



STAKEHOLDER POLICY

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1.0 INTRODUCTION

The charters, policies and corporate values of Lukefield Finance Limited express the Company's intention to create sustainable value for Stakeholders related to its business activity and institutional reality. Lukefield Finance Limited acknowledges that it is not entirely possible to achieve social interest and develop a responsible and sustainable business model without the strong engagement of its Stakeholders.

The Company therefore commits to involving Stakeholders in its day-to-day activities, whether directly or in cooperation with other organizations, including the promotion of diversity/equality and the encouragement of innovation.

2.0 DEFINITION OF TERMS

S/N	TERM	DEFINITION
1.	Company	Lukefield Finance Limited
2.	Stakeholders	<p>Individuals, groups, and organisations that directly or indirectly engage with and affect the Company, as well as the individuals, groups and organisations that the Company affects.</p> <p>The Company’s stakeholders include:</p> <ul style="list-style-type: none"> • Its customers and partners (Business partners, customers, and market participants) • Employees (Employees and their representatives) • Investors and Stakeholders • Regulators (Central Bank of Nigeria, FHAN, NFIU, FRC, and other relevant law enforcement agencies) • Community/Environment • The General public

3.0 OBJECTIVES

The objectives of the Stakeholder Policy (the “Policy”) are:

- a. To outline the Company's general principles and guidelines regarding its relations with stakeholders
- b. To ensure that stakeholder dialogue is handled in accordance with the principles outlined in the policy.
- c. To create long-term value for all stakeholders
- d. To welcome dialogue with all stakeholders regardless of their views and engage with them in an open and constructive manner
- e. To improve the level of confidence imposed on the Company by its stakeholders

4.0 SCOPE

The Stakeholder Policy is relevant to everyone (particularly those who have a stake in the Company and its activities) and outlines the principles for stakeholder engagement.

5.0 BASIC PRINCIPLES

Lukefield Finance Limited accepts and promotes the following basic principles to engage and establish business relations with its Stakeholders

- a. **Responsibility:** Stakeholders must act responsibly and build relationships based on ethics, integrity, sustainable development and respect for human rights and the society
- b. **Transparency:** Transparency must be ensured in relationships and financial and non-financial communications. Stakeholders must also ensure that they disseminate truthful, sufficient, relevant, complete, clear, reliable and useful information at all times
- c. **Active listening:** Stakeholders of the Company shall practice active listening, encourage bi-directional and effective communication as well as direct, fluid, constructive, diverse and inclusive dialogue
- d. **Participation and engagement:** The Company shall encourage the participation and engagement of Stakeholders in all of its activities and promote voluntary communication processes in the planning and executing of the Company's projects
- e. **Consensus:** Management shall work in agreement with the Stakeholders and ensure that their viewpoints and expectations are adequately taken into consideration
- f. **Collaboration:** Management shall ensure collaboration with Stakeholders in order to contribute to compliance within the mission and values of the Company
- g. **Continuous improvement:** the Board shall continuously improve and regularly review Stakeholder engagement mechanisms to ensure that they respond in the most efficient way possible to the needs of the Company at every point in time

6.0 STAKEHOLDER PRINCIPLES

- i. **Customers:** Customers are the focal point of the Company's business. This is because, satisfied customers are the foundation of long-term growth and profitability. It is therefore the Company's duty to:
 - a. Give its customers honest and clear advice based on individual situations and proffer solution based on an assessment of what is most sustainable and financially advantageous for the customer
 - b. Be a constructive and long-term partner for its customers and to include them in solutions and product development
 - c. Develop products and services that would support customers towards achieving sustainable progress

- ii. **Business Partners, Finance Associations, and other Market Participants:** The Company shall collaborate proactively with other industry players to provide shared solutions for its customers and the society at large. The Company shall:
 - a. Aim to be a transparent, credible, trustworthy and responsible representative of the sector
 - b. Collaborate with the objective of reaching shared goals for the benefit of its customers and the society at large
 - c. Be accessible and maintain professional relations with its stakeholders
 - d. Serve as a long-term partner, dedicated to bringing ideas and ambitions to life and support sustainable progress through its way of doing business

- iii. **Employees:** The Company's employees constitute a special stakeholder because their commitment, efforts, collective knowledge and performance form the basis of the Company's business and ability to create value for its customers, investors and the society at large. The skills, expertise and engagement of employees should be harnessed towards delivering world class customer services. Lukefield Finance Limited shall:
 - a. Build an engaging culture that nurtures potential
 - b. Ensure a workplace where employees thrive and are empowered to act according to organizational commitments
 - c. Embrace diversity and remain committed to maintaining an inclusive working environment
 - d. Foster productive dialogue between employees and the Company
 - e. Put policies in place to regulate the activities of employees and the Company

- iv. **Investors/Shareholders:** The continued support of investors and shareholders remains the foundation of business. Owing to this, the Company shall:
 - a. Timely notify investors and shareholders of any changes in the nature or state of the Company's business

- b. Seek and apply the opinion/input of investors and shareholders before taking major decisions which would affect the Company
 - c. Operate an open and transparent business that is easily accessible by investors and shareholders
 - d. Ensure a stable and diversified investor base
 - e. Make its expertise available to other stakeholders and create value for them through effective communication and collaboration
- v. Regulators:** As a duly licensed financial institution, the Company is bound by regulatory policies, laws and regulations. Management shall therefore:
- a. Ensure compliance with all regulatory requirements in line with designated time frames
 - b. Render regulatory returns to requisite authorities as and when due
 - c. Ensure the accuracy of information supplied to regulators and third parties
 - d. Protect the confidentiality of client information unless compelled by law to disclose same
 - e. Strive to ensure that the Company remains a credible expert/constructive partner in developing and implementing regulations
- vi. Community/Environment:** As one of its operating principles, Lukefield Finance Limited is committed towards the protection of the community/environment in which it operates and shall:
- a. Carry out its day-to-day activities in an eco-friendly manner
 - b. Support activities/organizations which advocate for a greener planet
 - c. Reduce its environmental impact to the most practical level
- vii. The General Public:** Since its inception, Lukefield Finance Limited has not only helped people and businesses achieve their individual and business goals but has evolved as a reflection of the society with wider contribution and engagement. The Company shall:
- a. Recognize the role/responsibility it plays in the society and actively contribute towards creating sustainable progress and development
 - b. Constantly strive to improve the trust imposed on it by members of the general public
 - c. Give back to the society through its Corporate Social Responsibility (CSR) activities

7.0 COMPLIANCE

- a. The provisions of this policy shall be observed by customers, employees, investors/stakeholders, regulators and the general public

- b. Compliance shall be mandatory and shall take effect from the date of issuance of the policy
- c. Lukefield Finance Limited shall host a copy of this policy on its website for ease of access by third parties
- d. The Company shall render annual returns to the Financial Reporting Council of Nigeria on the extent of its compliance with the provisions of this policy
- e. Failure to comply with the Stakeholder Policy is a serious violation and may lead to action being taken in accordance with the applicable regulation

8.0 REVIEW AND UPDATE

This policy shall be reviewed every three (3) years by the Audit Committee and appropriate recommendations (where necessary) shall be made to the Board for update.

Board Approval:

Name:	Signature:	Date:
Name:	Signature:	Date:
Name:	Signature:	Date:

Board Approval: (STAKEHOLDERS ENGAGEMENT POLICY)

Name: LOTA BOTANUWA Signature: [Signature] Date: 8/09/22

Name: Tayo Asuwo Signature: [Signature] Date: 8/7/2022

Name: Azubike Okunwo Signature: [Signature] Date: 08.07.2022

Name: Tunji Fabunmi Signature: [Signature] Date: 08/7/22

Name: Adeola Adeniji Signature: [Signature] Date: 08/07/2022

Name: Signature: Date:

Board Approval: (STAKEHOLDERS ENGAGEMENT POLICY)

Name: Olawale Amao Signature: [Signature] Date: 08/07/2022

Name:.....Signature..... Date.....

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