

# NETWORK MOVEMENT FOR DEMOCRACY AND HUMAN RIGHTS (NMDHR)

## ***COMMUNICATION POLICY***



2023



148 Circular Road, Freetown

## Table of Contents

1. Summary .....	2
2. Scope and Objective .....	2
3. Principles .....	3
3.1 Responsibility and spokespersons .....	4
3.1.1 External communication.....	4
3.1.2 Internal Communication.....	5
4. Breaches against the policy – Speak up .....	5
5. Roles and Responsibilities .....	6
6. Framework.....	6
7. Policy Review .....	6

## **1. Summary**

The objective of this Communication Policy is to contribute to a correct and long-term effective exchange of information within NMDHR and its employees and between the organization and the organizations' external stakeholders. Communication in accordance with the Communication Policy contributes to increased confidence in management, employees and Board of Advisors and enhances knowledge of the organization's profile, goals and objectives. It further ensures consistent communication with the operating environment in accordance with the organizations' strategies. Information within NMDHR is ultimately intended to support the organizations' vision, mission and strategies. In addition, it should strengthen NMDHR's reputation and brand and counteract the risk of a decline in trust.

NMDHR's Communication Policy has been established by the Board of Directors in accordance with applicable listing requirements with a view to meet legal requirements and to comply with applicable stock market regulations.

## **2. Scope and Objective**

This Policy is valid for all NMDHR registered partners, its donors/supporters, and joint operations (jointly "NMDHR") and applies to all employees, as well as consultants, interns and volunteers who work at NMDHR premises or under the direction of NMDHR (all referred to in this policy as "employees").

This Policy provides an overview of NMDHR's principles covering both external and internal communication to make sure it is performed in a coordinated, efficient, and professional manner. To support the organization internally in communication, two supporting directives have been developed as part of this overall Communication Policy. Also, matters of inside information are addressed by NMDHR's Insider Policy.

All employees and members of the Board are expected to follow this Policy as well as applicable directives in all communication, internally and externally.

### 3. Principles

The Communication Policy applies to all *written* statements in annual reports, interim reports, press releases, letters to shareholders or employees, statements from management, information on the Organisation's digital communication platforms, information in public registers and other content in both external and internal communications.

The policy also covers all *verbal* statements at group or individual meetings with analysts and investors, telephone conversations with analysts and investors, speeches by organisation management, interviews with the media and at press conferences, and all other external or internal communications and statements that are to be executed.

In all situations where any form of communication is to take place, regardless of whether it is through written or oral communication and regardless of choice of medium and recipient, it must be considered how the communication affects the organisation as a whole. All persons must in each situation evaluate the impact and consequences of the communication. When handling inside information, each person has an independent responsibility to ensure that they comply with relevant rules and requirements.

The guiding principles for NMDHR's communications are to:

- a. Communicate in an open, reliable, well-structured, and transparent way, both internally and externally.
- b. Treat all stock market stakeholders equally.
- c. Disseminate all inside information timely and accurately.
- d. Fulfil legal requirements and comply with applicable stock market regulations.
- e. Uphold a high level of ethics.
- f. Ensure the reliability of information by maintaining specific communication channels and procedures.
- g. Ensure a consistent and aligned communication to protect and promote our organisation image and business in a proper and consistent manner.

## 3.1 Responsibility and spokespersons

### 3.1.1 External communication

- A. **The Board of Advisors** is ultimately responsible for NMDHR's strategy and organization and shall ultimately monitor the administration of and compliance with the Communication Policy.
- B. **The Chairman of the Board** is the Board's spokesperson and responsible for issuing statements to NMDHR's external stakeholders. The Chairman of the Board may also issue statements on issues related to the organizations' business of operations. Other Board members must refer such matters to the Chairman of the Board or the Executive Director.
- C. **The Executive Director** is ultimately responsible for all matters of communication. The Executive Director has ultimate responsibility for contacts with the media and is the primary spokesperson for all issues concerning the organisation. The Executive Director may delegate the role of spokesperson as well as strategic and operational implementation of communication activities to other employees. In the first instance such delegation is to the Programmes Director, who in turn can further delegate.
- D. **Communications Consultant** is responsible for planning, coordinating, steering and implementing communication in accordance with this Communication Policy.
- E. **The Finance Manager (FM)** is responsible for all information about and related to the organisation's financial position and results in press releases, financial reports and other information material. The FM is responsible for preparation of financial information in interim reports, financial statements and annual reports. The FM is responsible for remaining continuously up to date with the legal and stock market requirements applicable to the organisation's communications. The FM shall in cooperation with the Executive Director and the Programmes Director, ensure that NMDHR performs its communications obligations in accordance with the applicable laws and stock market regulations, including the listing requirements and generally accepted stock market practice. In so far as the FM deems necessary, the FM shall seek legal advice to ensure such compliance.
- F. **The Programmes Director** leads the communications and is responsible for planning and steering of all of NMDHR's communication.

None of the organisation's employees are authorized to speak on behalf of NMDHR regarding financial and share-price sensitive matters unless he or she has been appointed to do so by the Executive Director or the Finance Manager in relation to the financial position.

- A. **Other members of the NMDHR Executive Team** are responsible, in their respective areas, for adapting and following the principles of the Communication Policy, as well as for

ensuring that the information used in the communication within their respective area is correct, relevant, clear and not misleading.

External communication relates to communication that is intended to reach one or more target groups outside NMDHR, such as the media (which is both a channel and a target group), customers, existing and potential investors, the capital market, authorities and the general public. The mission of NMDHR's external communication is to support the business in reaching its overall objectives by developing and maintaining good relations with important stakeholders and by increasing knowledge and awareness of the organisation and its operations.

All handling of inside information are encompassed by the specific rules set forth in NMDHR's Insider Policy. In addition, the External Communication Directive contains certain routines for disclosure of inside information. These routines constitute a complement to, and are subordinated, the rules on handling of inside information in the Insider Policy.

Only spokespersons appointed in section 3 have a mandate to make official statements on behalf of NMDHR and/or its subsidiaries and joint operations within the individually defined areas set forth in the section.

### **3.1.2 Internal Communication**

The mission of internal communication is to support NMDHR in realizing its objectives by providing employees with information about NMDHR's objectives, strategy, operations, results as well as how to realize these objectives. The internal communication is limited by the rules of disclosure of inside information described in NMDHR's Policy, which means that information constituting inside information cannot be communicated freely internally.

Internal communication is directed primarily to NMDHR's employees. This audience can be divided into two subgroups:

- managers and/or other key employees.
- all employees

Considering the limitations stated by the rules of inside information, NMDHR's employees must secure a continually open and interactive flow of information at and between each organizational level, supported by adopted procedures and flexible and adequate channels.

## **4. Breaches against the policy – Speak up**

Do not hesitate to raise a concern. Any NMDHR employee who suspects violations of this Policy is expected to speak up and raise the issue to their line manager, Human Resources, to the Executive Director, or to use the Speak-Up Line. The Speak-Up Line is available on NMDHR internal and external webpages.

At NMDHR, we do not accept any form of retaliation against someone who speaks up, expresses concerns or opinions.

## 5. Roles and Responsibilities

All NMDHR employees are individually responsible for reading, understanding, and complying with this Policy. Each employee is responsible for acting in accordance with this Policy, every line manager is responsible for making sure each team member has access to this Policy and related Directives.

Violations against the Policy can lead to disciplinary action, up to and including termination.

## 6. Framework

This Policy is part of NMDHR's Governance Framework, which includes:

- Code of Conduct, Our Cultural Values, Strategic framework, Policies approved by the Chairperson of the Board of Advisors, Directives approved by the Executive Director.
- Decisions made by the Executive Director or otherwise under the Delegations of Authority as approved by the Board of Advisors.
- The Management team is responsible for ensuring that the latest version of this Policy is published and available to all employees on the NMDHR.
- This Policy will be reviewed every other year or as needed.
- The original language of this Policy is English.

## 7. Policy Review

NMDHR aim is this policy will be reviewed every three years or potentially sooner if in response to any applicable

Reviewed Date	31 <sup>st</sup> June 2023
Next Reviewed Date	31 <sup>st</sup> May 2026

If you have any questions or concerns, please just contact us via [habib@nmdhr.org](mailto:habib@nmdhr.org) or +23276410137, we will be more than happy to help.

### Sign off:

Name: Abdul Karim Habib



Designation: Executive Director.

Name: Nancy Diana Sesay

A handwritten signature in black ink, appearing to read "Nancy Diana Sesay".

Designation: Board Chairperson