summary of the Corporate Communications Policy. For more comprehensive details and guidelines for implementation, please refer to the Main Content of the Policy. This policy should be read together with SEPLAT's Inside Information Disclosure Policy.

POLICY OWNER: CHIEF EXECUTIVE OFFICER

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Security Classification: **Restricted**

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CORPORATE COMMUNICATIONS POLICY

MAIN CONTENT

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1. DEFINITIONS

Terms/Acronym	Definition
Authorized Spokesperson	the Chairman, the CEO, the CFO, the COO, and the Director, External Affairs and Social Performance
Board	The Board of Director of Seplat Energy Plc.
Chairman	The chairman
CEO	Chief Executive Officer of Seplat Energy Plc.
CFO	Chief Financial Officer of Seplat Energy Plc.
COO	Chief Operating Officer of Seplat Energy Plc.
Confidential Information	Any information about the Company, including, without limitation, the Company's operations, business objectives, financial status, policies, and procedures that are not known to the public.
Director, EA & SP	director of External Affairs and Social Performance in Seplat Energy Plc.
DL/CS	Director Legal/Company Secretary of Seplat Energy Plc
Inside Information	Information that is not available in the public domain, relates directly or indirectly to SEPLAT and would, if generally available, be likely to have an impact on the Company's business, investments and/or value. Please see examples in Section 6 of this Policy.
Material Information	Any information that is not available in the public domain, relates directly or indirectly to Seplat, and would, if generally available, be likely to have an impact on the Company's business, investments, and/or value.
Senior Leadership Team	means the Senior Leadership Team of Seplat, as constituted by the Chief Executive Officer from time to time.
Workforce	All employees, contract staff, contractor staff, consultants or any other person engaged in the operations of Seplat. This Policy refers to these individuals as " Workforce " for simplicity of reference only, and no further meaning shall be implied and construed by such reference.
Seplat / Company	Seplat Energy Plc with all of its group companies (subsidiaries and incorporated joint venture companies in which Seplat Energy Plc or its subsidiary is a shareholder)


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2. ROLES AND RESPONSIBILITIES

- 2.1. Board:** The Board shall approve and periodically review this Policy as required.
- 2.2. CEO:** the CEO shall be the overall owner of this Policy and shall be responsible for the implementation of this Policy. The CEO may also delegate the day to day implementation of this Policy to members of the Senior Leadership Team (SLT) as required.
- 2.3. Workforce:** Seplat Workforce, including those involved in any external communications and those charged with responsibility for internal communications, are responsible for complying with this Policy.
- 2.4. Director EA & SP:** The Director, EA & SP shall have general oversight of this Policy and shall support the CEO in ensuring its company-wide implementation.
- 2.5. Senior Leadership Team (SLT):** Seplat's SLT shall be responsible for ensuring compliance with this Policy.
- 2.6. Specific Departments/Units:** The Legal Directorate shall ensure that this policy is published on the Company's website for accessibility to the Workforce and external stakeholders.

3. OBJECTIVES

- 3.1** The goal of this Policy is to develop and sustain a culture of effective communication and thereby ensure Seplat achieves its communication targets and complies with the relevant regulations.
- 3.2** This Policy highlights that failure to achieve effective and controlled communication with all stakeholders may result in significant issues for the Company that could impact its reputation, market value, and risk disruption of its business activities. This Policy statement outlines the importance of communication responsibility and roles in the communication process, target groups, approval processes, and identification of Authorized Spokespersons.
- 3.3** The principal purpose of this Policy is to:
- a. Establish guidelines for communicating with current and potential stakeholders.
 - b. Streamline information and communicate effectively.
 - c. Guarantee accurate and effective communication of our corporate perspective on all issues.
 - d. Ensure compliance with all relevant regulatory requirements and best practice standards and guidelines governing corporate communication.
 - e. Ensure proactive measures are taken to communicate Seplat's commitment to health, education, environmental, and social impact.
 - f. Ensure that corporate communication aligns with:
 - Legal and regulatory protocol
 - Corporate reputation and brand standards
 - Company goals and objectives
 - Corporate governance provisions
 - Corporate and Social Responsibility principles

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4. APPLICABILITY AND SCOPE OF POLICY

4.1 This Policy applies to the Seplat Workforce and the Seplat Board of Directors.

4.2 This Policy governs procedure for disclosing Company information via:

- a. News media (news releases, feature stories, news alerts) in print, electronic, or digital.
- b. Speeches and presentations by Company representatives.
- c. Official Company correspondence (via emails and letters).
- d. Publications.
- e. Discussion of material, non-public information in public or quasi-public areas outside of the workplace, where information regarding the Company could be inappropriately disclosed.
- f. Publication on the Internet, which includes but is not limited to social media sites (Facebook, Instagram, Twitter, LinkedIn, etc.), chat rooms, bulletin boards, blogs, Seplat’s website, and wikis; and
- g. Internal communication platforms.

5. EXTERNAL COMMUNICATION


5.1 As a corporate entity, Seplat values its reputation. All communication with the Company’s respective stakeholders should align with the established corporate identity. Effective communication is an essential element of corporate reputation management and is crucial to the Company in achieving its goals and objectives. It is against this background that the following guidelines are provided to ensure Seplat’s external communications are planned to support its business objectives and strategies while maintaining confidence in the Company.

5.2 Disclosure of Company Information

- a. No member of the Workforce or Board, except those expressly authorized under the terms of this Policy, shall communicate externally regarding Seplat’s prospects, performance, and policies, or release or disclose the Company’s information, internal matters, or developments which relate in any form to Material Information to any person not affiliated with the Company (including, without limitation, to the media, friends, family members, or other relatives).
- b. There shall be no “selective disclosure” or the disclosure of Material Information to any external individual or group before public dissemination of that information by the Company.
- c. Any member of the Workforce or Board who selectively discloses Material Information to people or groups outside the Company at any time shall be deemed to be in breach of this Policy.
- d. Any member of the Workforce or Board shall not comment or respond to comments on the Company or the Company’s strategy, operations, policies, plans, technologies, or products in the print, electronic, and on social media.
- e. No aspect of this Policy shall be construed as prohibiting any member of the Workforce or Board from complying with applicable law in Nigeria and the UK, nor shall any aspect of this Policy prevent any member of the Workforce or Board from complying with the Company’s whistleblowing policy.

5.3 Approvals for External Communications

Approvals for all external communications under this Policy shall be in accordance with Appendices 1 and 2 hereunder this Policy.


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5.4 Authorized Media Spokesperson

- a. To ensure our messages are effective, consistent, coordinated, and aligned with the policies and needs of the Company, only the following persons are authorized to discuss the Company’s business with the media (both print and digital media) unless otherwise approved by the Chief Executive Officer (“CEO”) or by the Board of Directors of Seplat through the Chairman:
 - The Chairman
 - The Chief Executive Officer (CEO)
 - The Chief Operating Officer (COO)
 - The Chief Financial Officer (CFO)
 - Director, External Affairs & Social Performance
- b. Each of the above-listed Company officials is designated as an “Authorized Spokesperson.” All media interviews and other media engagements relating to the Company shall be approved by the CEO and undertaken under the guidance of the Director, External Affairs and Social Performance, who will provide the necessary preparation and materials, as well as attend and monitor such interviews.
- c. Other members of the Board and members of the Workforce, except those who have been expressly mandated by an Authorized Spokesperson to speak on behalf of the Company, are hereby instructed not to respond, under any circumstances, to inquiries from the media. Directors and members of the Workforce who receive media inquiries either directly or indirectly must refer the inquirer to the Director, External Affairs & Social Performance.
- d. The Company’s website is to be utilized to host Company materials, where new Material Information has been disclosed. The CFO is ultimately responsible for all investor and capital market materials published on the Company’s website.
- e. Except for investor and capital market events which are handled solely by Seplat’s CFO and Head of Investor Relations, the Workforce should obtain permission from the Director, External Affairs and Social Performance before accepting an external speaking or presentation engagement or getting materials published in external publications. Such engagements should be in the interest of or have a clear benefit to Seplat or its Workforce or be critical to the professional development of the Workforce.
- f. All materials to be used in such public engagements should be submitted to the External Affairs and Social Performance department for approval in good time prior to the event, to ensure consistency in Company disclosure. The External Affairs and Social Performance team, in turn, should be aware of the need to check this with the CFO if there is uncertainty over any information being material/non-material.

5.5 Communication With the Media/ Media Interviews

- a. All media requests or enquiries must be directed immediately to the Director, External Affairs & Social Performance. These may include formal and informal requests for interviews or comment, as well as enquiries, and these relate to all media including TV, radio, newspapers,

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magazines, trade media, and digital media. All business units, departments, directorates, subsidiaries, managers, and members of the Senior Leadership Team of Seplat are required to share their media engagement plans or materials with the Director External Affairs and Social Performance for alignment on corporate messaging ahead of any such engagement.

- b. Non-regulatory Company-related information, statements (e.g., community-related, corporate events, photo news, etc.) can only be issued through External Affairs and Social Performance.
- c. Quarterly reporting Regulatory statements and other operational updates (e.g., financial results, production and operations updates/trading statements, releases around material business events) can only be issued with the explicit and documented approval of the CFO, and CEO.

5.6 Media Speaking Opportunities

- a. The Chairman or Chief Executive Officer may approve a subject matter specialist to speak on behalf of the Company under certain circumstances if such media engagement will be beneficial to the Company. However, such delegated individuals may only speak on behalf of the Company on issues directly related to their specific area of expertise and may not address the reporter's/media's enquiries related to other topics or issues or release Material Information before publication by the Company.
- b. A representative of the External Affairs & Social Performance team should be present at all journalist briefings.

5.7 Personal or Non-Company Representation in The Media


There is a real possibility of the Workforce or the Board being approached by the media from time to time to provide opinion on non-industry and non-company issues or matters or on topics related to their personal interests or non-work-related activities. The Workforce or the Board may participate in such interviews but to avoid confusion about whether the member of the Workforce or member of the Board is speaking on behalf of Seplat or on their own behalf, they shall not reference, or permit reference to Seplat or any information directly or indirectly related to Seplat or their role within the Company, unless they have obtained prior approval to do so from the Director, External Affairs and Social Performance. All presentation materials referencing Seplat must be submitted for review and approval by the Director, External Affairs and Social Performance.

5.8 Relationship With the Media

It is the aim of Seplat to engage the media and to manage such relationships in an open, pragmatic, and professional manner. Seplat sees the media as an important stakeholder and will therefore treat the media as a partner and proactively manage the Company's relationship with them. Only the Chief Executive Officer and the Director, External Affairs & Social Performance and his/her designates have responsibility for handling all media relationships and enquiries.

5.9 Media Calls

- a. Every request from the media should be immediately and appropriately passed on to the

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Director, External Affairs and Social Performance. This includes formal requests for interviews as well as enquiries, and includes all media – TV/radio, newspapers, magazines, national/international/trade media/digital or new media.

- b. The Director, External Affairs & Social Performance, will either respond on Seplat’s behalf or identify the appropriate person from Seplat to handle the response.

5.10 External Letters


- a. All letters to third parties that place a commitment or legal responsibility or liability on the Company must be reviewed and approved by the **Director Legal/Company Secretary (DL/CS)** and signed off by the CEO or his designate. These include but are not limited to letters approving requests made by third parties to or on behalf of the Company. All such letters that are to be approved by the DL/CS and signed off by the CEO (or his designate) should pass through the Directorate Head of the division or Manager of the unit originating the letter.
- b. Members of the Board or the Workforce shall not under any circumstance use the Company’s letterhead for matters of personal interest or concern. However, where the Company’s letterhead is required for personal interests or concerns such as introductory letters or letters of recommendation, such requests shall be directed to the Human Resources Department and approved by the Director, Corporate Services,. All unauthorized use of the Company’s letterheaded paper for Company’s business purposes or for purposes outside of the Company’s business interests are prohibited and could lead to termination of employment or contract.

5.11 Email Communication

- a. Emails to external parties should be cleared by the Directorate Head/General Manager responsible for the division/department of the originating team. The divisional head of the team should be in copy of the original email when it is sent to the external party.
- b. Material information on or about the Company must not be shared outside of the Company without necessary authorization, at any time. No Workforce should conduct personal business using the Company email system. It should be noted that the Company owns all communication and documentation sent via email or that is stored on Seplat equipment.

5.12 Monitoring Activities

- a. Seplat reserves the right to monitor all external and internal communications and access to its network, intranet, and the Internet (as applicable), where Seplat’s property or asset is used in any communications or is accessed remotely from outside Seplat. The Company reserves the right to use any and every legitimate method available for monitoring of communications. Seplat will also consider the impact of monitoring on the Workforce such as:

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- i. The risk of intrusion into the private lives of the Workforce.
 - ii. The extent to which the Workforce will be aware of the monitoring.
 - iii. The impact monitoring will have on the relationship between the Workforce and Seplat.
 - iv. How monitoring will be perceived by the Workforce.
- b. Seplat shall inform the Workforce prior to the introduction of any such monitoring or the extension of any existing monitoring. Furthermore, Seplat shall inform any member of the Workforce if their communications are being specifically monitored or accessed. However, an individual will not be informed where serious breaches of this Policy or criminal activity is suspected and where informing the individual will hamper any investigation or risk the loss of data and evidence.


5.13 Data Classification

Seplat adopts a system that classifies all data/information into four different categories:

- a. **Secret:** Highly valuable and sensitive business information that MUST NOT be shared under any circumstances. If such information were to become available to unauthorized persons, it could cause serious reputational damage to Seplat or worse, result in Seplat going out of business. Examples of secret information include passwords, access codes, and encryption keys.
- b. **Confidential:** Information distributed or shared on a ‘need to know’ basis that pertains to external stakeholders, Workforce, and strategies. Examples include staff salaries, personally identifiable information, audit, and regulatory reports.
- c. **Restricted:** Information that any member of Seplat Workforce can have access to and disclosure within Seplat is not expected to cause any serious harm to Seplat. However, such information is not to be shared externally. Examples include policies, procedures, and internal e-flyers.
- d. **Public:** Information that may be released to the public and will not benefit a competitor or have a negative impact on Seplat or breach confidentiality. Only the Director, External Affairs & Social Performance can classify documents as public. Examples are annual reports, marketing brochures, email and digital marketing materials, and all other marketing materials regularly released to the public.

5.14 Handling Seplat’s Information


- a. Secret and confidential information and matters relating to Seplat will not be discussed in and around places, such as hallways, restaurants, airplanes, taxis and all other vehicles, buildings, locations, and environments, where the discussion may be overheard.
- b. Secret and confidential documents will not be read in public places.
- c. Secret, confidential and ‘internal use only’ information/documents that have been printed and served the purpose for printing will be shredded or discarded in ways which cannot allow for others to retrieve them.

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- d. All members of the Workforce that regularly deal with confidential information will take all necessary measures to maintain the confidentiality of information in their possession outside of the office.
- e. Transmission of documents by electronic means, such as by scanning or directly from one computer to another, will be made only where it is reasonable to believe that the transmission can be made and received under secure conditions.
- f. Where, for justifiable reasons, an external party is to be looped into an internal email trail, the Workforce looping in the external party shall first ensure that no secret or confidential information or one intended for ‘internal use only’ is on the trail.
- g. Unnecessary copying of confidential documents will be avoided and documents containing confidential information shall be promptly removed from conference rooms and work areas after meetings have concluded.
- h. Extra copies of printed confidential documents will be shredded or otherwise destroyed beyond any attempts at retrieval.
- i. Access to confidential electronic data will be restricted using passwords.
- j. If the official mailbox of a member of the Workforce is to be accessed from outside of Seplat network, they shall ensure the information is not accessible by anyone other than them.

5.15 Official Meetings (Physical and Virtual)

- a. All business meetings will take place using Seplat’s meeting facilities or Seplat- approved venues. When held virtually, because participants are in different locations or working from home (WFH), only approved virtual meeting apps/platforms may be used.
- b. Conference calls will only be arranged using Seplat’s conferencing facilities or approved conferencing apps/platforms and no other methods.
- c. All business calls will be made using Seplat’s facilities or approved call apps/platforms or the official mobile phone of the Workforce if s/he is provided with one.
- d. Where a personal phone or device is to be used for a business call or other official purposes, the user will ensure they comply with guidelines detailed in this policy.
- e. Seplat’s meeting and call facilities will be used for business purpose only and not deployed for personal use.
- f. The same level of preparation, decorum and meeting etiquette expected as regards physical meetings will be maintained for virtual meetings.
- g. While the Workforce are not expected to be as formally dressed in virtual meetings where their video is or could be turned on, especially in the emerging WFH (working from home) era, as when appearing for physical meetings, they will be appropriately dressed and ensure that their background environment is neat, noiseless, and devoid of distractions.
- h. Reasonable care will be taken by the Workforce in business calls or meetings where external parties are involved not to divulge confidential information or cite any data classified as secret, confidential or ‘internal use only’.
- i. Where any member of the Workforce is invited in their capacity as a staff of Seplat to participate in a webinar, whether as a facilitator, speaker, panellist or moderator, they will, before accepting the invitation, seek approval from the Director, External Affairs and Social Performance for event and content clearance and timely provide their speaking outline, notes or presentation.

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5.16 Investor Communications

- a. As a publicly listed company whose shares are traded on the London Stock Exchange and the Nigerian Exchange Limited, Seplat is strictly governed by the two respective regional regulatory bodies: the Financial Conduct Authority (the “FCA”) and the Securities and Exchange Commission (the “SEC”). These bodies dictate what constitutes, and how Seplat communicates, material/inside information, and have the power to impose severe penalties on those businesses or individuals who fail to comply with their rules.
- b. The principal concept underlying this Policy is that all shareholders should be treated equally, with the selective/delayed disclosure of new Material Information strictly prohibited. This means that any new information concerning, but not limited to, the Company’s operations, finances, prospects, new business, and strategy etc. should only be disclosed through the required formal regulatory channels and in a timely manner. All announcements of a regulatory nature can only be released with the explicit and documented authorization of the CFO and CEO.
- c. The Company has and maintains an investor-relations portal on its website where this Policy as well as the Company’s annual reports and other relevant information about the company are published and made accessible to the public.


6. IDENTIFYING INSIDE INFORMATION AND/OR THE NEED FOR DISCLOSURE

6.1 Inside information is defined as information that is not available in the public domain, relates directly or indirectly to Seplat and would, if generally available, be likely to have an impact on the Company’s business, investments and/or value. Examples of such information include and are not limited to:

- a. Announcement of financial results and new information of a financial nature.
- b. Information on the Company’s operations such as production, reserves, drilling results, significant delays, or interruptions to the Company’s work programme.
- c. Withdrawal / extension / award of licenses.
- d. New business opportunities – i.e. Acquisitions, divestments, farm-ins, farm-outs
- e. Capital raises and financing activities.
- f. Litigation
- g. Changes in the Company’s capital structure
- h. Board and executive management changes
- i. Negotiations with partners/counterparties/government
- j. Security/environmental incidents

6.2 In determining the likely significance of any information, the relevant Executive Management (CFO and CEO) and Board of Directors should immediately assess whether the information in question would be likely to be used by a reasonable investor as part of the basis of his investment decisions and would therefore be likely to influence the price of Seplat’s financial instruments – ie. The Company’s share price and as a result market value (this is known as the “reasonable investor test”).

6.3 It is the sole responsibility of Seplat’s CFO, CEO and Board of Directors to determine what constitutes Material Information and seek advice from relevant members of the Workforce or the Company’s advisors (i.e. the Company’s brokers and the DL/CS advising on Listing Rules) as


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and when necessary. The decision as to whether a piece of information is material / inside information may be finely balanced and the Company (with the help of its advisers) will need to exercise its judgement.

- 6.4** All members of the Workforce are likely to, from time to time, be in possession of such Material Information and it is therefore imperative that each member of the Workforce complies with this Policy to ensure that no Material Information is illegally or unethically provided to any external party. The default position and safe rule to be adopted by all members of the Workforce is that all information held by a member of the Workforce that is not already in the public domain should be considered to constitute Material Information. In other words, such information should not under any circumstances be disclosed to or discussed with anyone outside of the Company. In some cases, such information may require strict confidentiality and disclosure to other members of the Workforce on a need-to-know basis. If there is any doubt or a need to confirm if information is already in the public domain / constitutes material / inside information, the CFO (or person(s) authorized by the CFO) should be consulted in the first instance.
- 6.5** Seplat has built its reputation on strictly adhering to the governing principles of stakeholder communication; therefore, the damage to the Company in the event of a breach of this Policy could be considerable. It is the responsibility of every member of the Workforce to ensure that Seplat's reputation is protected by adhering to the guidelines laid out in this Policy.

7. PREPARATION AND RELEASE OF REGULATORY ANNOUNCEMENTS

- 7.1** Once the need for regulatory disclosure is established, the Investor Relations office, the DL/CS, and External Affairs and Social Performance Department will draft the required announcement in standard Company template and in compliance with the law and this Policy. During this process, the draft announcement will be circulated to relevant person(s) within the Company, the Company's brokers, and public relations advisors to ensure factual accuracy/verification
- 7.2** Once all comments have been considered, the release will be provided to the CEO and CFO for final comments. If the announcement mentions, relates to, or is a joint release with subsidiaries, affiliates, partners or other stakeholders, the Company may notify such external parties and, where necessary, seek approvals. Where required, the Company shall collaborate with such subsidiaries, affiliates, and partners in ensuring that accurate information is contained in any regulatory disclosure, release, or corporate announcement.
- 7.3** Once the announcement is in final form as agreed by the CFO, DL/CS and CEO, the Investor Relations office will circulate the announcement to all relevant parties with instructions for release upon approval from the CFO.
- 7.4** Once approval for release has been explicitly given by the CFO (and documented – usually in an email) the Company's Investor Relations team will set up for the simultaneous release at a specified day/time through the Nigerian Group Exchange (NGX) in Nigeria and the Regulatory News Service (RNS) in the UK, both of which have a direct feed to the Company's website.
- 7.5** The Company may also wish to simultaneously upload a copy of the release to the press release section of its website or/and send same to the media.
- 7.6** Only once the NGX and RNS announcement have been released can the External Affairs &

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Social Performance team distribute to various press and media.

8. DEALING WITH LEAKS, RUMOURS AND PRESS SPECULATION

8.1 The Nigerian Exchange Limited (NGX), the Security & Exchange Commission (SEC), the Financial Conduct Authority (FCA), and the London Stock Exchange (LSE), have stated that an interim regulatory announcement should be made where there is a strong likelihood of an information leak, rumor or press speculation. In this event, such an announcement should promptly disclose the relevant material, the reasons for lack of a more comprehensive announcement, and provide an undertaking to release further details as soon as the same are available.

8.2 As stipulated in section 6.3, it will be the sole responsibility of the CEO, CFO and Board of Directors to determine what disclosure requirements may have been triggered and seek advice from the Director Legal and the Company's brokers advising on Listing Rules (as and when necessary).

8.3 Any member of the Workforce who becomes aware of leaked information should immediately report this to his/her line manager and any Manager of the External Affairs and Social Performance Department.


9. INVESTOR AND ANALYST ENGAGEMENT, CONTACT AND PRESENTATIONS

9.1 As a publicly listed company, Seplat has many institutional and private investors and actively undertakes a market engagement programme to effectively communicate its investment proposition. The Company also has a growing list of equity research analysts and equity sales teams within various banking and financial institutions with which it also actively engages. The following persons may engage with the investment community directly and make presentations at investor and capital markets events and forums:

- CEO
- CFO
- Head of Investor Relations
- Other members of the Workforce approved by the CEO or CFO

9.2 All investor and analyst enquiries that are received by the Company should in the first instance be directed to the Head of Investor Relations in copy of the CFO. With the exception of the authorized list of persons above, under no circumstances should a member of the Workforce engage with or discuss any aspect of the Company or information directly or indirectly relating to the Company with an investor, analyst or any other capital markets participant.

9.3 The Company may also receive requests for information from other research and consulting firms (e.g., Wood Mackenzie, IHS Energy, Rystad Energy, etc). These firms provide paid-for research and evaluation services that are extensively referred to and distributed amongst the banking, investment, and industry (competitor) communities. All enquiries for information from such firms should be directed to the Head of Investor Relations in copy of the CFO. To ensure controls on public disclosure are maintained and for the purpose of consistency no member of the Workforce should discuss or provide any information whatsoever to such firms.


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10. SOCIAL MEDIA/ INTERNET COMMUNICATION

- 10.1** The Workforce is prohibited from publishing information on behalf of Seplat and from disclosing Material Information regarding any aspect of the Company's business on the Internet unless otherwise authorized. Publication on the Internet includes, but is not limited to, social media sites (Facebook, Google+, Twitter, LinkedIn, Instagram, YouTube etc.), chat rooms, podcasts, bulletin boards, blogs, and wikis. All social media/internet communication platforms are to be managed by the External Affairs and Social Performance Department while the company website is managed in conjunction with the Investor Relations.
- 10.2** Information about Seplat posted on the Internet by the Workforce or parties other than Authorized Spokespersons is not to be considered data made publicly available by the Company or otherwise attributable to the Company.
- 10.3** Disclosure of Material Information by any member of the Workforce about Seplat through the Internet could result in disciplinary action against the member, including and up to prosecution and dismissal, and may force the Company to issue a press release either confirming or correcting the statements.
- 10.4** Seplat will solicit and encourage the participation of the Workforce on social media channels to boost its social media footprints, amplify its message and promote Seplat events and activities.
- 10.5** The Workforce will be expected, while supporting Seplat on social media whether through shares, comments, or personal stories, to comply with Seplat's Code of Conduct and this Policy.

11. BOARD LEVEL COMMUNICATION

- 11.1** Whilst Board level communication is often interchangeable depending on the situation, best practice dictates that individual members of the Board each take responsibility for specific parts of the business.
- 11.2** The Board has a responsibility for ensuring that satisfactory dialogue with investors takes place. In terms of communication with the investment community, this should be led by the CEO/CFO in liaison with the Head of Investor Relations. Whilst recognizing that most of the Board interaction with investors will be through the CEO and CFO, the CEO/CFO in consultation with the Chairman should ensure that the views of shareholders are communicated to the Board as a whole. The Chairman should discuss governance and strategy with shareholders and investors. Non- executive Directors may be offered the opportunity to attend scheduled meetings if requested specifically by shareholders. The Senior Independent Non-Executive Director should attend sufficient meetings with a range of shareholders and investors to listen to their views to help develop a balanced understanding of their issues and concerns. The Board will be required in the Company's annual report to state the steps that it has taken to ensure that all members of the Board, and in particular the non-executive directors, develop an understanding of the views of shareholders about the Company.
- 11.3** Traditionally, the Chairman and the CEO will address operational topics and provide background on the market, corporate strategy, and outlook for the sector, with the Chairman focusing on issues of corporate governance.
- 11.4** The Chairman of the Board may issue statements on pertinent issues arising from the Board's responsibility for ownership issues, strategies, nominations, appointments, compensation, and

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corporate governance of the Company. Other Board members are not permitted to make such statements without prior consultation with and approval of the Board Chairman. Board members should not discuss Company related information which has not been publicly disclosed by the Company as outlined in Section 9.1. Except as otherwise stated in this Policy or as approved by the Board, any Board level communication, commitment(s) by any other person to shareholders, institutional investors or any other stakeholder shall not be recognized by the Board and the Company.

12. CRISIS COMMUNICATION


12.1A crisis is a situation in which events beyond Seplat’s control threaten to damage Seplat’s relations with its stakeholders, or its reputation, financial position, or other vital interests.

12.2 The aim of communicating in a crisis is to ensure efficient, effective, and consistent engagement with internal and external stakeholders. Other details of crisis communication are outlined in the Company’s Emergency Response Plan.

12.3 Identifying the Crisis: All business units must immediately inform the Director, External Affairs and Social Performance and Head of Investor Relations on any reputational/operational matters likely to be important to Seplat. These include those matters which could impact brand reputation/image or the Company’s operational performance, such as:

- a. Oil spills and other major environmental hazards.
- b. Kidnapping of members of its Workforce.
- c. High impact security challenges.
- d. Community unrest.
- e. Natural disasters and their impact on Company installations (pipelines, plants, oil rigs, & other equipment).
- f. Major personnel changes, operating procedures, products, or policy involving or affecting Seplat.
- g. Public statements, publications, or coverage relating to government actions or investigations affecting Seplat.
- h. Major shutdown of facilities.
- i. Major disruption of production.
- j. Financial or accounting discrepancies or irregularities.
- k. Leaks, Rumors, and Press Speculation.
- l. Decline of approval of major projects or delay in approval of projects that could necessitate:
 - i. Litigation
 - ii. Withdrawal of licenses
 - iii. Fine or other penalty by regulatory or supervisory agencies
 - iv. Divestment by shareholder(s)
 - v. Sharp fall in market price of crude oil
 - vi. Other important matters that may impact the Company.

12.4A crisis is liable to materially impact the Company’s prospects, valuation, and/or ability to operate. As such, with Seplat being a listed company, a crisis should be expected to trigger


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timely disclosure of a regulatory nature, as discussed in section 6.0.

12.5 Handling Reputational Crisis: The Crisis Management Team (CMT) is responsible for examining, reviewing, and advising on appropriate crisis communication response. More information about the CMT can be found in the company’s Emergency Response Plan

12.6 Procedure for Crisis Notification

- a. **PRE-CRISIS:** The Directorate Heads/General Managers of all Seplat functions should notify the Director, External Affairs and Social Performance of any perceived or potential crisis or a set of circumstances that may result in a crisis and the Director, External Affairs and Social Performance should immediately appraise and monitor the situation to determine whether there is indeed a serious threat of a crisis.
- b. **CRISIS:** Upon confirmation that a crisis has developed or is in the early stages of development, the Director, External Affairs and Social Performance shall immediately notify the CEO. The CEO directs the Crisis Management Team (CMT) Lead to convene a meeting of the CMT to enable a review of the situation and formulation of appropriate communication plans. In carrying out their task under this clause, the CMT may, depending on the nature of the Crisis:
 - i. request the Director, External Affairs and Social Performance and any other member of the CMT in conjunction with any identified key business managers to investigate the facts surrounding the crisis and, on a worst-case basis, assess the damage and advise the CMT on the following:
 - the cause of the crisis.
 - the severity and breadth of the crisis.
 - the impact on the company’s stakeholders.
 - the impact on the company’s operations; and
 - any further development to guide the CMT on the proper response from the company.
 - ii. The CEO (or his designate) shall immediately notify the Board that a crisis has developed or that it is in the early stages of development and shall keep the Board duly informed of the developments during any crisis to enable the Board to monitor the crisis, determine its level of involvement in the company’s response, and provide input as appropriate.
 - iii. The CEO shall, at its discretion, and depending on the nature of the crisis, determine the persons to be involved. In this regard, the CEO may request certain persons originally involved in a crisis to be recused and substituted with other representatives of key operational departments. He may also, in reasonable exercise of this discretion, identify external advisors, including but not limited to legal experts, accountants, and public and investor relations consultants who may be retained as part of the larger CMT.
 - iv. Notwithstanding the foregoing, the CEO shall have the final authority to decide and approve all actions prior to their execution by all persons involved, including matters

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pertaining to all regulatory and other disclosures.

- v. the Director, External Affairs and Social Performance continuously appraises the situation and with approval of the CEO, could undertake media engagement as deemed appropriate with managing the situation.
- c. **POST CRISIS:** The CMT shall conclusively confirm the resolution and/or abatement of the crisis. Depending on the nature of the crisis, the Director, External Affairs and Social Performance shall put out a notification in the media on its resolution and send internal communication to all members of the Workforce. Lessons learned from the crisis shall be registered in the Knowledge Sharing Information (KSI) Template.


12.7 Communicating During the Crisis

The Director, External Affairs and Social Performance shall, on the advice of the CEO, notify the Board (through the Director Legal/Company Secretary), management, staff, and external stakeholders on the progress of the crisis.

- a. **Regulatory Notifications:** If the CMT considers the crisis may trigger regulatory disclosure, the Director, External Affairs and Social Performance, shall immediately work with the Director Legal, CFO, and Head of Investor Relations to align all communication requirements. In a crisis where there are material implications for the Company’s personnel, operations, and valuation, any initial and subsequent information will need to be disclosed through the formal regulatory channels prior to being disclosed to outside parties such as the media. Any regulatory announcement must have the prior approval of the Crisis Manager and the CFO.
- b. **Other Notifications:** The Director, External Affairs & Social Performance is authorized to manage the media and urgent enquiries and requests for information as may be required from any team set up to manage the crisis. In addition to media enquiries, there are likely to be enquiries from shareholders, analysts, and regulators. These will be directed to the CFO and/or Head of Investor Relations who are authorized to respond, if appropriate and in compliance with the Company’s regulatory disclosure obligations.
- c. Any other crisis management process in the Company requires that the External Affairs and Social Performance and Investor Relations functions continue to be appropriately briefed in conjunction to ensure that as any situation develops or new information becomes available, this is reviewed in the light of the Company’s regulatory disclosure obligations (outlined in Section 6.3) and an optimal communications strategy can be formulated encompassing all appropriate stakeholders.
- d. During a crisis, the official spokesperson shall be only one of the Authorized Spokespersons in Section 6.2 above.

13. THIRD PARTY ANNOUNCEMENTS, ENDORSEMENTS AND USE OF SEPLAT’S LOGO

13.1 Business partners, organizations, or businesses external to Seplat may need to issue a statement that promotes a business relationship or identifies a partnership with Seplat at any time.

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13.2 Such announcements that would include the name or logo of Seplat by third parties will require advance approval from the Director, External Affairs & Social Performance, or her authorized delegate. The relevant heads of business units will be expected to provide a justification or the business rationale for the request by the third party. Working with the third party, the External Affairs and Social Performance team will help to determine the appropriateness of the publication or press statement and a plan for the external distribution of the information.

13.3 Generally, Seplat does not approve the use of its name, logo, or statements by the Workforce or third parties in the Company’s corporate documentation without prior written permission from the Director, External Affairs & Social Performance. The Workforce is advised to refer all requests from third parties to use the Company logo, statement, or material to the Director, EA & SP, or her authorized delegate, who will provide guidance on the correct use of Company collateral and review its suitability.

14. GUIDELINES FOR BRANDING & COLLATERAL

The name, logo, and all the other elements of Seplat’s corporate identity are the foundation for expressing or communicating our brand. The use of the Seplat logo or other elements of our brand identity will be carefully guided and scrutinized to ensure brand consistency and recognition, enhance our reputation for quality and excellence while communicating our commitment to building a world-class company. Therefore, the use of our logo or any of the other elements in branding and collaterals including but not limited to stationary, clothing, vehicles, and machinery must be approved in advance by the External Affairs and Social Performance Department.

Should there be a need for use of the approved artwork, the Workforce and business partners are expected to maintain the integrity, proportions, and design integrity of the logo as approved. Where in doubt, Workforces must seek the guidance of the External Affairs and Social Performance Department to ensure the use of the Seplat logo conforms to approved branding guidelines.

15. EMAIL SIGNATURE


The Workforce is expected to use a uniform email signature using Calibri font type size 11, as formatted below:



John Smith
Payroll
Human Resources
Seplat Energy Plc
Head Office: 16a Temple Road
(Olu Holloway) Ikoyi, Lagos, Nigeria.
Phone: +234-1-2771235 Ext: 45678
Email: jsmith@seplatenergy.com
<https://seplatenergy.com>






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16. VIOLATION OF POLICY

Violation of this Policy, intentional or unintentional, can have materially adverse consequences on the Company and any Workforce involved. Therefore, violations of this Policy will result in disciplinary action up to and including termination of employment. Violation of this Policy may in certain circumstances also constitute a violation of applicable law which could result in civil or criminal prosecution by governmental or regulatory authorities.

17. WAIVERS AND CLARIFICATIONS


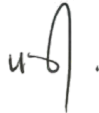
Some aspects of this Corporate Communications Policy, other than those relating to the handling and disclosure of Material Information (section 6.0), may be waived conditionally on a case-by-case basis in exceptional circumstances with written approval from the Chief Executive Officer. All requests for exceptions/exemptions should be directed to the Director, External Affairs & Social Performance. If approved, these exceptions will be recorded by the External Affairs and Social Performance Department.

The Workforce is encouraged to seek clarifications on any aspect of this Policy by contacting a member of the External Affairs and Social Performance Department.

18. AMENDMENTS

This policy will be reviewed by the Board annually and at such other times as circumstances may require. This policy may only be amended, or its requirements varied, in relation to individual circumstances, with the approval of the Board.


This policy has been approved by the following authorised individuals:

Name	Title	Signature	Date
Roger Brown	Chief Executive Officer		
Udoma Udo Udoma	Board Chairman		

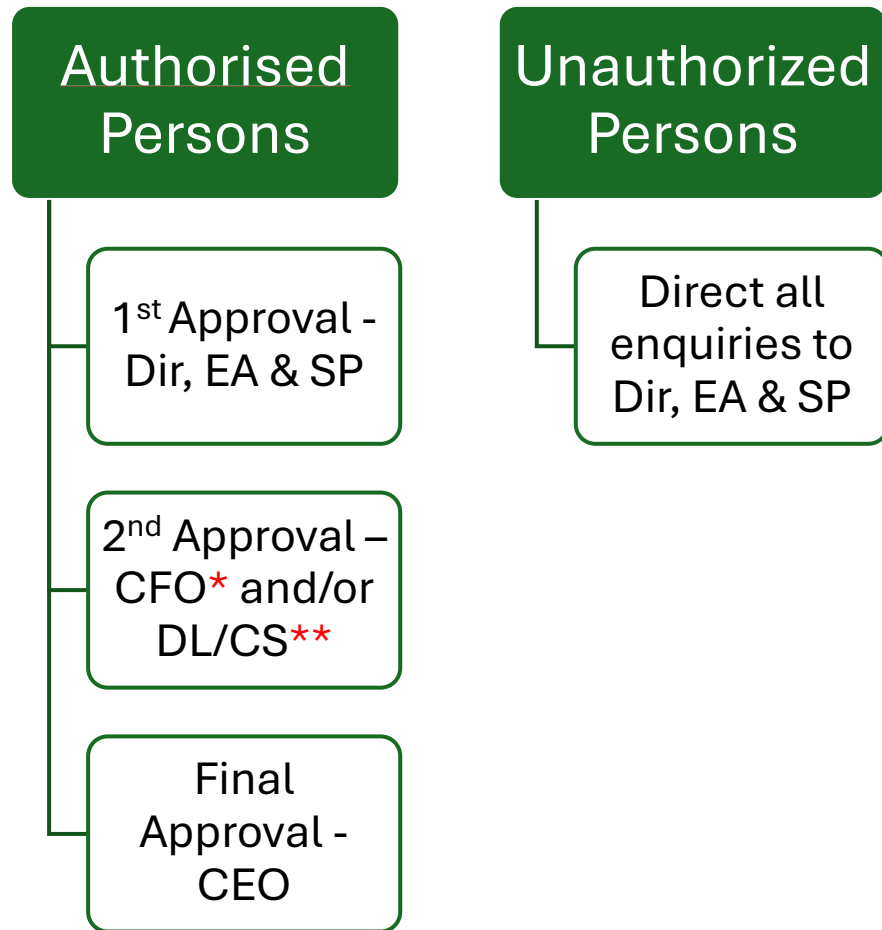
Contact Information

For any questions or clarifications regarding this policy, please contact:

- **Department:** External Affairs and Social Performance
- **Email:** corporateaffairs@seplatenergy.com

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APPENDIX 1
APPROVAL WORKFLOW FOR MEDIA AND OTHER ENQUIRIES



* Applies to regulatory announcements to be made on the Exchanges and other disclosures in response to leaks and rumours.

** Applies only to regulatory announcements to be made on the Exchanges, formal letters to regulators, and statements that have legal implications or obligations to Seplat.

APPENDIX 2
APPROVAL WORKFLOW FOR CAPITAL MARKETS DAY AND INVESTOR ENQUIRIES

