

UN GLOBAL COMPACT: COMMUNICATION ON PROGRESS

September 2022

Letter from FBNHoldings Group MD

Much like in 2020, the COVID-19 pandemic dominated the headlines throughout 2021 – a year universally acknowledged as the second year of the pandemic. While there were no universal lockdown of cities and disruption of economic activities as was the case in 2020, the world was forced into a panic mode several times in 2021, due to the changing tactics of the coronavirus. The virus mutated into various strains, such as the Delta and Omicron variants, which caused much fright and difficulty across the world.

While the pandemic continued to rage and disrupt lives and businesses into a second year, FBN Holdings Plc and its member companies and their subsidiaries did not relent in their mission and drive of enabling dreams through the services they provide to people across Africa and other locations in the world. This was not the result of a new commitment by FBN Holdings or an afterthought spurred by the unprecedented pandemic.

Since our founding in 1894 as Bank of British West Africa (BBWA) and through our evolution as First Bank of Nigeria Plc and FBN Holdings Plc, we have remained committed to Nigeria and the Nigerian people, as well as all the nations and peoples we now serve. Come rain or shine, we have continued to put our customers, the larger public and other stakeholders first, in order to enable their dreams. In Nigeria and other countries where we operate through our member companies or their subsidiaries, we continued to make giant strides in an effort to consolidate on our support to customers, communities and other stakeholders in order to see all effectively weather the storm of the COVID-19 pandemic and build for the future.

In spite of the challenges of the pandemic and the difficulties in our operating environment, we did not lose focus on our pursuit of greater diversity and inclusiveness in the Group. Neither did we slack in our commitment to women-led businesses and interests that continue to attract more and more funding from the Group, with FirstBank approving a N5 billion “FirstGem Fund” for women with a single-digit annual interest rate. We carried on with empowerment programmes organised for both female staff and customers to increase gender participation in leadership, entrepreneurship and financial inclusion.

We have consolidated progress in the efficient and effective screening of all transactions towards responsible lending and mitigating the associated environmental, social and



governance risks. This follows the automation of the use of the environmental, social and governance management systems (“ESGMS”) framework in our operations and decision-making process. We successfully screened for ESG risks transactions valued at N6.29 Trillion.

In addition, we extended the SPARK (Start Performing Acts of Random Kindness) initiative by introducing the SPARK Amplification campaign which is designed to expand and reinforce the SPARK initiative. It is aimed at deepening our involvement within the communities of our stakeholders by integrating and institutionalizing acts of random kindness. The SPARK Amplification campaign is implemented in an engaging manner, giving staff the opportunities to make choices whilst leveraging the Bank’s Employee Volunteering and Giving programme. The campaign recorded 7,650 beneficiaries with more than 40 million people reached by the SPARK campaign messages.

Our corporate responsibility and sustainability (CR&S) goals across the various strategic pillars of Sustainable Finance and Investments, People Empowerment, Community Support and Environmental Sustainability provide us a veritable platform to further the interests of all our various stakeholders and enable them achieve their dreams. Our commitment is to maximise the platform and opportunity so our stakeholders’ dreams can be optimally enabled.

Thank you.



Nnamdi Okonkwo
Group Managing Director
FBN Holdings Plc

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 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.

It's about driving a sustainable business that contributes to the overall sustainable growth and development of the society while responsibly managing our environmental, social and governance impacts in the process through the following initiatives:

The FutureFirst Programme:

The future is our most present priority at FirstBank. It is on this premise coupled, with our commitment to promote financial inclusion in the country, that we have consistently been implementing the FutureFirst programme.

FutureFirst is a unique programme designed to ensure that the youth of the nation are financially independent through fulfilling careers and the right financial knowledge. The programme is built around career counselling, financial literacy and entrepreneurship.

The aim of Career Counselling is to guide the students appropriately towards making the right career choices to prevent the wrong career move in future, which could have long-term negative effects. FirstBank executes career counselling through various activities, such as Youth Empowerment Series (3.0), UI Career Fair, etc., which are designed to equip students with the knowledge needed for career planning and fulfilment.

Financial Literacy is structured to empower secondary school students with the requisite financial knowledge, such as access to quality financial education, to enable them make informed choices on money matters and take effective actions for their financial well-being.

Financial literacy is partly executed through our participation in the Global Money Week and World Savings Day. The latter is a day set-aside by the CBN, which mandated all

banks to adopt over 30 assigned schools across the six geopolitical zones in Nigeria to ensure financial inclusion for the unbanked. FirstBank delivers in these schools a teaching module, designed by Junior Achievement Nigeria, to inculcate the savings culture in the students.

FirstBank partners Junior Achievement Nigeria (JAN), a non-profit organisation to implement our FutureFirst programme. JAN's programme aligns with FutureFirst's vision and based on the curriculum, we have positively assisted students in different locations across the country. Through our partnership with JAN, senior secondary school students are provided with practical business experience under three pillars of financial literacy, work readiness and entrepreneurship.

The programme offers an experiential supplement to students' business and economics studies. It provides insights into how businesses are organised and operated; it develops critical thinking, speaking and leadership skills; it imparts understanding of the rewards of the free enterprise system; it helps students learn about career opportunities; and helps them gain basic workforce-readiness skills. The programme also fosters a positive relationship between young people and the business community.

Over the years, we have actively supported, participated and volunteered in the implementation of JAN's various experiential programmes, especially in the Company of the Year (COY) Programme.

The COY programme brings secondary school students together to form a company, choose a business name and elect company officers to oversee operations of the company for the programme duration. It teaches students to put theory into practice in order to fully understand what financial literacy and entrepreneurship is. At the end of the programme, the students that complete the programme successfully will compete in the regional competition and will represent their school in the National Company of the Year competition in Lagos. The winning school will go on to represent Nigeria in the African Regional Company of the Year competition with other JA (Junior Achievement) Member Nations in Africa. Consistently, FirstBank has been sponsoring the National Company of the Year (NCOY) competition, as well as the competition at the African level.

The theme for 2021 NCOY was "Innovation with Grit". There were twelve student companies as finalists in the 2021 competition. Student companies that competed include: The Seer company from Alvana High School; Sonic

HUMAN RIGHTS Contd



Informatics company from Heritage Global Academy (which developed an automated waste detector); Nexus Queens company from Queens School (which created a plastic-bottle Ottoman – a concept of Waste2wealth); JA Stars from Theological College of Northern Nigeria (TCNN) (who created Star lamp, Star mosaic, Star chandelier, Star curtains from “waste to wealth” using olive seeds). Furthermore, there were Amazing Amazon Students from Government Girls’ Secondary School, Abaji (who developed Amazing Life Bank); KereTerra Company from Secondary School, Etoi, Uyo (who made keyholders, phone pouch, seat, storage purse, etc. – all from polymer waste); The Exploit Thinkers from Taidob College (they developed a multi-level detector); Mystic Global Company from Rosa Mystica High School, Agulu (who made an antiseptic soap to reduce scabies and rashes in Nigeria and are keen on exporting the product to other African countries and the world at large); PetraMech Tech from Petra Schools (they developed a web-based platform to connect road users to mechanics so they never get stranded); The Amazing Inventors from Government Secondary School Tudun Wada (who developed a human motion detector); Blue Crystal Company from Methodist Girls School (who made a blender and rain-resistant bags); and Artizans from Igbobi College (which created an app that connects artisans to residents).

KereTerra Company from Secondary School, Etoi, Uyo emerged the winners.

Impact

The FutureFirst programme in partnership with JAN has imparted knowledge of financial literacy and entrepreneurship to over 1,000,000 people across the regions of the country including Lagos, Port Harcourt and Abuja.

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

FirstBank is an equal opportunity employer and recognises the fundamental rights of citizens under the constitution. This is evident in our employee relations affirmative action policy statement which states that “The Bank is an equal opportunity employer and all members of staff receive equal opportunities throughout their employment”.

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 (as highlighted in our Diversity programme) 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 established disciplinary committees for sanctioning.

Our grievance policy is part of our commitment to creating a safe and fair workplace for our employees, and there is a clear process supporting the policy. Employees may therefore follow this process to raise, for investigation, any issues against their person or workplace discrimination that may affect their fundamental human rights.

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 Group 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 FBNHoldings, 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

The Group maintains a fair and efficient procedure for resolving disputes and ensures disciplinary measures are fair and effective without breaching labour laws or standards.

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 (Employee 'Share-of-Voice'), instituted various initiatives to drive collaboration and refresh employee connection, without losing sight of strategic objectives.

These include:

- CEO webcasts;
- Department village meetings and town hall meetings;
- Voice of the millennials; and
- Employee focus group sessions.

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

Closing Gender Gap

We pride ourselves in being an equal opportunity employer and have integrated diversity and inclusion policy and awareness into our practices. Our efforts at closing the gender gap include having in place a diversity and inclusion policy that encourages inclusion; programmes and products designed to empower women and that are tailored to remove barriers to advancement as well as change individual behaviour.

FirstBank recognises the significant role women play in the development of the society and has prioritised women empowerment through initiatives, policies and products.

FirstBank Women Network was established to address the gender gap at the senior levels and tap the opportunities presented by enabling our women to contribute even more if given the necessary strategic support and an intentionally enabling environment

Strategic Pillars of First Women Network are:

1. Career Management
2. Program, events and networking opportunities
3. Personal Branding
4. Mentoring, Coaching & Sponsorship
5. Support & Welfare
6. Financial Planning & Empowerment

FirstGem is the Bank's bespoke financial solution designed for women. It focuses on the following strategic pillars

- Financial Empowerment & Wealth management
- Mentoring & capacity building
- Health & Lifestyle

FirstGem Finance is introduced as the bank's support for Women in micro, medium and small-scale businesses to access low-cost finance. The key distinctive features of the offering include the single digit interest rate) and tailored documentation requirement

Target: women owned & led businesses/enterprises in

- Food / Beverage processing & Packaging
- Confectionaries, Catering & Restaurants (on exceptional basis)
- Transportation - Logistics (Dispatch/Delivery Services)
- Beauty/cosmetic products
- Agric/Agro Allied (retail / food value chain)



FirstBank Gender Equality Assessment

FirstBank Gender Equality progress report is based on the IFC and Nigerian Exchange recommendations from the joint Research on Gender Equality in Nigeria private sector designed to enable Nigerian companies reap further business benefits by reducing gender gaps in their businesses.

Category A: Gender Balance in Leadership and the Workforce

S.N	Category	Progress Report
1	Leadership Championing	The CEO and senior management effectively set the tone, and champion gender equality issues through First Women Network with the different committees under the 6 pillars driving a culture that embraces gender equality
2	Targets to increase women representation at all levels	i) Female employees - 39% (target - 40% in 2024) ii) Women in management positions - 30% (target - 40% in 2024).
3	Promote Diversity proactively	i) Address barriers to C-suite appointments through Diversity & Inclusion policy ii) Drive diversity, equality, and inclusion throughout the organization via programmes under the six pillars of First Women Network iii) Providing professional development opportunities for women training

LABOUR STANDARDS Contd

Category B: Equal Compensation and Work-Life Balance

S.N	Category	Progress Report
1	Leadership Championing	The CEO and senior management effectively set the tone, and champion gender equality issues through First Women Network with the different committees under the 6 pillars driving a culture that embraces gender equality.
2	Targets to increase women representation at all levels	<ul style="list-style-type: none"> i) Female employees – 39% (target –40% in 2024) ii) Women in management positions-30% (target – 40% in 2024).
3	Promote Diversity proactively	<ul style="list-style-type: none"> i) Address barriers to C-suite appointments through Diversity & Inclusion policy ii) Drive diversity, equality, and inclusion throughout the organization via programmes under the six pillars of First Women Network iii) Providing professional development opportunities for women training

Category D: Commitment, Transparency, and Accountability

S.N	Category	Progress Report
1	Endorsements	<p>To demonstrate our commitment to gender equality:</p> <ul style="list-style-type: none"> ● A member of the UN Women ● Active member/partner of the UNGC Local Network and participates in the Target Gender Equality programme. ● Founding member of the UN Women-driven Unstereotype Alliance Nigeria National Chapter that seeks to eradicate harmful stereotypes from advertising and media to help create a more equal world
2	Visibility	<p>We are deliberate about driving visibility of the Bank's commitment to gender equality both internally and externally.</p> <ol style="list-style-type: none"> 1. Internal: emails, Yammer; Desktop banners; screen savers; Tickertapes; first messenger portal page 2. External: social media platforms; Press releases; features and advertising

Category C: Policies Promoting Gender Equality

S.N	Category	Progress Report
1	Proactive Talent Management	<p>Support women's career Progression:</p> <p>Over 8000 female employees impacted from First Women Network initiatives across all cadres in the Bank. Initiatives include:</p> <ul style="list-style-type: none"> (i) FWN Bulletin (ii) Partnerships with WIMBIZ; WISCAR (iii) FWN Mentoring (iv) Webinars on career management, mental health and financial health and planning
2	Diversity and inclusion (D&I) Council	First Women Network governance body that promotes and monitors gender equality performance
3	Safe workplaces for women and men	<ul style="list-style-type: none"> i) Equal Rights and sexual harassment policy in place ii) 4 workshops/campaigns in 2021 on preventing sexual harassment under the FWN Support and Welfare pillar
4	Supplier diversity & Customer empowerment	<ul style="list-style-type: none"> i) Implement supplier diversity programs including 2 workshops for women-owned vendors in 2021 ii) Over N36 Billion loans to women including women-owned businesses in 2021 iii) First Gem: 5Billion Fund for women-owned/led small businesses iv) First Gem workshops/conferences for SMEs v) 27% of the total First Monie agents are women



SPARK
Start Performing Acts of Random Kindness

LABOUR STANDARDS Contd

INITIATIVES INVOLVING STAFF

Corporate Responsibility and Sustainability (CR&S) Week and Spark Initiative

The CR&S Week is a dedicated week that offers employees opportunities to give their time and resources to defined causes in line with FirstBank's CR&S strategic approach. The Week's activities are an aspect of FirstBank's Employee Giving and Volunteering Programme, which was instituted with the aim of encouraging employees to give back to the community as well as inculcate in them the integral corporate culture of giving.

FirstBank held the maiden edition of the CR&S Week in 2017 with a focus mainly on three key initiatives/activities: (1) giving and visits to orphanages / homes for the underprivileged / IDPs, (2) Career Counselling Day and (3) Start Performing Acts of Random Kindness (SPARK) initiative (originally called Staff Promoting Acts of Random Kindness).

SPARK is a values-based initiative designed to raise consciousness that we can choose to be kind. SPARK seeks to reignite our once-cherished moral values which appear to be eroding fast. The initiative focuses on creating and reinforcing the attitude of going beyond just meeting the material needs of people, who are unable to help themselves, to showing compassion, empathy, affection, etc.

FirstBank is concerned about the current deficit in moral values in society. Given FirstBank's historical role in the development of the nation, it will be negligent on the Bank's part to stand aloof and act unconcerned. FirstBank considers it its moral obligation to be at the forefront of the efforts to reignite our societal/moral values. The Bank believes it is absolutely important to raise people who choose to do the right thing always. We believe that every act of kindness (regardless of how little or whatever form it takes) ignites a ripple effect that goes on without end. The SPARK activities include: visits to orphanages / homes for the underprivileged; empowering students through curriculum-based activities; empowering small and micro businesses.

FirstBank has also introduced the SPARK initiative to secondary school students across the country. This aspect of the SPARK initiative involves FirstBank staff coordinating sessions that will develop values to guide the students' young personality and encourage them to develop and practise compassion, empathy and giving.

The SPARK initiative also involves supporting women empowerment initiatives, as well as advancing social engagement by providing vision screening and affordable eye glasses for women with low income during a dedicated "Giving Tuesday".

Testimonials:

Baby Ijeoma got another chance to live: Baby Ijeoma is one of the many beneficiaries nominated through the platform of SPARK initiative. She had a heart condition and the parents could not afford the N4 million estimated as the cost to help save her life. Through the SPARK initiative, she got a corrective surgery in India in partnership with Vama Wave Foundation.

A Joyous Widow: A widow with eight children who could barely make ends meet from her petty trading, got a new lease of life through the SPARK initiative with a donation of N200,000 to boost her business. Her business has picked up again and some of her kids who were withdrawn from school have gone back to school.

Impact

There have been 60 beneficiary schools. Over 18,000 secondary school students have participated in SPARK launch, and over 20,000 underprivileged lives, including widows, have been touched.

The impact of the SPARK initiative has spread across at least eight countries where FirstBank has operations, including the United Kingdom, Ghana, DRC, Guinea, Sierra Leone, Senegal and Nigeria.



LABOUR STANDARDS Contd



Partnerships with over 100 charities / NGOs, including LEAP Africa, International Women Society, UNGC, UN Women and Junior Achievement Nigeria.

Trends and visibility: The SPARK initiative has gained from trending top on Twitter and from stories in 14 mainstream publications with a reach of over 200 million, as well as over 40 million reach and 30 million impressions across social media platforms.

Employee Giving and Volunteering

Strategic alignment: our volunteering activities and initiatives must be aligned with our corporate responsibility and sustainability strategy.

Partnerships: the initiatives are also implemented by leveraging existing partnerships, such as LEAP Africa, the Down Syndrome Foundation, Junior Achievement Nigeria and the Nigerian Conservation Foundation.

Participation: it is open to all employees; for some projects, a subset of employees who possess the required expertise is targeted. For example, the FutureFirst financial literacy and career counselling programme is driven by employees with the appropriate skills and knowledge. In addition, employees are encouraged to begin and promote their personal initiatives and such initiatives are often recognised and rewarded by the Bank for outstanding performance.

The Employee Giving and Volunteering Programme aligns with the four core areas of our Community Support Pillars: (1) education, (2) health and welfare, (3) economic empowerment and (4) the environment:

Education: volunteers are expected to train or mentor students and members of the local community on specific subjects identified as knowledge gaps that hinder them from doing business (successfully). The initiatives under

this pillar include: FutureFirst and the Youth Leadership and Development programme.

Health and welfare: volunteers give their time, energy and financial resources to the aged, orphans, the underprivileged and the sick. Such initiatives include: the Hope Rising programme and visiting the underprivileged.

Economic empowerment: volunteers use their skills to empower students, community groups and displaced people through coaching and teaching. The initiatives include: FutureFirst and entrepreneurship.

Environment: FirstBank supports training that enables employees adopt responsible practices that positively impact the community. Such initiatives include: staff training and the Environment Conservation programme.

Over the years, staff volunteers have participated in different CR&S activities of FirstBank, including Global Money Week, World Savings Day, the Youth Empowerment Series as well as SPARK. These activities have helped to provide students with financial literacy lessons as well as practical business experience, for example, through the organisation and operation of an after-school business enterprise programme, as well as passing on the relevant skills and values, such as good judgement, hard work, integrity, confidence and collaboration.

Impact

Touched lives with over N20,000,000 donations covering books and infrastructure for students, food items and clothing for the underprivileged, provision of capital for small and micro businesses.

Over 80,000 volunteering hours have been fulfilled by staff of FirstBank.



E-Learning Initiative

The e-learning initiative allows students to receive e-learning solutions through devices or online access from the e-learning platform on the FirstBank website.

FirstBank partnered the Lagos State Government, Robert & John (owners of the Roducate platform on which the e-learning initiative runs), IBM and Curious Learning (an initiative of UNESCO, of which FirstBank is a member of the Global Education Coalition that it leads) with a resolve to educate one million Nigerian students through innovative e-learning solutions that would drive sustainable efforts towards improving education for all. These partnerships reinforce FirstBank's "You First" brand promise of putting not just its customers but indeed the economy of its host communities first. As part of the partnership, the Bank donated 20,000 units of e-learning devices to the Lagos State Government for students in public schools in the State. The initiative was designed to close the gap created by the indefinite closure of all educational institutions nationwide due to the COVID-19 pandemic which had kept children idle. This was informed by the belief that children could easily be forgotten at the time, hence it was important to meet their peculiar needs and ensure they remained resourceful and fully engaged so they could compete favourably with their peers internationally. Over 150,000 students have been impacted by the initiative so far.

IBM

IBM's role as a key partner in the initiative to move one million students to e-learning has been to enhance the drive by promoting opportunities for youths to learn and acquire skills of the future. The IBM offering, called IBM Digital-Nation Africa (DNA) program, has been complimentary. The program empowers students, entrepreneurs and communities with the knowledge and tools to innovate, design, develop and launch their own digital solutions. It

is providing students with skills development on emerging technologies through focus areas, such as Artificial Intelligence, Coding, Cloud, Internet of Things, Blockchain, Data Science and Analytics, Cyber Security and Quantum Computing. The DNA programme focuses on three key audiences: the explorer (people keen on learning about emerging technologies), the innovator (people whose bright ideas need acceleration and innovative enhancement) and the new collar (those who want to align their skills to the job market and seek better opportunities).

Roberts and John

The role of Roberts & John, an edutech company, has been to provide the Roducate platform on which the e-learning initiative is delivered. Structured in line with the government's accredited curriculum for primary, secondary and tertiary schools across various fields of academic endeavours, such as science, commercial and arts, the Roducate platform has eight modules, which includes: lecture notes, tutorial/revision videos; assignments/class work for students; exams; life skills; games and network. Two learning models are offered on the platform: online and offline. The online model offers students with access to devices online access to the solutions through apps and web options on a subscription that is payable monthly. The offline model is available for students who may not have access to devices. It comes preloaded on an affordable device with all the functionality required. The entire curriculum from primary through secondary and several university courses are preloaded already, which means the student has and owns access for life. Curriculum updates are done remotely once the phone is plugged in and data activated just for the duration of the update. FirstBank handed over to Lagos State Government 20,000 low-end devices preloaded with Roducate offline for distribution to students.



ENVIRONMENT

7. BUSINESSES SHOULD SUPPORT A PRECAUTIONARY APPROACH TO ENVIRONMENTAL CHALLENGES

Embedding Environmental Sustainability through Responsible Lending

We are conscious of our lending activities across the Group, making sure that our customers' business activities are eco-friendly. 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. Sustainability performance management and reporting is a key component of the sustainability strategy as it enables the Bank to effectively measure, manage and report its sustainability performance and also meet its NSBP obligations to report a wide range of metrics. While we haven't been able to kick-start the performance management, reporting and implementation tool to make reporting efficient; more effective, we have adopted clearly defined KPIs that align with international best practice such as GRIs.

8. BUSINESSES SHOULD UNDERTAKE INITIATIVES TO PROMOTE GREATER ENVIRONMENTAL RESPONSIBILITY

Initiatives to Promote Environmental Responsibility

Environmental Sustainability Initiatives

Part of FirstBank's long-term approach to sustainability is minimising our direct and indirect impact on the environment. This has informed our efforts at conserving energy to reduce global warming by reducing our CO2 emissions, as well as conserving resources.

Partnership with Nigeria Conservation Foundation:

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 wildlife and biodiversity among school children.
- To educate and build environmental-conscious students through partnerships with reputable NGOs and institutions.

We continued our partnership with Nigeria Conservation Foundation (NCF) in our drive to protect the environment. NCF is Nigeria's premier non-governmental environment conservation foundation dedicated to nature conservation and sustainable development in Nigeria. FirstBank maintains an ongoing partnership with NCF and actively supports the Foundation's activities annually in its conservation and preservation of wildlife and bio-diversity.



ENVIRONMENT Contd

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 Virtual Card

In furtherance of FirstBank's commitment to the growth of innovative technologies and its contribution to the nation's Gross Domestic Product.

The Virtual Card is a digital representation of a physical card and has the look and feel of a physical card. The card has a PAN, CVV and expiry date. The FirstBank Virtual Card is issued on FirstMonie, LitApp and FirstMobile platforms. Issuance of Virtual Card on FirstBills Pay will be deployed in the next phase of the project. The Card is a debit card linked to a FirstBank account as well as a FirstMonie wallet. The Virtual Card can currently be used for ecommerce transactions. Usage on other channels would be enabled in subsequent phases of the project.

The Virtual Card is a Naira or Dollar denominated payment card issued in partnership with Visa International. It is a digital representation of any plastic card, linked to either customer operative account or wallet account. Unlike a plastic card, it does not require any physical representation as it is hosted online.

The features are;

- Naira denominated
- Personalized, bears the customers name
- Accepted for Web transactions. Acceptance for POS and ATM transaction would be enabled in subsequent phases of the project.
- Instant card activation



ANTI-CORRUPTION

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

Corporate Ethics and Culture

Strong and Resilient Corporate Governance Framework

Accountability, integrity and transparency remain the pillars upholding our corporate governance framework. This framework has been foundational to FBN Holdings Plc's continuing success story in pursuit of our long-term strategy, promoting ethical and responsible decision-making and ensuring transparency and accountability to all stakeholders. Our success and our measure of it, in turn, have revolved around the interests of our various stakeholders (shareholders, customers, staff, regulators and the community) and our ability to enhance these interests. Keeping these interests at the heart of our operation as a Group has played no small role in our enduring commitment to creating a positive impact in the places where we have our footprints.

The FBN Holdings Board has focused on further strengthening the framework and adapting it to suit current realities and emerging trends in the market (e.g. changing workplace arrangements and people, cyber security risks, technology adoption, etc.). This reflected in renewed efforts to ensure the application of the highest standards of corporate governance across the Group, where the Boards of the different operating entities bear responsibility for translating the Group's vision into reality in their various market domains and playing fields. The Boards have pursued this goal while ensuring compliance with industry-specific statutory and regulatory requirements.

The Group's governance framework, which ensures that there is a dynamic blend of Board autonomy and Group coordination at the operating company level, aligns with best practices across the globe and complies with the requirements of the Central Bank of Nigeria (CBN), National Insurance Commission, Securities and Exchange Commission, the Nigerian Stock Exchange and the Financial Reporting Council of Nigeria. It remains the bedrock for furthering the interests of our various stakeholders through policies and practices that enable FBN Holdings stand out as a Group in the expression of our enduring commitment to creating a positive impact.

Diversity

Our diversity as a Group is mirrored by our gender mix, which complies with CBN recommendations, as well as through the diversity of thought, experience, cultures, nationalities

and social and academic backgrounds represented in the Group. It is also reflected through the inclusive policies that prevent all forms of discrimination. Through robust policies and procedures, we have created an enabling environment for the culture of equal opportunity, diversity, fairness, respect and inclusion to thrive within the Group.

Shareholder and Regulatory Engagement

We are equally committed to stakeholder engagement as a veritable tool for enabling the Board and Management to effectively listen to other perspectives and get direct feedback from shareholders as well as to engage regulators to promote trust and cordiality in driving our relations with those who oversee our industry.

Appointment Philosophy

FBN Holdings Plc' appointment philosophy is informed by relevant regulatory guidelines and laws. It underpins the transparent Board appointment process that the Group follows. From a pool of eligible candidates selected on the basis of their skills, competencies and experience, the Board Governance Committee screens and makes recommendation of suitable candidates to the Board, who then decides on the appointment of new Directors, subject to the approvals of the relevant regulatory authorities and the shareholders at the Annual General Meeting.

Customer Complaints and Resolution

FBN Holdings Plc (the Group) is committed to delivering a high standard of service to all its stakeholders. The Group seeks to maintain its reputation as a group of companies delivering high quality professional services, committed to responding to the needs and concerns of its various stakeholders. A complaint, for the purpose of this Policy, is defined as "an expression of dissatisfaction made to an organisation, related to its products and or services, or the complaints-handling process itself, where a response or resolution is explicitly or implicitly expected". This Policy is designed to align with relevant regulatory requirements and best practice in complaints management, and to meet the requirements of the following regulators:

- The Central Bank of Nigeria (CBN);
- The Securities and Exchange Commission (SEC); and
- The Nigerian Stock Exchange (NSE).
- Where applicable, the principles contained in this Policy shall guide the Group's subsidiaries in developing their respective sector-specific Complaints Management Policies and Guidelines.

WHISTLE-BLOWING PROCEDURES

At FBN Holdings, a culture where people can speak up is promoted. Individuals are encouraged to raise concerns about perceived wrongdoing or unethical conduct.

- **Anti-Money Laundering Training Programme:** All employees were enrolled for our mandatory Anti-Money Laundering training programme.

Our Employee Handbook reflects global best practices and ensures compliance with employment legislation. The following are some of the policies per anti-bribery and corruption practices:

- **Whistleblowing:** This policy gives employees of the Bank an avenue to report any form of misconduct such as bribery and corruption. This policy provides a framework that guards and protects the Bank's reputation for integrity and responsibility.
- **Gift Policy:** This policy guides employees on what is appropriate and otherwise, concerning the acceptance of gifts, offerings, advertisements, awards, or tokens of appreciation. This policy states that all gifts must be declared regardless of amount. However, the allowable limit of a non-monetary gift is valued at N10,000.00 whilst any other sum may be received but must be declared. This policy sets the standard for preventing bribery and corruption practices in the Bank.

The Board of FBN Holdings Plc attaches importance to high ethical standards and integrity and expects its employees and officers to do the same in all their dealings.

The Group's Whistleblowing Policy applies to both internal whistleblowers (staff, contract employees, management, or directors) and external whistleblowers (customers, service providers, applicants, auditors, consultants, regulators and other stakeholders). Reports made through this policy should not be based on mere speculation, rumours or gossip, but on factual knowledge. The full version of the Group's Whistleblowing Policy can be viewed on the website: <https://www.fbnholdings.com/wp-content/uploads/2021/05/WHISTLE-BLOWING-POLICY-AND-PROCEDURE.pdf>

The whistleblower can report through any of the following, either by declaration or in confidence/anonymously:

Formal letter to the Group Managing Director, FBN Holdings Plc and/or Head, Internal Audit FBN Holdings Plc;

Dedicated phone number as contained on the website, www.fbnholdings.com; 0817 597 8505; and Dedicated email address: FBNHoldingsWhistleBlowing@fbnholdings.com

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.

Any issue raised should include all relevant background information (including dates) as well as the reason(s) why the whistleblower is particularly concerned about the situation.

The Policy was developed by the Group to protect whistleblowers who disclose concerns in good faith and without frivolity, malice or mischief. The concern raised is thoroughly investigated and reported to the appropriate authorities, including the Chairman, Board Audit and Risk Assessment Committee. The whistleblower, whether internal or external, may elect to disclose information directly to any of the listed regulatory bodies such as the Central Bank of Nigeria (anticorruptionunit@cbn.gov.ng), the Nigeria Deposit Insurance Corporation (info@ndic.org.ng), the Securities and Exchange Commission (sec@sec.gov.ng), the Nigeria Insurance Commission (info@naicom.gov.ng), the National Pension Commission (info@pencom.gov.ng) and the Nigerian Stock Exchange (x-whistle@nse.com.ng).

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