



UN GLOBAL COMPACT:
COMMUNICATION ON PROGRESS

March, 2017

LETTER FROM FBNHOLDINGS GROUP MD

We are delighted to present our communication on progress report for 2017 to reaffirm our support for, and continued commitment to, the UN Global Compact. Since 1894, our ability to manage relationships with our stakeholders remains the bedrock of our commitment to nation building. These include meeting our obligations to our over 10,000 employees through constant engagement and empowerment; putting our customers' needs first and enriching the lives of the communities where we live and work. As an institution, our contribution to overall sustainable growth and development ensures we enhance the quality of life and financial security of our customers and their families whilst also ensuring that we manage our environmental, social and governance impacts in the process.

Our commitment to the ten principles of the Global Compact (UNGC) is demonstrated through the alignment of our sustainability objectives with the principles structured along four key priorities, namely Sustainable Finance and Investment, Community Support, Environmental Sustainability and People Empowerment.



We have updated each reporting section (Human Rights, Labour, Environment, and Anti-Corruption) with additional information on our activities in 2017.

Through our FutureFirst and Youth Leadership programmes, we have reached out to an approximate 70,000 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 minimizing 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 2017 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.

Urum Kalu Eke
GMD,
FBNHoldings

Human Rights

We are dedicated towards providing product and services tailored to meet the needs of its stakeholders. We demonstrate our commitment towards protecting, respecting, upholding their rights and code of ethics amongst youths. Also, ensuring businesses are sustainable and overcome major physical and environmental challenges, through the following initiatives:

I. The FutureFirst Programme:

In keeping with our aim to promote financial inclusion, we developed the FutureFirst initiative. FutureFirst is a financial literacy and career counselling programme designed to empower secondary school students to build fulfilling careers and be financially aware.

Key objectives include helping students to:

- Gain the tools and knowledge to make effective and informed financial management decisions and achieve long-term financial independence;
- better understand how businesses are organized and operated;
- develop critical thinking, speaking and leadership skills and be able to demonstrate the rewards of the free enterprise system; and.
- Make the right career choices.

The Financial Literacy Day is one of the activities commemorating the Global Money Week; the Group was mandated by the Central Bank of Nigeria to adopt 30 schools across six geo-political zones. We have reached out to over 70,000 students thereby imbibing the importance of saving culture, learn about money, creating livelihoods, gaining employment and becoming an entrepreneur. A total of 90 secondary school students have been reached so far, with over 38,000 staff volunteering hours expended. To actualize these objectives, we partnered with Junior Achievement Nigeria, an NGO whose programme is designed to provide an experiential supplement to the business and economics education of senior secondary school students to help them better understand how businesses are organized and operated.

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 underlines the significance of education in the development of human personality. It also, underlines the significance in the improvement of human rights and fundamental human freedom. In line with this fact, we have prioritized financial education equipped in the direction of personal growth.



Beneficiaries of FirstBank's Financial Literacy Exercise for Financial Literacy and World Saving's Day.



Participant of the Career Counselling session during the Corporate Responsibility and Sustainability week

II CFA UNIVERSITIES ETHICS CHALLENGE AND SAMUEL ASABIA CHAIR ON BUSINESS ETHICS

To demonstrate the Organisation's commitment to ethics, professional excellence; capacity building and inclusive growth of Nigerians; and support for youth education and the drive for nation building, we partnered with CFA Society in its yearly Universities Ethics Challenge. CFA Institute is a global, not-for-profit association of investment professionals with a mission to lead the investment profession globally by promoting the highest standards of ethics, education and professional excellence for the ultimate benefit of society.

The Ethics Challenge aligns with the CRS strategic approach and the objective of FirstBank's Endowment programme – the Samuel Asabia Chair for Business Ethics at the University of Lagos. We believe that promoting ethics in business is not only important for the reputation of our brand, but also one of the solid pillars that effectively support sustainable financial institutions.

The Ethics Challenge took place at FirstAcademy, FirstBank's strategic platform for competence development, knowledge management and workplace culture change, on November 9 and 10, 2017; and the final results of the Ethic Challenge was announced during the CFA Society Nigeria's 2017 Charter Award Dinner scheduled for November 12, 2017 at the Grand Banquet Hall, Civic Centre, Lagos.



One of the Beneficiary of FirstBank's CFA ethics challenge receiving an award



Winner of the FirstBank CFA ethics challenge competition receiving an award

III Establishment of the FirstBank Sustainability Centre

Arguably first of its kind in Nigeria, the Centre was designed to refocus the relationship between business and its stakeholders by ensuring a consistent development of ethical business leaders, working with organizations on becoming positive change agents that incorporate responsible practices in their operations, develop innovative products and services that transform their communities while at the same time generate economic value. This focus enables businesses sustain livelihoods, reduce poverty and contribute to national development. In addition, the Centre provides veritable platforms for businesses to discuss and collaborate on mainstreaming the sustainability agenda in their organizations, based on cutting-edge research dovetailing sustainability practices and implementation.

The Centre's mission has remained equipping decision-makers and managers with the relevant skills to deliver corporate value through sustainable business strategies, while operating in an environmentally and socially responsible manner. The Centre has consistently achieved its mission through:

- Research that is academically rigorous and policy relevant;
- Capacity-building seminars on sustainability and management development; and
- Stakeholder engagements enabling constructive dialogue and collaboration between business, government, civil society and academics to find solutions to critical sustainability challenges.

The achievements of the Centre are highlighted in the image below



In addition to the achievements highlighted above, several milestones were reached:

- One of the Centre case studies: "Social Entrepreneurship: Answering the Call of Nature" won the second prize for the Emerald and Association of African Business Schools (AABS) Case Study Competition. The case was also accepted for publication in the Emerald Emerging Markets Case Studies Collection.
- The centre was nominated by Lagos Business School as the driver of the Africapitalism Research Project- a research project of international collaboration involving nine universities- Pan Atlantic University- Lagos Business School (Nigeria); Strathmore Business School (Kenya); University of Loughborough; University of Nottingham; University of Durham (UK); York University (Canada); University

of Cape Town (South Africa); and University of Grand-Bassam (Cote d'Ivoire), with the University of Edinburgh (UK) overseeing the entire project.

- The Centre has played host to many business owners, notable amongst them is the women's group of the Lagos State Chamber of Commerce who attended the sustainability workshop organized for women-led SMEs in September 2015.
- The Centre also enhanced its outreach by engaging stakeholders on sustainability issues through monthly newsletters and specific issues-based newsletters focused on topical and socio-economic concerns.
- Overall, more than five million people have been impacted by the Centre's activities both directly and indirectly.



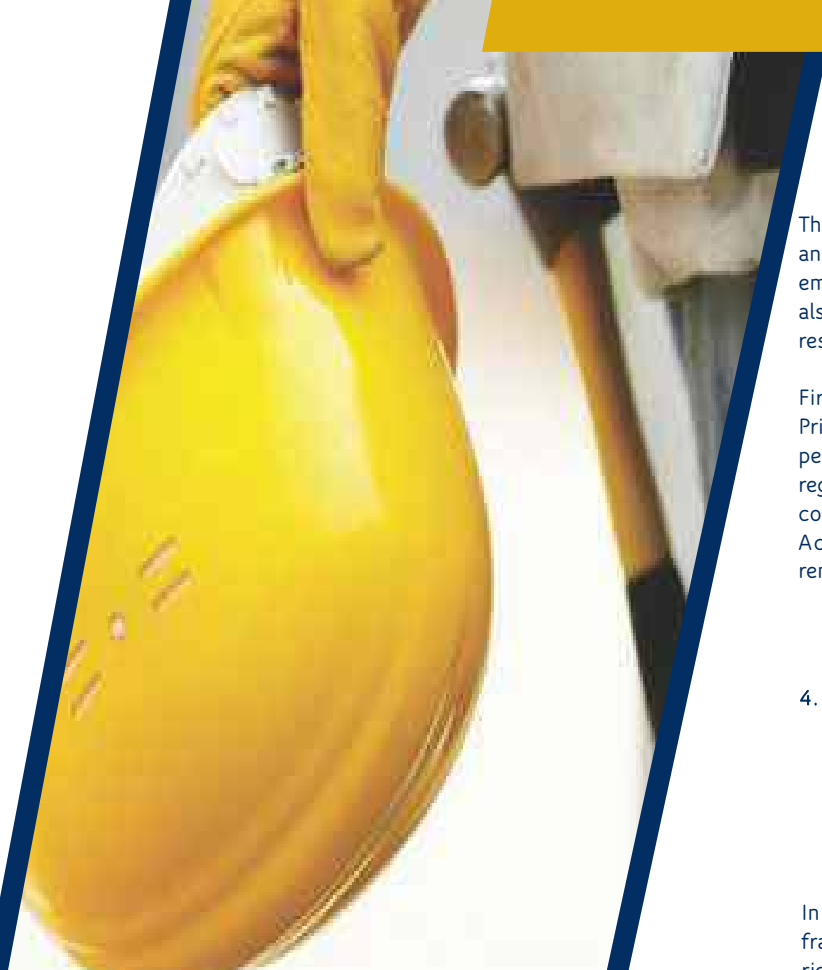
Panelists at the FirstBank's International Sustainability Conference in partnership with Lagos Business School

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

In carrying out our day-to-day operations, we are committed to protecting, valuing and supporting the rights of our people and stakeholders. 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 includes 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 toughly discouraged and culprits are usually handed over to the Bank's disciplinary committee for sanctioning.

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

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 FBN Holdings, we ensure that in everything we do, our people feel a genuine sense of fairness, equality, freedom and participation. The Group creates and sustains an environment that supports and encourages human rights/freedom of association as well as collective bargaining. For instance, at FirstBank, employees have the opportunities to belong to unions such as (ASSBIFI; NUBIFE) and the employees are at liberty to either become members or not. Management of the Bank 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 Empowering People 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. Across the Group, all employees get same remuneration regardless of gender or region.

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 have a framework designed to have the right people with the right skills doing the right job at the right time. 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 Group 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. This 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. The outcome of this investigation is the basis in which disciplinary committees of the different companies within the Group 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. 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 a 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 Group does not maintain partnerships with any organization 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 pride ourselves in being an equal opportunities employer, and have integrated diversity and inclusion policies and awareness into our practices. Our efforts at engendering diversity in the workplace include having in place a diversity policy that encourages inclusion. The Bank's diversity and inclusion objective is to be a recognized industry leader in workforce diversity and leverage diversity for the growth of the Bank and the success of the customers and communities we serve.

Our board composition consists of 21% female, the highest in any holdings company in Nigeria. We have a female to male gender population at 44.4% to 55.6% male. 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 Group's Employee Giving Volunteering Scheme.

Through our Employee Giving & Volunteering Programme, the Bank's staffs are provided with a platform that creates an enabling environment for team building and leadership activities and opportunities, as well as alleviating community development challenges. This involves employees volunteering their time and skills to support philanthropic activities. These activities provide them with opportunities to use their capabilities in varied contexts, develop new skills, partner with people within and outside the Bank, and expand their horizons. 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 2017, through the Volunteering programme, staff visited the Down Syndrome Foundation Resource Centre in Lagos Nigeria. This saw employees from FirstBank 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 Group in 2017 as part of the Hope Rising programme include:

- Support to Down Syndrome Foundation Inter House Sports and donation to Down Syndrome Foundation from Proceeds of Gift Policy
- Support to Benola First Annual Symposium
- Support to Folawiyo Adisa - Physically challenged para-badminton champion.
- Sickle Cell Foundation: Commemoration of World Sickle Cell Day.
- Support to Grace Eniekebi Foundation in Trilogy event for seniors
- Support to National Association of the Blind's Braille Reading and Writing Competition
- Partnership with Nigeria Red Cross Society in commemorating World Red Cross Day
- Support to the Nigeria Society for the Blind for its 2017 May Ball
- Partnership with Bunmi Adedayo Foundation in implementing Children's Day Event
- Partnership with DUSUSU Foundation: Zuriel Oduwale's Screening of Follow the Ball for Education
- Support for Benola: A Cerebral Palsy Initiative
- Chinwe Bode-Akinwande Foundation (CBA): Fundraising Charity Walk Tagged Walk4Hope to Support Underprivileged Widows & their Children
- Support for Hope 4 Sure Foundation
- Pacelli School for Blind and Partially Sighted Children
- Support for Patrick Speech and Languages Centre on their Talent in Autism Concert.



Visit to Old people's Home uring the Corporate and Sustainability Week



Visit to Down-Syndrome Foundation during the Corporate and Sustainability Week

Environment



7. BUSINESSES SHOULD SUPPORT A PRECAUTIONARY APPROACH TO ENVIRONMENTAL CHALLENGES

Embedding Environmental Sustainability through Responsible Lending

The indirect impact of our activities focuses largely on responsible lending. Responsible lending is about holding our customers to account by ensuring that the customers we lend to minimize their environmental impacts in their business operations through our environmental, social and governance management frameworks.

To enable the Group drive responsible lending, we have put in place an environmental, social and governance management system (ESGMS). This guide ensures that all transactions that FirstBank is

considering funding include adequate provision for actions necessary to prevent, control and mitigate negative impacts on the environment and communities, and to improve environmental quality. For efficiency, FirstBank is aligning the ESGMS process with its new credit workflow. The relevant implementation documents such as the environmental, social and governance risks screening checklist (which is to be completed by a relationship manager and verified by analyst against the EIA report are currently in use which is in compliance with the local & international regulation and best practices.

We adhere to international guidelines for engaging in the three priority sectors, Agriculture, Power and Oil & Gas.

The Bank through the FirstBank Sustainability Centre organizes seminars and workshop for stakeholders. Some of these seminars and workshops are targeted towards minimizing 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 minimize 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 organizational adaptability and survival in complex environments.

8. BUSINESSES SHOULD UNDERTAKE INITIATIVES TO PROMOTE GREATER ENVIRONMENTAL RESPONSIBILITY

Initiatives to Promote Environmental Responsibility

Part of the Group's long-term approach to sustainability is minimising its direct and indirect impact on the environment. This has informed our 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.

We are 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 minimize 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 Group and is part of our long-term approach to promoting sustainability which involves minimizing 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 minimize 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.

FirstBank Conservation Initiative is implemented in partnership with the Nigeria Conservation Foundation.

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. FirstBank has actively reduced the size of its data centre using rationalisation and virtualisation techniques. 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



- 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, our approach to conducting business is premised on high ethical standards and strict adherence to all provisions of the code of conduct guidelines. With an enviable corporate governance framework, the Bank has experienced continued growth in its various business operations in line with its strategic priority, which is 'to increase its share of the customer's wallet in the chosen market'.

Customer Complaints and Resolution



FirstBank have designed programmes to optimise efficiencies in our business operations, in particular, to strengthen service delivery excellence across our businesses' value chains. We have effectively ensured that quality service delivery and the satisfaction of our customers and other stakeholders are priorities in our business dynamics.

We respond to requests and enquires, and resolve complaints 24hours a day, seven days a week through our contact centre and various channels available to customers, such as emails via online platform, SMS text alerts through the relationship managers, and direct contact with customer service officers in branches.

We also ensure customers are aware of our complaints channels by displaying information about them in all our branches. These include escalation channels for complaints that are not adequately resolved. We put structures in place to ensure that we have a holistic view of all complaints received. The use of the complaints dashboard has helped to identify recurring complaints, seasonal complaints and the source of these complaints, resulting in quick resolution while outstanding issues receive the required attention.

At FirstBank, to ensure customers' complaints are properly handled, every customer on the bank's book has a relationship manager (RM). The RM is the main point of contact for the customer and ensures each account is functioning in accordance with the customer's expectations. As part of Know Your Customer, currently on an annual basis. The process is overseen by the Bank's Compliance department as part of its compliance monitoring programme.

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 organization 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.

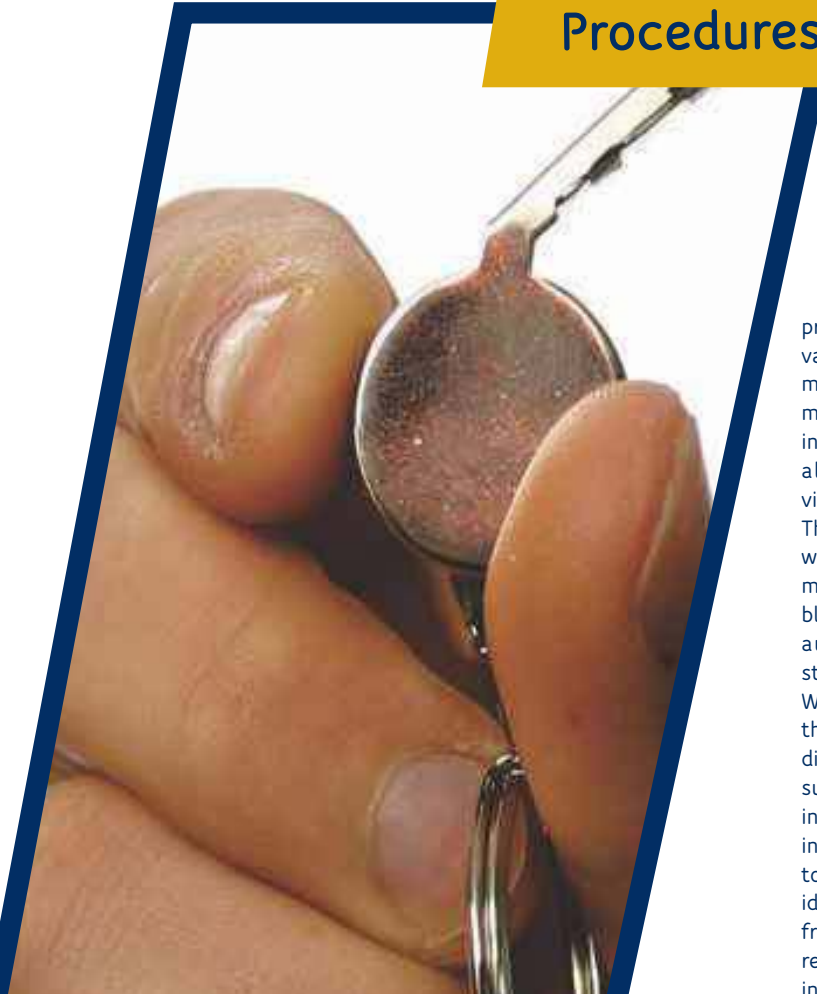
Complaints can be lodged to the Bank in one of the following ways:

- 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 Group has in place whistle-blowing policies and procedures to avoid corrupt practices. For example, the FirstBank'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, victimization 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 whistle-blowing 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 organization might have, while also offering whistleblowers 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 Group Managing Director/Chief Executive or directly to the Chief Internal Auditor.

