



COMMUNICATIONS POLICY

1. INTRODUCTION

Communication plays a key role in how we conduct our business at FCMB ("the Bank"), as it reflects on our image and reputation. It is, therefore, important to provide a Policy which guides how information is disseminated within the Bank (internal), as well as to outside parties (external). This Policy applies to all the Bank's employees, directors, officers, consultants and contractors. Any violation of this Policy should be brought to the attention of the Bank's Group Head, Corporate Affairs and may constitute grounds for termination of employment.

2. CONFIDENTIALITY AND DISCLOSURE OF INFORMATION

The Bank's employees, directors, officers, consultants and contractors are all bound to maintain the confidentiality of the information they have access to while carrying out their responsibilities. This includes any non-public information about the Bank, its customers and employees, as well as its strategy, growth and other business plans. Staff are expected to comply fully with the Bank's Information Security Policy. Where confidential information must be shared with a vendor, partner or other third party in the course of doing business, ensure that a Non-Disclosure Agreement has been signed by such a third party and duly approved by the Legal Team.

Personal information about a director, employee or customer **MUST NOT** be shared without the express permission of the individual. This includes information such as date of birth, address, phone number and email address.

3. AUTHORIZED SPOKESPERSONS

Only an Authorized Spokesperson can make public statements about the Bank or its employees, directors, products, services or operations. No other individual is permitted or authorized to speak on behalf of the Bank, and where a Third Party contacts them for information about the Bank, he/she should refer such a Third Party to an Authorized Spokesperson.

4. INTERNAL COMMUNICATIONS

It is vital to ensure that information is disseminated to the Bank's staff in a way that reinforces the Bank's goals and strategic focus. Internal communications must be relevant, useful, accurate and easy to understand. Internal Communications to ALL staff (i.e. mass emails) can only be sent by the Communications unit of the Corporate Affairs Department, Human Resources, the Bank's Managing Director or the Group Chief Executive. Broadcast to ALL staff sent by Corporate Affairs will be processed in line with the Department's Internal Communications processes.

The Bank will continue to explore various channels to disseminate information to and engage with all staff effectively. The current channels available for internal communications include Village Square (general email), Viva Engage (Yammer), desktop wallpaper, intranet, and targeted unit/group emails.

5. EXTERNAL COMMUNICATIONS

5.1 Investor Relations

All the Bank's communications with the investor community (shareholders, investors, analysts, researchers, market regulators and other related stakeholders) must comply with all applicable laws. In addition, all Material Non-Public Information of the Bank must be publicly disseminated in a way that is both nonexclusive and non-selective. Only an Authorized Spokesperson (the Managing Director, ED Finance/CFO, Company Secretary/General Counsel, Group Head, Corporate Affairs or Head of Investor Relations) may engage and discuss the Bank with members of the investing community. Any other insider who is contacted in this regard must refer all enquiries to an Authorized Spokesperson.

5.2 Financial Information/Share Price

On no account should any insider provide direct or indirect guidance to Third Parties in a way that can be interpreted as selective regarding the Bank's internal forecast of future financial results, transactions, business strategies or other material information that has not been Publicly Disseminated through a press release, Stock Exchange filing or other appropriate method. In the same regard, no Insider shall comment on how FCMB's share price will change over time, whether or not there will be a change, whether investors should buy or sell the shares or the impact of an event or occurrence on the performance of the shares.

5.3 Press Releases

During its normal business, the Bank issues press releases to disseminate important product, service, or other strategic information to its stakeholders. Press releases will be prepared in accordance with the appropriate internal processes, including review and approval by the relevant Authorized Spokesperson, Business unit, and the Corporate Affairs Department.

5.4 Media Relations

An employee may be contacted by outside sources, journalists or other members of the media for information about the Bank or its directors, employees or operations. Under no circumstance should an Insider respond to questions or enquiries from the press, both traditional and digital. All media enquiries must be referred to the Corporate Affairs Department. As part of its ongoing management of its relationship with the media, the Bank will deploy tools which include press statements, media parleys and interviews to share news, announcements, or important information with the media, stakeholders and the public. Each of these will be deployed in accordance with the strategic direction and process of the Communication Unit within the Corporate Affairs Department.

5.5 Social Media

FCMB's social media pages are set up to foster positive engagement between the Bank and its stakeholders and ensure accurate information is disseminated about the company.

The Digital and Direct Marketing Unit of the Corporate Affairs Department manages the Bank's social media pages. Regardless of the circumstances or assumed gravity of the situation, staff should not respond to a social media query about the Bank. Should staff

notice any comments or posts about the Bank on social media, they should send this information to the Communication or Digital and Direct Marketing Unit.

5.6 Corporate Website

The Bank's website is a critical source of information for its external stakeholders. Therefore, it is important to ensure that the information on the corporate website is accurate and easy to locate for members of the public.