



Type:	Policy
Name:	<b>Stanbic IBTC External Communication Policy</b>
Level:	Stanbic IBTC Holdings PLC
Classification:	Internal and External Use Only
Owner:	Head, Brand & Marketing
Governance committee	Operational Risk and Compliance Committee (ORCC)
Approved by:	Stanbic IBTC Board Risk Management Committee (BRMC)
Approval date:	October 2024
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Next review date	October 2026
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### **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

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## 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 External 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.

### 1.1 General principles

1.1.1. 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 organisation and in line with the values of the Group.

1.1.2 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 Brand and Marketing or the Brand Strategy & Communications Manager.

### 1.2. Guidelines

#### 1.2.1 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. **In line with the guideline for regulatory correspondence, interactions and inspections document.**



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.

#### 1.2.2 External communication

The Head of Brand & Marketing (or designate) is responsible for approving all external communications on behalf of Stanbic IBTC Holdings and its subsidiaries. All press releases, photo news, and so on as regards the organisation must have concurrence from the Head of Brand & Marketing. The Brand Strategy & Communications Manager coordinates communications such as press releases, audio visuals and video communication briefings before seeking approval from the Head of Brand & Marketing before final go ahead.

## 2 Applicability

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

## 3 Minimum requirements to comply with this policy

### 3.1. Print Publication and external media relations

3.1.1. The engagement of all new publications must receive written approval of the Stanbic IBTC Head of Brand & Marketing.



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3.1.2. 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.

3.1.3. All official communication meant for external circulation must be approved by the Stanbic IBTC Head of Brand & Marketing to ensure conformity with company regulations.

3.1.4. All official company publications, banners, flags, sign posts, bill boards, and so on, using the company's logo, must ensure that the logo is in the format and colours approved by the Head of Brand & Marketing or designate, and their display must be in accordance with Standard Bank Group policy relating to corporate and visual identity.

3.1.5. The content of advertisements or any other publication about the brand should be factual and unambiguous; expressed in clear and simple language and must not be offensive, misleading, deceptive, injurious, or exaggerate the benefits of the products or services being advertised.

3.1.6. 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.

3.1.7. All company communication and press releases shall emanate from such other person or entity authorised by the Stanbic IBTC Head of Brand & Marketing.



### 3.2. Media Relations

3.2.1. 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 Brand & Marketing is responsible for all official contacts with the media.

3.2.2. 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.

#### 3.2.2.1. 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.

#### 3.2.2.2. Group B:

This group consists of:

- The CE of the Bank who can speak for **all** areas of the bank and its subsidiary(ies).  
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 speaks for matters concerning Stanbic IBTC Capital Limited.
- The CFO who can speak on the company financials and investor relations matters.
- The Country Head of Brand & Marketing who can to speak to the media with approval from the CE of Stanbic IBTC Holdings.
- The Brand Strategy & Communications Manager is allowed to provide holding statements to the media with the approval of the Head of Brand & Marketing and CE of Stanbic IBTC Holdings.

#### Media Quotes

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

#### 3.2.2.3. Group C:

This group consists of subject matter experts who can speak only on their areas of expertise in thought leadership capacities. Group C spokespersons can only speak with approval from an Executive Director in their business areas. The Executive Director is accountable for the performance of the Group C spokesperson at any speaking engagement. Group C spokespersons must undergo the staff media training before being nominated to speak on behalf of the business.

### 3.3. 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, social media 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 Brand & Marketing will consult with the CE of Stanbic IBTC Holdings for a final position to take with the media. The Country Head of Brand & Marketing will inform Standard Bank Group's Head of Communications about the incident.

3.3.3. 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 Brand & Marketing. Where possible, the company prefers to come in direct contact with the writers of such letters in order to resolve the issue(s).

### 3.4. Crisis communication

3.4.1. The Group recognises 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

3.4.2. 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** authorised 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.

3.4.3. Crisis communication will be done in accordance with the Business Continuity Management Policy.

3.4.4. When a crisis arises in Nigeria, the CE of Stanbic IBTC will communicate the crisis to the CE of Sstandard Bank Group as soon as practically possible.

### **3.5. Outside Business Interest (OBI) communication**

3.5.1. The Group recognises 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 Brand & Marketing and the Brand Strategy & Communications 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.**

3.5.2. 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,





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the staff is required to seek approval from the Chief Compliance Officer, notifying the Head of Brand & Marketing.

#### 4 Exceptions

There is no exception to this policy. In cases of crisis, please refer to session **3.4 (Crisis Communication)**. It should be noted again, 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.**

#### 5 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.**

#### 6 Roles and responsibilities

##### 6.1. Chief Executive

- Chief spokesperson for Stanbic IBTC
- Oversee and provide final approval to Head, Brand & Marketing on communication matters.

##### 6.2. 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 their respective business areas.
- CEs of the subsidiaries to speak on behalf of their respective businesses.
- Business Heads to approve product heads who speak on behalf of the Bank.

### **6.3. Head, Brand & Marketing**

- 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 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.

### **6.4. People and Culture**

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

### **6.5. Compliance**



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

## 7 Related policies and procedures

- 7.1. Letter of engagement (confidentiality) – staff
- 7.2. Social Media Policy
- 7.3. Group Investor Relations Policy
- 7.4. Outside Business Interests Policy
- 7.5. Disciplinary Policy
- 7.6. Internal & Corporate Communications Policy
- 7.7 Guideline to Regulatory Correspondence, Interactions and Inspections

## 8 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
- vii. In the event of any violation of this policy, disciplinary actions will be applied in line with the Stanbic IBTC Disciplinary Policy.

## 9 Definitions

Employee:                      means:



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- permanent employees;
- temporary employees or secondees;
- contractors; and
- non-permanent staff,  
regardless of their location]

## 10 Policy administration

### Contact persons:

Title Chief Compliance Officer

Department Compliance

Title Head, Brand & Marketing

Department Brand & Marketing

Title Brand Strategy & Communications Manager

Department Brand & Marketing

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



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0.1	Annual review	September2020		<b>1.1 moved to point 5</b> It should be noted that ignorance or claimed ignorance <b>shall not</b> be accepted as an excuse for acts or omissions contrary to these rules. <b>All breaches of these rules shall attract disciplinary action.</b>
				1.3.2 Internal Communication updated is now 1.2.2
				2. Applicability is now 3. This policy applies to all staff (viz full-time employees; non-full time employees; temporary and contract employees), external parties, vendors, contractors, and/or temporary assignments in the company.
				3.1.5 (new addition)  The content of advertisements or any other publication about the brand should be factual and unambiguous, expressed in clear and simple language and must not be offensive, misleading, deceptive, injurious, or exaggerate the benefits of the products or services being advertised.
V2		September 2022		FRT Updates



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V3	Regulatory development and Biennial review	October 2024	October 2024	<p>1.2.2</p> <p>Amended to reflect the role of a designate in approving external communications</p> <p>3.2.2.2.</p> <p>Amended to reflect the requirement to clear holding statements with Head of B&amp;M and CE of Stanbic IBTC Holdings.</p> <p>3.3</p> <p>Amended to include social media as a distinctive channel</p> <p><b>General</b></p> <ul style="list-style-type: none"><li>• Amended to reflect current designations and name of the department.</li><li>• Amended to discourage the use of acronyms for entity names.</li></ul>
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*\*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).*