COMMUNICATIONS POLICY

Effective Date: October 2, 2008

PREAMBLE

As a function of good management, open and proactive communication policy ensures that the Bank's respective stakeholders receive timely and adequate information necessary in shaping their relationship with the Bank in a manner that is mutually beneficial.

Effective Communication model would not only ensure the provision of adequate information to these stakeholders, but also a reliable and consistent feedback mechanism. The feedback will shape further communication, product development and service initiatives.

OBJECTIVES - WHAT THIS POLICY WILL DO FOR THE BANK

This Policy shall guarantee the following for the Bank at all times:

- Ensure that Fidelity is visible, accessible and accountable to its publics.
- Ensure that the Bank delivers prompt, courteous and responsive service that is sensitive to the needs and concerns of the Customer and other stakeholders. This implies that market-facing roles shall deliver on whatever our Communication has promised.
- Promote the Bank's interests and project the Fidelity brand in a way that wins goodwill for the Bank at all times.
- Unambiguously declare the channels of communication available to all Fidelity people in line with the reporting structures in the Bank.
- Provide sanctions for breaching the provisions of the Policy.

DISSEMINATION OF POLICY

Marketing Communications Group shall disseminate this policy; the Head of Human Capital Management is responsible for ensuring that this Policy Statement is received by each Fidelity employee via the intranet; the Head, Inspection and Audit, shall ensure compliance.

1 LANGUAGE

- a. All official communication or interaction, whether verbal or written, shall be in formal English language.
- b. All information about policies, programmes/projects, services, products and other written literature like the Annual Reports and Statement of Accounts shall be written in English.
- c. The language must be clear, relevant, objective, easy to understand and useful. To ensure clarity and consistency, plain language and proper grammar must be used in all communication with the public.
- d. All correspondence to the Bank shall be replied in English.
- e. All signage, billboards, product brochures, and materials for media placements shall be in English.
- f. Radio and television adverts may be in Pidgin English or indigenous Nigerian languages for purposes of advertising Bank products in communities and among target audiences where the use of English is unlikely to yield maximum benefit to the Bank.
- g. The choice of language in advert production shall depend largely on the target audience and the Bank product being advertised. Such decision could be based on the

professional advice of the Marketing Communications Department.

2. LOGO

- a. Fidelity logo shall appear on all Bank's printed and official documentations including but not limited to forms, billboards, adverts, presentations, proposals, signage, letter heads, identity cards, call cards, as well as audio/visual media like websites and intranet, etc.
- b. All documents, which carry Fidelity logo are copyrighted to the Bank and are protected by the relevant National and International Copyright Laws.
- c. The logo is not subject to modification to suit individual whims and convenience, but must be consistent on all materials that it appears, in line with the provisions of the Bank's subsisting Identity Manual/provisions at any point in time.
- d. Even when the logo is to appear on materials that are written in other languages, it must remain in the same format and colour scheme.

3. BUILDING FAÇADE

- a. Branches of Fidelity Bank shall have a uniform exterior physical view, which is a subtle way of communicating uniformity of the Bank's high quality and innovative products and services. Where uniformity may not be easily achieved structurally, an efficient use of the colour scheme shall be explored.
- b. The uniform exterior shall remain consistent in the construction of new approved branches within or outside the country.
- c. The maintenance of a uniform physical exterior in all branches of the Bank, the uniform logo, and the adherence of staff to stipulated dress codes and colours are part of a deliberate strategy to evolve a distinct, clear and consistent corporate identity.

4. INTERNAL COMMUNICATION

The essence of Internal Communication is to provide a platform for the exchange of ideas and information within the institution. For the business, it provides a framework for building and sustaining commitment to the Bank's vision, business goals and objectives through the development of a structure for open and transparent communication.

4.1Bank-wide Messaging & The Role of BCD

The intranet platform is to facilitate work and information flow, as well as make life easier for all in the Fidelity workplace. The following shall, therefore, apply:

- a. Fidelity employees are generally not authorized to send Bank-wide e-mail messages for personal use. This includes messages announcing various events such as births, deaths, disengagements, retirements.
- b. Brand & Communications Division is responsible for passing on information about the Bank to staff.
- c. Any staff member who has information for the consumption of All Staff shall route same through his/her Group Head to Brand & Communications. Any unauthorized person using the crafty method of staff grouping (eg: All ABE, All ET, All DM) to reach All Staff or significant number of the staff shall be sanctioned for dishonesty in addition to breach of policy.
- d. Only Staff of AGM and above cadre, or the most senior officer in a Division, Group or Region/Area, may send "All Staff" mails. Others are Brand & Communications Division, IT, the Internal Auditor; or Groups/Divisions with profile in the intranet eg; Product Development, Service Excellence, or any other person authorized by the EXCO, unless on emergency or for urgent public good.

- e. Request for Group Address/Profile shall be sent to the Head of IT and approved by the Executive Director, Shared Services.
- f. Without prejudice to the provisions above, any staff member who has matters of a personal nature for general consumption, or want to inform for public good, eg, availability of goods and services at beneficial rates, may forward same to Brand & Communications Division for dissemination to All Staff.
- g. To avoid distraction that unwarranted mails may cause, staff may send/copy their mails to only those who are relevant to the subject being discussed or people whose inputs are necessary to resolve a matter. Mails may not be sent to the next level of staff unless it cannot be dealt with at lower levels. For instance, a mail on car maintenance may not be copied the ED,SS & P, unless the Group Head of Corporate Services has failed to handle it with his Fleet Manager.
- h. As a disciplined environment, staff are advised to work through their line supervisors. They should seek the intervention of higher authorities if their immediate supervisors/heads are unable to resolve relevant issues.
- i. In response to an All Staff mail or large groups, the staff may not need to copy all others in the original mail if they would not help him. Such would amount to distraction (spam mail) which this policy statement frowns upon.
- j. Any information circulated on the Bank's intranet is confidential and proprietary to Fidelity Bank Plc and on no account shall it be sent, copied or otherwise exposed to non- Fidelity staff members without approval of appropriate authorities.
- k. In the same manner as in (i) above, any internal memo circulated in the Bank is a confidential document not meant to be shared with non-Fidelity staff.
- I. In line with the Oath of Confidentiality signed by all staff, Fidelity members are not expected to share confidential

matters about the Bank's operations, strategies and people with non-Fidelity people.

4.2 Internal Memoranda

- a. Internal memoranda are the official means of communicating amongst Staff Bank-wide, in addition to the intranet platform (pending full operation of a paperless environment).
- b. Internal Memo format is accompanied in this Policy document as Exhibit.

4.3 Font

Internal Communication shall be in Black and approved Font is Century Gothic size 14.

5. EXTERNAL COMMUNICATIONS

5.0 BACKGROUND

Policy Considerations:

- As a service institution, the perception of Fidelity Bank by the various publics is essential to the Bank's business.
- External Communications must be handled proactively and in a way that attracts goodwill and patronage to the Bank.
- External Communications involves all relations with the Bank's external publics.
- Bank shall ensure a systematic and deliberate effort to create understanding between the Bank and these groups in order to attract goodwill and possible patronage.

5.1 CORRESPONDENCE

- 5.1.1 All written external communication between the Bank and the external publics:
- Shall be printed on Bank's letter headed paper in order to be valid.

- b. All pages after the first page of the Bank's correspondences shall be printed on official Continuation Sheet.
- c. For image, mails must be printed with a computerenabled printer.
- d. Official font must be used at all times- preferred fonts are Century Gothic size 14 which are conservative, professional and reader-friendly.
- e. Only official letter headed papers and continuation sheets shall be used for the Bank's correspondences.
- f. All of the Bank's external communications shall be signed by two officers of the Bank with their names and designations clearly printed on the letter in an unambiguous way.
- g. The only exceptions to (f) above are letters emanating from the offices of the MD and the Executive Directors.

5.1.2 Complaints to the Bank from External Publics

- a. All **Non-Customer** complaints to the Bank (these are issues that affect Brand perception) should be forwarded to Brand & Communications for handling (Customer complaints are to be dealt with by I & A).
- b. Where the complainant may not be physically present in Lagos and makes this complaint to a branch office, the staff in the branch shall assist the complainant.
- c. Brand & Communications shall send an acknowledgment of receipt of the complaint in writing within 24 hours.
- d. Brand & Communications shall liaise with Inspection & Audit, as well as the relevant groups or units to ensure that the complaint is investigated and properly addressed.
- e. Brand & Communications shall ensure that Bank's position on the complaint is sent to the complainant in writing within two weeks of receipt of the complaint.

6. MEDIA RELATIONS

- a. Bank's Media Relations policy is based on the understanding of the role of the media in shaping public opinion.
- b. Fidelity's view of the media is holistic and includes all mass media and practitioners.
- c. Bank's media relations strategy is to guarantee a harmonious relationship with the media and to ensure that media practitioners see the Bank as a partner and friend.
- d. Bank shall organize in such a way as to able to, on short notice, reach out to and inform the media on issues of importance to the public on the Bank.
- e. Brand & Communications Division is entrusted with the responsibility of ensuring that Bank's Media Relations objectives are achieved optimally.
- f. Staff of Fidelity Bank Plc may not talk to the media on issues pertaining to the Bank without prior approval of the MD&CEO or clearance from the Brand & Communications Divisional Head.
- g. Brand & Communications shall facilitate information and interview requests from the media in a way that serves the business interests of the Bank.
- h. Bank does not have to grant every request for media interviews or participation in media reports and events, if in the judgment of the BCD, so doing does not constitute optimal use of time and resources or does not help to build necessary good will.
- i. Media enquiries, whether by phone, e-mail, letter or in person shall be addressed properly to meet publication deadlines.
- j. In responding to media enquiries, Brand & Communications shall confirm matters about which it has no expert knowledge, from the relevant units. Such units shall assist to provide the required information to meet deadlines.
- k. Core to Media communications are:
 - Headline/Front page Placement: Prime positions in the media for the Bank's related events shall be the goal because such is consistent with the Bank's vision.

- Placed Features: Features based on the achievements or plans of the Bank shall be placed strategically in national dailies, weekly or magazines.
- Press Releases: Constant flow of credible press releases, also to be based on facts and working with a predetermined timetable so that the Bank is notable without being notorious.
- Exclusive Interviews for the CEO: This is to ensure name recognition and project the Bank's quality of mind as personified by the CEO.
- Focused Briefings/Hosting: This should be organized from time to time with editors, financial journalists and other identified groups. This is one of the activities for cementing existing relationships with the media.

7. SPOKESPERSONS

Fidelity Bank Plc is an institution that celebrates its people and willing to showcase the quality of its talents. Consequently,

- a. The Managing Director & Chief Executive Officer of the Bank, as the chief spokesperson, speaks on behalf of the Bank. He may, however, from time to time, authorize senior staff members to speak on his behalf.
- b. The Head of Brand & Communications is also authorized to respond to media enquiries.
- c. The Head of Brand & Communications signs and releases Press statements to the media. However, the information passed to the media on behalf of the Bank shall always be approved by the MD & CEO.
- d. The Bank encourages senior staff members to accept speaking engagements in their communities and professional bodies that they belong to. However, for proper co-ordination and to ensure adequate mileage, these engagements shall be cleared with MD&CEO and Brand & Communications briefed ahead.

8. GOVERNMENT RELATIONS

- a. The Bank shall ensure a healthy relationship with the government of the day.
- b. The Bank shall always respect the laws of the land and all other laws governing its operations in the industry.
- c. The highest level of management shall continuously ensure cordial relations with the key policy makers and other top government functionaries.
- d. The Bank as a corporate personality shall not go, nor be dragged, into party politics or issues that could have negative implications on its personality.
- e. The Bank may not overtly sponsor a political party or political figure.
- f. The Bank may, in the interest of the business, host key government officials of the day to relationship-building events which are not overtly political.

9. CORPORATE SOCIAL RESPONSIBILITY

- a. The Bank shall strive to re-enforce strong, healthy Community Relations by identifying with host communities in activities that have meaning to them.
- b. The Bank shall maintain high standards of integrity in relations to State and Community.
- c. The Bank shall strive to play a leading role by identifying with and seeking solutions to the problems of society especially those in the immediate operational environment.

10.1 Dimensions of Social Responsibility

10.1.1 Environment, Creative Arts and Health/Social Welfare

The Bank shall strive to support efforts aimed at identifying and promoting issues relating to the preservation, protection and beautification of the environment.

The Bank shall support efforts aimed at encouraging young and talented Nigerians to discover themselves in the area of creative writing.

The Bank shall seek to support the cause of the less-privileged members of the community in their effort to overcome their disabilities and become contributing members of the larger society.

10.1.2 Value Analysis

Any request for identification with any public or social cause must answer the Question: What is in it for Fidelity; the Host Community and Mankind?

NOTE:

The above is not necessarily a listing of the only areas for the Bank's social responsibility initiatives. The details of the Bank's CSR Direction are spelt out in the Policy document to that effect.

11 ADVERTISING

Advertising, as a paid form of public communication, affords the Bank the opportunity to promote its products and services.

11.1 Choosing an Advertising Agency

- a. The Bank shall engage reputable communication consultants to assist in prosecuting communication campaigns based on briefs given by the Bank.
- b. Separate Agencies may be commissioned to handle the Bank's different advertising needs, such as: Corporate OR Product Advertising; Print OR Electronic; Seasonal Productions; Design and Productions; Subsidiaries. Bank may also decide to use one Agency at a time.

c. To strengthen the quality of the inputs from appointed agencies, the Bank shall at least once in three years call a pitch for its business, failing which it shall demand the agencies for submission of their fresh advert understanding/interpretation of the Bank's business. Pitches shall be held primarily to establish that the Agency working for the Bank at any point in time has an appropriate understanding of the Bank and its business objectives.

12. CRISIS COMMUNICATION PLAN

12.1 INTRODUCTION

In a Work place like ours, a crisis could present itself in the form of a robbery, fire, management or board disputes, accidents of any description, etc.

Such occurrences have potential to erode public confidence in the institution, affect Brand reputation and ultimately market share, if not handled carefully.

12.2 Establishing an Emergency Management Team

The existence of a team that deals with a crisis intrinsically gives confidence that somebody is working to resolve the situation. Membership of this team shall cut across functional lines and shall be senior level officers in the Bank. Suggested member departments are: Legal, Brand & Communications, Corporate Services, Human Resources and Inspection & Audit. It shall be headed by the Executive Director, Shared Services & Products. The process owner shall be Brand & Communications Division.

- This Team shall have more members than are actually necessary because some will be away, ill or on holiday. So representatives of departments shall have alternates.
- There shall be more than one leader of this team an alternate chairman.

- The Team shall have an understanding of issues that could lead to crisis.
- Staff should know about the crisis management team and who to call for information.

In the case of a Management or Board issue, Team shall act only to the limit advised and directed by Executive Management.

12.3 Communicating in Crisis:

- Only the CEO or an EXCO member, or Head, Brand & Communications or any other appointed member of the Emergency Management Team may speak to the media.
- A media strategy shall be adopted and communicated to all the appropriate people. The over-all strategy, depending on the magnitude of the event, would include: a press briefing, press releases, visits to sites, and close contact to the media.

12.4 Over-aching Considerations:

The principle of openness and transparency shall be observed, but information not necessary to provide understanding of the issue at hand may not be freely given out to members of the public. Also, any information that would compromise the Bank's strategies and reputation shall not be freely given. Any form of publicity of the matter that imperils the Bank's reputation and seems to ridicule the leadership shall be avoided.

12.5 Internal Publics:

Information shall be disseminated to the Staff through the internal channels – intranet, telephone, sms, fax, etc so that Staff are not reliant on the public media for their understanding of an event.

12.6 The Role of Staff in Crisis Management

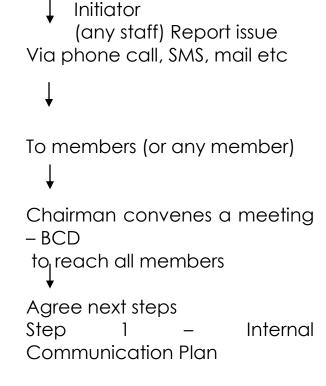
- Staff should be appropriately informed as soon as an event occurs.
- They should know that Management is responding to the situation.
- They should know who to call for further information.
- They should know the information to disseminate and their limits

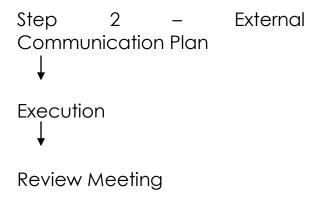
12.7 Notifying the Board

The Managing Director, or in his absence, the Deputy Managing Director shall notify the Chairman and other directors, depending on the magnitude of the incident. Otherwise, it shall be reported at the next meeting of the Board.

12.8 Process Flow

Attacks (robbery)
Accidents (fire, building collapse etc)
Disputes (Mgt, Board)
Other incidents





14 SANCTIONS

Where it is successfully established that a staff of the Bank overtly or covertly contravenes any provision of this Policy, the sanctions stipulated in the Bank's Personnel Policies shall apply. Exhibit 1 – Internal Memo Format



Internal Memo

To: MD/CEO

From: Brand & Communications Division

Date: September 3, 2015

Subject: New Communications Policy