

# UBA GROUP EXTERNAL COMMUNICATIONS POLICY

Policy Number: RES 003

Classification: Internal

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This policy overrides all extant policies and board decisions as it relates to the subject matter of this policy. The policy approvals by the Board of Directors shall be appropriately communicated by the Company Secretary before it becomes operational and binding.

**Policy Family**: Resources

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#### **Document Information**

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#### Reviewers

Review by:			Action	Status
Group Communica	Head, tions	Corporate	AU/QA	Complete
ED, Group Chief Operating Officer		FR/SA	Complete	
Executive Management Committee		FR/SA	Complete	

**SA** = Signed Approval Required; **QA**= Quality Assurance Review; **FR** = Formal Review Required, **IR** = Informal Review, **AU** = Author of Document, **DOM** = Document Domestication

#### Approval:

# The Group External Communications Policy version 3.0 was approved by:

Chairman on behalf of the		April 2020
Board of Directors	+	

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#### 1. Purpose

1.1. This policy shall serve to inform all Directors and Employees of UBA about their responsibilities relating to treatment of UBA Group's information. As a listed company, UBA Group is subject to certain obligations imposed by regulations regarding the disclosure of information to the public. Unauthorized disclosure of internal information, particularly material non-public information, relating to UBA Group could adversely affect UBA Group's image and in some cases result in liability for the UBA Group.

#### 2. Scope

- 2.1. This policy applies to;
  - 2.1.1. All Directors of UBA Group and
  - 2.1.2. All Employees, consultants, vendor staff, contractors of UBA Group
- 2.2. All such persons must be familiar with and observe the requirements of this policy

#### 3. Responsibilities

3.1. Group Head Corporate Communications, SSG and SBG Heads are ultimately responsible for ensuring compliance with this policy. All employees involved in any external communications are responsible for complying with this policy. Violations of this policy could be considered gross misconduct and are subject to disciplinary actions that may include termination of employment.

- 3.2. Where a staff violates the Provisions of this Policy, it shall be considered as gross misconduct and shall be subject to disciplinary actions in line with the provisions in the staff disciplinary policy and sanction grid.
- 3.3. Where a Director violates, the provision of this policy, it shall be referred to the Board Governance Committee for proper determination.

#### 4. UBA's Spokespersons

- 4.1. The authorized official spokespersons for UBA Group are; Group Chairman, Group Managing Director/Chief Executive Officer, Group Deputy Managing Director, Group Head Corporate Communications and CEOs of the Country of Operations. The Group Managing Director /Chief Executive Officer may also delegate any other person to act as a spokesperson for the Group.
- **4.2.** In line the Human Right provisions, the UBA Group shall not infringe on the right of her directors or staff in expressing their personal conviction or views on issues.
- 4.3. Where the director or staff chooses to oblige comments or responses to issues, on the strength of his/her personal conviction or view, on no account shall it appear to reflect the position of the UBA Group.
- **4.4.** On annual basis, all employees and directors of the UBA Group shall attest to comply with the provisions of the External Communication policy.
- 4.5. Principle for Making Expressions in the Public

The following shall be the guiding principles in making Public expressions

- i) When granting any interview or addressing any forum where the UBA Group is not being represented, it should be expressly stated that the views being presented are personal opinion.
- ii) The UBA Group shall not in any way infringe on the fundamental human rights of any of its Directors or employee to comment on any issue when called upon but it shall be expressly stated that such views are personal and are not that of the Bank.
- III) Where there is need for a Director or employee to represent the Bank, in line with the provisions of this policy, proper guidelines shall be provided by the GMD/CEO and Head Marketing and Corporate Communication.
- iv). Any view(s) or opinion(s) presented to the public without following the provisions as stipulated in the policy shall not represent the position of the UBA Group and any damage or liability arising therefrom, shall not be covered under the UBA Groups public liability insurance policy of the UBA Group. The Director shall be personally liable for any damage(s) or other liabilities arising from such views or opinions

v). Where the reputation of the UBA Group is infringed upon by the action of the employee, such shall be determined in line with the staff disciplinary grid and sanction Policy.

#### 5. Policy Statement:

- 5.1.UBA Group deals and communicates to a diverse set of stakeholders that operate in different legal, regulatory and cultural environments. UBA Group recognizes the role of Media factor that influences the reputation of UBA Group among customers, investors, regulators, communities, media and all its stakeholders.
- 5.2. Accordingly, UBA Group's External Communications approach shall be focused on the institution at all times and not on the individuals representing the institution.
- 5.3. UBA Group recognizes that there is an interrelationship between the brand of the individuals that make up Executive Management/Board and the brand of the organisation, however at all times these individuals representing the organisation as spokespersons must recognize that they are not acting in their personal capacity and shall project the institution and not themselves.

#### 6. Policy Focus Areas:

- 6.1. The Policy is divided into 3 sections to cover each of the following areas.
  - 6.1.1. Provides clear directions to all staff on how to communicate the publicly available information of the Group.
  - 6.1.2. Helps all staff and Directors understand how the communication of non-public information of UBA Group is managed, and who is authorized to handle these communications. This includes understanding

what constitutes sensitive, confidential, strategic and inside information and the regulations surrounding such information.

6.1.3. Clarifies to all staff and Directors the restrictions on communication with the Media.

#### 7. Exclusions from Policy

Circumstances requiring deviations from this policy shall be subject to approval by the Group Board of Directors. The UBA Group Communication Policy aims to encourage effective internal and external communications on behalf of the Group.

#### 8. Definitions

- 8.1. Close periods. These occur Four (4) times in a year for countries of operations or subsidiaries where public information disclosures are required by virtue of regulations and are:
  - From 1st February until announcement of the Full-year Results (usually at the end of February/beginning of March); and
  - ii. From August until announcement of the half year Results (usually late August.)
  - iii. Close periods for the quarterly returns shall be between April and May for the first quarter financial reports and between October and November for the Third quarter financial reports
- 8.2. Insider Information information directly concerning UBA Group and which:
  - i. is precise; and
  - ii. is not generally available; and

- iii. if made generally available, would likely have a significant effect on the price of the Group's shares or the Group's competitive position.
- 8.3. **Media:** Includes print media (e.g. Daily newspapers, trade magazines/journals, any other types of magazines including in-house publications etc), broadcast media (e.g. TV, Radio, Video and Cinema), internet/wire news services (e.g. Reuters, Bloomberg, Dow Jones etc), stockbrokers & analysts and similar reports. Social Media communication is covered in section 15.0 of this policy.
- 8.4. **Non-Public Information:** All information other than publicly available information that will include non public financial data and reports, confidential memos and documents, strategy documents and thinking.
- 8.5. Publicly Available Information: Information that is already legitimately available in the public domain (e.g. information available on the UBA Group's websites, Group's key messages available on UBA Intranet, information contained in the Group external publications such as the annual reports and newsletters)

#### 9. Policy on Communication of Publicly Available Information

- 9.1. The UBA Group supports the participation of all employees in helping to build the reputation of UBA Group and the business of the Group through knowledgeable and accurate communication of the Group's key messages.
- 9.2. Proper and accurate communication of publicly available information is therefore encouraged at all times, including in the course of business or appropriate private and social settings. However, communication to the Media is strictly confined to approved media spokespersons. Communication must be restricted to publicly available information only.

#### 10. Policy on Communication with the Media

- 10.1. The Media are both a key audience and influencer of all stakeholders of the UBA Group, and therefore play a big role in shaping the Group's reputation. Communicating with the Media must be both carefully managed and coordinated. No employee is allowed to respond to or make comments in the media on behalf of or with regard to UBA Group's business without first obtaining the approval of the GMD/CEO.
- 10.2. Communication to the Media, in a formal or an informal environment, is strictly confined to approve media spokespersons. Please refer to your respective Heads of Corporate Communications if you are unsure of who is the media spokesperson for the Group.

#### 11. Policy on Communication on rumours and speculation

11.1. UBA Group's Policy is generally not to comment on speculation, and staff should not be drawn into a discussion of leaks, rumours or speculation. Staff should refer all enquiries to Group Corporate Communications.

### 12. The following rules apply to all communication with the media:

- 12.1. All media contacts should be managed through Corporate Communications.
- 12.2. All Media queries must be referred immediately without comment to Corporate Communications.
- 12.3. All approved media spokespersons must undergo media and communications training including Group EMC members.
- 12.4. The list of approved spokespersons is managed by the respective Country Corporate Communications team.

- 12.5. All approved media spokespersons must confine their comments to their agreed area of expertise.
- 12.6. Only a limited number of individuals (i.e. the Group EMC members only) are authorised to comment on behalf of the Group or Group Subject matter experts on their areas of expertise only.
- 12.7. Only the CEO of UBA in the countries is allowed to speak on behalf of the local Operations.
- 12.8. Unauthorised comments should be avoided at all times.
- 12.9. If you are an approved media spokesperson, prepare the message thoroughly. Consider the likely reaction of delivering the message directly to any/all of the Group's key audiences.
- 12.10. Consult Corporate Communications to agree on all messages before talking to the Media;
- 12.11. Never give any information to the Media unless:
  - 12.11.1. You are authorised to do so; and
  - 12.11.2. You are absolutely sure the information you are relaying is accurate **AND** is authorised for release.
- 12.12. Restrict yourself only to the matter at hand to which you are authorised to speak on.
- 12.13. The UBA Group must be particularly careful about communicating to the Media during close periods. Media interviews or press releases related to performance during close periods should therefore be avoided in order not to

impact unexpected on stock prices and to avoid regulatory infractions.

12.14. Price sensitive/inside information is subject at all times to strict regulations required under the Disclosure Rules of the Stock Exchange of the countries of operation where the UBA Group is listed.

#### 13. Communication of Insider Information

Communication of non-public information must be treated with extreme care at all times. As a listed company, we must comply at all times with Stock Exchange disclosure regulations in both Nigeria and other countries where the Group/Bank is listed. Any external leak of non-public information may expose the UBA Group to reputational risk, cause formal disclosure announcement and lead to investigation by regulators and Stock Exchanges.

# 14. Communication of non-public information to any of the UBA Group's key Audiences:

- 14.1. Only a very limited number of the UBA Group's senior management are authorised to communicate non-public information to our key audiences.
- 14.2. When in doubt, please check with Corporate Communications.
- 14.3. Never provide any non-public information unless:
  - i. You are authorised to do so; and
  - ii. You are absolutely sure the information you are communicating is accurate **AND** is authorised for release.

#### 15.0 POLICY ON SOCIAL MEDIA COMMUNICATIONS MANAGEMENT

15 (a) UBA Group deals and communicates to a diverse set of stakeholders that operate in different legal, regulatory and cultural environments. The Bank recognizes the role of Media factor that influences the reputation of UBA among customers, investors, regulators, communities, media and all its stakeholders.

The Group recognize Social media as various virtual platforms that allow friends and loved ones to connect. In businesses, social media allows brands to stay connected with customers throughout their day. Connecting with people is just the beginning and is the least of what a company can do on any digital platform.

Digital media has slowly changed marketing from brand awareness through traditional channels to an ecosystem that can be used to discern customer's transactional and interactional behaviors using raw data supplied by the same customers.

With the proper business intel, the data can be distilled to place the relevant ads and curated products and services on the digital platforms the customers use the most at a faster speed. It is pertinent that at any point in time, we are listening to the customers' needs.

#### 15(b) Related Group Documents

UBA Group Social Media framework shall be read in conjunction with the following Group Documents

- i. UBA Group Email Policy
- ii. UBA Group IT Risk Management Policy
- iii. UBA Group External Communication Policy
- iv. UBA Code of Professional Conducts and Ethics
- v. UBA Group Personal Investment Plan Policy
- vi. UBA Internal Communication Policy
- vii. UBA Group Brand Management Policy

#### 15.(c) Definition of Social Media

**Social Media – as defined by Wikipedia -** are <u>computer-mediated</u> technologies that allow the creating and sharing of <u>information</u>, ideas, career interests and other forms of expression via <u>virtual communities</u> and <u>networks</u>. The variety of stand-alone and built-in social media services currently available introduces challenges of definition; however, there are some common features:

- i. social media are interactive <u>Internet</u>-based applications;
- ii. <u>user-generated content</u> such as text posts or comments, <u>digital photos</u> or videos, as well as data generated through all online interactions, are the lifeblood of the social media organism;
- iii. users create service-specific profiles for the website or application, that are designed and maintained by the social media platforms; and
- iv. social media facilitate the development of online social networks by connecting a user's profile with those of other individuals and/or groups.

Social media use <u>web-based</u> and mobile technologies on <u>smartphones</u> and <u>tablet computers</u> to create highly interactive platforms through which individuals, communities and organizations can share, co-create, discuss, and modify user-generated content or pre-made content posted online. They introduce substantial and pervasive changes to communication between businesses, organizations, communities and individuals. Social media changes the way individuals and large organizations communicate

### 15(d) Social Media Channels

The following are interactive social media channels

- i. Facebook
- ii. Skype
- iii. Twitter
- iv. Instagram
- v. You-Tube
- vi. Google+
- vii. Viber
- viii. Pintrest
- ix. Email
- x. Imo

- xi. FaceTime
- xii. Snapchat
- xiii. BBM
- xiv. WhatsApp
- xv. Yahoo messenger
- xvi. LinkedIn
- xvii. Hangouts

#### 15(e) Objectives of the Framework

With this document, UBA Group intends to properly explore all its social media platforms in order to achieve maximum results. Below are 3 major social media objectives:

- i. Awareness Keeping abreast of the changing socioeconomic conditions of our customers
- ii. Retention Shifting demographics by making use of intel to convert our customers as they move from one lifestyle demographic to another
- iii. Acquisition using digital marketing capabilities and innovative disruption to acquire unbanked demographics and the youth

The convergence of the above objectives in aggregation with the right digital technologies has the potential to change marketing into a revenue generator.

These objectives are further broken down for better understanding:

- a. Grow a community of brand ambassadors. These include third-party Brand supporters
- b. Build Brand affinity and visibility
- c. Change the perception of the Brand and make it more relevant to the target customers
- d. Increase the publics' awareness of the Group
- e. Build top-of-mind awareness
- f. Relay the message and make it clearer that UBA is truly Africa's global bank
- g. Portray the lifestyle nature of brand with the use of its products
- h. Reach out to multiple segments

- i. Connect/Bond/Engage with customers of every segment through all of the Group Social Media Platforms
- j. Continued engagement with the older demographic & corporates, while conveying value and significance to the younger, more socially cognizant consumer
- k. Emphasize that we serve entrepreneurs/small businesses
- I. Increase quality of customer service
- m. Grow the number of customers

#### 15(f) Fundamental Questions

- i. Who is our customer?
- ii. What value are we providing to them?
- iii. How do we best represent and talk about our value in the marketplace?

With the fundamental objective being to create an innovative banking experience that becomes part of the customers' lifestyle.

#### 15 (g) Types of Communication

For structured communication on Social Media across the continent, the content shall be centered on the following Group related activities:

- i. Group annual activities
- ii. Relevant calendar events
- iii. Product marketing
- iv. Seasonal/Public holidays
- v. Related lifestyle posts
- vi. Thought leadership articles projecting the Group as an expert on selected topic

#### 15(h) Posts that must be Avoided

The following types of posts shall be avoided in the Group Media:

i. Reprehensible content such as racial, religious, ethnic, sexual slurs.

- ii. Disruptive or offensive messages, including offensive comments about individuals, organizations race, gender, disabilities, age, sexual orientation, pornography, religious beliefs and practice, political beliefs, or national origin
- iii. Disclose of customer information at any time
- iv. Disclosure of Group information not yet available to the Public
- v. Posts used to promote individual initiatives, competitors or other businesses unrelated to UBA.

#### 15(i) Rules of Engagement

The following shall remain the rules to be adopted by all stakeholders in the social media engagement

- i. Engagements shall be ongoing. 'Like' comments from fans on the page and respond to feedback and enquires
- ii. Comments and responses shall be addressed professionally.
- iii. Always take customer resolutions off the timeline. Use inbox messaging
- iv. Turnaround time is of the essence as such enquiries shall be acknowledged within minutes of being posted
- v. Care shall be taken to ensure correctness on all posts, where in doubt, don't post.
- vi. Copyright and reference laws shall be strictly adhered to. Never claim authorship of documents where you have no proprietary right
- vii. Be very cautious of typographical errors. Always ensure that your post is vetted at least by two persons, a level above you and a level below you
- viii. Creative shall be in line with the Brands and shall be approved by Group Head, Marketing and Group Head, Corporate Communications

#### 15(j) Writing Style

- i. Professional
- ii. Vibrant and youthful
- iii. Pleasant
- iv. Casual tone
- v. Story-telling
- vi. Use of vernacular should be kept to a minimum
- vii. Shared content shall be in line with the Group Brand message, related business news, positive news about staff, financial and economic news and relevant lifestyle content.

#### 15 (k) Voice and Tone

The voice and tone shall reflect the way we aim to communicate our Brand to stakeholders and thought leaders.

The tone of all communications shall be:

- i. Helpful
- ii. Enlightening
- iii. Amiable
- iv. Professional
- v. Pan-African

#### 15 (I) Graphics

- i. All Graphics shall be of the highest quality and aesthetically pleasing. Generally, consumers only engage with 20% of all content so our images must be creative enough to grasp the customer's attention immediately and relay the intended message
- ii. Videos shall be short and the intent relayed immediately within the first 10 seconds for continued engagement

iii. External design vendors shall adhere to the Brand policy of the bank and be contracted by the MCC department

#### 15 (m) Understanding Best Practice

While posting on social media, it is important to listen to your audience, share relevant content and allow others to share your content.

Content is what you share and hopefully will be shared by your followers if they can relate with it. Good content cannot be over emphasized. A good social media strategy originates from a solid content marketing strategy. Great content gets people to share and that sharing widens your audience to a whole new world of potential fans, friends and customers.

Some of the unwritten rules for a successful social media engagement are:

#### 15(n) Post Every Day

Studies show that posting between 3-5 times a day is optimal for a business page and even more for platforms like Twitter. It is important to vary your posts while keeping an eye on analytics to ensure followers are actually engaging with the content. You can decide to take it down a notch on weekends but also realize that weekends are when many people are on Social media.

#### 15(o) Focus on Engagement

Ask questions, post helpful tips and links to articles that your audience will like, share or retweet. When you make the posts about your audience and what they need rather than selling, you will develop a richer and deeper relationship with them. You will sell more as a byproduct of that deeper relationship. Set aside time to follow up on posts and respond to questions on your Wall.

#### 15 (p) Have a Call to Action

Ask people to 'Like', 'Comment' or Retweet' your posts.

#### 15(r) Don't Oversell or Undersell

Use the 80-20 rule for Sales Messages vs. Content/Connection Posts/Tweets. So if you decide to post five times a week, one of the posts should be a sales message and four posts will be other helpful or fun content for your community.

#### 15 (s) Make It Fun

Social media platforms are social communities. People are there to have fun. This is a place where we can let loose a little. Stay true to the UBA brand but think of ways to entertain the audience. These rules are a good place to start but watch what works for your region. There is no one "right" way to do everything on Social Media. Encourage open ended conversations so customers can take action by engaging. However, it is important to observe the dos and don'ts of the bank.

#### 15 (t) Editorial Content Calendar

Creating a content calendar allows you to plan well in advance and properly allocate the resources of your team. It eliminates the ubiquitous dilemma of "what should I post/write today". Developing a content calendar has the following advantages:

- i. Allows you to publish regularly and on time
- ii. Give you a big picture view of your online communication
- iii. Synchronization/Synergy with other advertising sources
- iv. Ensures consistency over time

A calendar gives you a road map you can turn to without having to start with a blank page when trying to figure out what you want to communicate to your customers. A content calendar gives you an overview of what you're posting so you can ensure that you cover all the topics and products you want covered. It ensures that you're not repeating yourself. It forces you to think about what's important and what's not so you don't fall into the trap of posting content just to fill a void.

Month				
	Monday	Morning motivation	Product Post	#МСМ
	Tuesday	Tuesday teaser	Question of the day	Product post
	Wednesday	Product Post	Today in history	Health tips
Week 1	Thursday	#ThrowBackThursday	#Random	Product post
	Friday	#TGIF	#FlashBackFriday	#Financial tips
	Saturday	Soccer scores	UBA Style	Product post
	Sunday	Family day	Product Post	Entertainment News

As you develop your weekly content calendar, your community will also get to know your pattern and they will look forward to certain weekly events. Again, watch what works for your audience.

More ideas for content include:

- i. Rise and Shine: Inspirations to begin your day
- ii. Teaser Tuesday: Riddles and puzzles
- iii. Shout-out Wednesday
- iv. Love Thursday
- v. Freebies Friday
- vi. Other lifestyle content like sports, fashion, entertainment

# 15 (u) Bringing Down of Posts

Post shall be brought down under the following conditions where:

- i. It does not reflect the position of the Bank
- ii. It is not in line with the communication policy of the Bank

- iii. It may lead to negative reaction from the general public
- iv. It may embarrass the directors and management of the bank.
- v. It is used to promote individual initiatives, competitors or other businesses unrelated to UBA.
- vi. It is disruptive or offensive message and comment about individuals, organizations race, gender, disabilities, age, sexual orientation, pornography, religious beliefs and practice, political beliefs, or national origin

#### 15 (v) Key Deliverables.

Social media like every other media platform is a marketing tool for the bank and we shouldn't lose the aim of having the platforms.

The following are the expected monthly deliverables:

- i. A minimum of 20% growth on each platform
- ii. Increase post engagement reach weekly
- iii. Increase positive feedback on all platforms
- iv. Incorporate product post creatively to content. At least 3-5 product post a week
- v. Minimum of 1 post on weekends. (Saturday and Sunday)

### 15 (w) Approvals.

- i. Content calendar shall be prepared at least a month ahead and shall be approved by the Group Head, Corporate Communications before the new month.
- ii. Only post that have been approved shall be posted on the platforms.
- iii. For impromptu post or local content BMs/Social Media Head shall be contacted.
- iv. All graphics and creative shall be approved before posting

v. Approval for videos (Product/Brand) videos shall be sort form the head office.

**Note**: Always have the Group Head, Corporate Communications copied in all correspondence in this regard.

## Samples/adoptable post



"You may only succeed if you desire succeeding; you may only fail if you do not mind failing."

- Philippos



#### THE SAFER WAY TO SHOP ONLINE



#### Appendix I

# Attestation to comply with the provisions of the External Communication Policy by the Director

United Bank for Africa Plc has an External Communication Policy which provides guidance on expressing views/opinions on specific and/or general issues that may be construed to be the views of the Bank.

Section 4.1 of the Policy states that, "The Group Chairman, Group Managing Director & Chief Executive, Deputy Managing Director and Group Head, Corporate Communications are the authorized spokespersons on issues relating to the Bank. The Group Managing Director/Chief Executive Officer may also give approval to a member of EMC or Director who may be called upon to do so as the need arises."

Given the position of Directors in the society, they could be approached by the press or other institutions or entities, on a wide range of issues. Should the Director choose to oblige comments or responses to issues, on the strength of his/her personal convictions or views, on no account should it appear to reflect the position of UBA.

Accordingly, the following principles shall apply:

- When granting any interview or addressing any forum where the Bank is not being represented, it should be expressly stated that the views being presented are the Director's personal opinion.
- 2. The Bank shall not in any way infringe on the fundamental human rights of any of its Directors to comment on any issue when called upon but it shall be expressly stated by the Director that such views are not that of the Bank.
- 3. Where there is need for a Director to represent the Bank, in line with the provisions of the extant policy, proper guidelines shall be provided by the Group Managing Director/Chief Executive Officer and Head, Marketing and Corporate Communication.
- 4. Any view(s) or opinion(s) presented to the public without following the provisions as stipulated in the

policy shall not represent the position of the Bank and any damage or liability arising therefrom, shall not be covered by the public liability insurance policy of the Bank. The Director shall be personally liable for any damage(s) or other liabilities arising from such views or opinions.

I hereby agree to abide by the provisions of the External Communications Policy.

Signed by
Name:
Date

#### Appendix II

# Attestation to comply with the provisions of the External Communication Policy by Staff

United Bank for Africa Plc has an External Communication Policy which provides guidance on expressing views/opinions on specific and/or general issues that may be construed to be the views of the Bank.

Section 4.1 of the Policy states that, "The Group Chairman, Group Managing Director & Chief Executive, Deputy Managing Director and Group Head, Corporate Communications are the authorized spokespersons on issues relating to the Bank. The Group Managing Director/Chief Executive Officer may also give approval to a member of EMC or Director who may be called upon to do so as the need arises."

Given the position of staff in the society, they could be approached by the press or other institutions or entities, on a wide range of issues. Should the staff choose to oblige comments or responses to issues, on the strength of his/her personal convictions or views, on no account should it appear to reflect the position of UBA.

Accordingly, the following principles shall apply:

 When granting any interview or addressing any forum where the Bank is not being represented, it should be expressly stated that the views being presented are the staff personal opinion.

- 2. The Bank shall not in any way infringe on the fundamental human rights of any of its staffs to comment on any issue when called upon but it shall be expressly stated by the staff that such views are not that of the Bank.
- 3. Where there is need for a staff to represent the Bank, in line with the provisions of the extant policy, proper guidelines shall be provided by the Group Managing Director/Chief Executive Officer and Head, Marketing and Corporate Communication.
- 4. Any view(s) or opinion(s) presented to the public without following the provisions as stipulated in the policy shall not represent the position of the Bank and any damage or liability arising therefrom shall be borne of the staff. Where the reputation of the Bank is infringed upon by the action of the staff, such shall be decided in line with the provision of the staff disciplinary grid and sanction policy.

I hereby agree to abide by the provisions of the External Communications Policy.

Signed by:
Name:
Employment No
Date