



FIRSTBANK GROUP COMMUNICATIONS POLICY 2025

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1. DOCUMENT REVIEWS AND APPROVALS

Issue Date	Issue No	Obsolete/Current/Archived	Reason/Notes
07/09/2023	Issue 1	Current	Reviewed and Approved

Reviewers.

This document has been reviewed by the following:

Name	Status	Date of Issue	Issue No
Oze K. Oze	Unit Head, Internal Communications, Content Management and Merchandising		
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Approvals

This document has been approved by the undersigned:

Name	Representing	Date	Issue No
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Chairman MANCO E/R Subcommittee	MANCO Subcommittee Expenditure & Operations		
Chairman Board Risk Management Committee	Board Risk Management Committee		

2. DISTRIBUTION

Distribution List

A current version of this document is available to members of staff on the corporate intranet. This document has been issued on a version-controlled basis to the following:

Name	Status	Date of Issue	Issue No
Toluwaleke Salu	Unit Head, Internal Communications, Content Management and Merchandising		
Bamidele Olujitan	Unit Head, Brand and Stakeholder Management		
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3. INTRODUCTION

3.1 This Communications Policy is a demonstration of the commitment of FirstBank Group to delivering value for and to all stakeholders – the customer, the employee, the Executive Leadership, the shareholder, the community, the supplier, the partner, the regulator, the government, the environment and everyone and everything that can impact or be impacted by the business – in the way they communicate.

3.2 The FirstBank Group covered by this Policy include:

- FirstBank Nigeria
- FirstBank UK
- FirstBank DRC
- FirstBank The Gambia
- FBNBank Ghana
- FirstBank Guinea
- FBNBank Senegal
- FirstBank Sierra Leone
- First Nominees
- First Pension Custodian Nigeria Limited

3.3 This Communications Policy is therefore to be read in conjunction with all applicable policies of each subsidiary as well as the relevant laws and industry policies and regulations within the jurisdiction where each operates. In addition, the Policy is to be read alongside other policies and documents listed in Chapter 13.

3.4 'FirstBank', the Masterbrand, is hereinafter used to imply both First Bank of Nigeria Limited and the subsidiaries listed in **3.2** above.

4. PURPOSE

4.1 The goal of this Policy is to ensure that FirstBank always communicates internally and externally in a way that conveys and delivers value for and to all stakeholders. All FirstBank communications, when developed according to guidelines in this Policy, will always convey a sense of the esteem and value FirstBank accords its stakeholders.

4.2 This Policy is intended to provide guidance in developing and implementing communications strategies for FirstBank in its avowed commitment to effectively disseminate as well as receive information and communications to/from all its internal and external stakeholders, in a way that communicates value.

4.3 All employees and other internal stakeholders will do their utmost to mirror the commitment and example of FirstBank in their communications with fellow internal stakeholders and interactions with external stakeholders as good ambassadors of FirstBank.

5. SCOPE AND APPLICABILITY

5.1 Forming part of the terms and conditions of employment for employees at FirstBank, this Policy applies to everyone employed at FirstBank, whether in a head office or branch location or any other sites that s/he may be detailed to work at from time to time in the course of her/his employment.

5.2 This Policy applies to all employees (irrespective of status and the nature of their contract – full-term, temporary, core, non-core, intern/volunteer/student); management; members of the Board of Directors; all FirstBank partners and collaborators.

5.3 The Policy is also to be observed when FirstBank employees visit and use client or partner facilities.

5.4 FirstBank employees will ensure that they also comply fully with the policy or guidelines that exist at client or partner facilities.

5.5 This Policy applies as well to the client, partner, supplier, contractor, agency personnel, temporary worker or volunteer working within or for FirstBank. All – without exception – will abide by the guidelines contained in this document.

5.4 All employees, including Executive Leadership, are responsible for knowing, understanding, and complying with this Policy and all its guidelines that affect them directly at any time.

5.5 This Policy encompasses:

- a. Purpose of communications
- b. Communications tools and mechanisms
- c. Liaison with the media

5.6 This Policy does not provide detailed guidelines on or encompass the following:

- a. Handling of feedback and complaints from customers, employees and shareholders – refer to the Customer Complaints Handling Policy and Investor Relations Guidelines
- b. Issues of privacy – refer to the Privacy Policy
- c. Business partnerships and relationships with external parties
- d. General management of information resources in FirstBank – refer to the Management Information System Policy
- e. For other subject matters assumed to be within the purview of the Marketing and Corporate Communications department (M&CC) but not included in this Policy document, because they are either dealt with in a different policy document with a narrower scope or not M&CC-related activities and responsibilities – refer to chapter 12 of this Policy document titled Enquiries.

6. STATEMENT OF PRINCIPLES

6.1 All stakeholders of FirstBank deserve to be accorded value and treated with respect, dignity and esteem, irrespective of status, gender, religion, ethnicity, race or appearance. Nowhere else is this more imperative than in the content and manner of FirstBank’s communications to stakeholders.

6.2 In line with this philosophy, FirstBank’s communications to all stakeholders will be:

- a. Open and honest
- b. Clear, unambiguous, and consistent
- c. Timely and proactive
- d. Empowering and energising
- e. Responsive to questions and feedback
- f. Accessible to all

6.3 In addition, in terms of origination, essence, purpose, structure, style and tone, FirstBank’s communications will always:

- a. Align with the strategic objectives of FirstBank
- b. Be tailored to the audience (both in delivery and content)
- c. Be mutually reinforcing, streamlined, consistent and purposeful
- d. Project the FirstBank tone of voice, which is flexible, warm, relevant, passionate, confident, collaborative, and spirited.
- e. Be grammatically correct – using standard British English, except in those limited areas like certain internal communications contexts, audio-/visual productions in vernacular or pidgin English and social media where recognised deviations from standard writing are the norm rather than the exception
- f. Emphasise use of simple, short, and active sentences with original creations rather than clichés, and devoid of jargons (technical information and terms), acronyms and unnecessary words
- g. Employ all FirstBank’s communication systems, equipment, and assets for the sole purpose of achieving the objectives of FirstBank.
- h. Clearly communicate a key message directly and succinctly.

7. OUTCOMES

7.1 FirstBank's communications will always leave recipients of its messages – whether internal or external stakeholders – with a strong sense of being valued by FirstBank. This will happen not only because of the way the messages are couched to convey value, but also because of the consistent process adopted to generate, develop, and disseminate such messages.

7.2 Over time, customers and other stakeholders, by answering the question 'how does this make you feel?' in their mind, will easily distinguish FirstBank's communications from others without (or before) seeing or hearing the brand name/logo and other identifiers.

7.3 Engaging and consulting with stakeholders, getting feedback from them and addressing their concerns – rather than ignoring or sidestepping them – will be integral to FirstBank's adopted consistent process for developing communications.

7.4 FirstBank will undertake, as the first crucial step to conveying any sense of value through its communications, to let customers, employees and other stakeholders know that they matter and their views will be heard and taken into consideration.

7.5 FirstBank's external communications will increase awareness of the brand and understanding of issues relevant to the brand and its customers and other stakeholders.

7.6 FirstBank's internal communications will bolster knowledge management, information sharing and operational excellence within FirstBank.

8. FUNCTIONS AND DELEGATIONS

8.1 Given the pivotal nature of communications in the effective operation of any organisation, several internal stakeholders usually discharge critical roles that have bearing on the direction and outcomes of the organisation's communications function.

8.2 The following organs and officers of FirstBank play important roles regarding this Policy and the communications function of FirstBank.

8.3 Board of Directors

8.3.1 The Board, as part of its governance and oversight of FirstBank's corporate strategies and policies, endorses the Communications Policy and institutes it for adoption and use by all relevant stakeholders.

8.3.2 The Board emphasises the sanctity and inviolability of the Policy, stressing in very clear terms FirstBank's zero tolerance for breaches or non-compliance.

8.3.3 The Chairman of the Board of Directors speaks on behalf of the Board.

8.4 Management Committee (MANCO)

8.4.1 The Management Committee is vested with the authority to review and approve the draft of the Communications Policy transmitted to it by the Group Head, Marketing and Corporate Communications.

8.4.2 The Management Committee is also vested with the authority to approve all subsequent reviews and updates of the Policy.

8.4.3 MANCO bears responsibility for defining FirstBank's overall communications objectives and priorities and ensuring that the right resources are allocated to all programmes and activities involving communications planning and management.

8.5 Group CEO

8.5.1 The Group Chief Executive Officer of FirstBank is the chief spokesperson and face of FirstBank.

8.5.2 As part of her/his accountability and reporting role to the Board in the management of FirstBank and the establishment of FirstBank's policies, the Group Chief Executive Officer oversees the work of FirstBank Management Committee members, providing leadership in establishing FirstBank's overall communications direction and themes.

8.5.3 This leadership role is also expressed in the Group Chief Executive Officer, who is the chief custodian of FirstBank Communications Policy, designating the Group Head, Marketing and Corporate Communications to coordinate the implementation of this Policy.

8.5.4 The Group Chief Executive Officer ensures that the communications function is fully integrated into the planning, management and evaluation of policies, programmes, services, and initiatives of FirstBank.

8.6 Group Head, Marketing and Corporate Communications

8.6.1 Reporting to the Chief Executive Officer, the Group Head, Marketing and Corporate Communications as chief enforcer of FirstBank Communications Policy, bears responsibility for oversight of the communications function and implementation of this Policy.

8.6.2 The Group Head, Marketing and Corporate Communications is the functional key spokesperson and custodian of the brand.

8.6.3 Working with her/his communications staff and closely with all departments, as applicable, in carrying out the communications function, the Group Head, Marketing and Corporate Communications:

- a. Directs the deployment of all internal and external communications (traditional and digital), marketing and public relations to support FirstBank's products, services, initiatives, collaborations, and partnerships (PSICP).
- b. Provides oversight to ensure consistent compliance with this Policy across all FirstBank's products, services, initiatives, collaborations, and partnerships (PSICP).
- c. Works with other executives and managers to align their communications priorities, objectives and requirements for effective programme and service delivery.

- d. Ensures liaison and cooperation among all the various communications departments and staff within FirstBank for all communications-related matters to ensure synergy within the Group.
- e. Ensures a proper balance of professional resources among the principal elements of the communications function: internal and external communications; digital communications; media relations and public relations; advertising; sponsorship; and stakeholder relations.
- f. Reviews and approves the communications strategies; and
- g. Assesses all new initiatives within the public environment to ensure that communications are fully considered in each new plan.

9. RISK MANAGEMENT

9.1 The purpose for establishing any communications policy, no matter how well articulated, will always be defeated if there are no mechanisms in place to ensure that communications are effective and monitored.

9.2 The following guidelines are therefore in place regarding monitoring.

9.3 Monitoring

9.3.1 FirstBank reserves the right to monitor all external and internal communications and access to its network, intranet and the Internet (as applicable), where FirstBank's property or asset is used in any communications or is accessed remotely from outside FirstBank. This includes the use of portable computers and mobile devices, including mobile phones issued to FirstBank employees.

9.3.2 FirstBank reserves the right to use any and every legitimate method available for monitoring of communications. This will include but not limited to the following: fileserver log file analysis; data packet analysis; employee productivity tracking tools; Internet usage and activity; camera footage; access logs; email message analysis, including content of individual emails and attachments where required; telephone number analysis; and other related methods.

9.3.3 FirstBank will assess the impact of any monitoring or extension to existing monitoring within FirstBank prior to its introduction. Any assessment will consider the following:

- a) The reason for implementing or extending monitoring and whether it is justified.
- b) The likely adverse impact on employees and third parties communicating with FirstBank.
- c) The use of alternatives to monitoring or alternative methods of monitoring.
- d) Any additional obligations that arise due to the monitoring, for example the secure storage of, and access to, information gathered by monitoring.

9.3.4 FirstBank will also consider the impact of monitoring on employees such as:

- a) The risk of intrusion into employees' private lives.
- b) The extent to which employees will be aware of the monitoring.
- c) The impact monitoring will have on the relationship between employees and FirstBank.
- d) How monitoring will be perceived by employees.

9.3.5 FirstBank will inform all employees prior to the introduction of any such monitoring or the extension of any existing monitoring. Furthermore, FirstBank will inform individual employees if their communications are being specifically monitored or accessed. However, an individual will not be

informed where serious breaches of this Policy or criminal activity is suspected and where informing the individual will hamper any investigation or risk the loss of data and evidence.

9.3.6 FirstBank will take all reasonable steps to ensure that personal communications are not accessed during monitoring. However, FirstBank can access personal communications where such communications are partly used to pass information belonging to FirstBank or where the nature of the personal communications provides evidence of the breach of this Policy.

9.3.7 FirstBank will not be liable for any breach of privacy should any communications of a personal nature be found and accessed by other employees of FirstBank or third parties engaged in monitoring as authorised by FirstBank and/or acting in the course of their employment.

10. POLICY IMPLEMENTATION

10.1 General Information/Guidelines

10.1.1 The guidelines and principles set out in this chapter apply to the entire range of internal and external communications issued by FirstBank and they relate to all forms and media of communications. The absence or lack of explicit reference to a specific channel or form does not limit the extent of the application of this Policy.

10.1.2 Media Channels

All the channels of communications may be divided into two groups:

10.1.2.1 Internal channels, which include:

- Internal portal (the FirstBank intranet)
- Email via Microsoft Outlook
- e-flyers sent via Microsoft Outlook
- e-newsletters, e-bulletins sent via Microsoft Outlook
- Yammer
- SharePoint
- Microsoft Teams
- Communicator app
- Screen savers
- Desktop backgrounds
- Ticker tapes
- Pop-up banners
- Email signature adverts (deployed internally)
- Physically published newsletters, bulletins, and other publications, such as Employee Handbook, policy documents and other documents in hard copy
- Internal memoranda (memos)
- SMS messages
- WhatsApp messages
- Verbal instructions and messages
- Other internal channels, whether currently existing or to be adopted in future

10.1.2.2 External channels, such as:

Conventional media channels of:

- Printed publications, such as newspapers, magazines, newsletters/bulletins, among others
- TV
- Radio
- Out-of-home

Below-the-line (BTL) channels of:

- In-branch posters
- Doorway displays
- Audio-visual displays
- Point-of-sale merchandising
- ATM terminal displays
- Experiential executions
- And other BTL channels, whether currently existing or to be adopted in future

Digital (marketing) channels of:

- FirstBank website and microsites
- Other (third-party) websites carrying FirstBank (sponsored) messages, adverts, and other content.
- FirstBank social media channels – Facebook, Instagram, Twitter, YouTube, LinkedIn, WhatsApp, and other social media platforms, whether currently existing or yet to be created.
- Other (third-party) social media channels carrying FirstBank (sponsored) messages, adverts, and other content.
- Search engines, especially Google
- FirstBank transactional platforms/channels, such as FirstOnline, FirstMobile and ATM screens
- Email messages from FirstBank to customers
- SMS messages from FirstBank to customers
- Other external channels, whether currently existing or to be adopted in future

10.1.3 Forms/Nature of Communications – Content Types: Using relevant media/channels, FirstBank’s visibility and profile will be promoted through well-coordinated efforts of all relevant stakeholders. The efforts will manifest themselves in a wide range of forms, including but not limited to: **advertising** (BTL and ATL – above-the-line), **branding**, **public/media relations**, **perception management**, **exhibitions**, **digital marketing** and other marketing activities that will be undertaken by FirstBank.

10.1.4 Shared Responsibility: Managers and staff at all levels have a responsibility to foster good communications internally and externally. None is exempt from this critical and shared duty.

10.1.5 In most areas of FirstBank, there will also be significant communications/consultation with stakeholders and partners and contact with “customers” across the whole Group which are not covered by this Policy. The rule of thumb in such circumstances is to engage with discretion, ensuring there is no breach of any laid-down policies of FirstBank. When in doubt, refrain and seek advice.

10.1.6 Recourse to M&CC: Matters which are not sufficiently provided for in, or deviate from, this chapter of the Policy may only be implemented with the written approval and authorisation of the Group Head, Marketing and Corporate Communications or her/his designate.

10.2 Internal Communications

10.2.1 Definition: All official communications activities carried on between employees or from FirstBank to employees or vice versa and intended for consumption by only internal stakeholders (which could include employees and Management and even the Board of Directors) constitute internal communications.

10.2.2 Importance: The value of good internal communications as one of the vital ingredients in making an organisation successful in achieving its goals cannot be overstated. Research shows that effective communications within an organisation can significantly improve employee engagement, enabling the organisation to work more efficiently and effectively as one single unit and leading to enhanced performance, productivity, and profitability.

10.2.3 Content Focus: The actual content of what is communicated internally will not be exclusively or even predominantly about FirstBank in any narrow sense: Most of it will likely relate to understanding the ambitions and meeting the requirements of other stakeholders and partners, as well as understanding and responding to relevant issues in the customer experience.

10.2.4 Defining Principles: Two key principles will define and underpin the internal communications processes to be designed and implemented by FirstBank to ensure productivity and effectiveness:

a) **Two-way communications** that are continuous and offer Management and staff regular opportunities for reviews, discussions and debates of official information and communications, contributing to the realisation of corporate goals and objectives, enhancement of projects and boosting operational efficiency. These will ensure that there is consultation with staff on all relevant issues, together with the active encouragement of feedback and ideas from staff.

b) **In-person, face-to-face communications** as the preferred method allowing managers and supervisors to communicate to their direct reports such important information as strategic and operational direction, relevant corporate issues, decisions, and projects.

10.2.5 Group/Departmental Communications

10.2.5.1 All duly approved messages originating from a department, unit, branch or subsidiary and intended for electronic communications to all FirstBank employees/Group, will be disseminated only through the Internal Communications unit of the Marketing and Corporate Communications department with the exception of communications emanating from the Chief Executive Officer of FirstBank.

10.2.5.2 Only communications relevant to all employees within FirstBank will be disseminated FirstBank-/Group-wide.

10.2.5.3 All group emails, memos and SMS messages to be circulated will be approved/signed by the head of the department/group, unit, branch or subsidiary sponsoring the message before being logged on the internal helpdesk channel(s) for execution by the Internal Communications unit of the Marketing and Corporate Communications department, which will disseminate to all or specified departments.

10.2.5.4 Where an email response is required to a group email, memo or other internal communications, all responding employees will ensure that they do not 'reply to all' but reply only to the sender/originating department/group, unit, branch or subsidiary requiring the response.

10.2.5.5 Similarly, email requests and other forms of internal communications notices will not be sent and/or copied to an entire department/group, unit, branch or subsidiary where only an employee or team in that department/group, unit branch or subsidiary needs to be informed or notified.

10.2.5.6 All duly approved/signed communications from departments or groups intended for external stakeholders will be appropriately logged on the internal helpdesk channel(s) for execution by the Marketing and Corporate Communications department. All communications with external stakeholders, including customers, will be at the instance of the Marketing and Corporate Communications department.

10.2.5.7 While **10.2.5.6** above is not intended to limit the ability of customer-facing units and employees, such as relationship managers, business managers and other employees who deal directly with customers, to communicate and engage one-on-one with their customers on an ongoing basis, it seeks to forestall a situation where such employees or others broadcast messages to their customers in the name of FirstBank using the customer relationship management (CRM) platform or any other mass-messaging tool at their disposal.

10.2.5.8 Where mass-messaging to (any group of, or all) customers is required, the request will be duly approved and logged on the internal helpdesk channel(s) for execution by the Marketing and Corporate Communications department.

10.2.6 Email Use, Compliance and Monitoring

10.2.6.1 All emails will be signed with the employee/sender's Name, Job Title, Functional Unit and Contact Details. The email signature will be inserted at the bottom of all email messages with all the correct contact details specified and will be presented based on FirstBank brand guidelines as detailed in the Brand Manual.

10.2.6.2 Emails will be used for work-related communications only, which will be via staff official email addresses and not through personal email addresses/mailboxes.

10.2.6.3 FirstBank/official email address will not be used for personal communications.

10.2.6.4 All employees will archive their official emails regularly to ensure their official mailboxes do not get full, leading to emails not being received.

10.2.6.5 FirstBank has a right to check all incoming and outgoing emails received and sent respectively using FirstBank IT infrastructure.

10.2.7 Non-use of Social Media for Internal Communications

10.2.7.1 Internal communications will be published on the intranet/portal and not FirstBank website, microsites, or social media sites.

10.2.7.2 Social media sites will not be used for internal communications.

10.2.8 Official Meetings (Physical and Virtual), Telephone and Conference Calls, Webinars

10.2.8.1 All business meetings will take place using FirstBank's meeting facilities or FirstBank-approved venues. When held virtually, because participants are in different locations or working from home (WFH), only approved virtual meeting apps/platforms may be used.

10.2.8.2 Conference calls will only be arranged using FirstBank's conferencing facilities or approved conferencing apps/platforms and no other methods.

10.2.8.3 All business calls will be made using FirstBank's facilities or approved call apps/platforms or the employee official mobile phone if s/he is provided with one.

10.2.8.4 Where a personal phone or device is to be used for a business call or other official purposes, the user will ensure they comply with guidelines regarding such use as detailed in the Information Security Policy.

10.2.8.5 FirstBank's meeting and call facilities will be used for business purpose only and not deployed for personal use.

10.2.8.6 All conference calls and meetings (physical or virtual) will be summarised as meeting minutes and circulated to the relevant members of the concerned department(s) by the meeting organiser/convener (or their designated staff).

10.2.8.7 The same level of preparation, decorum and meeting etiquette expected as regards physical meetings will be maintained for virtual meetings.

10.2.8.8 While employees are not expected to be as formally dressed in virtual meetings where their video is or could be turned on, especially in the emerging WFH (working from home) era, as when appearing for physical meetings, they will be appropriately dressed and ensure that their background environment is neat, noiseless and devoid of distractions.

10.2.8.9 Reasonable care will be taken by employees in business calls or meetings where external parties are involved not to divulge confidential information or cite any data classified as secret, confidential or 'internal use only' as detailed in **10.2.10.1** below.

10.2.8.10 Where any employee is invited in their capacity as a staff of FirstBank to participate in a webinar, whether as a facilitator, speaker, panellist or moderator, they will, before accepting the invitation, seek approval from their Line Executive, and then engage the Marketing and Corporate Communications department for event and content clearance whilst timely providing the latter with their speaking outline, notes or presentation.

10.2.8.11 Only employees of AGM grade and above will represent FirstBank, except where exceptional approval is obtained by the Marketing and Corporate Communications department for other employees, when considered expedient. FirstAcademy, given the nature of their work with external trainers and facilitators and the verification process in place, will be exempted from this requirement.

10.2.9 Responsibilities and Expectations of Staff in Terms of Internal Communications

10.2.9.1 Use of Approved Templates: All internal communications within and across departments, units, branches and working teams will be done using approved templates and formats, such as memo, email, presentation documents and all other formats, whether currently existing or to be adopted in future, will carry the visual representation of FirstBank brand as detailed in the Brand Manual.

10.2.9.2 Vision and Mission Statements in Presentations: All presentation documents will, in addition to being visually representative of the brand, include the vision and mission statements of FirstBank on their early pages/slides i.e. the pages/slides after the cover.

10.2.9.3 Internal Branding: The internal look and feel of departments, branches and all other FirstBank locations as well as adjoining corridors and spaces linking them, where applicable, will mirror the brand identity as part of the holistic make-up of the internal communications of FirstBank. Heads of departments, branches and other FirstBank locations, especially Head of General Services, Business Development Managers (BDMs), Cluster Operations Services Managers (COSMs), Business Managers (BMs) and Heads of Branch Services (HBS), bear responsibility for ensuring that their departments, branches and locations as well as the environs are in compliance with this guideline.

10.2.9.4 Members of Staff Expectations

10.2.9.4.1 As a member of staff, employees will expect to be:

- a. Provided with relevant information and kept informed of relevant developments.
- b. Consulted on issues relevant to their area and the wider Organisation.
- c. Given the opportunity to raise questions or issues of concern relevant to their work. Their questions will be treated seriously and respectfully and will be answered either immediately or within a reasonable period.

10.2.9.5 Members of Staff Responsibilities

10.2.9.5.1 As a member of staff, employees will:

- a. Raise relevant questions or problems with their supervisor or line-manager (or through other channels if necessary) – their questions will be treated seriously and respectfully.
- b. Attend relevant internal meetings where requested (or, where this is not possible, arrange to be given feedback by a colleague or manager);
- c. Read all FirstBank communications and notices and comply with them.

10.2.9.6 Supervising Staff Expectations

10.2.9.6.1 As a supervising staff, employees will expect to be:

- a. Allowed to communicate most issues (particularly relating directly to their own area) to their staff/direct reports themselves.
- b. Briefed on any sensitive or significant issues in advance of their staff/direct reports being informed, so that they can answer questions from their staff/direct reports.
- c. Consulted on proposed developments that will affect their area, to ensure that proposals are 'workable' on the ground.
- d. Asked by their line-manager for feedback and concerns from their staff/direct reports on any relevant issues.
- e. Kept informed of general developments by their line-manager or senior managers.

10.2.9.7 Supervising Staff Responsibilities

10.2.9.7.1 As a supervising staff, employees have responsibility to:

- a. Talk* to their staff/direct reports about relevant issues, how they apply to their work area, whether proposals are 'workable' or how they could be improved, etc. (* Supervising staff can use email/SMS, etc. if appropriate, but will ensure that their staff/direct reports have an opportunity to discuss the issue and raise any relevant problems or concerns);
- b. Treat questions from their staff/direct reports seriously and respectfully. Respond to all questions (whether immediately or after further investigation) and provide an explanation for their answer.
- c. Raise any significant problems or issues of concern in their area (which they cannot resolve) with their line-manager.
- d. Be as informed as they can be about the issues relevant to their area and their staff/direct reports.
- e. Empower their staff/direct reports by providing them with information to enable them to do their jobs as well as possible.
- f. Encourage networking by their staff/direct reports, both with staff in other areas of FirstBank and with other stakeholders geographically.
- g. Attend relevant training relating to internal communications, when and if invited.

10.2.9.8 Senior Management Staff Responsibilities

10.2.9.8.1 As part of Senior Management/the Leadership Team, in addition to the expectations and responsibilities of supervisors (above), Management staff also have a responsibility to:

- a. Support managers/supervisors reporting to them in carrying out the responsibilities listed above, including ensuring that they have all relevant information and that they are adequately trained where necessary.
- b. Hold regular meetings with their staff/direct reports to discuss developments, plans and performance within their area/department, as well as wider FirstBank developments where relevant.
- c. In particular, consult their staff/direct reports on all relevant proposed developments to ensure that they are 'workable'; ensure that their managers discuss them with frontline staff; and actively seek and address any feedback or concerns;
- d. Empower their managers by allowing them to communicate on most issues directly with the staff reporting to them.

10.2.10 Handling FirstBank Information/Data

10.2.10.1 Information/Data Classification and Definitions

FirstBank adopts a system that classifies all data/information into four different categories:

- a. **Secret:** Highly valuable and sensitive business information that MUST NOT be shared under any circumstances. If such information were to become available to unauthorised persons, it could cause serious reputational damage to FirstBank or, worse, result in FirstBank going out of business. Examples of secret information include passwords, PINs, tokens, and encryption keys.
- b. **Confidential:** Information distributed or shared on a 'need to know' basis that pertains to customers, employees and financial programmes or strategies. Examples include staff salaries, customer account information, personally identifiable information, card PAN, audit, and regulatory reports.
- c. **'Internal Use Only':** Information that any FirstBank employee can have access to and disclosure within FirstBank is not expected to cause any serious harm to FirstBank. However, such information is not to be shared externally. Examples include policies, procedures, and internal e-flyers.

d. **Public:** Information that may be released to the public and will not benefit a competitor or have a negative impact on FirstBank or breach confidentiality. Only Marketing and Corporate Communications department can classify documents as public. Examples are annual reports, marketing brochures, email and digital marketing materials, and all other marketing materials regularly released to the public.

10.2.10.2 Secret and confidential information and matters relating to FirstBank will not be discussed in and around places, such as hallways, restaurants, airplanes, taxis and all other vehicles, buildings, locations and environments, where the discussion may be overheard.

10.2.10.3 Secret and confidential documents will not be read in public places.

10.2.10.4 Secret, confidential and 'internal use only' information/documents that have been printed and served the purpose for printing will be shredded or discarded in ways which cannot allow for others to retrieve them.

10.2.10.5 All employees, particularly those of departments including the Marketing and Corporate Communications department that regularly deal with confidential information, will take all necessary measures to maintain the confidentiality of information in their possession outside of the office.

10.2.10.6 Transmission of documents by electronic means, such as by scanning or directly from one computer to another, will be made only where it is reasonable to believe that the transmission can be made and received under secure conditions.

10.2.10.7 Where, for justifiable reasons, an external party is to be looped in to an internal email trail, the employee looping in the external party will first ensure that no secret or confidential information or one intended for 'internal use only' is on the trail.

10.2.10.8 Unnecessary copying of confidential documents will be avoided and documents containing confidential information will be promptly removed from conference rooms and work areas after meetings have concluded. Extra copies of printed confidential documents will be shredded or otherwise destroyed beyond any attempts at retrieval.

10.2.10.9 Access to confidential electronic data will be restricted using passwords.

10.2.10.10 If any employee's official mailbox is to be accessed from outside of FirstBank network, they will ensure the information is not accessible by anyone other than them.

10.3 External Communications

10.3.1 Definition: One key defining feature of external communications is that they are almost always intended for customers – used here loosely to include FirstBank existing customers, potential customers, the public and investors/shareholders. The intended recipients of external communications are not internal stakeholders, such as employees, Management, or members of the Board of FirstBank, but external stakeholders.

10.3.2 External Stakeholders of FirstBank include:

- a. **Government** whether at the federal, state or local level and whether in the executive, legislative or judicial arms – represented by public officials who carry on the day to day business of governance over territories and spheres in which FirstBank transacts business.
- b. **Industry regulators** including the Central Bank of Nigeria (CBN), which is the foremost regulatory agency for banks and other institutions offering financial services; Nigeria Deposit Insurance Corporation (NDIC), which insures the deposits of banks' customers; Securities and Exchange Commission (SEC), which has oversight of the financial securities market in Nigeria; Nigerian Exchange (NGX), which provides the platform for trading in stocks and shares of quoted companies.
- c. **The media** consisting of broadcast, print and online outfits, which publish news, entertainment and other forms of content, as well as the journalists and reporters who work for them, especially journalists on their financial, brand and tech/fintech (technology/financial technology) desks.
- d. **Partners and collaborators** are organisations or individuals involved with FirstBank.
- e. **Investors and shareholders** who hold investments and shares of interest to FirstBank.
- f. **Host community** is the immediate environment or territory where any FirstBank office, branch, operations, or project is based and all the people who live in and around the environment.
- g. **Customers** of FirstBank, whether active or otherwise.
- h. **The general public** is the mass of people outside FirstBank, including potential customers.

10.3.3 Branding

10.3.3.1 Definition of Brand: The FirstBank brand is the perception of FirstBank that people hold out there. It is the associations that people make of FirstBank and the value that they attribute to FirstBank based, to a large extent, on the quality of products, services and experiences that FirstBank delivers (or is perceived to deliver) to customers and/or audiences.

10.3.3.2 Brand Elements – Use and Application: The FirstBank logo and other corporate identity features are key elements of the brand. The use and application of the brand elements will be as detailed in the Brand Manual, which is readily available through the office of the Group Head, Marketing and Corporate Communications.

10.3.3.3 All FirstBank communications, irrespective of forms and media, will carry the brand elements or identifiers in the manner prescribed in the Brand Manual.

10.3.3.4 All exceptions to, or deviations from, the prescribed corporate identity standards as detailed in the Brand Manual, will be approved by the Group Head, Marketing and Corporate Communications.

10.3.3.5 Brand assets will only be issued externally following due application and subsequent approval and authorisation by the Group Head, Marketing and Corporate Communications.

10.3.3.6 FirstBank brand name will not be attached to or associated with any products, services, initiatives, collaborations, and partnerships (PSICP) without the prior approval of the Group Head, Marketing and Corporate Communications.

10.3.4 Advertising and Marketing

10.3.4.1 In support of the corporate brand as well as products, services, initiatives, collaborations and partnerships (PSICP), FirstBank will, on an ongoing basis, deploy advertising and marketing campaigns in Nigeria and, where necessary, abroad in pursuit of FirstBank's stated objectives and priorities.

10.3.4.2 All advertising will be planned, executed, and managed only by the Marketing and Corporate Communications department using approved third parties, agencies, and vendors at its disposal.

10.3.4.3 All major advertising and marketing campaigns will proceed and be executed only after it has been established that they will help to achieve well-defined and measurable objectives and that they demonstrate cost-effectiveness.

10.3.4.4 While being run, all major campaigns will be monitored to ensure compliance with approved schedules, consistency, and delivery of expected output. When completed, all major campaigns will be formally evaluated for their effectiveness.

10.3.4.5 Without exception, all advertising will be consistent with the corporate brand for which the Marketing and Corporate Communications department is responsible.

10.3.4.6 With a view to ensuring a consistent corporate image, no advertising (material/campaign) will be released until approved by the Group Head, Marketing and Corporate Communications, who has been delegated to so act by the Chief Executive Officer of FirstBank.

10.3.4.7 Heads of departments/groups, units or branches within FirstBank involved with third-party companies and/or individuals and who enter into negotiations and agreements with them for the development of, or that will result in, products, services, initiatives, collaborations and partnerships (PSICP) which will eventually require the use or deployment of FirstBank corporate identity elements and communications, will engage and involve the Marketing and Corporate Communications department early in their discussions with the third parties. The Group Head, Marketing and Corporate Communications will be consulted before any such agreements are entered into on a group or business level.

10.3.4.8 All approved third parties, agencies and vendors will provide indemnity to FirstBank with respect to the creative works they produce for the brand. The indemnity will cover issues of plagiarism, image rights, copyright, intellectual property and other related rights across all territories and every jurisdiction where claims can be made and absolve FirstBank of any liabilities when the third parties, agencies and vendors, including those working for them, knowingly or unknowingly violate the intellectual property rights of others.

10.3.5 Digital Communication

10.3.5.1 Importance and Centrality of FirstBank Website to Digital Communication: The FirstBank website remains the primary platform through which information about FirstBank, its products, services and initiatives is provided to the public – in Nigeria and abroad. It serves as a veritable tool for FirstBank to engage customers and prospects through the delivery of rich, exciting content and memorable online experiences that result not only in repeat website visits, but also the establishment of active customer relationships and referrals.

10.3.5.2 Other Digital Tools/Channels: The website is but one element in a mix of digital tools/channels deployed by FirstBank. FirstBank boasts an impressive array of digital channels that help FirstBank to maximise reach and optimise its presence across the digital landscape. They include:

- a. An active blog on FirstBank website
- b. Microsites
- c. Mobile apps, such as FirstMobile
- d. Email (marketing)
- e. Facebook
- f. Instagram
- g. Twitter
- h. YouTube
- i. LinkedIn
- j. Other social networking platforms

10.3.5.3 All information to be published on the Internet or social media sites will be approved and processed according to FirstBank Digital Marketing and Social Media Response policies.

10.3.5.4 FirstBank's digital communication activities will extend to e-commerce, e-marketing, e-banking and other electronic formats, or digitisation of FirstBank products, services, initiatives, collaborations, and partnerships (PSICP) as well as channels.

10.3.5.5 Social media channels and mobile technologies will be employed in FirstBank's efforts to reach audiences, especially the younger population segments, with its message.

10.3.5.6 Given the rapidly evolving nature of the technological landscape, FirstBank's digital strategy will incorporate robust monitoring of evolving technologies and identifying opportunities that can be leveraged.

10.3.5.7 FirstBank will solicit and encourage employee participation on social media channels to boost its social media footprints, amplify its message and promote FirstBank events and activities.

10.3.5.8 Employees will be expected, while supporting FirstBank on social media whether through shares, comments, or personal stories, to comply with FirstBank Code of Conduct/Employee Handbook and the Social Media Response Policy.

10.3.5.9 Employees will also be expected to avoid disclosing confidential or proprietary information, infringing copyright requirements or breaching privacy while using their social media pages to promote FirstBank causes or amplify its messages.

10.3.5.10 Employees will not commit FirstBank to a course of action that they are not authorised to commit FirstBank to, using their social media pages.

10.3.5.11 Employees will not present themselves as representing FirstBank in any way, using their social media pages.

10.3.5.12 Employees will not engage customers in the name of FirstBank or as representatives of FirstBank, using their social media pages. They will not ask for customers' account details or converse

with customers on their banking issues, using their social media pages. They will refer customers instead to the authorised FirstBank-owned channels (FirstContact's various contact details) for them to pursue resolution of their banking issues.

10.3.5.13 Employees will not solicit for financial or any other assistance on behalf of FirstBank or causes FirstBank supports, using their social media pages.

10.3.5.14 Employees will not use unprofessional or foul language during conversational interactions while promoting FirstBank causes or amplifying FirstBank messages, using their social media pages.

10.3.5.15 Employees will maintain decorum and show restraint on their social media pages in the face of any unprovoked aggression by angry and unruly followers, friends, connections, fans and other contacts who jump onto their pages or timelines to attack them or FirstBank because of FirstBank messages shared on their pages, doing so possibly in reaction to a negative experience the followers, friends and contacts. or others may reportedly have had with FirstBank.

10.3.5.16 FirstBank will not interfere or intervene in the way and manner people, including employees, manage their personal spaces such as their private social media pages and deal with unprovoked attacks probably by unfriending, muting or blocking aggressors. The requirement of restraint in subsection **10.3.5.15** above is to avoid the risk of reputational damage to the brand when private social media pages are used to share brand messages.

10.3.6 Copyright

10.3.6.1 As a responsible body corporate, FirstBank will dutifully respect intellectual property rights.

10.3.6.2 FirstBank will take steps to ensure that the use of images, sounds, recordings, etc. in its print, audio, graphic, audio-visual and digital communications and their delivery to targeted audiences, fully comply with extant copyright and intellectual property laws.

10.3.6.3 FirstBank will fully respect the ownership rights associated with works subject to copyright that FirstBank employs in its communications and channels.

10.3.6.4 While FirstBank will exercise reasonable care in its choice of vendors, suppliers, partners and agencies, it will not bear responsibility or liability for any (unverified or false) claims made by such third parties on materials and productions they undertake on behalf of FirstBank.

10.3.7 Media Relations

10.3.7.1 Financial services generally attract significant media attention, which should not be seen as an obstacle, but opportunity FirstBank can exploit to help achieve its corporate goals.

10.3.7.2 The media can provide a powerful conduit for FirstBank to get its key messages out to customers and the general public. Engaging with the media will also help FirstBank in building a strong brand image through coordinated media leverage.

10.3.7.3 It is important that FirstBank constantly communicates to customers and the general public the initiatives, actions and efforts being taken by its Executive Leadership to provide delightful customer experience and protect shareholders' investments.

10.3.7.4 Positive and proactive news stories about FirstBank are a proven method to adopt to increase trial and lead generation as well as build brand loyalty.

10.3.7.5 In engaging with the media, FirstBank will avoid some of the pitfalls that exist when dealing with the media.

10.3.7.6 Management and staff will always keep in mind that careless or unauthorised statements or release of information to the media can have drastic consequences and create reputational risks for FirstBank.

10.3.7.7 As FirstBank continues to build brand affinity for its products, services, initiatives, collaborations and partnerships (PSICP) whilst deepening brand value and equity with both customers and potential customers, all employees will be mindful of their conduct especially when engaging with external parties.

10.3.7.8 FirstBank's media relations network will be leveraged to broadly disseminate information about FirstBank's products, services, initiatives, collaborations, and partnerships (PSICP), engaging with the media proactively on all relevant subjects, issues, and questions. This will be done with utmost discretion to ensure none of FirstBank's obligations to other parties – whether of a judicial, legislative, commercial or privacy nature – is breached.

10.3.7.9 All requests for official communications from FirstBank will be directed to the appropriate and authorised officials of FirstBank.

10.3.7.10 Only the Chairman of the Board, the Managing Director/CEO and the Group Head, Marketing and Corporate Communications are allowed and authorised to speak to the media on behalf of FirstBank as specifically detailed in chapter 8 of this Policy.

10.3.7.11 No employee will engage the media in any way, including speaking with the media. Responses to the media, such as "No comment" or "I will call you back", fuel speculations and conjectures and, as such, pose reputational risks to FirstBank.

10.3.7.12 All employees who receive any call from the media (and are not authorised to handle the associated discussion) will politely decline giving any details (not even their name), politely refuse to be drawn into conversation (to avoid the risk of easily saying what they did not intend), whilst assuring the journalist that they will pass the enquiry on, at once, to an informed spokesperson who will call the journalist back immediately. They will subsequently transmit the media enquiry to the Marketing and Corporate Communications department with the journalist's name, organisation, contact details and reason for calling (refer to the SOP of the Marketing and Corporate Communications department for details on the procedural aspects of this guideline).

10.3.7.13 Exceptions to **10.3.7.11** and **10.3.7.12** above are made for Senior Management as part of FirstBank's strategic initiative to position them as thought leaders and subject-matter experts in their fields. Senior Management staff will speak to the press, grant interviews and present papers on behalf

of First Bank of Nigeria Limited or any of the subsidiaries, subject to approval by the Chief Executive Officer with the requisite input and pre-appearance/-interview preparation from the Marketing and Corporate Communications team led by its Group Head.

10.3.7.14 Senior Management staff will always ensure that information released publicly, for example via approved media interviews, has been lawfully obtained and released in accordance with all relevant policies and the Code of Conduct and Ethics.

10.3.7.15 All release of information to the public via media interviews, speeches, and stand-in representations by any employee of FirstBank other than the Chief Executive Officer her/himself will be pre-approved by her/him or her/his designate.

10.3.7.16 The script or speech or talking points for all approved (as specified in **10.3.7.15** above) media interviews or appearances will be reviewed with the Group Head, Marketing and Corporate Communications, so necessary checks can be made for alignment with brand speak and key messages.

10.3.7.17 Before participating in approved (as specified in **10.3.7.15** above) media interviews, all employees will first review with the Group Head, Marketing and Corporate Communications the interview script (refer to the SOP of the Marketing and Corporate Communications department for details on the procedural aspects of this guideline).

10.3.7.18 All employees participating in approved (as specified in **10.3.7.15** above) media Interviews will adhere to the reviewed interview script (specified in **10.3.7.16** above) and exercise utmost care to resist being swayed or derailed into making statements out of context during the interview.

10.3.7.19 All employees participating in any approved (as specified in **10.3.7.15** above) media appearance, whether the programme is to be produced live or recorded, on radio or television, will as a measure of comfort, have a written script that has been reviewed by the Group Head, Marketing and Corporate Communications and will go through a basic media prep to be facilitated by members of the Marketing and Corporate Communications team, except where otherwise exempted by the Chief Executive Officer or their designate (refer to the SOP of the Marketing and Corporate Communications department for details on the procedural aspects of this guideline).

10.3.7.20 All requests for media interview and appearance will be routed through the Group Head, Marketing and Corporate Communications for approval by the Chief Executive Officer or their designate.

10.3.7.21 All requests for media interview and appearance (whether personal or otherwise) that have been contracted even though not routed through the Marketing and Corporate Communications department will be reviewed with the Group Head, Marketing and Corporate Communications before participation in the interview.

10.3.7.22 All employees appearing in an official capacity in events with media exposure, such as media briefings, press conferences, product launches, awards and other corporate events, will be properly attired in the approved official dress code complete with branded tie/scarf and lapel pin. In case of product launches where branded T-shirts are worn, Senior Management staff will always have a jacket worn over the T-shirt.

10.3.7.23 Employees should endeavour to be professional always and be mindful of their activities within or outside FirstBank business premises and on social media.

10.3.7.24 Conflict of Interests: Official Representation, Personal/Private Capacity and Third-Party Representation

10.3.7.24.1 Whereas all employees have the right to express an opinion in public debates, letters to the editor, calls to talkback radio, on social media, etc., whereas employees also have the right to join political parties and hold and express political views as any other Nigerian citizen, personal opinions and political activities will be expressed and undertaken in their capacity as a private citizen and not as an employee of FirstBank.

10.3.7.24.2 Examples of private media appearances include television and radio phone-in programmes, social media comments and posts, and social event media interviews such as at weddings, religious programmes, and club/association meetings.

10.3.7.24.3 Employees will ensure all comments made by them in their personal/private capacity will not be seen as representing the official view of FirstBank or allowed to compromise their ability to discharge their duties or be loyal to FirstBank in a politically-neutral manner.

10.3.7.24.4 In expressing opinions or undertaking political activities in a private capacity, employees will ensure that there is no conflict of interest with their role as FirstBank employees.

10.3.7.24.5 Examples of conflicting communications or representation include using official FirstBank mailbox for personal emails and communication, using official FirstBank designation or identification in an association's or private engagements and expressing official views in a personal capacity.

10.3.7.24.5 Employees will not refer to their position in FirstBank when expressing an opinion or participating in public debates in a private capacity.

10.3.7.24.6 In situations where public comments, although made in a private capacity, may appear to be an official comment on behalf of FirstBank, employees will state emphatically that their comments are made in a private (or in their capacity as representatives of a union or association or other bodies, if that happens to be the case) and do not represent the official view of FirstBank.

10.3.7.24.7 Employees will not wear FirstBank-approved merchandise, such as promo T-shirts, tie, or lapel pin, when expressing private opinions in public or before the media.

10.3.7.24.8 Any employee of FirstBank who liaises with the media on behalf of a union or industrial association or other group will ensure that their appearance, status and comments are not misinterpreted as representing the official views or policies of FirstBank.

10.3.7.24.9 When speaking as an industrial representative, the FirstBank employee involved will clearly identify themselves by name and position in the union or association, not by position in FirstBank.

10.3.7.24.10 Any employee who doubles as a representative of an industrial union or association and speaks on their behalf will make sure their comments are recognised as being made on behalf of the union or association and not FirstBank.

10.3.7.24.11 Any employee who also represents an industrial union or association will not engage in conduct that may constitute a conflict of interest with their primary duties and/or impinge on the integrity of FirstBank within the local or global landscape.

10.3.7.24.12 All employees who are also representatives of an industrial union or association will not wear FirstBank merchandise or other insignia while appearing for the union or association in public or before the media.

10.3.8 Disclosure of Information

10.3.8.1 FirstBank recognises the right of stakeholders, especially shareholders/investors, to access relevant information it maintains in its records.

10.3.8.2 FirstBank will do its utmost, on an ongoing basis, to proactively make all relevant information available on its website and in the media through press releases.

10.3.8.3 By making every reasonable effort, FirstBank will proactively disclose applicable records on its website. It will also grant the public access to records in accordance with the Freedom of Information Act and the Privacy Act.

10.3.8.4 Employees will only access, use and/or disclose confidential information if required by duty and if they are authorised by the approving officers.

10.3.8.5 Employees, as part of their regular duties, can explain or describe existing non-confidential policies or procedures to members of the public. However, only the Chairman of the Board, the Chief Executive Officer and the Group Head, Marketing and Corporate Communications or other approved spokesperson(s) are authorised to comment on policy, procedures and/or sensitive information or position in public or before the media.

10.3.9 Crisis and Emergency Communications

10.3.9.1 In times of emergency and crisis, FirstBank will proactively issue communications with a view to containing the situation, dousing tension, reducing panic and reassuring stakeholders that the situation is under control and being managed to ensure the best possible outcome.

10.3.9.2 During crisis, the Chief Executive Officer will remain the face of, and chief spokesperson for, FirstBank and where they so designate, the Group Head, Marketing and Corporate Communications will stand in that stead.

10.3.7.3 All other duties and roles, and steps to be taken by FirstBank during crisis will be as detailed in the Crisis Communications Plan, which is contained in the Business Continuity Plan, available through the office of the Group Head, Marketing and Corporate Communications.

11. BREACH OF THE POLICY

11.1 All actions by any employee which contravene guidelines in this Policy fail the test for value for and to stakeholders and will be dealt with by the line manager or head of department of the employee concerned.

11.2 Contraventions involving external parties will be reported to the Group Head, Marketing and Corporate Communications for appropriate actions to be taken.

11.3 Depending on the severity of the contravention involving external parties, the Group Head, Marketing and Corporate Communications will involve the Legal department in pursuing civil or criminal litigations against those parties and seeking judicial remedies for FirstBank, where FirstBank's reputation is threatened/damaged and/or there have been disruptions of FirstBank's operations following the contravention.

11.4 Contraventions of a serious nature involving employees will be reported to the Human Capital Management and Development department for appropriate action, which could involve invitation to FirstBank's Disciplinary Committee and application of the necessary sanctions for breach of FirstBank's policies.

12. ENQUIRIES

12.1 If there are any questions regarding guidelines in the Communications Policy and how they apply to any employee or should be applied, or if there are questions about particular issues any employee assumes to be covered by this Policy, please consult:

- a. Group Head, Marketing and Corporate Communications (M&CC) or
- b. Head, Sustainability/Media and External Communications unit of the M&CC before taking any action that may be in breach of any of the guidelines.

12.2 All media enquiries, interview requests and queries should be directed to:

Group Head, Marketing and Corporate Communications

Olayinka Ijabiya via:

- a. Email: **Olayinka.T.Ijabiya@firstbankgroup.com** or
- b. Mobile: **08122220931**

13. OTHER RELEVANT DOCUMENTATION

This Communications Policy must be read in conjunction with all related FirstBank policies and standard operating procedure documents including:

13.1 FirstBank HR Policy

13.2 Employee Handbook/Employee Code of Conduct and Ethics

13.3 FirstBank Brand Manual

13.4 Social Media Response Policy

13.5 FirstBank Group Crisis Management Guide

13.6 M&CC Standard Operating Procedure (M&CC SOP)

13.7 Information Security Policy

13.8 Framework for Staff Engagement with the Media (included as part of the Appendices in this Policy document)

APPENDICES

A. FRAMEWORK FOR STAFF ENGAGEMENT WITH THE MEDIA

Introduction

An addendum to the Media and External Relations (MER) Policy of FirstBank, this framework is intended to offer guidance to all members of staff of FirstBank on the subject of speaking to the media. It spells out the guidelines that all employees should follow when they are approached by the media, when they are to make any public or media appearance on behalf of the Bank or other group or in their private capacity and the Bank's key messages that are to be projected in media interviews and appearances.

This framework has become more critical for employees today than ever before because of the ubiquitous nature of the contemporary media scene, which now includes online news media and social media. Employees are now more exposed to people who work for various media platforms that are nosing around for news scoops, including seemingly ordinary people often tagged citizen journalists who can "create" a news item with their mobile phones and make it go viral in seconds. Any careless or unauthorised statements or release of information by employees, whether done deliberately or unintentionally, to today's pervasive media platforms can have drastic consequences and create reputational risks for FirstBank.

It is for this reason that the overriding guideline regarding speaking to the media remains that: **"No employee is allowed to engage the media in any way, including speaking with the media."** Even responses to the media, such as "No comment" or "I will call you back," are enough to fuel speculations and conjectures and as such, pose reputational risks to FirstBank.

Framework Subject	Guidelines
<p>SO WHAT DO YOU DO IF YOU ARE APPROACHED BY THE MEDIA?</p>	<ul style="list-style-type: none"> • If you receive any call from the media (and are not authorised to handle the associated discussion), you are to politely decline giving any details (not even your name), politely refuse to be drawn into any conversation with the media (to avoid the risk of easily saying what you did not intend), whilst assuring the journalist that you will pass the enquiry on, at once, to an informed spokesperson of FirstBank who will call the journalist back immediately. • You are to subsequently transmit the media enquiry to the Marketing and Corporate Communications department with the journalist's name, organisation, contact details and reason for calling.

Framework Subject	Guidelines
	<ul style="list-style-type: none"> All requests you receive for official communications from FirstBank should be directed to the appropriate and authorised officials of FirstBank. You are not to presume to know and provide the answers or source them from unauthorised officials.
<p>IF YOU ARE NOT AUTHORISED TO SPEAK TO THE MEDIA ON BEHALF OF FIRSTBANK, WHO ARE THOSE SO AUTHORISED?</p>	<ul style="list-style-type: none"> Only the Chairman of the Board, who speaks on behalf of the Board; the Chief Executive Officer who speaks on behalf of the Bank and the Group Head, Marketing and Corporate Communications (GH, M&CC), as the spokesperson of the Bank are allowed and authorised to speak to the media on behalf of FirstBank.
<p>ARE THERE NO EXCEPTIONS MADE FOR OFFICIALS OTHER THAN THE CHAIRMAN, CHIEF EXECUTIVE OFFICER AND GH, M&CC TO SPEAK ON BEHALF OF FIRSTBANK?</p>	<ul style="list-style-type: none"> There are exceptions made for Senior Management staff as part of FirstBank’s strategic initiative to position them as thought leaders and subject-matter experts in their fields. Senior Management staff are allowed to speak to the press, grant interviews and present papers on behalf of FirstBank or any of the subsidiaries, subject to approval by the Chief Executive Officer with the requisite input, pre-appearance/pre-interview preparation from the Marketing and Corporate Communications team led by its Group Head. All Senior Management staff who are allowed to speak on behalf of FirstBank have a duty to always ensure that the information released publicly, for instance via approved media interviews or public presentations, has been lawfully obtained and released in accordance with all relevant policies and the Code of Conduct and Ethics. All release of information to the public via media interviews or speeches or stand-in representations by any employee of FirstBank other than the Chief Executive Officer himself will be pre-approved by him or his designate.
<p>WHAT GUIDELINES AND PROCEDURES SHOULD BE FOLLOWED IF YOU ARE TO SPEAK ON BEHALF OF FIRSTBANK?</p>	<ul style="list-style-type: none"> You should ensure that all requests for media interview and appearance are routed through the Group Head, Marketing and Corporate Communications for approval by the Chief Executive Officer or his designate. And all requests for media interview and appearance, whether personal or otherwise, that have been contracted even if not routed through the

Framework Subject	Guidelines
	<p>Marketing and Corporate Communications department, are to be reviewed with the Group Head, Marketing and Corporate Communications before participation in the interview.</p> <ul style="list-style-type: none"> • Before participating in any approved media interviews or appearances, you are expected to first review the interview script or speech or talking points with the Group Head, Marketing and Corporate Communications. This review will help in making the necessary checks to ensure the script or speech is aligned with the tone and character of the FirstBank brand as well as the periodically reviewed key messages of FirstBank. • You are then expected to adhere to the reviewed interview script and exercise utmost care to resist being swayed or derailed into making statements out of context during the interview or speech. • If you are participating in any approved media appearance, whether the programme is to be produced live or recorded on radio or television, as a measure of comfort, you are to have a written script that has been reviewed by the Group Head, Marketing and Corporate Communications and you are to go through a basic media prep to be facilitated by staff of the Marketing and Corporate Communications team, except where otherwise exempted by the Chief Executive Officer or his designate. • The written script/speech would contain some relevant key messaging points. The key messaging points of FirstBank currently include: <ul style="list-style-type: none"> I. <u>Safe, Secure, Trusted and Enduring</u> FirstBank is safe, secure, trusted and enduring. FirstBank puts the safety of its customers first, ensures secure transactions for customers and non-customers using FirstBank’s different channels and has gained the trust of Nigerians through its many years of reliance and endurance. II. <u>Strong Fundamentals</u> We have thrived on strong fundamentals, demonstrated by our solid track record over the 127 years of our existence. III. <u>(Delivering) Value</u>

Framework Subject	Guidelines
	<p>With our diversified products suite, competitive pricing through our wide and accessible business networks across the nation, we have consistently provided value to our over 19 million customer accounts.</p> <p>IV. <u>Nation Builder</u> Truly woven into the fabric of society, FirstBank has played a role in every developmental milestone that has moved this nation forward.</p> <p>V. <u>Dynamic and Transformational</u></p> <ul style="list-style-type: none"> ✓ We are a resilient, enduring and forward-looking financial institution and we have transformed from a one-shop barter company to a global one-stop financial supermarket. ✓ We continuously reinvent ourselves, having moved from an analogue bricks-and-mortar banking institution to a digitally led enterprise. ✓ We are deliberate in our transformation cycles, ensuring we remain relevant and well positioned to serve our customers and stakeholders. ✓ From our Century II program to PR1MUS now, transformation is institutionalised and in our DNA. ✓ We have an incredibly youthful and vibrant workforce, supported with exceptional training to achieve their potential and aspirations. <p>VI. <u>Strong Corporate Governance</u></p> <ul style="list-style-type: none"> ✓ A strong board composition with best-in-class human capital in the industry. ✓ We foster a culture of compliance with all extant industry rules and regulations, promoting a strong corporate governance culture across all our operational entities. <p>VII. <u>A Bright Future</u></p> <ul style="list-style-type: none"> ✓ We remain greatly optimistic about the next 127 years. ✓ Our strategic thrust is to maintain sustainable and profitable growth that leverages technology to drive innovation and efficiency across all areas of our franchise. ✓ With demonstrated visionary leadership, our enviable talent pool, we remain confident of achieving our stated goals and targets over the course of our strategic planning cycle. ✓ The future remains very bright for this iconic Nigerian brand.

Framework Subject	Guidelines
	<ul style="list-style-type: none"> The Group Head, Marketing and Corporate Communications would engage the relevant media accordingly and ensure content is maximally and appropriately utilised.
<p>HOW SHOULD YOU DRESS IF YOU ARE TO APPEAR OR SPEAK ON BEHALF OF FIRSTBANK BEFORE THE MEDIA?</p>	<ul style="list-style-type: none"> If you are appearing for a media interview or in an official capacity in events with media exposure, such as media briefings, press conferences, product launches, awards and other corporate events, you are to be properly attired in the approved/official dress code complete with branded tie/scarf and lapel pin. In case of product launches, you are expected to wear your branded T-shirt, which should always have a jacket worn over it if you are a Senior Management staff.
<p>WHAT GUIDELINES SHOULD YOU OBSERVE IF YOU ALSO REPRESENT A UNION, GROUP OR AN ASSOCIATION OTHER THAN FIRSTBANK?</p>	<ul style="list-style-type: none"> If you liaise with the media on behalf of a union or an industrial association or some other group, you are to ensure that your status, comments and appearance before the media on the body's behalf are not misinterpreted as representing the official views or policies of FirstBank. It is your duty to make sure your comments are recognised as being made on behalf of the union or association and not FirstBank. You are not to wear FirstBank merchandise or other insignia while appearing for the union or association in public or before the media. You are to clearly identify yourself by name and position in the union or association, and not by position in FirstBank. You are not to engage in conduct that may constitute a conflict of interest with your primary duties at FirstBank and/or impinge on the integrity of FirstBank within the local or global landscape.
<p>WHAT GUIDELINES SHOULD YOU OBSERVE WHILE PUBLICLY EXPRESSING PERSONAL OPINIONS TO WHICH YOU ARE ENTITLED?</p>	<ul style="list-style-type: none"> Whereas you as a FirstBank employee have the right to express an opinion in public debates, letters to the editor published in newspapers or magazines, calls to talkback radio, comments on social media, etc.; whereas you also have the right to join a political party and hold and express political views as any other Nigerian citizen, your personal opinions and political activities are to be expressed or undertaken in your capacity as a private citizen and not as a FirstBank employee.

Framework Subject	Guidelines
	<ul style="list-style-type: none"> • Examples of private media appearances include television and radio phone-in programmes, social media comments and posts, and media interviews at social events, such as weddings, religious occasions, etc. • It is your responsibility to ensure all comments you make in your personal/private capacity are not seen as representing the official view of FirstBank or allowed to compromise your ability to discharge your duties or be loyal to FirstBank in a politically neutral manner. • In expressing opinions or undertaking political activities in a private capacity, you are to ensure that there is no conflict of interest with your role as a FirstBank employee. • Examples of conflicting communication and representation include using official FirstBank mailbox for personal emails and communication, using official FirstBank designation or identification in your association's or private engagements and expressing official views in your personal capacity. • You are not to refer to your position in FirstBank when expressing an opinion or participating in public debates in a private capacity. • In situations where your public comments, although made in a private capacity, appear to be an official comment on behalf of FirstBank, you are to state emphatically that your comments are made in a private (or in your capacity as a representative of a union or association or other body, if that happens to be the case) and do not represent the official view of FirstBank. • You are not to wear FirstBank-approved merchandise, such as promo T-shirts, tie, or lapel pin, when expressing private opinions in public or before the media in your personal capacity.

Framework Subject	Guidelines
<p>GENERAL NOTE OF CAUTION</p>	<ul style="list-style-type: none"> • As an employee of FirstBank, you should endeavour to be professional always and be mindful of your activities within or outside FirstBank business premises and on social media. • Be mindful of your conduct, especially when engaging with external parties. • Be careful what you say about FirstBank to your family, friends, neighbours, or that (casual) acquaintance you hang out with. There are journalists disguised as ordinary people and there are ordinary people who help journalists, who could be their family members, source for the information they publish accurately or wrongly. You do not want to be the source of any misrepresentation of FirstBank in the media that can cause reputational damage and other difficulties for FirstBank, do you?

FirstBank Stakeholder Engagement Framework.

1.Introduction

The Stakeholders Engagement Framework has been developed to provide guidance for FirstBank Group to identify, engage with and manage all its stakeholder groups while increasing quality service delivery effectively and proactively. Effective stakeholder engagement is important to forestall miscommunication and ensure possible risks do not translate to issues. This framework clearly articulates the purpose, principles and processes that are required to enhance FirstBank's management of its diverse stakeholder groups.

2. Objectives

The objectives of the Stakeholder Engagement Framework include:

- To ensure that FirstBank has a clear and defined process of identifying and engaging stakeholders.
- To ensure that there is prompt identification of risks associated with stakeholder groups to prevent such risks from crystallising.
- To ensure that stakeholder groups are properly categorised according to their level of influence.

- To enhance the formulation of strategies for effective management of stakeholder expectations.
- To enhance a timely approach to stakeholder engagement convenient for different stakeholder groups.
- To ensure that there is an adequate platform for obtaining and addressing the concerns of stakeholders.
- To encourage diverse perspectives and stakeholder collaboration in problem solving and decision-making process.
- To encourage the development of open, honest, and transparent stakeholder communications and relationships.

3.Guiding Principles

This Policy is underpinned by five principles. These principles will guide all stakeholder engagement activities to enhance effective stakeholder communication and management. The guiding principles include:

- **Clarity:** Clarity in how stakeholders are communicated and engaged with will be at the centre of this policy. All engagement activities shall be communicated clearly to prevent ambiguity and noise.
- **Inclusive:** This policy will ensure the inclusion of all stakeholder groups in relation to identification and management. Therefore, all engagement activities will be tailored towards achieving the inclusion of stakeholders, their diverse backgrounds, and interests. The method of engagement shall be planned to consider the different categories of stakeholders. Each stakeholder group will be engaged through relevant means of communication.
- **Accountability:** The Bank will always be accountable to all its stakeholder groups in its direct and indirect communication with stakeholders.
- **Transparency:** All engagement activities will be carried out with complete openness, providing avenues for stakeholders to ask questions, and be provided with clarifications required on issues of concern to them. We will seek insights and openly report inputs from our stakeholders. Information provided to stakeholders will be clear and unambiguous.
- **Timely:** Communication with stakeholders will be carried out in a timely manner. FirstBank will agree timelines and methods of engagements with all stakeholders beforehand. FirstBank will ensure that its stakeholder engagement activities will be communicated to stakeholders in time to allow for proper preparation.

4.Process of Engagement

FirstBank has identified four process flow in its stakeholder engagement activity. The process flow include:

- Stakeholder Identification
- Stakeholder Positioning Analysis
- Strategies and Plan for Engagement
- Evaluation and Feedback

4.1 Stakeholder Identification

This involves the identification and mapping of stakeholders into stakeholder groups. The stakeholder groups will include customers, shareholders, investors, employees, regulators, community, NGOs, etc.

4.2 Stakeholder Positioning Analysis

This involves the prioritisation of Stakeholders based on their positioning. This classification also informs the level and method of communication with stakeholders. The Bank will ensure that stakeholders are properly classed to ensure that each category is communicated with through appropriate means and the required level of priority.

4.3 Strategies and Plan for Engagement

Following the accurate classification of stakeholders, the Bank shall then identify the most effective way of communicating with them. Selecting the appropriate method of engaging stakeholders may vary depending on the situation, time, skill, and budget for activities. This is followed by the creation of a periodic plan for the engagement of stakeholders with clear objectives and methods of engagement. The plan should include:

- Category of stakeholder.
- Identified means of engagement appropriate for the stakeholders.
- Timing of engagement.
- Logistics required.
- Risks associated with the means of engagement and how to mitigate these risks.

4.4 Evaluation and Feedback

It is important that the process of engagement should be reviewed and evaluated at the end of every planned activity. This is necessary to assess the effectiveness and efficiency of how the Bank engage with its stakeholders. It will also allow the Bank to learn from the engagement experiences to enhance improvement going forward. Feedback shall be gotten from stakeholders to assess the effectiveness and efficiency of engagement to enhance continuous improvement. The evaluation and feedback process should include:

- Evaluation methodology.
- Evaluation against key performance indicators to determine impact.
- Consideration of the representation of stakeholder groups.
- Timing and resource planning.
- Findings, analysis, and dissemination.

5.0 Reporting

FirstBank shall ensure that a stakeholder register, and stakeholders engagement plan are available to provide guidance to the activities of engagement:

5.1 Stakeholders Register

This is a document that contains information on the stakeholders of the Bank. It is a list of identified stakeholder groups and their representatives. The register should have the following information:

- Name of stakeholder group
- Contact details of representative(s) of stakeholder group

- Impact focus area with stakeholder group
- Level of engagement; and engagement strategy.

5.2 Stakeholders Engagement Plan

Stakeholder engagement plan is an annual plan that contains the activities to be carried out to engage various stakeholders. It consists of the following:

- Name of stakeholder group
- Category of stakeholder group
- Type (s) of engagement
- Frequency of engagement
- Proposed date of engagement
- Responsibility for engagement