



Type:	Policy
Name:	Stanbic IBTC Communication Policy
Level:	Stanbic IBTC Holdings PLC
Classification:	Internal Use Only
Owner:	Head Marketing & Communications
Governance committee	Stanbic IBTC Risk Oversight Committee (ROC)
Approved by:	Stanbic IBTC Board Risk Management Committee (BRMC)
Approval Date:	30 January 2017
Effective Date:	30 January 2017
Next review Date	Annually
Contact:	Nkiru.Olumide-Ojo@stanbicibtc.com +234 (1) 422 7413

Classification

This document has been issued strictly for internal business purposes of Stanbic IBTC Holdings (a member of the Standard Bank Group Limited) and its subsidiaries

Copyright

All rights including those in copyright in the content of this document are owned by the Standard Bank Group Limited

Access Group policies on the Group Intranet page or contact <mailto:GovernanceDocumentation@stanbicibtc.com>



1 Policy Statement

Stanbic IBTC Holdings PLC (“Stanbic IBTC” / “the company”) recognises that internal and external communication activities are key aspects of how Stanbic IBTC and the Standard Bank Group (“SBG” / “the group”) are perceived in the market.

The Stanbic IBTC Communications Policy (“policy”) covers among other issues, rules of communication, use of the company’s communication facilities, representation of the company in the media and other third parties, and confidentiality of company information and procedures.

This Policy applies to members of Stanbic IBTC Holdings and its subsidiaries

2 General Principles and Guidelines

It should be noted that ignorance or claimed ignorance **shall not** be accepted as an excuse for acts or omissions contrary to these rules. **All breaches of these rules shall attract disciplinary action.**

2.1. General Principles

2.1.1. All Spokespersons or their designates who speak on behalf of the group, its business units or subsidiaries must make media statements that are in the best interest of the organization and in line with the values of the group.

2.1.2. Employees that are not official spokespersons must **NOT** communicate with the media and upon receipt of a media enquiry must refer such to the Country Head of Marketing or the Communication Manager.

2.2. Guidelines

2.2.1. Publishing of Annual Report / Financial Results

Financial Results and Annual Reports are to be reviewed by the country’s board audit committee and the external auditors and recommended to the main board for approval before publication. The office of the Chief Financial Officer (CFO) will then be required to secure regulatory approvals.

It shall be the CFO’s responsibility to ensure that the institution’s financial statements fairly present the state of affairs of the institution as at the end of the financial year and that of the profit or loss and cash flows for that period. The Group CE has the responsibility of getting final sign-off from the board before publishing.



2.2.2. Internal Communication

Stanbic IBTC Head of Marketing and Communication is responsible for coordinating all internal communications within their operations, which covers not only the bank but also its associated companies. Any new initiatives should have the approval of the Stanbic IBTC Head of Marketing and Communication, who is responsible for ensuring co-ordination of all communications such as newsletters, audio visual and video communication briefings, internal directories etcetera.

3 Applicability

This policy applies to all staff (viz full-time employees; non-full time employees; temporary and contract employees), contractors, and/or temporary assignments in the company.

4 Minimum requirements to comply with this Policy

4.1. Print Publication and External Media Relations

- 4.1.1. The engagement of all new publications must receive written approval of the Stanbic IBTC Head of Marketing and Communication.
- 4.1.2. All such approved publications must clearly indicate who the editor(s) is (are) by showing the full name(s) at the end of each publication. Any publication with an unknown author is strictly prohibited.
- 4.1.3. All official communication meant for external circulation must be approved by the Stanbic IBTC Head of Marketing and Communication to ensure conformity with company regulations.
- 4.1.4. All official company publications, banners, flags, sign posts, bill boards, etcetera, using the company's logo, must ensure that the logo is in the format and colours approved by the Head of Marketing and Communication, and their display must be in accordance with SBG policy relating to corporate and visual identity.
- 4.1.5. Departmental publications are restricted to the business activities of the department and are for internal circulation only with the approval of the "Business Unit" head.
- 4.1.6. All company communication and press releases shall emanate from such other person or entity authorised by the Stanbic IBTC Head of Marketing and Communication.



4.2. Media Relations

4.2.1. Departments or individuals are NOT authorised to speak or write in the media directly or indirectly on matters concerning the Company or Group unless so authorised by the Chief Executive (CE) of Stanbic IBTC. The Stanbic IBTC Head of Marketing and Communication is responsible for all official contacts with the media.

4.2.2. For the purpose of the Nigerian market, bearing in mind the peculiarities of our regulatory system and complexity of the Stanbic IBTC Holdco structure, there are three sets of spokespersons with different levels of interaction with media.

4.2.2.1. Group A:

The CE of Stanbic IBTC Holdings is the official spokesperson for all of the company. Only the CE is allowed to speak to the media when Standard Bank is referred to in Nigeria and on behalf of Stanbic IBTC Holdings PLC and ALL of the businesses within the Nigerian Holdings structure.

4.2.2.2. Group B:

This group consists of:

The CE of the bank who can speak for ALL areas of the bank and all its subsidiaries.

The Executive Directors of the bank who can speak for only areas of their businesses; for example, ED of CIB speaks for all areas of CIB

The CEs of the subsidiaries who are to speak ONLY for their subsidiary; for example, CE of Stanbic IBTC Capital (SICL) speaks for matters concerning SICL.

The CFO who can speak on the company financials and investor relations matters.

The Head of Marketing and Communication who can to speak to the media with approval from the CE of Stanbic IBTC Holdings.

The Head of Marketing and the Communication Manager are allowed to provide holding statements to the media without recourse to any of the categories.

Media Quotes

Only the above persons are to be quoted in news releases or advertorials on matters described above



4.3. Reputational Risk Management

It may happen, from time to time, that Stanbic IBTC or its subsidiaries receive publicity in the media that may have a damaging effect on its reputation. Such media could be newspapers, magazines, television, radio or the internet.

- 4.3.1. Unless the comments published directly mention Stanbic IBTC Holdings and not a general reference to the banking industry, Stanbic IBTC should not respond.
- 4.3.2. In the event that Stanbic IBTC Holdings receives publicity that has a medium to high risk of harming its reputation the Stanbic IBTC Head of Marketing and Communication will consult with the CE of Stanbic IBTC Holdings for a final position to take with the media. The Country Head of Marketing and Corporate Communication will inform SBG's Group Head of Communication about the incident.
- 4.3.3. The company, its business units and subsidiaries are NOT to respond in writing to letters of criticism that are sent to the media by employees, stakeholders or customers without consulting their CE and Head of Marketing and Communication. Where possible, the company prefers to come in direct contact with the writers of such letters in order to resolve the issue(s).

4.4. Crisis communication

- 4.4.1. The group recognizes the importance of effective communication to employees, customers, the media and other stakeholders during a crisis situation. In general, a crisis can be any incident that is likely to have a significant, severe or catastrophic impact on the business or reputation of the group and its business units or subsidiaries
- 4.4.2. During a crisis, the CE of Stanbic IBTC Holdings and CE of Stanbic IBTC Bank and the EDs of the bank (where relevant) are the ONLY authorized spokespersons for Stanbic IBTC. Other spokespersons may be selected and assigned to communicate with any of the following groups: employees, customers and shareholders, in line with the Business Continuity Management Policy.
- 4.4.3. Crisis communication will be done in accordance with the Business Continuity Management Policy.
- 4.4.4. When a crisis arises in Nigeria, the CE of Stanbic IBTC will communicate the crisis to the Group CE of SBG as soon as practically possible.



4.5. Outside business interest communication

4.5.1. The group recognizes that staff members may have outside business interests or hobbies that they engage in outside official office hours. When a staff member gets a media request (Print, Electronic or Digital) to speak on their personal business interests/hobbies, they **MUST** get clearance from the



Compliance team with appropriate notification to the Stanbic IBTC Head of Marketing and Communication and the Communication Manager.

Staff members are also to ensure that they state categorically through a caveat statement that their views / utterances are personal and in no way representative of the views of their employers.

- 4.5.2. Where a member of staff who is part of an interest group or is representing an interest group as a spokesperson is requested to engage the media as part of his representation; the staff is required to seek approval from the Chief Compliance Officer, notifying the Head Marketing and Communication.

5 Roles and Responsibilities

5.1. Chief Executive

- Chief spokesperson for Stanbic IBTC
- Oversee and provide final approval to Head of Marketing and Communication on communication matters

5.2. Bank CE, Bank Executive Directors, CFO, CEs of the subsidiaries, Business Heads

- Bank CE to speak on behalf of the bank. EDs to speak on behalf of the business areas. CEs of the subsidiaries to speak on behalf of their businesses.

5.3. Head Marketing and Communication

- Provide Holding statements where required, speaks on marketing campaigns, other strategic issues as agreed.
- Ensure that the company is positively and accurately represented in public and the media, with coherent information that is in line with the company and group policies.
- Ensure that authorised information to be released to the media is coordinated centrally through company authorised channels to ensure proper and effective dissemination both externally and within the company.
- Ensure that authorised information to be released to the media is coordinated centrally through company authorised channels so as to ensure proper and effective dissemination both externally and within the company.
- Ensure that for the purposes of disseminating information, the company engages with publications that are properly defined and registered; and that the engagement with these publications contributes to the building and the positive



promotion of the group's reputation and brand.

- Regulate use of electronic media for dissemination of information and data.
Clearly communicate all procedures relating to responses to third parties
-



and the granting of press, radio, T.V., and public interviews on matters concerning the company.

5.4. Human Capital

- Draw staff attention to their obligation of maintaining confidentiality relating to company matters.

5.5. Compliance

- Assess requests for media engagement by staff on their outside business interest and provide the required approvals.

6 Related policies and procedures

- 6.1. Letter of engagement (confidentiality) – staff
- 6.2. Social Media Policy
- 6.3. Group Investor Relations Policy
- 6.4. Outside Business interests Policy
- 6.5. Disciplinary Policy

7 Disciplinary Action

Potential sanctions include but are not limited to:

- i. Warning
- ii. Suspension of employee
- iii. Limitation of communications facilities
- iv. Termination of appointment or contract (whichever is the case)
- v. Dismissal
- vi. Legal action

In the event of any violation of this policy, disciplinary actions will be applied in line with the Stanbic IBTC Disciplinary Policy.

8 Definitions

Employee: refers to:

- permanent employees;
- temporary employees or secondees;



- contractors; and
 - non-permanent staff, regardless of their location]
-



9 Policy Administrators

Contact Persons:

Name Rotimi Adojutelegan
Title Chief Compliance Officer
Department Risk Management and Compliance
Telephone +2348023122957
Email opeyemi.adojutelegan@stanbicibtc.com

Name Nkiru Olumide-Ojo
Title Head, Marketing and Communications
Department Marketing and Communications
Telephone +2348034021699
Email Nkiru.olumide-ojo@stanbicibtc.com

Name Usman Imanah
Title Communications Manager
Department Marketing and Communications
Telephone +2347066317267
Email Usman.imanah@stanbicibtc.com



10 Revision History

*Version no.	Purpose of revision: <i>[Regulatory development annual review]</i>	Review date:	Effective date:	Summary of key revision points:

**ONLY whole numbers will be accepted as final versions for publishing purposes (e.g. from v0.1 – v0.9 are still drafts, v1 is considered a final version for publishing).*