

Stanbic IBTC Communication Policy

1. Policy Statement

Stanbic IBTC Holdings PLC ("Stanbic IBTC") recognises that internal and external communication activities are key aspects of how Stanbic IBTC 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 PLC and its subsidiaries.

2. General Principles and Guidelines

- 2.1 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 Stanbic IBTC.
- 2.2 Employees that are not official spokespersons must NOT communicate with the media and upon receipt of a media enquiry must refer such to the Stanbic IBTC Head of Marketing and Communication or the Communication Manager.
- 2.3 Financial Results and Annual Reports are to be reviewed by Stanbic IBTC'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. Stanbic IBTC Chief Executive (CE) has the responsibility of getting final sign-off from the board before publishing.

2.4 Internal Communications

The Head of Marketing and Communication is responsible for coordinating all internal communications within Stanbic IBTC. Any new initiatives should have the approval of the 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 etc.

2.5 External Communications

All external publications must receive written approval of the Head of Marketing and Communication to ensure conformity with company regulations.

2.6 Media Relations

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

2.7 Reputational Risk Management

Stanbic IBTC, 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 Chief Executive(s) 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).

2.8 Crisis communication

Stanbic IBTC 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. During a crisis, the CE of Stanbic IBTC Holdings and CE of Stanbic IBTC Bank and the Executive Directors 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.

2.9 Outside business interest communication

Stanbic IBTC 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 Head of Marketing and Communication as well as 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. 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 of Marketing and Communication.