
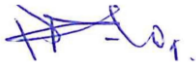




## COMMUNICATIONS POLICY

Date	Author	Version	Change Reference
August 2024	Rafiu Mohammed	9.00	Updated Version
February 2026	Adeola Adejokun	10.00	Revised version

### 1.2. Sign Offs

Name	Division	Designation	Signature	Date
Adeola Adejokun	Corporate Affairs	Head, Communications		20/02/2026
Diran Olojo	Corporate Affairs	Divisional Head, Corporate Affairs		20/02/2026

## 2. PURPOSE & SCOPE

Communication shapes how we are seen and how we lead. This Policy sets the standard for how information is created, shared, and governed across the Bank.

- **Strategic Intent:** Every communication must serve as an asset that strengthens our brand equity and complies with the Central Bank of Nigeria (CBN), Nigerian Exchange (NGX) and Securities and Exchange Commission (SEC) regulations.
- **Applicability:** This Policy is binding for all employees, directors, officers, consultants, and contractors.
- **Enforcement:** Any breach, including unauthorized media contact or disclosure of sensitive data, may result in disciplinary action, up to and including summary dismissal and legal prosecution.

## 3. Our Three Tone Principles

Our tone defines how we sound in writing and speech. It must be consistent across all communication.

We operate with three tone principles:

- Stronger Together
- Calmly Assured
- Forward with Purpose

### **3.1. Stronger Together**

We communicate as one institution.

- Use “we,” “us,” and “our” to reflect shared responsibility. Avoid language that separates “management” from staff.
- Frame achievements as collective outcomes rather than individual accomplishments.
- Avoid hero narratives or personality-driven messaging.
- Ensure communication feels inclusive and aligned, not top-down or self-congratulatory.

### **3.2. Calmly Assured**

We communicate with clarity and control.

- Lead with facts. Support statements with clear evidence or data.
- Avoid exaggeration, hype, or superlatives.
- Use plain English. Messages should be easy to understand.
- In difficult situations, use short, direct sentences.
- Do not adopt slang or temporary trends that weaken credibility.

### **3.3. Forward with Purpose**

We communicate with direction and intent.

- Every message should show where we are going and why it matters.
- Be specific about outcomes, timelines, or impact. Avoid vague claims.
- Acknowledge current realities while clearly stating the next steps.
- Ensure each communication has a clear purpose and value to stakeholders.

These principles apply to speeches, emails, press releases, presentations, social media posts, and all official communication.

## **4. CONFIDENTIALITY & DISCLOSURE**

The protection of information is our duty as members of staff.

- All data is "Confidential" by default unless officially cleared for public release.
- In compliance with the NDPR/NDPA, personal data (DOB, addresses, phone numbers) is private data. Sharing customer or colleague data without explicit, documented consent is a Tier-1 violation.

- Before discussing bank business with vendors or partners, a Legal-approved Non-Disclosure Agreement (NDA) must be fully executed.
- Material Non-Public Information (MNPI) must be released via the NGX portal first. Telling a friend, family member, or select investor about a deal before this is "Insider Trading."

## **5. AUTHORIZED SPOKESPERSONS**

To ensure we speak with "One Voice," only the following are authorized to make public statements:

- Chief Executive Officer/ Managing Director.
- Executive Directors & CFO.
- Company Secretary / General Counsel.
- Divisional Head, Corporate Affairs.
- Head of Investor Relations.

### **5.1. The 30-Minute Referral Rule**

If a journalist or analyst contacts you:

1. Be Courteous: "Thank you for reaching out. To ensure you get the most accurate information, I need to refer you to our Corporate Affairs team."
2. Refer: Do not answer "off the record." There is no such thing as "off the record."
3. Escalate: If you are contacted directly by a journalist, blogger, analyst, or media platform, please decline comment and immediately refer the enquiry to the Divisional Head, Corporate Affairs or Head of Communications within 30 minutes. Share the caller's name, organisation/outlet, contact details, and the nature of the inquiry. Silence, speculation, or informal commentary are not permitted.

## **6. INTERNAL COMMUNICATIONS**

- Internal first: Whenever legally possible (outside of regulatory disclosure requirements), staff should hear major news via internal channels before it appears in the mass media.
- Gatekeeping: To prevent "email fatigue," mass broadcasts are restricted to Corporate Affairs, HR, and the MD/GCE.
- Standardisation: Every internal communication must be accurate, actionable, and easy to navigate. Use clear headings, concise bullet points, and, where helpful, visual or multimedia elements to support understanding and retention.

## **7. EXTERNAL COMMUNICATIONS**

### **Investor Relations & Financial Information**

All communications with shareholders, investors, analysts, researchers, regulators, and related stakeholders must comply with applicable laws and regulatory requirements.

Material Non-Public Information (MNPI) must be publicly disseminated in a broad, non-exclusive, and non-selective manner through appropriate regulatory channels before any private discussion.

### **7.1. Authorised spokespersons**

Only an Authorized Spokesperson, the Chief Executive/ Managing Director, Executive Directors/ CFO, Company Secretary/General Counsel, Divisional Head, Corporate Affairs, or Head of Investor Relations may engage with external stakeholders on corporate performance and financial matters. Any other employee who is contacted must immediately refer the enquiry to an Authorized Spokesperson.

The following rules apply strictly:

- Selective disclosure prohibited: No insider may provide direct or indirect “hints,” guidance, or commentary regarding financial forecasts, results, transactions, strategy, or any material information that has not been publicly disclosed.
- Share price neutrality: No employee may comment on share price movements, speculate on future performance, or advise any person to buy or sell FCMB shares.
- No implied guidance: Staff should not say anything, directly or indirectly, that could make others think they are hinting at the organisation’s internal plans, targets, forecasts, or decisions, except where such information has already been formally published and is in the public domain.

### **7.2. Media Relations**

All external communications with the media must be centrally coordinated to protect the Bank’s reputation, ensure factual accuracy, ensure regulatory compliance, and preserve consistency of tone, positioning, and strategic intent.

This requirement applies to all categories of public-facing communication, including but not limited to:

- Product launches and product updates
- Earnings releases and financial disclosures
- Leadership appointments and Board changes
- Strategic transactions and partnerships
- Crisis communications and issue-based rejoinders
- Holding statements
- Regulatory announcements
- Market clarifications and public responses

No business unit, branch, or function may issue or circulate media-facing content independently.

### **7.3. Approval workflow**

All external communications must complete the following review and clearance process before release:

- Business / Product Owner: Confirmation of factual accuracy, commercial context, data integrity, and operational readiness.
- Finance/ Investor relations (where applicable): Validation of financial figures, forecasts, and earnings-related disclosures.
- Legal (where applicable): Review for regulatory compliance, disclosure obligations, contractual sensitivities, litigation exposure, and governance considerations.
- Corporate Affairs: Alignment on messaging/ narrative, tone, positioning, stakeholder impact, and coherence.

Final publication authority resides with Corporate Affairs, which will coordinate timing, distribution channels, stakeholder sequencing, and media follow-up.

No exceptions apply, including time-sensitive announcements, crisis situations, sponsored content, event speeches, or digital-first releases. Where urgency exists, expedited review may be arranged, but the approval sequence must still be completed before any public disclosure.

## **8. DIGITAL GOVERNANCE & SOCIAL MEDIA**

### **Generative AI & Innovation**

AI tools can support your work. You may use them to think through ideas, structure drafts, or improve clarity.

However:

- Do not enter sensitive information into public AI tools such as ChatGPT or Gemini. This includes customer names, account details, internal reports, financial data, passwords, unpublished results, future strategies, or any confidential document.
- Assume anything typed into a public tool could leave the Bank. If in doubt, leave it out.
- Every AI draft must be reviewed and edited by a human before use. The final version must reflect our voice—clear, responsible, and human. AI is a support tool, not the final author.
- AI must not be used to create false statements, fabricate data, or imitate official Bank communication without approval.

You remain fully responsible for anything you produce using AI.

### **8.1. Social media conduct**

What you post online can affect the Bank, especially if your profile identifies you as an FCMB employee.

#### **Personal Responsibility**

- If your bio mentions FCMB, your behaviour reflects on the Bank.

- Avoid posts that could harm the Bank’s reputation, reveal confidential information, or suggest inside knowledge.
- When discussing sensitive topics, such as finance, politics, regulation, or industry issues, include a clear note in your bio or post: *“Views are my own and not those of my employer.”*
- A disclaimer does not excuse inappropriate or harmful content. You are still accountable for what you publish.

### **Engagement and Online disputes**

- Do not argue, insult, or “clap back” at customers, critics, or trolls.
- Do not attempt to defend the Bank online unless you are an Authorized Spokesperson.
- If you see a post that could damage the Bank’s reputation, take a screenshot and send it to Corporate Affairs immediately.

Let the appropriate team review and respond.

When in doubt, pause before you post.

## **9. MARKET DISCLOSURE**

We are committed to fair and equal access to information. No investor, analyst, journalist, or individual should receive price-sensitive information before it is made public.

All material information, such as financial results, major transactions, leadership changes, strategic decisions, or any development that could affect the share price, must be released through approved public channels before it is discussed anywhere else.

Selective sharing is not permitted. There are no private previews, hints, or informal briefings.

If you receive questions about results, forecasts, dividends, mergers, capital raising, or similar matters, refer them to Investor Relations or Corporate Affairs immediately.

### **Closed period**

The Bank observes a close period before releasing financial results. During this time:

- We do not discuss performance, trends, or expectations.
- No one-on-one meetings are held to discuss the financial outlook.
- All enquiries are deferred until after the official release.

### **Personal Responsibility**

Members of staff who have access to confidential or price-sensitive information must not trade in FCMB securities during restricted periods.

If you are unsure whether information is price-sensitive, treat it as confidential and seek guidance before speaking or trading.

## **10. Issues and crisis management**

Not every situation is a crisis, but every issue must be managed early and properly.

An issue is a developing concern that could affect our reputation, customers, regulators, or market confidence if not addressed.

A crisis is a serious event that disrupts operations, threatens customers or staff, attracts major public attention, or may affect our financial standing.

This framework applies to both.

### **Immediate Escalation**

- Any employee who becomes aware of a reputational, regulatory, operational, or media concern must inform their Line Manager and Corporate Affairs immediately.
- Do not attempt to manage the matter privately or respond informally.
- Share facts only. Do not speculate or assume intent.

Early reporting allows us to control the narrative before it escalates.

### **Assessment and Activation**

- Corporate Affairs, working with Legal, Risk, Compliance, and relevant business units, will assess whether the matter is an issue or a crisis.
- If classified as a crisis, the Crisis Communications Team (CCT) will be activated immediately.

No department, branch, or individual may issue statements or respond externally unless formally authorised.

### **10.1. Communication Response**

For Issues:

- Update will be provided internally as appropriate.
- A clear position or clarification may be prepared.
- Engagement may be proactive (to prevent escalation) or reactive (to correct misinformation).
- Messaging will be aligned internally before any external response.
- Once resolved, a review will be conducted to strengthen controls and prevent recurrence.

For Crises:

- Updates will be provided internally as appropriate.
- A Holding Statement will be prepared within one hour of confirming the situation. The statement will acknowledge the matter, confirm that action is underway, commit to updates, and require executive approval for distribution.
- We communicate confirmed information only. We do not guess, argue, or over-explain.
- Once resolved, a review will be conducted to strengthen controls and prevent recurrence.

## **10.2. The One Voice rule**

During issues or crises:

- All external communication must come from an approved source.
- Staff must not share personal opinions, internal updates, screenshots, or “their version” of events on social media, WhatsApp, or any public platform.
- Do not engage critics, journalists, or customers online.
- Redirect all enquiries to Corporate Affairs.

We address issues early, handle crises with discipline, and communicate clearly and factually through a single, coordinated voice to protect our customers, our people, and business.

## **11. COMPLIANCE**

Compliance with this policy is mandatory.

### **11.1. Brand Standards**

- All external materials must use approved templates, logos, colours, and fonts as set out in the FCMB Brand Identity Manual.
- No altered logos, unofficial designs, or self-created templates are permitted.

### **11.2. Accountability**

- This policy is actively monitored.
- Unauthorized media engagement, selective disclosure of information, misuse of the brand, or breach of approval processes constitutes misconduct.
- Violations may result in disciplinary action, including termination of employment.

### **11.3. Reporting Obligations**

- If you become aware of a breach of this policy, you are required to report it.
- Reports may be made to the Group Head, Corporate Affairs, or through the anonymous Whistleblowing channel.

Protecting the Bank’s reputation and compliance standards is a shared responsibility.