



UN GLOBAL COMPACT:
COMMUNICATION ON PROGRESS

March, 2016

-You First-

FirstBank
Since 1894 

LETTER FROM FIRST BANK'S MD/CEO

It is with great delight that we present our communication on progress report for 2016 to reaffirm our support for, and continued commitment to, the UN Global Compact. Our connection with the ten principles of the Global Compact (UNGC) is clear. The principles align with our sustainability objectives structured along four key priorities, namely Sustainable Finance and Investment, Community Support, Environmental Sustainability and People Empowerment.

As a leading financial institution in sub-Saharan Africa, we recognise that playing an important role in the lives of our customers and our host communities is a huge privilege. We also recognise that this comes with a huge responsibility which we are committed to honouring. We do this by ensuring financial stability and contributing to the prosperity of our customers and the communities we are part of through providing capital for investments, managing risks, innovating the financial infrastructure and helping people and businesses actualise their goals.



We have updated each reporting section (Human Rights, Labour, Environment, and Anti-Corruption) with additional information on our activities in 2015.

Through our FutureFirst and Youth Leadership programmes, we have reached out to an approximate 40,000 students with knowledge of financial literacy and career counseling in selected locations in Nigeria. We also initiated the FirstBank Conservation Programme, part of our long-term approach to promoting environmental sustainability which involves minimising our direct and indirect impacts on the environment. The conservation initiative employs

the tree planting and students' conservation clubs as vehicles to drive environmental protection and conservation. (The 2015 report would shed more light on this).

We again restate our commitment to upholding the principles of the UNGC and our commitment to accountability and innovation in the effort to improve conditions among all Nigerians and the world at large.

Adesola Adeduntan
MD/CEO
First Bank of Nigeria Limited & Subsidiaries

Human Rights



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

Enhancing Human Rights through Financial Literacy and Collaborative Partnerships channeled towards Promoting Leadership and Ethics amongst Youths and Capacity Building for Stakeholders.

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.

The Bank's commitment to engendering personal prosperity, promoting leadership and ethical values amongst youths and ensuring businesses are sustainable and overcome major physical and environmental challenges has seen it launch the following initiatives:

I. The FutureFirst Programme:

The FutureFirst Programme was initiated in 2013 as part of the Bank's commitment to add value to the lives of stakeholders. It has two expressions which are Career Counseling and Financial Literacy. The Financial Literacy programme is designed to provide an experiential supplement to the business education of high school students in Nigeria.

This is by empowering students with financial knowledge through training on running a business and learning of basic money skills to promote savings culture and thereby building a crop of future financial managers.

The Career Counseling leg of the FutureFirst Programme is geared towards equipping high school students with knowledge on how to make the right career choice. To actualise these objectives, the Bank partnered with Junior Achievement Nigeria, an NGO whose main objective is youth empowerment and the Lagos Empowerment and Resource Network (LEARN).

In 2015, the Bank implemented these programmes through its Employee Volunteering Scheme which saw staff volunteers of the Bank that underwent a training of trainers exercise utilising their time and resources to teach high school students in Lagos, Port Harcourt, Abuja and Enugu – four major cities in Nigeria about financial literacy. An approximate 40,000 students have been reached through this programme.



A staff volunteer of the FutureFirst Initiative of the Bank teaches students of Fountain Heights Secondary School Lagos Nigeria about Financial Literacy.



Beneficiaries of FirstBank's Financial Literacy Exercise display their awards for being second place in a Junior Achievement Nigeria's competition for Financial Literacy and Entrepreneurship.

II The Leadership, Ethics and Civics Programme

The leadership, ethics and civics programme is designed to inculcate knowledge of leadership and ethics on Nigerian youths. It is a Youth Development Training Initiative that is implemented in Partnership with LEAP Africa. LEAP is an acronym for Leadership, Effectiveness, Accountability and Professionalism.

This initiative is also implemented through the Employee Volunteering Scheme of the Bank. Staff volunteers who underwent a training of trainers exercise are also provided with manuals to train Nigerian youths especially high school students on LEAP Africa's leadership, and life skills curriculum and also support them in implementing social change projects that will positively impact their communities.

In 2015, the Bank's volunteers who participated in the Leadership, Ethics and Civics Programme reached out to an approximate 5,000 students utilising about 18,700 hours. This programme has helped youth to understand their rights as individuals and also build their self-confidence to meet up with the challenges of a world that is constantly evolving.



A financial literacy training session organised by the Bank for students of Government Secondary School Maitama Abuja.

III Establishment of the FirstBank Sustainability Centre

With sustainability becoming very topical, the Bank established the FirstBank Sustainability Centre in 2013 as a specialised Centre that focuses on Sustainability in banking, finance and related issues in partnership with the Lagos Business School.

The FirstBank Sustainability Centre seeks to achieve the following objectives:

- A specialised training center that focuses on knowledge creation, knowledge dissemination and knowledge application as it relates to Sustainability in banking, finance and related Issues;
- A capacity building center for staff of FirstBank and other Financial Institutions who are signatories to the Nigeria Sustainable Banking Principles (NSBP); and
- A platform to promote best practice, learning and sharing on Sustainability in Nigeria.

In 2015, the centre in furtherance of these objectives organised several open and in-company seminars, workshops and International and local conferences for the cross fertilisation and exchange of ideas on sustainability. These include: Sustainability Workshop for SMEs 1st and 2nd run, Sustainability Workshop for Media Practitioners, Leading a Sustainable Business (Lagos and Edinburgh edition), Sustainability Workshop for Women in SMEs 1st and 2nd run, CEO roundtable on sustainability and an International Sustainability Conference.

Through the activities of the FirstBank Sustainability Centre, over 2,500 stakeholders have been empowered with knowledge of embedding sustainability into their business practices.

The centre has carried out several researches and case studies. Amongst them is "Social Entrepreneurship:

Answering the Call of Nature” which won the best prize for the Emerald and Association of African Business Schools (AABS) case study publication. The case was

also accepted for publication in the Emerald Emerging Markets Case Studies Collection.



Capacity Building and Women Empowerment: Participants at the Sustainability workshop for Women in SMEs



Capacity Building: A Lagos Business School Faculty lectures participants at one of the workshops organised by FirstBank Sustainability Centre

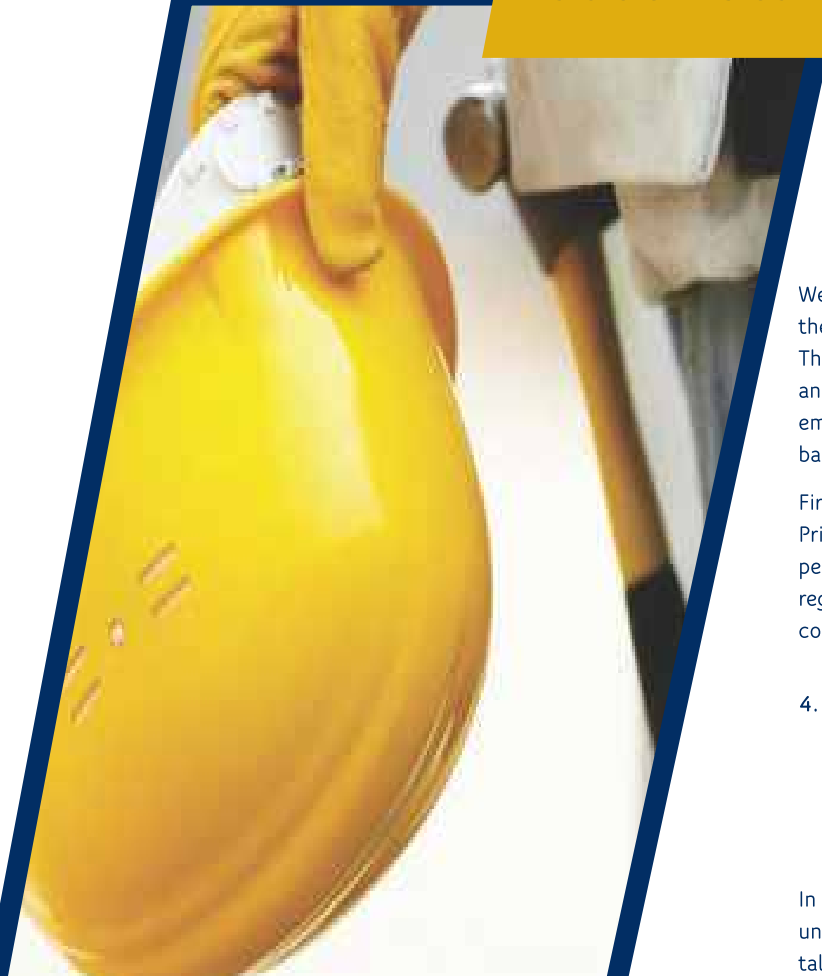
2. BUSINESSES SHOULD MAKE SURE THAT THEY ARE NOT COMPLICIT IN HUMAN RIGHTS ABUSES.

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. We are committed to dealing fairly with all our stakeholders which include our staff, customers, shareholders, government agencies amongst others. We do not encourage staff to take advantage of each other or

manipulate one another based on superiority rather respect for each other's dignity is encouraged. Gender discrimination and discrimination of minority group is not allowed. Harassment of staff in any form is strongly discouraged and culprits are usually handed over to the Bank's disciplinary committee for sanctioning.

Furthermore, the Bank maintains an organisational culture that encourages an open line of communication between superiors and subordinates. The Bank carries out induction for new staff to acquaint them with values and vision of the Bank so as to understand how to behave with other staff in the course of their stay in the Bank.

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.

FirstBank also practices a Pay for Performance Principle where bonuses are tied directly to staff performance. The Bank encourages staff to hold regular meetings, engage in open discussions and consultations so as to engender flow of information.

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. Staff of the Bank are hired based on their free will and there is no forced, bonded or involuntary prison labour. Staff are allowed to resign based on the terms in their contracts.

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 of all forms of bias such that potential employees make recruitment-based decision without fear.

In the case of conflict amongst staff, inquiries are made regarding the dispute or conflict and the Bank's disciplinary committee resolves such issues. Through this, the rights of staff are upheld and no single individual is treated unfairly.

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.

Also, as a matter of principle, the Bank does not maintain partnerships with any organisation or group that uses forced or compulsory labour. We carry out intensive due diligence checks on our partners' employment policies before building relationships with them.

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

We are committed to engendering diversity and inclusion in our business practices. Our board composition consists of 21% female, the highest in any holdings company in Nigeria. At the management level, gender population is 35.9% female to 64.1% male while our workforce comprises of persons of every tribe and culture in Nigeria including expatriates from other countries. We also employ persons with disabilities, one of them is the President of the Nigeria Association of the Blind (NAB). We support the NAB's annual white cane and safety day where we donate white canes for the visually impaired and also participate in the Charity Walk through the Bank's Employee Volunteering Scheme (EVS).

Through our Employee Volunteering Programme, the Bank's staff are provided with a platform that allows them to participate in socially responsible initiatives that impact their community, giving them a sense of ownership in building the brand and at the same time fulfilling their yearnings to show care and support for the needy. We are also committed to fostering a safe work environment where the safety, security and wellbeing of our workers are protected. Part of this

includes the operation of a clinic where ailing staff can have access to first aid and preliminary medical treatments before visiting the hospital. Our commitment to enshrining human rights guides the way we treat our employees; hence we ensure fair working conditions, improve employee engagement and eliminate discrimination.

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.

Asides from airing the Hope Rising Drama Series on Down Syndrome, the Bank has maintained an existing partnership relationship with the Down Syndrome Foundation Nigeria. The Bank supports its annual Inter House Sports competition designed to improve the physical and mental wellbeing of children living with Down Syndrome. The Bank also supports its annual awareness week with the goal of increasing advocacy and public enlightenment on the Down Syndrome disorder. In 2015, the Bank conducted an Employee Volunteering Visit to the Down Syndrome Foundation Resource Centre in Lagos Nigeria. This saw staff volunteers from the Bank visiting the resource centre. It provided an opportunity for staff to demonstrate their care and support for children with Down Syndrome. Donations were made to the Down Syndrome Centre in the form of food, toiletries, clothing and other household materials.

Other initiatives supported by the Bank in 2015 as part of the Hope Rising programme include:

- Continued higher education support for Mr. Alani Azeez for his HND III education in Osun State Polytechnic, Iree as a part time student. The Bank had previously supported him for his HND I & II in the same higher institution.
- Supported the Chike Okoli Foundation in its 4th edition of cardiovascular health campaign in ten secondary schools in Lagos State and the 9th edition of its Heart and Soul Gala.

- Continued support for Mr. Folawiyo Jimoh Adisa, Nigeria's Para-Badminton Gold medallist to attend para-badminton sports in Europe.
 - Maintained partnership with the Down Syndrome Foundation Nigeria and supported them in their annual Inter House Sports Competition, Children's Day Commemoration, provided advert support for the World Down Syndrome Day, and participated in the Down Syndrome Awareness Week.
 - Supported the Benola Cerebral Palsy Initiative for its implementation of advocacy campaigns and capacity building programmes as well as provision of infrastructure to care for persons with cerebral palsy.
 - Partnered with Theseabilities Ltd. in hosting a Children's day celebration for children with disabilities at Freedom Park Lagos Island. Participants include children from the Pacceli school of the Blind and school for the hearing impaired Meiran.
 - The Bank supported the Nigeria Society for the Blind on its Diamond Jubilee May Ball designed to raise funds for the activities of the Vocational Blind Centre in Oshodi Lagos.
- Supported the Pacceli School of the Blind on their graduation ceremony and end of year activities.
- Provided support to Star Children's Development Initiative for the provision of medical intervention for Ms. Jomiloju Ibiyemi, a disabled girl with hole in the heart.
 - Supported the International Association of the Scientific Study of Intellectual Disabilities for hosting its International Conference on disabilities event aimed at promoting the cause of people living with disabilities.
 - Supported the Sickle Cell Foundation Nigeria in the Commemoration of the World Sickle Cell Day to provide advocacy and public enlightenment on the sickle cell disorder.
 - Provided Support to Golden Hearts Touching Lives Initiative for its medical outreach to Od-Olowo town Mushin Lagos.

- Provided support to Sebbecly Cancer Care Initiative for its Light Lagos Pink Campaign with the aim of providing advocacy and public enlightenment on the cancer ailment through the human pink ribbon – a gathering of 12,000 people wearing pink to form a ribbon in attempt to break the Guinness World Record of the human pink ribbon.



Visually impaired students of the Pacceli School for the Blind Lagos Nigeria feel ancient artefacts at a museum in Lagos as part of activities of a Children's day event hosted for them by the Bank.

- Support to Segun Aina Foundation in hosting a Christmas party event for less privileged children.
- Support to Mr. Ade Adelekan, a physically challenged youth in completion of his final year project thesis at the Lagos State University.

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 improving it, based on changing international standards the company's lending profile; considerations with regards 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.

The Bank through the FirstBank Sustainability Centre organises seminars and workshop for stakeholders. Some of these seminars and workshops are targeted towards minimising negative impact on the environment. One of such is an international conference tagged: 'Implementing Sustainable Strategies in the Energy and Extractive industries.'

The conference sought to empower firms in the energy and extractive industries on how to competitively minimise their negative impacts and enhance their positive impact on the environment by embedding sustainability thinking and paradigm in their strategies. This is because research and experience have shown that a well-articulated and engrained sustainability strategy enhances organisational adaptability and survival in complex environments.

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 of alternative energy sources and the reduction of energy consumption for and from business activities and operations. These have included solar powered ATM machines.

Staff of the Bank are also encouraged to engage in teleconferencing in order to minimise traveling and carbon emission from vehicles. The Bank also invests in innovative technologies that lead to higher carbon efficiencies and financial savings.

FIRSTBANK CONSERVATION PROGRAMME

The FirstBank Conservation initiative is one of the key programmes of the Bank and is part of our long-term approach to promoting sustainability which involves minimising our direct and indirect impacts on the environment. The conservation initiative employs the tree planting and students' conservation clubs as vehicles to drive environmental protection and conservation.

The key objectives are:

- To minimise carbon footprint through planting of trees
- To create awareness of the need to preserve wild life and biodiversity among school children.
- To educate and build environmental-conscious students through partnerships with reputable NGOs and institutions.

The first phase of the initiative began in Lagos, Ogun and Edo states respectively. In partnership with Nigeria Conservation Foundation (NCF), the Bank launched the Lagos leg of the first phase at Lagos State Civil Service Model College, Igbogbo, Ikorodu with the planting of 120 trees and formally setting up a conservation club. This was followed by the planting of another set of 120 trees at Evboesi Mixed Secondary

School Benin City and the setting up of another conservation club amongst the students of the school. The final part of the first phase will take place at an identified secondary school in Ogun State.

The planting of 120 trees is a symbolic representation of the Bank's 120 years in existence and it's a commemoration of the anniversary of the Bank with regards to its contributions to Nigeria on the green economy as well as combating deforestation/desertification, while recognising the key role of children/youth in the sustainability agenda.



FirstBank Conservation Initiative: Tree planting campaign at



Conservation Champions: Students of Lagos State Civil Service Model College Igbogbo Ikorodu planting trees at the flag-off of the FirstBank Conservation Programme.

**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.

To further enhance the Bank's efforts at conserving energy, mitigating global warming, reducing pollution and reducing waste products in landfills, the Bank engaged in recycling of note books and pens in 2014. As a start-off project, the Bank produced five hundred recycled note books and pens which were distributed to the youths in Lagos State Nigeria. In 2015, the Bank targets production of 20,000 recycled materials, notebooks and pens inclusive.

Anti-Corruption



- 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.

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.

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



FirstBank seeks to maintain and enhance our reputation of providing stakeholders with high quality products and services. We value complaints as they assist us to improve our products, services and customer service. We are committed to being responsive to the needs and concerns of our customers or potential customers and to resolving complaints as quickly as possible.

The Bank thus has a Customer Complaints and Resolution policy designed to provide guidance to both our customers and staff on the manner in which it receives and manages complaints. We are committed to being consistent, fair and impartial when handling complaints.

Upon receipt of a complaint via any of our channels, the complaint would be logged on FirstCustomer which in turn will generate a unique identifier code that is sent to the customer. The complaint would identify the remedy sought by the complainant and any other information necessary for the effective handling of the complaint.

Receipt of each complaint would be acknowledged to the complainant immediately via SMS or e-mail notification. The notification will contain the Unique Identifier Code as well as the expected resolution time of the complaint. Upon receipt, each complaint would be initially assessed in terms of criteria such as severity and possibility of immediate action and will be treated accordingly.

We would then investigate all the relevant circumstances and information surrounding a complaint. The level of investigation would be commensurate with the seriousness, frequency of occurrence and severity of the complaint.

Complaints are tracked from initial receipt through the entire process until the complainant is satisfied or the final decision is made. An up-to-date status is made available to the complainant upon request and at regular intervals, via any of our channels. The decision or any action taken regarding the complaint, which is relevant to the complainant, would be communicated to them as soon as the decision or action is taken via email and SMS. If the complainant accepts the proposed decision or action, then the decision or action would be carried out and recorded.

If the complainant rejects the proposed decision or action, then the complaint would remain open. This would be recorded and escalated to the Complaints Management Team. The complainant would be informed of alternative forms of internal and external recourse available. The organisation would continue to monitor

the progress of the complaint until all reasonable internal and external options of recourse are exhausted or the complainant is satisfied.

Complaints can be lodged to the Bank in one of the following ways:

- By completing a Complaints form on our website
www.firstbanknigeria.com
- By calling First Contact on
0700FIRSTCONTACT
(0700-34778-2668228), 01-4485500,
0708-062-5000
- By writing to us:
Complaints Management Unit
First Bank of Nigeria Limited
35 Marina
P.O. Box 5216
Lagos, Nigeria
- SMS: Send an SMS to 30012
- Social Media:
 - Facebook: <https://www.facebook.com/firstbankofnigeria>
 - Twitter: @firstbankngr

Whistle Blowing Procedures



The Bank's whistle blowing policy is intended to encourage staff and other relevant stakeholders to report unethical or illegal conduct or conduct of employees, management, directors and other stakeholders to appropriate authorities in a confidential manner without any fear of harassment, intimidation, victimisation or reprisal of anyone for raising a concern under this policy.

Therefore employees, stakeholders, and members of the public can raise legitimate concerns, without fear and are given assurance that such concerns would be adequately addressed. Our whistleblowing policy is

thus fundamental to the Bank's professional integrity. In addition, it reinforces the value it places on staff to be honest and respected members of their individual professions. It provides a method of properly addressing bona fide concerns that individuals within the organisation might have, while also offering whistle-blowers protection from victimisation, harassment or disciplinary proceedings.

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).

Whilst the Bank encourages disclosure of identity by the whistle-blower, where possible, it also appreciates disclosure under anonymity with re-assurance that such identity would be protected at all stages in any internal matter, except with the consent of the individual or in circumstances where the Bank is unable to resolve the concern without revealing such an identity; for instance, if external legal action flows from the disclosure and the employee's evidence is required in court. 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. Members of staff may contact Adeyemi.O.Ogunmoyela@firstbanknigeria.com or Internalaudit.Head@firstbanknigeria.com. In addition, whistle blowers can also log onto 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 Managing Director/Chief Executive or directly to the Chief Internal Auditor.

