FirstHoldCo Stakeholders Communications Policy

Approvals:

This document has been prepared and approved by the undersigned.

	Name	Position	Signature	Date
Prepared By:	Temitayo Akpeneye	Team Lead, M&CC		
Reviewed By:	Tunde Lawanson	Head, M&CC		
Approval By:	MANCO			
Approval By:	Board Risk Management Committee			
Final Approval By:	Board of Directors			

Definition of Terms

- **Analysts:** Persons/Companies who researches macroeconomic and microeconomic conditions along with company fundamentals to make business, sector and industry recommendations.
- **Correspondent banks:** Banks in foreign countries that act as FirstBank's agent in those countries.
- **Credit rating agencies:** A company that assigns credit ratings — rating of the debtor's ability to pay back the debt by making timely interest payments and of the likelihood of default e.g. Standard & Poor's.
- **External parties:** Entities with a business relationship with First HoldCo Plc (FirstHoldCo) that FirstHoldCo has no direct control over other than by an agreement or a contract.
- **Group:** Represents the FirstHoldCo Group, comprising FirstHoldCo and all the subsidiary business entities of the Group.
- **HoldCo/ FirstHoldCo:** This refers to the First HoldCo Plc.
- **Investors:** This refers to the current and potential shareholders of FirstHoldCo as well as holders of debt instruments of FirstHoldCo and/or any of its subsidiaries.
- **Material information:** Any information that results in, or would reasonably be expected to result in, a significant change in the market price or value of any of the securities of FirstHoldCo and/or its subsidiaries.
- **NGX:** This shall mean the Nigerian Exchange Limited.
- **Principal Officers:** This includes the Group Managing Director, Chief Financial Officer, The Managing Directors of operating subsidiaries, Group Company Secretary, Head, Investor Relations, Head, Risk Management, Chief Compliance Officer (CCO), Head, M&CC, Management staff or any senior officer of FirstHoldCo and the subsidiaries.

Contents

2. INTRODUCTION

This Stakeholder Communications Policy articulates FirstHoldCo's commitment to clear, consistent, responsible, and value-driven communication across the Group. As a holding company with diverse operating subsidiaries across banking and non-banking financial services, FirstHoldCo recognises communication as a strategic governance and reputation-management function, not merely a tactical activity.

This Policy establishes a unified framework that enables Group coherence while respecting subsidiary individuality, ensuring that all communications reinforce FirstHoldCo's corporate purpose, strategic priorities, brand architecture, and stakeholder trust.

This policy outlines FirstHoldCo position with regards to the release and control of insider information, and its commitment to taking reasonable measures to establish and maintain adequate procedures, systems and controls to enable it to comply with its disclosure obligations. The policy specifies the internal procedures within the Group regarding the timely and accurate disclosure of information to the market and, in particular, to ensure that potential insider information is escalated to the appropriate level for an announcement decision to be made. Statements made to external parties, whether orally or in writing (including all forms of electronic communication), are covered by the policy including but not limited to:

- Press releases and interviews with the media, conference and other speeches by Group employees
- Group-wide information dissemination of all media related events
- Information on the Group's corporate internet site and other social media sites
- Oral statements made in meetings or on telephone calls with groups or individual analysts and shareholders
- Printed materials and information to be published in printed materials

- Communication with lenders and credit-rating agencies
- Other communication to regulators, customers, shareholders, and other stakeholders including via letters, printed materials and the media.

2.1 Marketing & Corporate Communication Department

Marketing and Corporate Communications Department manages the reputation, brand identity, and messaging to internal and external stakeholders for First HoldCo PLC (FirstHoldCo) and support to its subsidiaries (the "Group"). The overall objective of M&CC is delivering creative corporate communications solutions whilst ensuring compliance with the FirstHoldCo Brand.

2.2 Confidentiality

This document is for internal usages only and content of this document must not be given or communicated to any third party without the prior written consent of FirstHoldCo. Reviewing, updating, and ensuring the availability of this Policy shall be the responsibility of the Head, Marketing & Corporate Communications (M&CC) as the Policy Owner and Custodian, in consultation with the established governance structure.

3. PURPOSE

The purpose of this Policy is to:

- Provide a clear governance framework for internal and external communications across FirstHoldCo and its subsidiaries.
- Ensure alignment of all communications with Group strategy, values, brand architecture, and regulatory expectations.
- Protect and enhance the reputation, credibility, and equity of FirstHoldCo and its operating companies.
- Define roles, approvals, escalation paths, and accountability for communications activities.
- Support effective stakeholder engagement across employees, regulators, investors, customers, vendors, business partners, the media, and the wider public.
- Ensure structured engagement with relevant internal and external stakeholders in the development, implementation, and periodic review of this policy.

4. SCOPE AND APPLICABILITY

This Policy applies to:

- FirstHoldCo.
- All operating companies (banking and non-banking subsidiaries) within the First HoldCo Group.
- All directors, employees, contract staff, consultants, agencies, and vendors acting on behalf of the Group.

The Policy governs all forms of communication, including but not limited to internal communications, external communications, media engagement, digital and social media, marketing campaigns, sponsorships, events, investor communications, and crisis communications.

5. GUIDING PRINCIPLES

All FirstHoldCo communications and disclosure shall be driven by the following considerations and guiding principles:

- Strategically Aligned – Directly supporting Group strategy, transformation priorities, and long-term value creation.
- All information in the Group's public communications, including Nigerian Exchange Limited (NGX) filings, shall be full, fair, accurate, timely and understandable.
- Audience Centric – Tailored appropriately for stakeholders while preserving brand coherence.
- FirstHoldCo will consistently disclose information in compliance with all applicable legal and regulatory requirements. The Company shall ensure that its investors and the public are kept fully informed of all factors that may influence their interest, and its financial position.
- Credible and Responsible – Truthful without misrepresentation or omission of material facts about the Group and its Subsidiaries, compliant with legal and regulatory disclosure requirements, while mindful of reputational risk.
- Respectful and Inclusive – Reflecting professionalism, dignity, and cultural awareness.
- Brand Led – Consistent with FirstHoldCo's brand values, tone of voice, and corporate identity guidelines. There is a need to promote the Group as 'one' brand; therefore certain public announcements will be made by FirstHoldCo on behalf of its subsidiaries. Pursuant to the above and given the size and complexity of the FirstHoldCo Group, subsidiaries may make announcements on operational matters which relates to products and services it offers and other matters that do not meet the definition of material information. However, other announcements which are not significant enough to meet the definition of material information but which relates to the business and affairs of the Group and

which might be of interest to investors or shareholders, debt holders or other members of the financial community should be conducted in accordance with this stakeholder communications policy.

6. COMMUNICATIONS GOVERNANCE STRUCTURE

6.1.1 FirstHoldCo Board of Directors (The Board)

The Board of Directors shall be responsible for signing off on any subsequent amendments to this Stakeholder Communications Policy recommended by the Chief Financial Officer, Group Company Secretary, Head, Investor Relations and Head, M&CC. The Board of Directors through the Board Risk Management Committee shall review and supervise functions on disclosure controls and procedures.

6.1.2 Group Managing Director (GMD)

The GMD shall approve the disclosure of market sensitive information and exercise judgment on the timing and nature of all relevant disclosure communications in line with this policy.

6.1.3 Group Company Secretary

- Ensures that FirstHoldCo is compliant with its disclosure obligations
- Communicates with stakeholders and regulatory authorities
- Reviews proposed external announcements and reviews materially price sensitive communication to the regulatory bodies, and consults with relevant Board members, officers and/or external advisers as necessary
- Implements reporting processes and determines divisional guidelines (financial or qualitative) for materiality of information
- Reports on disclosure issues regularly to the Board
- Keeps a record of all regulatory and other announcements that FirstHoldCo has made and
- Monitors the effectiveness of and regularly reviews this Policy for legislative changes or development of best practice, and communicates any amendments to directors, officers and employees.

6.1.4 Chief Financial Officer

The Chief Financial Officer shares responsibility for the approval of the release of quarterly and annual financial reports of FirstHoldCo, and mergers and acquisitions

6.1.5 Head, M&CC

- Acts as the Owner and Custodian of the Stakeholder Communications Policy, responsible for its governance, interpretation, implementation, and periodic update;
- Attends to all enquiries, acts as spokesperson as well as designate subject-matter experts to speak as may be required;
- Prepares and coordinates all communication harmonisation sessions;
- Manages/coordinates briefing preparation and training for spokespersons;
- Manages all publications for the Group for message and tone-of- voice consistency
- Acts as sole point of contact for all media enquiries;
- Monitors new developments in the media and align Group communication strategies accordingly;
- Monitors all reactions and log incidents/issues as part of crisis management;
- Updates this document to reflect changes as and when due;
- Ensures communication of policy to all Group staff;
- Ensures compliance with regulatory guidelines for communication.

6.1.6 Head, Investor Relations

- Ensures consistency of information released to the market
- Ensures key issues are appropriately addressed in publications
- Attends to inquiries from rating agencies, analysts and institutional investors concerning released information;

- Collaborates with relevant stakeholders in preparing draft of external announcements, and consulting with appropriate members of the FirstHoldCo Board, officers and/or external advisers as necessary
- Monitors the market's reaction to information as it is released in order to assist Management in making future materiality judgments
- Continuously gather market intelligence and monitor investors and analysts perceptions of the Group
- Reviews and advises on potential impact of released or non-released material information
- Ensures Investor engagement activities align with the provision of this Policy.

6.1.7 Disclosure Committee

The Disclosure Committee shall be responsible for overseeing the identification, review, and approval of materially price sensitive information prior to external disclosure.

The Committee shall ensure that all disclosures comply with applicable regulatory requirements, including Nigerian Exchange Limited (NGX) rules, and that communication to the market is timely, accurate, and complete.

The Disclosure Committee shall comprise the following members:

- Group Company Secretary
- Chief Financial Officer
- Head, Investor Relations
- Chief Compliance Officer
- Head, Marketing & Corporate Communications (M&CC)
- Other stakeholders/functional Heads and Heads of subsidiaries may be required to attend the committee meetings occasionally especially when matters relating to their units/ companies are being considered.

The Committee shall work in coordination with Management and the Board where required and may engage other functional Heads or subsidiary representatives where matters relate to their areas.

The Committee shall review disclosures and recommend them for approval by the Group Managing Director or Board as appropriate.

6.1.8 Team Lead, Marketing & Corporate Communications (FirstHoldCo)

- Manages day to day implementation of this Policy.
- Coordinates subsidiary alignment, approvals, reporting, and compliance.
- Escalates noncompliance or reputational risks as required.

6.1.9 Subsidiary M&CC Leads

- Implement communications activities in line with Group policy and subsidiary strategy.
- Ensure compliance with Group brand, messaging, and approval requirements.
- Submit required plans, reports, and materials to FirstHoldCo M&CC for oversight. All plans must have been approved by the subsidiary CEOs.

The implementation and ongoing effectiveness of this Policy shall be supported through continuous stakeholder engagement across key governance and control functions to ensure alignment with regulatory requirements, Group strategy, and reputational risk considerations.

7. INTERNAL COMMUNICATIONS

7.1 Purpose and Objectives

The objectives of this policy are to:

- Establish FirstHoldCo as the Group governance authority for internal communication standards, narratives, and escalation
- Ensure strategic alignment and consistency of internal messaging across FirstHoldCo and all operating subsidiaries
- Provide a structured oversight framework for planning, approving, and coordinating communications with Group-wide implications
- Clearly distinguish between Group-level communications originating from FirstHoldCo and subsidiary-level operational communications
- Prevent conflicting, duplicative, or unauthorised messaging that may expose the Group to reputational, regulatory, or governance risk
- Support effective leadership communication, culture reinforcement, and strategic clarity across the Group
- Enable assurance, traceability, and measurement of internal communications that have Group-wide relevance.

7.2 Roles and Responsibilities

7.2.1 Marketing & Corporate Communications (M&CC)

- Acts as the central coordinating and governance function for Group-level internal communications

- Defines standards, templates, tone, and deployment protocols
- Reviews and approves communications with Group-wide implications
- Provides guidance to subsidiaries on alignment and escalation.

7.2.2 Executive Management / MANCO

- Provides strategic direction
- Approves leadership and sensitive Group communications
- Escalates matters requiring Board awareness where applicable.

7.2.3 Subsidiaries – The Marketing & Corporate Communications Department

- Own and execute operational internal communications
- Escalate matters with potential Group implications to FirstHoldCo M&CC
- Align subsidiary communications with approved Group narratives and standards.

7.3 Stakeholders' Communications Committee

The Committee shall be chaired by the Head, Marketing & Corporate Communications (M&CC) and shall report to Executive Management (MANCO), with escalation to the Board where required. Membership shall include representatives from Marketing & Corporate Communications, Company Secretariat, Investor Relations, Compliance, Risk Management, and other relevant business units as required.

The Committee shall meet periodically (at least bi-annually or as required) and shall provide oversight on stakeholder communication practices, policy compliance, and emerging reputational or disclosure risks across the Group.

The mandate of the stakeholders' Communications Committee shall be to:

- Maintain an awareness and understanding of guidelines and rules governing stakeholder communication.

- Develop and implement procedures to regularly review, update and correct corporate disclosure;
- Monitor compliance with the Stakeholder Communications Policy, and undertaking review of any violations, including assessment and implementation of appropriate sanctions and also communicating to their principal
- Review the policy at least once in two years.
- Define the Group's position and response to any rumour, misrepresentation of facts and information leakages

7.4 Principles

All internal communications governed by this policy shall adhere to the following principles:

- **Accuracy:** Communications must be factual, verified, and approved at the appropriate level
- **Consistency:** Messaging must align with Group strategy, values, and approved narratives
- **Central Coordination:** Group-level communications must be coordinated through FirstHoldCo M&CC
- **Timeliness:** All information should be shared promptly
- **Relevance:** Communications must be purposeful and channel-appropriate
- **Confidentiality:** Sensitive information must be clearly classified and controlled.

7.5 Internal Communication Categories

Internal communications under this policy include:

- Group leadership messages
- Strategy, governance, and policy communications

- Regulatory and compliance-related updates
- Culture, values, and engagement initiatives with Group relevance
- Crisis or sensitive communications (in line with the Crisis Communication Policy).

7.6 Channels

Approved internal channels include, but are not limited to:

- Email communications via approved Group mailboxes
- Intranet / SharePoint platforms
- Microsoft Teams
- Viva Engage
- Internal memos, e-flyers, newsletters
- Town halls and leadership briefings
- Other channels approved by FirstHoldCo M&CC.

Subsidiary channels remain under subsidiary control, subject to escalation requirements. All Group wide internal communications must be routed through and approved by FirstHoldCo M&CC, except where issued directly by the GMD.

7.7 Use of Instant Messaging Platforms (e.g WhatsApp)

Instant messaging platforms, including WhatsApp, are recognised as informal communication tools and may be used for coordination, alerts, and quick clarification.

WhatsApp **shall not** be used for:

- formal approvals
- policy issuance or interpretation
- contractual or regulatory communication
- official leadership or Group-wide directives

Any decision, instruction, or approval communicated via WhatsApp must be **formalised through approved channels** (email, memo, or documented system).

For audit and governance purposes, formal records shall take precedence over informal messaging.

7.8 Approval and Escalation

- All Group-level internal communications must be reviewed or approved by FirstHoldCo M&CC
- Communication involving regulatory, reputational, or legal sensitivity require additional clearance from relevant functions
- Matters with potential Group-wide impact must be escalated promptly to FirstHoldCo.

8. EXTERNAL COMMUNICATIONS

8.1 Definition

External communications are communications intended for audiences outside the Group, including regulators, investors, customers, partners, media, and the general public.

8.2 Release and Communication of Materially Price Sensitive Information

8.2.1 Company Announcement Procedures

The management of FirstHoldCo's external announcements depends largely on an effective system of internal reporting and announcement preparation. The following procedures will apply in relation to all external announcements:

- **Identification and notification of material price sensitive information:** a director or officer of FirstHoldCo shall promptly notify the Group Company Secretary upon becoming aware of important price-sensitive information that has not yet been made public by FirstHoldCo.
- **Review of materially price sensitive information:** after receiving any material price sensitive information, Company Secretary will review the information in consultation with the Group Managing Director, Chief Financial Officer, Head, Investor Relations, Head M&CC and/or external advisers (if necessary), to determine whether the information is required to be disclosed.
- **Prepare internal and external announcements:** if the information is required to be disclosed, the Chief Financial Officer, Head, Investor Relations, and the Head, M&CC as required will prepare draft announcements. Such announcements should be factual, relevant, and expressed in an objective and clear manner.

- **Obtain Approval:** the draft Company announcement must be approved by either the Group Managing Director or the Group Chairman as appropriate.
- Subsidiary specific communications of material impact must be shared with FirstHoldCo M&CC prior to release.

8.3 Branding and Identity

- All external materials must comply with approved brand and corporate identity guidelines.
- All official communication materials must be written in the Group's official font style – Calibri Light, and font size – 12.
- No entity may use the FirstHoldCo name, logo, or brand assets without approval.

8.4 Media Relations and Spokesperson

8.4.1 General Media Relations Rule

- Only authorised spokespersons may speak to the media on behalf of FirstHoldCo.
- **Media and market speculations:** The Group shall observe a general **"no comments"** policy in relation to market speculation and rumors, which must be observed at all times. The **"no comments"** policy implies the use of a **pre-agreed holding statement** pending an official position and announcement on the matter. However, FirstHoldCo or its subsidiaries may issue an announcement in response to market speculation or rumor where it is necessary to comply with the disclosure obligations, such as correcting factual errors or responding to a formal request from NGX.
- All enquiries, complaints, or media requests received must be referred immediately to FirstHoldCo M&CC.
- Subsidiary media engagements with potential Group impact must be coordinated with FirstHoldCo M&CC.

- Employees are prohibited from responding to criticism, engaging in public debate, or issuing statements on behalf of the Group
- Detailed procedures are contained in the M&CC SOP.

8.4.2 Designated Spokesperson

To minimise the risk of selective disclosure and to ensure a clear and consistent message is communicated to the public, FirstHoldCo and its subsidiaries shall designate certain officials to speak on its behalf as appropriate when material information is to be disclosed. The designated officers shall include:

- Group Managing Director
- Chief Financial Officer
- The Managing Directors of operating subsidiaries
- The Group Company Secretary
- The Head, Investor Relations
- Chief Compliance Officer
- The Head, Risk Management
- The Head, M&CC
- Key officers of the operating subsidiary(ies) with the highest contribution (i.e. Gross earnings and/or Profit) to the Group numbers. e.g. The Chief Financial Officer, Chief Risk Officer, Treasurer of FirstBank

When communicating with external parties, a spokesperson:

- Shall ensure all comments relate to information within the public domain and/or are not material, as the disclosure of confidential information
- May clarify information that FirstHoldCo has released publicly but must not comment on material price sensitive information that has not previously been released
- Should limit any comments to his or her area of expertise as much as possible; and

- Should provide feedback to the Head, Investor Relations and FirstHoldCo Company Secretary after the external communication is made, to determine if any confidential information has been disclosed and whether as a consequence any disclosure to SEC/NGX is necessary.

8.5 Disclosure and Market-Sensitive Communications

Materially Price Sensitive information' is any information relating to the business and affairs of FirstHoldCo or any of its subsidiaries which has not been communicated to the public that may result in, or would reasonably be expected to result in, a significant change in the market price or value of FirstHoldCo's securities.

Specifically, materially price sensitive information covers all disclosures of materially sensitive information by the Group. Insider information is information that:

- Is precise
- Has not been made public
- Relates directly or indirectly to the Company and if made public, would have a significant effect on the price of the Company's shares

The Group Company Secretary in consultation with Head, M&CC, Chief Financial Officer and the Head, Investor Relations, will monitor developments and issues within the Group that may necessitate disclosure to the public. These matters may include, but are not limited to changes in:

- Securities
- Management structure
- Earnings
- Assets
- Businesses.

Where there is doubt as to whether certain information should be disclosed, depending on the subject matter, the Group Company Secretary in consultation with Directors, Chief Financial Officer, Head, Investor Relations, and Head, M&CC will discuss the issue with the Group Managing Director (GMD), and the Group Chairman of the Board of Directors ("Chairman"). If necessary, seek advice from relevant external stakeholders.

The following provides a guide as to the type of information that may require disclosure:

- A change in the Group's financial forecasts or expectations. As a guide, a variation in excess of 10% may be considered material.
- If the Group has not made a forecast, a similar variation from the previous corresponding period may be considered material.
- The death, resignation, dismissal or appointment of any Principal Officer in the Group
- Change in the registered office address, or in the FirstHoldCo's or its subsidiaries' name
- A recommendation or declaration of dividends or a decision if one will not be declared
- Changes in the Board, Management team or the external auditor of FirstHoldCo and its subsidiaries
- A material variation in the value of Group's investment portfolio
- An agreement between FirstHoldCo (or a related party or subsidiary) and a director (or a related party of the director)
- Events regarding FirstHoldCo's shares, securities, financing or any default on any securities (for example, under or over subscriptions to an issue of securities or a share re-purchase program)
- Giving or receiving a notice of intention to make a takeover offer
- A transaction for which the consideration payable or receivable is a significant proportion of the written down value of the Group's consolidated assets (an amount of 5% or more would normally be significant but a smaller amount may qualify in particular cases)

- Mergers, acquisitions and divestments, joint ventures or changes in assets
- Significant developments with regards to new projects, ventures and products; major products expected to have significant impact.
- Legal proceedings against or allegation of any breach of the law, whether civil or criminal, by FirstHoldCo or its subsidiaries
- Industry issues that may have a material impact on the Group's business
- Significant changes in technology or the application of technology which could affect the Group's business
- Natural disasters or accidents that have particular relevance to FirstHoldCo or any of its subsidiaries
- Any other information necessary to enable shareholders to appraise the position of the company and to avoid the establishment of a false market in the shares of the company.

Other than financial results, all necessary information relating to the Group/FirstHoldCo and published on the NGX shall be disclosed on the corporate website. The Group Company Secretary shall maintain a register of materially sensitive information within the Group.

If FirstHoldCo and its subsidiaries discover that a prior disclosure had a material error at the time it was given, the correction must be made immediately.

8.5.1 Disclosure Controls

8.5.1.1 Delaying Disclosures

- There are limited circumstances in which it might be appropriate for FirstHoldCo to delay disclosure for a short time whilst it clarifies the relevant facts. Delaying disclosure is only permitted if FirstHoldCo is able to ensure the confidentiality of that information.

- The FirstHoldCo GMD is responsible for ascertaining whether a short delay is permissible before an announcement is made. A written record of the decision-making process must be maintained by the FirstHoldCo Company Secretary.

8.5.1.2 Selective Disclosures

8.5.1.2.1 It may be necessary for certain categories of stakeholders to be informed of certain insider information prior to its public release. Examples of stakeholders may include:

- Lenders
- Advisers
- Rating agencies; and
- Regulators or other parties with whom it is negotiating.

8.5.1.2.2 Prior to the release of such insider information to the selected persons the following criteria must be satisfied:

- There must be clear and justifiable reasons as to why the information should be disclosed
- At least two officers authorised to approve category three announcements must agree in principle to the disclosure of information to this particular party in the circumstances; and
- The recipient's consent to being made an insider should be documented.

8.5.1.2.3 The Group Company Secretary shall advise, in writing, the recipients of such information that it is confidential and that the recipients should not deal in the securities of the Company before the information has been made available to the public.

8.5.1.3 Forward-Looking Information

Forward-looking information means all disclosure regarding possible events, conditions or results of operations that is based on assumptions about future economic conditions, courses of action and future oriented financial information with respect to prospective results of operations, financial position or cash flows presented as either a forecast or a projection.

- FirstHoldCo and its subsidiaries may, provide guidance and forward-looking information with respect to revenue, operating income, capital expenditures, and operating expenses, profits and other operating or financial information as well as significant developments and future plans to enable the investment community better evaluate the Group and its prospects.
- Subsidiaries shall conduct and provide the Chief Financial Officer, Head, Investor Relations, the Group Company Secretary, and Head, M&CC with the potential financial impact of materially significant policies and initiatives. The affected subsidiary shall provide the impact assessment to the Group Company Secretary, Head, M&CC and Head, Investor Relations not less than **two (2) weeks prior** to the release of such policies or initiatives

8.6 Managing Communication with Analysts and Investors

8.6.1 Briefings/ Meetings/ Conference Calls with Analysts or Investors

- As part of FirstHoldCo's management of its investors, and to enhance analysts' understanding of its background and technical information, it will periodically conduct briefings with analysts and/or investors, including:
  - One-on-one discussions (for the purpose of this Policy, this includes any communication between FirstHoldCo and an analyst/investor)
  - Group briefings
  - Conference calls
  - Email correspondence; and/or
  - Any other electronic means of communication.
- The Group shall not disclose any information which is, or potentially is, material price sensitive information, that has not been announced to relevant regulators and the market generally at these sessions.

- Materials for conference calls, publications and other discussions for investor engagements should include appropriate cautionary warnings of the risks inherent in relying on forward-looking projections or statements.

8.6.2 Broker Sponsored Investor Conferences

The Group or its executives are from time to time invited to participate or present at broker-sponsored investor conferences. The policy and protocols for the Group's briefings shall apply to such conferences.

8.6.3 Responding to Analyst Reports and Forecasts

I. FirstHoldCo and its subsidiaries are independent and ensure independence to analysts in fact and appearance. FirstHoldCo and its subsidiaries will not endorse any such reports and will restrict its comments to factual matters and information previously disclosed to NGX and the market. In particular, FirstHoldCo and its subsidiaries:

- Will not generally comment on analyst forecasts or disclose its own earnings projections (except as required by regulators) however, it may comment on analyst reports by:
  - acknowledging the report's range of estimates; and
  - correcting factual errors or assumptions where the relevant information has been previously disclosed.
- Will not include any analyst reports in its own corporate information or post any analyst reports (including hyperlinks) on its website. However, analyst’s contact and coverage may be included, and reports may be used internally.
- Will include a disclaimer that FirstHoldCo or its subsidiary, as it applies is not responsible for, and does not endorse, the analyst report, in any response made to an analyst.
- May consider issuing a profit warning/statement if it becomes apparent that in general, the market's earnings projections is materially different from its own estimate

II. If a draft analyst report has been sent to FirstHoldCo or its subsidiaries for comments, it should be forwarded immediately to the Head, Investor Relations.

III. Only designated persons may correct factual errors in analysts' reports or models, using information that is already in the public domain or is not price sensitive.

8.6.4 Advisers and Consultants

The Group shall require consultants and professional advisers engaged by FirstHoldCo or any of its subsidiaries to adhere to this Policy. FirstHoldCo and its subsidiaries shall ask such consultants and professional advisers to sign a confidentiality agreement prior to engagement.

8.7 Business Letters and Emails

This Policy defines authority and standards for signing official outgoing business letters and emails on behalf of FirstHoldCo to ensure consistency, accountability and reputational protection. It applies to:

- All official letters and emails issued in the name of FirstHoldCo Plc.
- External correspondence with regulators, rating agencies, investors, partners, media, and other stakeholders
- Internal correspondence of strategic, reputational, or policy significance

8.7.1 Authority to sign

8.7.1.1 Group-Level External Correspondence

The following officers may sign external correspondence on behalf of First HoldCo Plc, within approved mandate:

- Group Chairman

- Group Managing Director (GMD)
- Group Company Secretary (for statutory and governance matters)
- Chief Financial Officer (result publication, regulators, and auditors' engagement)
- Heads of Departments (for official correspondence with their relevant stakeholders)
- Head, Marketing & Corporate Communications (for communications-related matters)
- All such correspondence must comply with approved messaging and governance requirements.

8.7.1.2 Solo Sign-Off

Heads of Departments and authorised officers may sign external correspondence independently where the communication:

- is functional in nature
- does not convey Group strategy, public positioning, or leadership views
- does not expose the Group to reputational, regulatory, or legal risk

8.7.1.3 Mandatory Co-signing Clearance

External communications must be co-signed or cleared by Marketing & Corporate Communications (and Company Secretariat/Compliance where applicable) where they involve:

- Group-wide matters or implications
- sensitive stakeholder engagement
- regulatory interpretation or response
- public-facing or externally shareable materials
- leadership statements or commitments

8.7.1.4 Delegated Authority

- Delegated signing authority must be formally documented and approved.
- No employee may assume signing authority by virtue of role alone.

8.7.2 Email Communications

- Official emails must be sent from approved corporate email addresses only.
- Standardised email signatures approved by M&CC shall be used.
- Emails conveying policy positions, sensitive matters, or external commitments must be approved at the appropriate authority level.

8.7.3 Departmental Email Addresses

Departmental email addresses are approved corporate communications channels established for functional correspondence.

8.7.3.1 Usage

- May be used for routine departmental and cross-functional correspondence.
- Messages must remain within the scope of the department's mandate and comply with this Policy.

8.7.3.2 Governance Requirements:

- Each departmental mailbox shall have a designated primary custodian and an alternate.
- Access rights and usage shall comply with Information Security policies.
- Must not be used for correspondence with regulators, auditors, vendors, and stakeholders.
- Must not be used for media engagement, public statements, Group positioning, or leadership communication.

8.7.4 Prohibitions

- Personal email accounts shall not be used for official business.
- Employees may not issue correspondence that binds the Group without authority.

8.8 Digital and Social Media

8.8.1 Digital Media (Corporate Website)

The Corporate Website will contain relevant information on FirstHoldCo such as: company profile, NGX announcements, Annual reports & other interim results, Annual general meeting information.

Investor Relations and M&CC must review the relevant information prior to it being posted on the website. The website will be reviewed regularly to ensure that it is up-to- date, complete and accurate. Announcements shall be classified along the following approval categories:

S/N	Categories	Approval Required
1	Ordinary routine announcements e.g. shareholding notifications.	–
2	Ordinary but major announcements, e.g. annual results, major acquisitions	Announcements in this category will require the approval of the FirstHoldCo GMD after the sign off of any of the following officials as appropriate: ▪ Group Company Secretary ▪ Head, Investor Relations ▪ Head, M&CC ▪ Chief Financial Officer ▪ Chief Compliance Officer ▪ MD of relevant subsidiary ▪ Head of the Relevant Department
3	Major and urgent announcements e.g. commenting on market rumour which may/has affected share price, approach by third party	Announcements in this category will require the approval of the FirstHoldCo GMD after the sign off any of the following officials: ▪ Group Company Secretary ▪ Head, Investor Relations

	regarding a major corporate transaction.	▪ Head, M&CC ▪ Chief Financial Officer ▪ Chief Compliance Officer ▪ MD of relevant subsidiary ▪ Head of the Relevant Department

8.8.2 Social Media

- LinkedIn is currently the only authorised social media platform for FirstHoldCo at Group level with room for expansion of scope.
- No other social media platforms (including X/Twitter, Instagram, Facebook, YouTube, TikTok, blogs, or similar) may be created, managed, or used in the name of FirstHoldCo without explicit written approval of MANCO, upon recommendation by M&CC.

Subsidiaries may operate additional platforms based on business needs, provided such platforms:

- Are disclosed to FirstHoldCo M&CC; and
- Comply with Group brand, governance, and escalation requirements.

8.8.3 Policy Requirements

- The M&CC team is the gatekeeper for all communication, including online communication. However, alignment to communication procedures and processes shall be part of the culture of the entire Institution, as all employees are ambassadors.
- FirstHoldCo's overall goal is simple: to enable employees and contractors to participate online in a respectful, relevant way that protects our reputation and follows the letter and spirit of the law.

- Employees on social media must understand that they are posting in a personal capacity unless expressly authorised by FirstHoldCo to post on the Company's behalf (i.e. M&CC employees). Any posts on social media should be made under the employee's own name.
- If a person is identified as a FirstHoldCo employee or holds a sensitive position (Directors, MANCO, HOD), the employees' opinions and viewpoints on social media must reflect the responsibilities of the position held within the Institution.
- Any personal opinions which may be associated with the organisation must be accompanied by a disclaimer: "***The opinion here is entirely my own and does not represent the views or opinions of First HoldCo Plc."***
- Employees are not permitted to use their official FirstHoldCo email on social media in any personal capacity. Private email accounts must be used for such interactions.
- Accounts using names associated with, or owned by, FirstHoldCo, its subsidiaries/associated companies, or other unregistered or registered trademarks must not be created or used without authorisation.
- Copyrights standards and the respect of intellectual property of others when publishing any information, pictures videos or other content online must be adhered to.
- Disclosure of confidential information about FirstHoldCo, its employees, its practices, or any information meant to be shared internally only is highly prohibited.
- Use of the identity or likeness of another employee, logos or trademarks of FirstHoldCo is prohibited.
- Internet access at the office is to be used primarily for business purposes. Any personal social media use must not interfere with normal business activities, must not involve solicitations,

must not be associated with any for-profit outside business activity, and must not potentially embarrass the Company, damage the Company's reputation, or tarnish its image.

- The Company at its sole discretion, reserves the right to block access to any Internet site.
- Rumours, innuendos, or non-public information shared via social media may significantly negatively impact FirstHoldCo and its reputation. Legal action may be brought against the individual responsible.
- Employees authorised to represent the company must ensure the following best practice guidelines are applied:

i. The personality, tone of voice and brand of the firm must be reflected in all communications.

ii. Never represent yourself or the Institution in a false or misleading way. All statements must be true and not ambiguous; all claims must be substantiated or referenced.

iii. Post meaningful and respectful comments. Spam or remarks that are off-topic or offensive are unacceptable.

iv. Keep to your area of expertise and feel free to provide unique perspectives on non-confidential activities at the Company.

8.8.4 Caveat/Further Guidelines:

- As a general rule, the Institution refrains from commenting on topics pertaining to religion, ethnicity and politics.
- Never comment on any topic related to legal matters, litigation or any parties the Company may be in litigation with.

- Never participate in discussions when the topic being discussed may be considered a crisis situation for the Institution. Even anonymous comments may be traced. Refer all Social Media activity around crisis topics to the M&CC department.
- Do not create Company specific social media profiles outside of the standard process. All social media platforms/profiles **must be** created by the M&CC Team.
- Always protect yourself, your privacy, and the Company's confidential information. What is publish is widely accessible and will be around for a long time, so consider the content carefully.

8.8.5 Exceptions

The following departments/units may be granted access to some online platforms for the purpose of carrying out unit specific communication, subject to approval from M&CC:

- **Human Resources:** May request access to the use of the LinkedIn account for activities such as posting of job vacancies and communication with prospective employees.
- **Executive Leadership**: Members of Management may have Company social media accounts created on their behalf by the M&CC department for the official purpose of professional commentary within industry circles on social media or for thought leadership purposes.
- Employees or departments that are permitted to use official accounts must always adhere to the Institution's guidelines. A breach of these guidelines will amount to gross misconduct and may result in disciplinary action.

8.8.6 Roles & Responsibilities

8.8.6.1 General

- The M&CC team is primarily responsible for creating, managing, and tracking all the Institution's official online, social media, and website interactions with the public to promote activities, initiatives, or events. The department is responsible for screening and approving all communication that goes out online on all identified platforms.
- All employees are responsible for being aware of the policy and understanding their responsibilities regarding using social media in their professional and personal capacity.
- Employees are not permitted to create social media sites or accounts or post material on any social media site on behalf of the organisation without prior approval from M&CC.
- Employees are expected to be aware of and understand the potential risks and damages to the Group, either directly or indirectly, through their personal use of social media, and should comply with this policy to ensure the risk is mitigated.
- Where an employee becomes aware of inappropriate or unlawful online content that relates to the organization or content that may otherwise have been published in breach of this policy, the incident should be reported immediately to M&CC by sending an email to FirstHoldCoInternalCommunications@first-holdco.com

8.8.6.2 Materially Price Sensitive Announcements

- The Group Company Secretary, Chief Financial Officer, Head, Investor Relations and Head, M&CC shall be responsible for the timely communication of materially price sensitive information to relevant internal stakeholders within the Group. Custodians of such sensitive information shall ensure they are closely guarded and not appropriated.

- Internal communications of materially price sensitive information shall be done to relevant internal stakeholders before communication to the regulator or the general public, except where regulatory requirements stipulate otherwise.
- The Head, Investor Relations will disseminate the information to: Analysts, Investors; and Credit rating agencies.
- The Head, M&CC (working with Head, Investor Relations) will have the responsibility of uploading information and announcement on the website, other public media, financial journals etc.
- The dissemination of results shall be done immediately after publishing on the NGX portal and uploaded on the corporate website.

9. CRISIS COMMUNICATION

FirstHoldCo maintains a zero-tolerance approach to unmanaged reputational risk. In the event of a crisis:

- All communications shall be centralised and coordinated by FirstHoldCo M&CC.
- The GMD (or spokesperson designated by the GMD) shall serve as the primary voice during crises.
- Crisis procedures are detailed in the Crisis Management Framework and M&CC SOP.

9.1 Group Escalation Matrix

Event Type	Subsidiary Action	HoldCo Action	Timeline
Incident (low impact)	Manage internally, record event	HoldCo not notified unless recurrence observed	No escalation
Issue (extended downtime, trending chatter, internal tension	Notify HoldCo M&CC via Issue Alert Form	Review, classify, prepare for potential escalation	Within 1 hour
Critical Incident (fatality, fraud, sanctions, cyber breach, major outage)	Immediate alert to HoldCo, activate subsidiary crisis management team	HoldCo conducts risk assessment, activates Group CMT if required	Within 30 minutes
Crisis (media blitz, regulatory enquiry, cross-entity impact, national attention)	Suspend external statements until HoldCo clearance	HoldCo leads communication, Board notified, unified messaging issued	Immediate Activation

9.2 Response to Leakage of Materially Price Sensitive Information

If any inadvertent disclosure of market sensitive information occurs or is believed to have occurred, whether on a selective basis or otherwise, a designated spokesperson must be contacted immediately so that an interim announcement can be released. The interim announcement shall:

- provide as much detail of the subject matter as possible
- set out the reasons why a more comprehensive announcement cannot be made; and
- include an undertaking to announce further details without delay as soon as the details are available.

9.3 Media Training and Preparedness

As part of FirstHoldCo's crisis preparedness framework, Senior Management staff and designated spokespersons shall undergo periodic media and crisis communication training. Such training shall cover:

- spokesperson responsibilities and message discipline;
- handling hostile or speculative media enquiries;
- alignment with approved crisis narratives and regulatory considerations.

Marketing & Corporate Communications shall coordinate media training programmes, maintain a register of trained spokespersons, and recommend refresher sessions as required.

10. RISK MANAGEMENT AND COMPLIANCE

10.1 General Points

FirstHoldCo shall maintain records of the disclosed information including disclosure documents, news releases, analysts' reports, transcripts or tape recordings of conference calls and where practicable, other public oral statements, debriefing notes and newspaper articles.

The minimum retention period for material corporate information posted on the website, news releases, quarterly and annual reports and other materials filed with regulatory authorities shall be for a minimum period of six years.

Communications activities shall be monitored for compliance with this Policy. Breaches may result in disciplinary action, reputational remediation, or legal action where applicable.

10.2 Quiet Periods, Restrictions and Breaches

10.2.1 Pre-result “Quiet” Periods

- To prevent inadvertent disclosure of material price sensitive information, during the periods between the end of its financial reporting periods and the actual results release (about a month for Quarterly results, and three to four months for Annual results), FirstHoldCo and its subsidiaries will not discuss any financial information, broker estimates and forecasts, with institutional investors, individual investors, analysts, or the media unless the materially price sensitive information being discussed has previously been disclosed to the NGX.
- Directors, officers and other employees of the Group shall observe this “quiet period” commencing at the end of each quarter and expiring upon the public release of the earnings for the quarter.

10.2.2 Trading Restrictions and Blackout Periods

- A director, officer or other employee of the Group shall not trade in securities of the Group with knowledge of material information affecting the Group that has not been publicly disclosed. Except in the necessary course of business, it shall also be illegal for any director, officer or other employee of the Group to inform any other person of material non-public information.

- Questions regarding the application of this policy in any particular circumstance should be directed to the Group Company Secretary.

10.3 Distribution of Policy

- Upon approval of the Board, and whenever changes are made, the policy will be circulated to all directors, officers, and employees of FirstHoldCo, subsidiaries and those authorised to speak on the Group's behalf.
- New employees of the Group will also be provided with a copy of this Policy.

10.4 Insider Lists

The Group shall maintain an Insider List of its employees and other relevant external parties with access to insider information relating directly or indirectly to the Company. In particular, the Company maintains a list of Directors, other Management staff, a list of other employees, Registers, and Auditors with access to insider information; and a list of those involved in specific projects.

The list shall also state the identity of all personnel with access to inside information, the reason why they have access to inside information, the date on which they first had access to inside information and the date on which the list was created.

The lists must be updated whenever:

- There is a change in the reason why a person has access to inside information;
- A new person is added to the list; and
- Any person on the list no longer has access to inside information.

10.4.1 Maintaining Confidentiality

The individuals on these lists are under a duty of confidence not to disclose any insider information without due authorisation. In order to prevent the misuse or inadvertent disclosure of material information, the procedures set forth below should be observed at all times:

- Confidential matters shall not be discussed in places where the discussion may be overheard;
- Confidential documents should not be read in public places and should not be discarded where others can retrieve them. Directors, officers, employees and consultants should not leave confidential information in their homes
- Transmission of documents by electronic means should be made only where it is reasonable to believe that the transmission can be made and received under secured conditions;
- Confidential information sent to clients, customers, vendors or other third parties, must be done in a secure manner.
- When emailing confidential electronic files, those files should be password protected with the password being passed on to the recipient
- Unnecessary copying of confidential documents should be avoided and documents containing confidential information should be promptly removed from conference rooms and work areas after meetings have been concluded. Extra copies of confidential documents should be shredded or otherwise destroyed securely.
- Access to confidential electronic data should be restricted to the use of passwords.
- Documents and files containing confidential information should be kept in a safe place to which access is restricted to individuals who "need to know" in the necessary course of business. Code names should be used, if necessary.
- All proprietary information, including computer programs and other records, remain the property of the Group and may not be removed, disclosed, copied or otherwise used except in the normal course of employment or with prior permission.
- Where computers or other work tools are no longer in use, appropriate discontinuation techniques/approach should be adhered to in line with the extant information security policy.

11. BREACH OF POLICY

Non-compliance with this policy may constitute a breach of securities rules. This may result in fines for FirstHoldCo, personal liabilities for directors and other officers, and damage to the Group's reputation. Such breaches may therefore result in disciplinary action against erring individuals. *Any breach of this policy will be addressed in line with applicable disciplinary, legal, or governance processes.*

The internal audit function shall monitor compliance with the provision of this policy within the Group and shall regularly report the level of compliance to the GMD and/or the Board of Directors.

12. RELATED DOCUMENTS

This Policy should be read alongside:

- M&CC Standard Operating Procedures (FirstHoldCo)
- Brand and Corporate Identity Guidelines
- Code of Conduct and Ethics
- Information Security and Data Protection Policies
- Crisis Communications Framework

13. POLICY REVIEW

This Policy shall be reviewed every two (2) years or earlier where required by regulatory, structural, or strategic changes. The review process shall be coordinated by the Head, Marketing & Corporate Communications (M&CC) as Policy Owner and shall include formal consultation with relevant stakeholders.