



CRUSADERSTERLING PENSIONS LIMITED
ANNUAL CORPORATE GOVERNANCE EVALUATION REPORT
FOR THE YEAR ENDED 31ST DECEMBER, 2021

TABLE OF CONTENTS	PAGE NUMBER
List of Tables	2
Summary	3
The objective of the Report	4
Terms of Reference	4
Methodology	4-5
The Company	5-6
Governance Overview	6- 17
Succession Plan	17
Auditors	18
Shareholding Structure	18
Investors Portal	18
Management Evaluation	18– 20
List of Company's Policies	20-22
Compliance	22

LISTS OF TABLES

List 1	Board Composition during the year ended December 31, 2021
Table 1.0	Record of Attendance of Board Directors' Meeting
List 1.2	Training of Directors in 2021
Table 1.2	Committee Allocation during the year ended December 31, 2021
List 2	Composition of the Board Risk Committee during the year ended December 31, 2021
Table 2.0	Attendance at the Board Risk Committee Meetings in 2021
List 3	Composition of the Board Audit Committee in 2021
Table 3.0	Attendance at the Board Audit Committee in 2021
List 4	Composition of the Board Investment Strategy Committee in 2021
Table 4.0	Attendance at the Board Investment Strategy Committee in 2021
List 5	Composition of the Board Governance Committee in 2021
Table 5.0	Attendance of the Board Governance Committee in 2021
Table 6.0	Shareholding Structure
Table 7.0	Company Policies

SUMMARY REPORT

This is to express a view about the activities of the Board of CrusaderSterling Pensions whether it is in line with the circular on Corporate Governance for Pension Fund Operators as issued by the regulator for the year ended December 31, 2021.

For the purpose of this report, this Governance code has been narrowed down to areas specified in the regulation with reference to Sections 2.10.2 Accordingly, the report will focus more on Board activities during the period, full Board and its Committees, description of Corporate Governance practices instituted by CPL within the reporting year. The report will express an opinion on the minutes of the Board and Board Committees, whether it complies generally with the circular on Corporate Governance as issued by the Commission.

This report will also express an opinion on Board members' attendance at meetings, whether they are well represented and whether their suggestions and decisions are carried out by the management.

The report is not an appraisal of the Board rather it is a review of the activities of the Board and to ascertain that the Company complies with the Nigerian Code of Corporate Governance 2018, PenCom's circular on Corporate Governance for Pension Fund Operators 2019 and other relevant code and regulations issued by the National Pension Commission within the period under review.

OBJECTIVE OF THE REPORT

The objective of the report is to review the activities of the Board of CrusaderSterling Pensions within the last twelve months in line with PenCom's circular on Corporate Governance 2019 and the Nigerian Code of Corporate Governance 2018.

TERMS OF REFERENCE (COMPLY AND EXPLAIN RULE)

Terms of reference include:

- To express an opinion as to whether or not CrusaderSterling Pensions complied with the provisions of the codes issued by the Commission, the Nigerian code of Corporate Governance 2018 and the laws of the Federal Republic of Nigeria.
- To express an opinion as to whether the Board of CrusaderSterling Pensions conducted its business in a transparent manner geared towards the growth of the company.
- To express an objective opinion on the accountability of the Board of CrusaderSterling Pensions as a whole.
- Explanation in instances where the Company failed to comply with the Code of Corporate Governance 2018 and PenCom's Circular.

METHODOLOGY

The methodology applied is a review of the minutes of the last four Board meetings and the respective Board Committee meetings to arrive at a conclusion whether it conducted its business in a transparent manner. The key ingredients include the following:

- Review of the minutes of the last four Board meetings.
- Review of the minutes of the four Board Committee meetings during the period.
- Identification of all the relevant compliance criteria in the Circular on Corporate Governance for Pension fund Operators (PFOs);
- Prepare structures in line with the review and draw appropriate conclusions.

The criteria examined include:

- Board composition
- Board Committee structure and details of their activities

- Induction and Training of Directors
- Board operations and responsibilities
- Regulatory compliance
- The Board Charter and Code of Corporate Governance
- The Code of Ethics
- The terms of reference of the Board Risk Management, Audit, Investment Strategy & Governance Committee AND
- Other relevant Policies of the Company.

THE COMPANY

CrusaderSterling Pensions was incorporated on the 12th of October 2004 under CAMA 2004 as a PFA to administer and manage pension retirement savings and contributions of employees in Nigeria in accordance with the Pension Reform Act (PRA) of 2014. CrusaderSterling was granted a license to operate as a Pension Fund Administrator by the National Pension Commission in accordance with the provisions of the PRA 2014. The management team is composed of professionals in financial matters, risk management, stock market, asset management, legal and pension administration. The company business is structured along Compliance, Financial Control, Internal Control, Investment, Contributions, Benefits Administration, Human Resources & Facilities, Information Technology, Marketing and Legal and Governance.

INTRODUCTION

Corporate Governance refers to the practice and process by which the businesses and affairs of the company are directed, managed and controlled to enhance long term shareholders' value through enhancing corporate performance and accountability, whilst taking into account the interests of other stakeholders.

The Board of Directors of CrusaderSterling Pensions Limited is responsible for the governance of the company which would be achieved through clearly specified Board functions and responsibilities.

As at the financial year ended 31st December 2021, the Board of Directors had put in place all necessary structures to ensure compliance with the Corporate Governance provisions as required by the Pension Reform Act 2014, Code of Corporate Governance for Licensed Pension Operators, The Nigerian Code of Corporate Governance 2018.

Board members understood their responsibilities and their performances were in line with the PRA 2014. Board meetings were efficiently managed with a focus on relevant and strategic issues affecting the Company. The members had equal opportunities and contributed objectively to do deliberation of the Board responsibilities as highlighted below:

- Routine responsibilities;
- Monitoring the performance of management;
- Review and approval of the yearly budget;
- Review and approval of the annual audit plan;
- Constant monitoring of the Company's 3-year strategy and the aligned IT strategy;
- Monitoring the activities of the Board committees;
- Risk management;
- Strategic responsibilities;
- Compliance;
- Transparency;
- Maintaining a healthy shareholders relationship;
- Paying attention to the environment in which the Company operates, occupational and community health and safety.

BOARD OF DIRECTORS

Board Responsibilities

The most significant duties and responsibilities of the Board are as follows:

Stakeholders' Interests

- (1) Directing and guiding the Company to ensure long term, sustainable, and adequate returns for all stakeholders including shareholders, contributors and regulators.

- (2) Constantly reviewing and monitoring Corporate Governance and ethics throughout the company.

Corporate Strategy

- (1) Reviewing, approving and constantly monitoring the Company's overall strategic plans and direction.
- (2) Deciding on the company's dividend policy.
- (3) Approving and reviewing all major investments and other strategic commitments.

The integrity of Financial Reporting

- (1) Reviewing the system, processes and internal control that ensure and safeguard the accuracy and integrity of the company's financial accounting records and reporting.
- (2) Monitoring and reviewing reporting to the shareholders, regulators, contributors and other stakeholders.

Internal Control Risk management and Compliance

- (1) Reviewing and monitoring the Internal Control and Risk management processes within the company to ensure that they are effective and comply with regulatory standards and prescriptions.
- (2) Ensuring that the regulatory compliance framework within the company operates at the optimum level all the time.

Performance

- (1) The setting, reviewing and challenging management on its business performances and result as against the Board approves budgets.
- (2) Ensuring proper accountability of the Senior Management Team for the financial results and general business performance of the company.
- (3) Ensuring that all business processes are adequately documented and constantly reviewed for continual improvement and to incorporate changes within the company in particular and the industry in general.

- (4) Reviewing and monitoring all Information Technology-based systems to ensure that they function optimally and that proper system controls are in place.

Conflict of Interest

The Directors of CrusaderSterling Pensions Limited have no interests that adversely influence the performance of their responsibilities. None of the directors had interests that might make it difficult for him to perform his responsibilities objectively in the period under review.

The Board also reserved for itself certain powers, duties, and responsibilities and delegate authority and responsibility to the MD/ CEO for day to day running of the company. The Board is specifically responsible for considering and approving funding, capital expenditure, senior management recruitment benefits and marketing expenditure.

The Chairman's Responsibilities include:

1. The Chairman must not only be effective but must also be seen to demonstrate effective leadership of the board.
2. The Chairman ensures that the relationships and communications with shareholders and other stakeholders are well managed.
3. He ensures that the relationships and communications within the Board are constructive.
4. He ensures that the processes for setting the agenda is working and enables Board members to raise issues and concerns.
5. The Chairman guides the MD/CEO and he is always available for regular communication.

The MD/ CEO's Authority and Responsibilities include:

- (1) Day –to day management of the Company
- (2) Development and implementation of Board-approved strategies and initiatives to ensure the sustainability and growth of the Company.

- (3) Ensuring prudent management of the Company's finances and other resources-
From records cost containment is one of the strongest pivotal achievements of the MD.
- (4) The achievement of all approved business and operational plans and strategies within the framework of a comprehensive risk management structure.
- (5) Promoting and protecting the interest of the Company.
- (6) The development of all approved reporting procedures and mechanisms such that the Board is kept fully informed at all times.

List 1-Board Composition

- | | |
|------------------------|---|
| a. Mr. Oluwole Oshin | Chairman |
| b. Mr. Adeniyi Falade | Executive Director (MD/ CEO)Resigned effective from December 31, 2021 |
| c. Mr. Richard Asabia | Non-Executive Director |
| d. Dr. Femi Oyetunji | Non-Executive Director(INED) |
| e. Mr. Kunle Omilani | Non-Executive Director(INED) |
| f. Mr. Segun Oluyori | Non-Executive Director (NED) (Appointed 16 th July, 2020) |
| g. Mr. Conrad Ifode | Executive Director (Resigned effective from October 31, 2021) |
| h. Mr. Olufemi Odukoya | Executive Director (Appointed Ag.MD effective from January 1, 2022) |

The Board requires that all Directors possess the necessary qualifications and experience and are of unquestionable integrity and character.

The Board consists of the Chairman (Mr. Oshin) who is an industry leader with over thirty (30) years' experience and has at various times been a member of the Presidential Committee on Pensions Reforms and Chairman of the Nigerian Insurers Association, four other non-executive directors out of which two are Independent Directors and three executive directors including the Managing Director/ Chief Executive Officer.



All Directors have been approved by the National Pension Commission as “fit and proper” persons in accordance with the provision of the Commission's Guidelines on Appointment of Board and Top Management.

The Directors, who either currently occupy or have occupied a senior position in their respective fields of endeavour, bring to the Board a wide range of experience, skill and expertise. This contributes significantly to the proper functioning of the Board and dominating the Board's decision-making processes.

The roles of the Chairman and the Managing Director/ Chief Executive Officer are separated and defined. The Chairman is responsible for the Board leadership while the MD/ CEO is responsible for the day to day management of the company on the Board's behalf.

All Directors were also fully briefed and informed of all developments in the industry, especially with regard to regulatory pronouncements, prescription and legislative changes.

Board of Directors' Meetings

The Company has a structured time for all Board meetings. Directors are expected to effectively prepare themselves and to participate passably in all meetings of the Board.

The Board met four times (January 27, April 20, July 22, and October 21, 2021) during the year under review and the meetings were well attended by all Directors. All the Directors met the 50% attendance requirement for re-election consideration- as required and stated in paragraph 2.5.2 of PenCom's circular.

The quorum for Board meetings is clearly stated in the Memorandum and Articles of Association as well as the Board Charter and quorum was formed at the commencement of all Board meetings.

Table 1.0 Record of Attendance at Board of Directors' meetings

Directors	Jan 27, 2021	April 20, 2021	July 22, 2021	October 21, 2021
Mr. Wole Oshin	P	P	P	P
Mr. Adeniyi Falade	P	P	P	P
Dr. Femi Oyetunji	P	P	P	P
Mr. Richard Asabia	P	P	P	P
Mr. Kunle Omilani	P	P	P	P
Mr. Segun Oluyori (Appointed 16 th July 2020)	P	P	P	P
Mr. Conrad Ifode	P	P	P	P
Mr. Olufemi Odukoya	P	P	P	P

Note: P stands for present; A stands for absent.

All meetings of the Board were convened by giving sufficient and appropriate notice. Full agendas were prepared by the Company Secretary and were structured to assist the Board in achieving its varied responsibilities. The Board also received a full information pack ahead of Board meeting (s). This is expected to give maximum room for the review.

Minutes of all Board meetings were kept and signed by the Chairman before they were prepared in the Minute Book.

Society for Corporate Governance Nigeria was engaged and conducted the Board appraisal exercise for the 2021 financial year. The report of the evaluation has been forwarded to the Commission along with this report.

The Directors during the period attended training on Board Leadership & Governance and Anti-Money laundering aside other private training attended by each Director. The list of attendees is as stated below:

LIST 1.2-TRAINING: BOARD LEADERSHIP & GOVERNANCE TRAINING:

DATE: APRIL 8, 2021

VENUE: VIRTUAL

CORPORATE PERFORMANCE & SUSTAINABILITY: ROLE OF THE BOARD

ATTENDANCE:

1. Mr. Wole Oshin
2. Mr. Adeniyi Falade
3. Mr. Richard Asabia
4. Dr. Femi Oyetunji
5. Mr. Kunle Omilani
6. Mr. Conrad Ifode
7. Mr. Olufemi Odukoya

1.2 (b) THEME: TRAINING ON ANTI-MONEY LAUNDERING

DATE: AUGUST 5, 2021

VENUE: VIRTUAL

ATTENDANCE:

1. Mr. Wole Oshin
2. Mr. Adeniyi Falade
3. Mr. Richard Asabia
4. Dr. Femi Oyetunji
5. Mr. Kunle Omilani
6. Mr. Segun Oluyori
7. Mr. Conrad Ifode
8. Mr. Olufemi Odukoya

Board of Directors Committees

To effectively discharge its responsibilities and in accordance with the provisions of the revised Pension Reformed Act 2014, and Code of Corporate Governance for Licensed Pension Operators, the Board has established the following Committees and has adopted specific terms of reference setting out all matters relevant to the composition, responsibilities and administration of each Committee:

- (1) Board Risk Management Committee
- (2) Board Audit Committee
- (3) Board Investment Strategy Committee

(4) Board Governance Committee

TABLE 1.2 Board Members & Committee Allocation

S/N	NAME OF DIRECTOR	RISK MANAGEMENT	INVESTMENT STRATEGY	AUDIT	GOVERNANCE
1.	MR.RICHARD ASABIA		✓	✓	✓
2.	DR.FEMI OYETUNJI	✓			✓
3.	MR. KUNLE OMILANI	✓		✓	✓
4.	MR.ADENIYI FALADE	✓	✓		
5.	MR.CONRAD IFODE	✓			
6.	MR.OLUFEMI ODUKOYA		✓		
7.	MR.SEGUN OLUYORI	✓	✓	✓	

The Chairman Mr. Wole Oshin is not a member of any of the Board Committee. The Board Audit and Board Governance Committee are composed of only Non-Executive Directors.

- 2. Board Risk Management Committee** met four times (January 25, April 16, July 19, and October 18, 2021) during the year under review.

LIST 2.0 Members of the Committee

- (1) Dr. Femi Oyetunji -Chairman
- (2) Mr. Adeniyi Falade (Resigned effective December 31, 2021)
- (3) Mr. Kunle Omilani
- (4) Mr. Conrad Ifode(Resigned October 31, 2021)
- (5) Mr. Segun Oluyori

Table 2.0 Record showing Committee members and Attendance at Board Risk Management Committee meetings

Members	January 25, 2021	April 16, 2021	July 19, 2021	October 18, 2021
Dr. Femi Oyetunji	P	P	P	P
Mr. Adeniyi Falade	P	P	P	P

Mr. Kunle Omilani	P	P	P	P
Mr. Segun Oluyori	Appointed	P	P	P
Mr. Conrad Ifode	P	P	P	P

Note: P stands for present; A stands for absent

The members of the Risk Management Committee are well experienced to enable them to exercise adequate oversight on the operational, financial and strategic risk profile of the company. All reports were presented and reviewed by the Committee.

The duties and responsibilities of the Committee were fully documented in the Board Risk Management Policy as approved by the Board.

The Committee renders a report of its activities to the Board every quarter, same is always presented at the Board of Director's meeting.

Mr. Omilani and Mr. Oluyori are both members of the Board Audit Committee in compliance with paragraph 2.6.7.3 of PenCom's circular requiring at least one member having joint membership of both the Risk Management and Audit Committee. The Chairman of the Committee (Dr. Oyetunji) is an Independent Director in compliance with paragraph 2.6.7.4 of the said circular.

- 3. Board Audit Committee** met four times (January 25, April 16, July 19, and October 18, 2021) during the year under review.

LIST 3.0 -Members of the Committee

- (1) Mr. Richard Asabia –Chairman
- (2) Mr. Kunle Omilani
- (3) Mr. Segun Oluyori

Table 3.0 Record showing Committee members and Attendance at Board Audit Committee meetings

Members	Meeting of Board Audit Committee Members with the External and Internal Auditors without Management January 8, 2021	January 25, 2021	April 16, 2021	July 19, 2021	October 18, 2021
Mr. Richard Asabia	P	P	P	P	P
Mr. Kunle Omilani	P	P	P	P	P
Mr. Segun Oluyori	N/A	Appointed	P	P	P
Dr. Oyetunji	P	P	No longer a member	No longer a member	No longer a member

Note: P stands for present; A stands for absent, N/A stands for not applicable.

EXTERNAL ASSESSMENT OF THE EFFECTIVENESS OF THE INTERNAL AUDIT FUNCTION: The External Assessment of the effectiveness of the Internal Audit function was carried out by GOLDWYNS in December, 2021.

4. **Board Investment Strategy Committee** met four times during the year (January 25, April 16, July 19, and October 18, 2021).

Members of the Committee

- (1) Mr. Richard Asabia- Chairman
- (2) Mr. Adeniyi Falade-Resigned December 31, 2021
- (3) Mr. Femi Odukoya
- (4) Mr. Segun Oluyori

Table 4.0 Record showing Committee members and Attendance at Board Investment Management Committee meetings:

Members	January 25, 2021	April 16, 2021	July 19, 2021	October 18, 2021
Mr. Richard Asabia	P	P	P	P
Mr. Adeniyi Falade	P	P	P	P
Mr. Olufemi Odukoya	P	P	P	P
Mr. Segun Oluyori	Appointed	P	P	P

Note: P stands for present; A stands for absent

The Investment Strategy Committee's duties and responsibilities are documented in the Investment Policy as approved by the Board, as well as the terms of reference of the Committee.

5. Board Governance Committee met four times during the year (January 25, 2021, April 21, 2021, July 19, 2021 & October 4, 2021)

Members of the Committee

- (1) Dr. Femi Oyetunji - Chairman
- (2) Mr. Richard Asabia
- (3) Mr. Kunle Omilani

Table 5.0 Record showing Committee members and Attendance at Board Governance Committee meetings

Members	January 25, 2021	April 16, 2021	July 19, 2021	October 4, 2021
Dr. Femi Oyetunji	P	P	P	P
Mr. Richard Asabia	P	P	P	P
Mr. Kunle Omilani	P	P	P	P

Note: P stands for present; A stands for absent

COMPOSITION OF BOARD COMMITTEE

Membership of the Board Committees met with the criteria required for composition. Each Committee has at least three Directors (Paragraph 2.6.3) of PenCom's circular.

OTHER MEETINGS

ANNUAL GENERAL MEETING (AGM): The Annual General Meeting of the Company was held on the 22nd of July, 2021.

EXTRAORDINARY GENERAL MEETING (EGM): The Extra Ordinary General Meeting of the Company was held on October 21, 2021.

Notice of all general meetings was issued to all shareholders within time along with the financial statements and other necessary and required reports.

BOARD APPOINTMENT/ INDUCTION

In compliance with the Board Charter and Code of Corporate Governance of the Company (paragraph 3.12) and the Code of Corporate Governance 2018 on diversity, one female Director was appointed (Mrs. Hannatu Dikko) on October 21, 2021 to refresh the Board. In line with the Company's induction programme, Induction was conducted in respect of the newly appointed Director on March 14, 2022 and March 21, 2022 after conducting her fit and proper person screening exercise and biodata recapturing on February 22, 2022.

ACTING ROLES

Mrs. Oluwajoba and Mr. Dada were appointed to act in an acting capacity effective from January 1, 2022 as Acting ED Business Development and Operations respectively.

SUCCESSION PLAN

The approved Succession Plan is already in use and it is applied at all levels in the organization.

AUDITORS

The Auditors of the Company are PricewaterhouseCoopers (PwC)-5B, Water Corporation Road, Landmark Towers, Victoria-Island, Eti-Osa, Lagos.

TABLE 6.0 SHAREHOLDING STRUCTURE

CURRENT SHAREHOLDING STRUCTURE OF THE COMPANY

NAMES OF SHAREHOLDER	SHAREHOLDING POSITION	PERCENTAGE
1. CUSTODIAN INVESTMENT PLC	1, 233,707,147	77%
2. WSTC FINANCIAL SERVICES LIMITED	51,385,460	3%
3. IDEAL INSURANCE BROKERS LIMITED	16,041,767	1%
4. STERLING ASSETS MANAGEMENT	308, 312,762	19%
TOTAL	1,609,447,136	100%

In line with Regulation 13 of the Companies Regulation 2021 which mandates all existing Companies to fully issue all their unissued shares not later than 16th April, 2021 which was later extended to December 31, 2022, the Companies, shares are fully allotted and paid up. The Shareholders Fund as at December 31, 2021 is N5.6bn.

INVESTORS PORTAL

The Company has an investors portal and the Annual Corporate Governance Evaluation Report is hosted on the website along with the financial statement of the Company for the past ten (10) years.

MANAGEMENT

The Company is managed by a senior management team that was led by the Managing Director/ Chief Executive Officer (Mr. Adeniyi Falade), who resigned on the 31st of December, 2021. Mr. Olufemi Odukoya was appointed as the acting Managing Director effective from January 1, 2022. The senior management team meets weekly via management meetings. An agenda is prepared and all proceedings of the meeting are properly documented.

The Company has a clearly defined organizational structure with clear levels of authority within which operating units have specific goals, duties and responsibilities. Each unit is fully aware of its responsibilities and its internal procedures are comprehensively documented in detailed operation manuals. All policies and procedures, updated otherwise, are approved by the Board.

Management has also several working Committees, with specific responsibilities and mandates to facilitate the achievement of its goals. These Committees are as follows:

Investment Committee

This Committee comprises of the Ag. MD/ CEO and other members as stated herein under:

- (1) Ag. Executive Director, Operations;
- (2) Ag. Executive Director, Business Development;
- (3) Head, Marketing.
- (4) Head, Investment.
- (5) Head, Contributions.

The Committee is responsible for:

- (1) Implementation of specific investment strategies to ensure on-going compliance with the investment Regulations as issued by the National Pension Commission with the Pension Reform Act 2014.
- (2) Strategies and processes to establish an optimal investment mix consistent with the Company's profile and agreed benchmarked performance parameters.
- (3) The maximization of returns from equities, money market and fixed income with the investment portfolios.
- (4) Reviewing all securities within the portfolios on an individual, line by line basis to assess risk profiles for specific institutions.
- (5) To monitor all portfolio violations and ensure corrective action is taken timely.

The entire Committees' meetings are documented. The Committee met eleven times in the year under review. The Head, of Investment, presented the investment report

including Investment activities, Market reviews, equities, fixed income, Bonds and micro-economic outlook.

ICT Steering Committee

This Committee consists of the Ag. MD/ CEO and other members as stated herein under:

1. Ag. Executive Director, Operations
2. Ag. Executive Director, Business Development
3. Head, Financial Control
4. Head, Information Technology
5. Ag. Head, Contributions
6. Head, Marketing
7. Head, Internal Control and Audit
8. Head, Compliance
9. Head, Risk Management
10. Ag. Head, Investment
11. Head, Benefit Administration
12. Company Secretary

This Committee is responsible for making recommendations to the Board on issues relating to IT including developing and funding strategy, capital structure and the management of the IT department's risk.

The Committee also sets the policies and control procedures required to implement the company's IT strategy and policies. The Committee met eleven times in the year under review.

TABLE 7.0 COMPANY POLICIES

The list of the Company's Policies are as stated below:

NO/ITEMS	NAME OF POLICY
1.	Information Technology Policy
2.	Expanded Information Technology Policies
2a.	Information Security Manual
2b.	Access Control Policy
2c.	Change Management Policy
2d.	Computer & Related Equipment Disposal Policy
2e.	Incident Response Policy
2f.	Data Classification and Retention Policy
2g.	Password Policy
2h.	Backup and Restore Policy

2i.	Disaster Recovery Policy
2j.	Mobile Device Management Policy
2k.	Applications/Systems Software Support/Development Procedure
2l.	Database Management Policy
2m.	Policy on using the Web & Social Media
2n.	Server Virtualization Policy
3.	Backup and Restore Policy
4.	Disaster Recovery Policy
	Web Content Management Policy
5.	Whistleblowing Policy
6.	Code of Conduct and Board Charter for Corporate Governance
7.	Addendum to Vehicle Replacement Policy
8.	Investment Policy
9.	Investment Policy
10.	Business Development Policy
11.	Contributors Relationship Policy
12.	Bank Reconciliation Policy
13.	Succession Planning Process Manual
15.	Recruitment & Training Policy
19.	Job Rotation Policy
20.	Management Committee Terms of Reference
21.	Board Governance Committee Terms of Reference
22.	Board Investment Strategy Committee Terms of Reference

23.	Board Audit Committee Terms of Reference
24.	Board Risk Management Committee Terms of Reference
25.	Information Technology Committee Terms of Reference
26.	Terms of Reference for Investment Committee
27.	Anti-Fraud, Bribery & Corruption Policy
28.	Broker Performance Review Policy
29.	Directors Code of Conduct and Board Charter (Amendment)
30.	Contributors Relationship Policy
31.	Contributors Management Policy
32.	Compliance Policy
33.	Internal Control & Audit Policy Manual

34.	Investment Policy
35.	Investment Signing Mandate
36.	2020 Investment Strategy
37.	Unlawful Workplace Harassment Policy
38.	Code of Ethics
39.	Process & Procedures Review Manual (Benefits Department)
40.	Process & Procedures Review (Contributions department)
41.	Risk Management Policy & Procedure Manual
42.	Board Remuneration Policy
43.	Diversity Policy
44.	Stakeholder Management and Communication Policy
45.	Sustainability/Environmental, Social and Governance (ESG) Policy
46.	Policy on Anti-Money Laundering and Combating Financing of Terrorism and Proliferation of Weapons of Mass Destruction
46.	Privacy Policy
47.	Code of Conduct and Board Charter for Corporate Governance (2)
48.	Information Security Policy Manual
49.	Data Privacy Policy
50.	Stakeholders Engagement Policy
51.	Cyber Security Policy
52.	Schedule of Authority (SOA)

COMPLIANCE

The Company has complied with the provisions of the circular on Corporate Governance for PFOs, 2019, the Nigerian Code of Corporate Governance 2018 and other relevant regulations during the period under review.

Thank you.



Olusanjo Adeyemi

Compliance Officer



Olayemi Ogunsanya

Company Secretary