



UN GLOBAL COMPACT:  
COMMUNICATION ON PROGRESS  
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## Letter from FirstBank's GMD

FirstBank subscribed to the United Nations Global Compact (UNGC) membership in the first quarter of 2013 to strengthen our corporate responsibility engagements and also ensure that we adhere to global best practices in our social interventions.

We have therefore realigned our priorities to accommodate the citizenship approach which entails that we broadly consider the needs of our stakeholders, not only for enhanced business performance but largely for a mutually beneficial relationship. The citizenship approach ensures that we constantly listen to the needs and demands of our stakeholders and meet those needs in line with our laid down framework and strict adherence to the UNGC principles.

We believe that building strong relationships with our customers, employees, and communities underpins our own sustainability. The significance we place on relationships is reflected in our responsible approach to doing business which informs our focus areas and priorities.

We present to you today our Communication on Progress Report for 2013. The report highlights the efforts the Bank has made in the past year in adherence to the 10 UNGC principles. Some of our key programmes in 2013 include: The Future First programme; Educational Endowment scheme; Infrastructure Development programme; Youth Leadership programme and Hope Rising Initiative. These programmes are geared towards community development and they also guarantee that the communities we live and work are preserved for the present and future generation. The progress report would delineate further.

As a Bank, we are committed to environmental sustainability and we have adopted principles and structures to manage environmental and social risks. In addition, we are committed to promoting diversity and inclusion amongst all our stakeholders.

We are indeed proud to be a member of the UNGC and we reaffirm our commitment to making a real difference in our communities.

Thank You.

**Bisi Onasanya**  
**GMD/CEO**  
**First Bank of Nigeria Limited**



# Human Rights

## 1. BUSINESSES SHOULD SUPPORT AND RESPECT THE PROTECTION OF INTERNATIONALLY PROCLAIMED HUMAN RIGHTS

### Enhancing Human Rights through Financial Literacy

The Universal Declaration of Human Rights, Article 26 emphasises the significance of education in the development of human personality as well as the enhancement of human rights and fundamental human freedom. In line with this fact, we have prioritised financial education geared towards personal growth.

Our commitment to personal prosperity has seen us develop a financial literacy programme called FirstBank Future First. The Future First programme is designed to achieve the main objective of the Bank's youth strategy which is to engage the youth, change their perception and encourage a banking relationship. Future First through two expressions- Career Counselling and Financial Literacy focuses on empowering secondary school students between the ages of 13 and 17years old in JSS 3 to SS2. The key objective is to help build fulfilling careers for students and better equip them with the tools and knowledge for long-term financial independence.

Future First programme was launched in the last quarter of 2013 in partnership with Lagos Empowerment and Resource Network (LEARN) and Junior Achievement Nigeria (JAN). As with all our programmes, Future First is also implemented through a structured Employee Volunteering Scheme (EVS) where the our employees offer their time and knowledge in enlightening high school students in Lagos State on Financial Literacy and Career Counselling. Over 1000 students have benefitted from the programme and our target for 2014 is to enrich the lives of 10,000 students.

## 2. BUSINESSES SHOULD MAKE SURE THAT THEY ARE NOT COMPLICIT IN HUMAN RIGHTS ABUSES.

Our responsibilities to our people and stakeholders include protecting, respecting and upholding their rights. We believe our responsibilities go beyond legal compliance to moral obligations. We ensure human rights are not abused and make it our responsibility not to get involved in the violations of human rights.





## Labour Standards

### 3. BUSINESSES SHOULD UPHOLD THE FREEDOM OF ASSOCIATION AND THE EFFECTIVE RECOGNITION OF THE RIGHT TO COLLECTIVE BARGAINING.

#### Upholding Freedom of Association

At FirstBank, we ensure that in everything we do, our people feel a genuine sense of fairness, equality, freedom and participation. In creating and sustaining an environment that supports and encourages human rights/freedom of association as well as collective bargaining, we run an organisation where unions (ASSBIFI, NUBIFE) are allowed to function effectively and staff are at liberty to either become members or not.

We hold quarterly meetings with the executives of these unions who are also representatives of staff. These meetings provide a platform for management and union to discuss on all aspects of employees' employment relationship and also serve as collective bargaining mechanism to resolve issues.

### 4. BUSINESSES SHOULD ELIMINATE ALL FORMS OF FORCED AND COMPULSORY LABOUR

#### Elimination of All Forms of Forced labour

In carrying out our day-to-day operations, we understand the importance of not only having the right talents at the right places, but also an environment where people are willing to work without coercion. We have been able to achieve this by developing the right policies and frameworks which have helped ensure that our recruitment process is carried out in line with global best practice which is devoid from all forms of bias such that potential employees make recruitment based decision without fear.

For existing employees, we have established a clear framework for escalation such that our people can freely relate with their Human Resource (HR) business partners on any issue around supervisor-subordinate relationship. We have also reinforced acceptable workplace behaviours through series of campaigns (Jerk behavior campaign, etc). All these initiatives are strategically aimed at ensuring that we have a workforce that is not only emotionally connected to our brand, but also willing to effortlessly champion the cause of the brand.

### 5. BUSINESSES SHOULD UPHOLD THE EFFECTIVE ABOLITION OF CHILD LABOUR.

See principle 3 & 4

### 6. BUSINESSES SHOULD UPHOLD THE ELIMINATION OF DISCRIMINATION IN RESPECT OF EMPLOYMENT AND OCCUPATION

#### Promoting Diversity and Inclusion

Our responsibilities to our people include enhancing the quality of relationships among all people in the Bank as this is a key determinant of qualitative decisions and how they are implemented. To this end, we have put in place a diversity policy aimed at promoting diversity and inclusion in the workplace. We recognise that advancing diversity and inclusion creates possibilities for change and innovation as unique views and ideas are aligned towards a common goal.



Our mantra for year 2013 was “WHOLESONENESS”. This was borne out of a deep reflection on the all-important need to proactively drive synergies across the Bank, its various teams and subsidiaries.

Our engagement plan included people integration, managing change and promoting diversity and inclusion in the workplace. We recognise that advancing diversity and inclusion creates possibilities for change and innovation as unique views and ideas are aligned for a common goal.

Our employees come from diverse ethnic tribes in Nigeria. This also applies to other countries in which we operate. And as part of our efforts to encourage inclusion in the workplace, we have some physically challenged employees. We currently have nine women on the respective boards of the subsidiaries that make up FBN Holdings – which is the highest of any holding company in Nigeria. In addition, to engender healthy relationships and employee bonding, we have created platforms for our employees to actually express themselves and have truly fulfilling experiences.



### Hope Rising Programme

Hope Rising Initiative is one of the key programmes of the Group designed to empower people living with disabilities. Its key objective is engendering inclusivity and diversity through education, advocacy and enlightenment; skills acquisition training; as well as inclusive events. Our main focus is creating awareness on Down syndrome and how to live with Down syndrome. This is enhanced by the Hope Rising drama series which focuses on highlighting the challenges of Down syndrome and

exploring efforts at combating the disorder whilst providing the platform for advocacy and public enlightenment.

Some of the initiatives we have supported under this programme include Demystifying Autism in partnership with the Patrick Speech and Languages Centre; support to Mr. Folawiyo Jimoh Adisa, a Para-Badminton player to attend Para-Badminton tournaments across Europe; scholarships for two visually impaired persons: Mr. Morakinyo Emmanuel and Mr. Abdulateef Alani Azeez to complete their higher education at the Universities of Ibadan and Osun State Polytechnic respectively.



# Environment



## 7. BUSINESSES SHOULD SUPPORT A PRECAUTIONARY APPROACH TO ENVIRONMENTAL CHALLENGES

### Contributing to Environmental Sustainability through Responsible Lending

At FirstBank, we are committed to avoiding or minimising environmental impacts through our responsible lending efforts. Our customers remain a vital element of our business. We constantly seek responsible ways in providing products and services to meet their needs while ensuring that we manage our environmental and social impacts in the process, thus contributing to the overall sustainable growth and development.

As part of our commitment to driving sustainability in FirstBank, we have enhanced the existing environmental and social screening process to a more comprehensive mechanism – the Environmental, Social and Governance Management System (ESGMS).

The ESGMS consists of environmental, social and governance policy and procedures to screen transactions; guidance for monitoring performance and maintaining ESGMS records; ways of reviewing ESGMS and continuously improve it based upon changing international standards; the company's lending profile; considerations with regard to internal and external reporting of ESGMS performance; roles and responsibilities for implementation; as well as budget and training of staff.

In line with local and international standards, the ESGMS also highlights the sector specific policies and requirements with high impacts including oil and gas, agriculture and power.

We plan to begin implementation of the ESGMS in 2014 in line with the sustainability implementation plan.

## 8. BUSINESSES SHOULD UNDERTAKE INITIATIVES TO PROMOTE GREATER ENVIRONMENTAL RESPONSIBILITY

## Initiatives to Promote Environmental Responsibility

Part of the Bank's long-term approach to sustainability is minimising its direct and indirect impact on the environment. This has informed the Bank's efforts at conserving energy to reduce global warming by reducing its CO2 emissions; as well as conserving resources – a key aspect being through reduction in the use of paper in our business operations, anchored on our print optimisation programme.

The Bank is constantly seeking opportunities to manage environmental and social footprints through the use alternative energy sources and the reduction of energy consumption for and from business activities and operations. These have included solar powered ATM machines.

### 9. BUSINESSES SHOULD ENCOURAGE THE DIFFUSION OF ENVIRONMENTALLY FRIENDLY TECHNOLOGIES

#### Investing in Environmentally Friendly Technologies

As part of our efforts to encourage environmentally friendly technologies, we have been investing in Green IT initiatives. In the last three years, the Bank has actively reduced the size of its data centre using rationalisation and virtualisation techniques. A total of 68 servers have been decommissioned in this period. The Bank has also consolidated its data centre from 90 to 22 servers running 500 virtual servers; this has significantly reduced the energy consumption of IT.

The Bank also has an on-going partnership with the Nigeria Conservation Foundation, Nigeria's premier non-governmental environment conservation foundation dedicated to nature conservation and sustainable development in Nigeria and actively supports its activities annually.

## Anti-corruption

### 10. BUSINESSES SHOULD WORK AGAINST CORRUPTION IN ALL ITS FORMS, INCLUDING EXTORTION AND BRIBERY

#### Corporate Ethics and Culture

The code of ethics rolled out in the Bank in 2007 has remained in force..

The Board of Directors, in conjunction with its committees, oversees compliance programs by:

- Setting the tone at the top, both internally and externally, and promulgating a compliance charter or values statement.
- Focusing attention on critical risk areas.
- Ensuring the institutionalisation of the whistleblower helpline process and taking active control when appropriate.
- Working with management to incorporate leading practices (e.g., protocols for investigating complaints, helpline statistics, and internal reporting).

To influence culture and tone, the board:

- Reviews metrics and key performance indicators with respect to the company's compliance with law and policy.
- Maintains a deep understanding of the compliance monitoring, testing, and issue resolution processes.
- Assesses the adequacy of management's response to specific issues and areas of internal control weakness.



At FirstBank, management takes the lead in developing tools to establish the company's culture, through messaging, updating, and distributing codes of conduct, communicating helpline processes, and carrying out annual cultural surveys to test the effectiveness of the programme. The

board and management, working together, have been able to strengthen ethics and compliance in the organisation, thus leading to higher quality information, process optimisation, improved effectiveness, a protected reputation, and reduced costs.

## Customer Complaints and Resolution

Complaints management is an integral part of our overall Service Delivery Excellence framework and we take every complaint we receive seriously and work with our customers to deal with them quickly and in a satisfactory way. By listening to unsatisfied customers and taking actions to remedy issues, where appropriate, we are able to review our service standards and delivery processes to meet these standards.

Our Complaints Handling policy ensures that complaints received are dealt with in a clearly defined, effective and expeditious manner. We encourage customers to deal with their local branch, or the business unit in which the problem originated because our goal is to resolve these complaints at the local level. Where this is unsuccessful; we have an escalation mechanism in place.

Bank wide, all complaints are recorded and classified to indicate the nature of the complaint, along with the product or service the complaint is about. Once complaints are classified, the data is analysed and reported on a regular basis through our Service Measurement Dashboard. On a quarterly basis, our complaints management activity receives senior executive attention and accountability. Our goal is to

identify themes or trends that occur with front-line service delivery. With recurring issues identified, we take action to improve front-line service delivery, including reviewing products and services, providing additional training to staff on products and services, updating service standards and improving communications. Changes are tracked and monitored closely to ensure actions result in fewer customer complaints.

It is our policy to acknowledge complaints within 24 hours of receipt and also communicate a final resolution to the customer. We strive to resolve most complaints received within 3 to 5 days, however, where there are complexities involved which could extend resolution for more than 5 days, we provide the customer with a progress report. Where customers are not satisfied with the resolution provided, the Bank's Service Ombudsman will act as an independent arbiter in resolving cases.

In addition to our complaints management process, it is essential that customers who complain are satisfied with the complaints management process, hence we also have a complaints feedback system, through which, customers who complain are surveyed for feedback on the handling process, the feedback received helps us identify areas for improvement.



## Whistle Blowing Procedures

Whistle Blowing is a process of raising concern about a wrong doing, illegal or unlawful conduct, e.g., fraud, corruption, bribery or theft. The Board of Directors attaches priority to high ethical standards and probity, and expects all its employees and officers to observe these standards in all their dealings in the Bank. Thus, in compliance with the statutory requirement from CBN in its circular on Code of Corporate Governance for Banks in Nigeria, FirstBank's Whistle Blowing framework which had been established in 2010 was restructured.

The Bank's whistle blowing policy spans both internal whistle blowers (staff, contract employees, management or directors) and external whistle blowers (customers, service providers, applicants, auditors, consultants, regulators and other stakeholders). The stakeholders include employees, customers, contractors and service providers. The process creates a work environment where concerns on misconduct, irregularities or malpractices can be raised without fear of harassment and/or

victimisation. Concerns are taken seriously and investigated and the outcome communicated.

The phone lines are 01-9054583, 01-9054543 & 01-6054525 and the email address for the public is [firstcontact@firstbanknigeria.com](mailto:firstcontact@firstbanknigeria.com). Members of staff may contact [Adeyemi.O.Ogunmoyela@firstbanknigeria.com](mailto:Adeyemi.O.Ogunmoyela@firstbanknigeria.com) or [Internalaudit.Head@firstbanknigeria.com](mailto:Internalaudit.Head@firstbanknigeria.com). In addition, whistle blowers can also log onto [www.firstbanknigeria.com](http://www.firstbanknigeria.com) and click on the whistle blowing portal to report misconduct. Other avenues open to whistle blowers are through a letter to the Group Managing Director/Chief Executive or directly to the Chief Internal Auditor.

During the 2013 financial year, a total of 5 cases were recorded of which three (3) cases were earmarked for disciplinary measures, the fourth case involving a bank account was regularised while the fifth case involving an outsider who tried unsuccessfully to lure a staff into fraudulent activities was handed over to the Police for prosecution. The Bank maintains confidentiality of data revealed and the identity of the whistle blower.

[www.firstbanknigeria.com](http://www.firstbanknigeria.com)