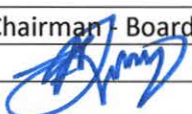




## SEYCHELLES PENSION FUND

Title	Corporate Communications Policy
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# SEYCHELLES PENSION FUND

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## Corporate Communication Policy

Caravelle House  
Victoria

Phone: 429 46 50  
Email: [info@spf.sc](mailto:info@spf.sc)

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# Corporate Communications Policy

## 1.0 POLICY

This Corporate Communications Policy ("Policy") sets out the guidelines governing communication with the internal and external stakeholders of Seychelles Pension Fund, ("SPF").

## 2.0 DESCRIPTION

This Policy is part of SPF's Corporate Policies. It outlines the guidelines governing internal and external communications in SPF.

## 3.0 DEFINITIONS

For purpose of this Policy, the following definitions apply:

- a) "Authorized Persons" are (i) Chief Executive Officer (CEO); (ii) Chief Operations Officer (COO); (iii) Chief Pension Administrator, (iv) Head of Corporate Communication Section (HCC), (v) SPF's Information Officer, and (vi) other individuals specifically approved by the CEO from time to time for specific kinds of communications on behalf of SPF or its subsidiaries. Authorized Persons are also those whose communication with SPF's employees and external stakeholders fall within their approved job descriptions and contracts
- b) "Information" is any information, in any form, about SPF, including its operations, investments, projects, products, services, finances, financing plans, employees, Members and other business relationships.
- c) "Confidential Information" is any information:
  - that has not been made publicly available by SPF,
  - that are prohibited from being disclosed in accordance with section 12 and 60 of the SPF Act, 2005, and
  - of third parties that the SPF is obligated to keep confidential, and protected under any signed non-disclosure agreement or other agreement, and in accordance with the Access to Information Act 2018 and any amendments thereof
- d) "External Communication" is the dissemination of information to external stakeholders
- e) "External Stakeholders" includes, but is not limited to, Regulators, Government and other Authorities; SPF Members; Issuers; Partners; Press Media; Service Providers; the general public, and any other future persons SPF engages with.
- f) "Internal Communication" is the dissemination of information to internal stakeholders
- g) "Internal Stakeholders" refer to SPF's employees, Management, and Board of Trustees

h) “Press Media” are SPF’s media partners that focus on delivering news to the general public or a target public. These include print media (newspapers, news magazines), broadcast news (radio and television), and the Internet (online newspapers, news blogs, social media outlet, online platforms, mobile applications, etc.)

#### **4.0 PURPOSE**

The purpose of this Policy is to define and provide guidelines on the extent, quality and output of communication with SPF’s external stakeholders and on the adherence to and quality of internal communications in line with SPF’s approved Standards, as required in its Act, Regulations and Internal policies and procedures.

#### **5.0 POLICY STATEMENT**

SPF is committed to the dissemination of timely, accurate and quality information to its internal and external stakeholders. All internal and external communications are required to ensure achievement of SPF’s vision, mission, core values and objectives, and should be in line with its approved Strategic Plan. All communication should be in line with SPF’s approved standards as required in its Act, Regulations and Internal policies. Only Authorized Persons are permitted to undertake SPF’s internal and external communications.

#### **6.0 GUIDING PRINCIPLES**

SPF recognizes that active communication with different stakeholders and the general public is an integral part of its objectives. In order to reach its overall goals for communication, the following guiding principles should always be adhered to:

- a) Only Authorized Persons shall be permitted to have formal engagements, on any issues relating to SPF, with external stakeholders via media engagements and press releases
- b) All information must be conveyed through the appropriate and approved communication channels to SPF’s stakeholders in a timely manner. All requests for information by stakeholders shall be responded to by the relevant Section without unnecessary delays. A turnaround time of two (2) working days shall apply to all requests; except, where the requested information may require more time to be addressed. In all cases, an acknowledgement of the request for information made must be delivered within the stipulated time period in accordance to the Access to Information Act 2018 and any amendments thereof.
- c) As a supervised and regulated organisation, all information disseminated to stakeholders shall be accurate, transparent and open as possible, while considering the legal obligation of SPF to protect its confidential information.



- d) All Divisions / Sections shall proactively develop contacts with its target stakeholder groups and ensure timely, open and constant communication, whilst ensuring that it is conveyed through the appropriate and approved communication channels
- e) All communication must be clear, concise and intentional
- f) Regular feedback is encouraged from all SPF stakeholders and will be applied towards ensuring better service delivery
- g) All SPF communication must be consistent, in style and message, to build stakeholders' trust

## **7.0 GUIDELINES FOR EXTERNAL COMMUNICATION**

The support and participation of SPF's external stakeholders are crucial to its long-term success and is therefore always desired. All communication to external stakeholders should be anchored on this premise and aimed at making the stakeholders feel involved and not alienated. External communication should also promote overall knowledge and awareness of SPF, its markets, products, services etc., among the different external stakeholder categories.

All external communication must be approved by HCC, through COO. The CEO (or acting CEO) shall approve all formal communication with government representatives and SPF's regulators, as well as confidential or sensitive information that may be required to be provided under the Laws of Seychelles or by the Court.

All presentations/materials for external use must be reviewed by HCC in conjunction with COO prior to exposing these documents to the stakeholders to ensure brand compliance and accuracy of information related to SPF. This includes presentations to external stakeholders at meetings, seminars, conferences, etc. and materials to be uploaded to the online platforms.

Exceptions may exist in situations where such information required to be communicated externally falls under the mandate of the Board of Trustees and its Committees. In such cases, the Chairman of the Board shall approve all communications.

SPF's relationship with the Press Media, particularly business reporters, is at the heart of its success. The press media, which serves as the medium through which SPF reaches its external stakeholders, is accorded high priority in SPF. As such, communication with press media is to be handled with the highest levels of sensitivity and professionalism and must always be handled by HCC as this is the approved Section for communication and interface with the press media. Only authorized persons shall be permitted to grant interviews of any sort (e.g. print, TV, online) and be quoted with respect to SPF's external communications.

The most common external communications through press releases, press conference and through online platforms. Therefore, below are specific guidelines for these forms of communications:

### **A. Press Releases procedures**

SPF uses press release commonly to inform stakeholders of one specific issue which is being targeted to be communicated to all press media. The issuance of a press release is not necessarily followed by an interview or press conference. The internal initiation of a press release should

usually be from the head of a particular section working on a particular issue that needs to be informed to stakeholders, to Corporate Communications.

- i. *Content* – The press release should have a clear message expressed simply and concisely. The aim is to ensure that readers will understand the purpose and objective of SPF and the gist of the announcement being made by the end of the opening paragraph. It is imperative that all contents are proof read before submitted to stakeholders to maintain the SPF's credibility.
- ii. *Pictures* - all visual aids posted with a press release should be related to the press release and approved by HCC
- iii. *Legal* – When drafting a press release, it is imperative that checks are being done on ensuring that all information used in the press release is accurate and up-to-date and that any professional claims can be substantiated. Additionally, no confidential information under an agreement, or the law of Seychelles should be issued in a press release.
- iv. *Format* – Corporate Communications shall issue separate guidelines for formatting of all press release from SPF to ensure uniformity.

#### **B. Press conference procedures**

A press conference may be conducted, in the event that a press release is not sufficient and there is a need to give more detailed information to stakeholders and to receive and answer questions. A press conference may be a planned event or one called at short notice in response to a recently submitted press release or in the case of an emergency.

- i. *Pre-preconference preparation* – HCC shall ensure that all a preliminary meeting is held with all speakers attending a press conference and representative of SPF's senior management for preparation reasons
- ii. *Selection of moderator* – HCC shall ensure that a representative of Corporate Communication Sections shall be appointed as a moderator for each press conference to be undertaken.
- iii. *Inviting Journalist* – It is the responsibility of the HCC to send out invitations to press media accordingly, from pre-existing list of media houses and journalists.
- iv. *SPF speakers* - Press conference involves a maximum of three representative of SPF. The selected speakers should be:
  - appropriate for the subject at hand,
  - charismatic, articulate and authoritative,
  - already briefed on the issue to be discussed
  - prepared in advance especially on how to answer difficult questions
- v. *Content* - and would cover a wide variety of topics. This would take place following issuing press release.
- vi. *Allocated timing* – A press conference shall be not more than 45 minutes in total including questions and answers. Any presentations in a press conference shall not take more than 4 minutes.
- vii. *Appropriate days* - Tuesdays Wednesdays and Thursday are ideal days as they are slower news days, unless it is an emergency.

#### **C. Online communication procedures**

Currently, SPF's main source of external communications online is through the SPF's website and Facebook page. SPF is also aiming to expand into other online platforms and provide constant



updates online. This will be done in accordance with its Digital communication plan and Social media communication plan. In ensuring that such communications are effective:

- i. All press release and conference will be submitted through online means
- ii. Proactive actions such as social listening to monitor and track social conversations on social media relating to SPF's services and products and prepare for external communications to address these.
- iii. Content for online submission should receive approval of HC

## **8.0 GUIDELINES FOR INTERNAL COMMUNICATION**

SPF's internal communication is targeted at all its internal stakeholders, towards the achievement of its overall objectives. Furthermore, internal communication is aimed at strengthening the organizational culture and feeling of commitment among the internal stakeholders, thereby increasing active participation and team spirit.

Internal communication shall be handled by the Sections responsible for such correspondence, including CEO, COO, Corporate Communications, Human Resource and Administration Division (HRA), Business Development, Secretariat to the Board of Trustees, depending on the type of information to be communicated.

Communication between and amongst SPF employees must be professional at all times. SPF employees are to be addressed by either their first names, surnames or by their initials in all written communications, except letters which must bear the full name of the employee. The use of nicknames or any other names is strictly prohibited in all forms of written communications.

## **9.0 DISCLOSURE OF CONFIDENTIAL INFORMATION**

SPF is committed to providing timely, accurate, and complete disclosure of its basic organisation information in an appropriate manner. Disclosure of confidential information is however strictly prohibited, in accordance with, section 12 and 60 of the SPF Act, 2005; some Non-disclosure agreements and other agreements with third parties and the SPF's Confidentiality and Non-Disclosure Agreement which is signed by all SPF employees upon assumption of duty. Violation of this Agreement may result in legal redress by affected parties or the public in general.

## **10.0 PUBLIC STATEMENTS OF PERSONAL OPINION**

SPF's employees should refrain from making public statements of personal opinion regarding SPF and its operations, or represent SPF under their personal names on social media outlets. Such public statements may include quotes given to media, contribution to blogs, published articles, etc. Any such public statements made on behalf of SPF must be approved by the CEO before publication.

## 11.0 STAKEHOLDER COMMUNICATION CHANNELS

No.	Stakeholders	Communication channel(s)
1.	Members	Information Sessions, Workplace clinics, Outreach programs, trade shows, online platforms, letters, email correspondence, telephone, AGMs, newsletter, media publications/interviews, corporate presentations, speeches, other publications, brochures, leaflets and advertisement
2.	General Public	Publications, road shows online platforms, media publications/interviews, press releases, investor presentations, other publications, brochures, leaflets, advertisement, letters, email correspondence, and telephone
3.	Regulators Government and Authorities	Meetings, knowledge sharing sessions/Seminars, visits, online platform, AGMs, newsletter, media, market reports, publications, Annual Report), brochures, leaflets and presentations, letter, email correspondences
4.	Media	Press releases, interviews, speeches, workshops/seminars/ AGMs, online platform
5.	Staff	Intranet, emails, debriefings and information sessions, staff meetings, online platform, letters, team building sessions, telephone
6.	Board of Directors	Email, letters, Board and Committee meetings, telephone

## 12.0 GUIDELINE TO APPROACH PARTNERSHIP AND SPONSORSHIP

The following guidelines states the approach to Partnership and Sponsorship from a Communication perspective, specifically designed for SPF. These are as follows:

- Partnerships for SPF program development may be pursued through encouraging the development of programs which are beneficial for SPF, its members, stakeholders and potential partners.
- Partnership may include current or future Governmental and non-governmental organizations, as well as private institutions and any such communication should read '*in partnership with*', or '*in association with*'
- Advertisements are one type of benefit that may be offered to a partner in exchange for in-kind partnership, taking into consideration that all advertisements done by SPF should be socially responsible and follow strict ethical standards