



COMMUNICATION POLICY

OF

FIRSTTRUST MORTGAGE BANK PLC

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FIRSTTRUST MORTGAGE BANK PLC

COMMUNICATION POLICY

1. INTRODUCTION

FirstTrust Mortgage Bank Plc (“FirstTrust” or “the Bank”) is committed to ensuring that appropriate policies, procedures, and monitoring arrangements are in place to support good internal and external communications. The Bank also recognizes the importance of developing two-way communication channels acknowledging that its key stakeholders who can support the improvement of its services are those who actually use the services and those who deliver them. Maintaining good internal and external communications is important as it encourages a healthy, progressive work environment. Effective communication will help staff and other stakeholders to understand the Bank’s statement of purpose, values, objectives, developments and issues and the reasons behind them.

2. PURPOSE

This document sets out the policy of FirstTrust Mortgage Bank Plc, on external and internal communication with employees, general public, customers, shareholders, potential investors and other stakeholders

3. GOALS

External Communication

External communication supports the Bank in the pursuit of its overall goals as described in its statement of purpose and its core values. The major purpose of the Bank is to go beyond the regular delivery of mortgage and real estate financial services leveraging disruptive technology and its people.

This creates, first, a natural need to communicate *to support lending and funding processes*. Therefore, customer relations (customer experience, branding, marketing) and investor relations play an important role in the external relations of the Bank.

Secondly, external communication helps to *promote the overall knowledge and awareness of FirstTrust among its different stakeholders*. As our goals are beyond making profit (they include competitiveness and concern for the environment), FirstTrust is accountable to its Customers, Shareholders and to other Stakeholders as well.

Internal Communication

The Bank’s internal communication support the achievement of the overall goals described in the Bank’s statement of purpose and core values.

The internal communication shall strengthen the organisational culture and commitment among staff. Mutual information sharing is an essential tool for ensuring that the Bank has in place an effective system for internal communication. Staff also act as multipliers in the communication process.

3. GUIDING PRINCIPLES

FirstTrust recognises that active communication with different stakeholders and the general public is an integral part of good business and administration. In order to reach its overall goals for communication, FirstTrust follows a set of guiding principles:

Efficiency

FirstTrust uses modern communication methods in a timely manner to convey its messages to its audience. Synergies are sought when it comes to using different communication channels. FirstTrust responds without delay to information requests by its shareholders, stakeholders, the media and the general public.

Transparency

As a financial institution, FirstTrust strives in its official communication to be as transparent and open as possible, whilst acknowledging the need for discretion and confidentiality in certain instances. In being transparent in all our communication, we shall ensure that all circulations are issued to those entitled to receive them and that full and accurate details are provided in official correspondence, where needed.

Proactivity

FirstTrust shall anticipate the information needs of its stakeholders based on the constantly evolving nature of the financial services sector and shall strive to communicate important information concerning their affairs and transactions with the Bank as such information becomes available.

Clarity

FirstTrust aims at clarity, i.e., to send uniform and concise messages on key policy issues as they emerge. The Bank shall avoid esoteric language in its communication and shall ensure that its communications are routed through the standard official channels to avoid confusion. FirstTrust reinforces clarity by adhering to a well-defined visual identity in its external communications.

Feedback

FirstTrust actively and regularly seeks feedback on its image and communication activities both from the media as well as from its key target groups. This feedback is used to fine-tune the Bank's communication activities.

4. FIRSTTRUST'S COMMUNICATION NETWORK

The following are the categories of internal and external individual and corporate stakeholders with which FirstTrust regularly interfaces and with whom it shall routinely exchange various forms of official communication.

External Communication

Customers

FirstTrust grants Mortgage facilities for property acquisition and building projects which promote commerce, addresses the housing and infrastructural needs of the populace, thus providing invaluable services that help to secure the economic firmament of the nation. FirstTrust's customers are located in the private and public sectors of the Nigerian economy. External communication supports the process of maintaining current customer relations as well as locating potential new customers. Customer relations (customer

experience, branding, marketing) play an important role in the external relations activities of the Bank.

Investors

With its strong brand name, FirstTrust has access to funding. In its operations, FirstTrust cooperates closely with investment banks and other investors. External communication should support the funding process by promoting name recognition and the role of FirstTrust as a top-rated institution.

Regulators and Other Stakeholders

FirstTrust ensures compliance with all regulations pertaining to Primary Mortgage Banks and analyses carefully all aspects of its loans. The Bank establishes a two-way dialogue process whereby it communicates its goals and Corporate Social Responsibility policy to the Stakeholders and ensures timely disclosure of its financial and non-financial information to Regulators and other stakeholders.

Media

FirstTrust acknowledges the role played by the media as an intermediary in reaching other key target groups.

Internal Communication

Staff

FirstTrust aims to recruit and retain personnel that possess the competencies and skills required to enable the Bank implement its strategy. Highly motivated staff are an important multiplier in external communication.

5. SOME KEY MESSAGES

The key message is:

- FirstTrust promotes sustainable growth by providing short, medium and long-term mortgage and project-finance facilities to private individuals, companies and public sector operators.***

Some Key messages the Bank aims to continually communicate to different target groups are the following:

About FirstTrust (all target groups)

- FirstTrust is a reputable Mortgage Bank in Nigeria
- FirstTrust offers Innovative mortgage and real estate finance solutions
- FirstTrust offers Financial Advisory Services

Loans (customers and potential customers)

- FirstTrust provides long-term complementary financing
- FirstTrust promotes sustainable growth by financing projects that strengthen competitiveness and enhance the environment
- Focus: Mortgages, Real Estate Finance and Financial Advisory
- FirstTrust strengthens customer credibility and is a reliable partner

Capital markets (investors and potential investors)

- FirstTrust responds with flexibility to investor needs and is a reliable partner
- FirstTrust is responsive to the changing demands of investors

Human Resources (Staff and potential staff)

- FirstTrust has professional and highly motivated staff that are efficient and professional

6. COMMUNICATION CHANNELS

To fulfil its objective of optimizing its communication channels, the Bank employs a variety of communication tools. The most important of them are listed below. The officers responsible for utilising each tool within the Bank are also mentioned below.

Target Group	Communication Tools	Responsible Officer
Customers (Lending)	Seminars, Internet, newsletter, media, corporate presentations, speeches, publications, brochures, leaflets, advertising	Managing Director
Investors	Publications, Internet, Social, Print and Electronic media, investor presentations, publications (in particular the Annual Reports), brochures, leaflets, advertising	Managing Director and Company Secretary
Regulators and Other Stakeholders	Institutional contacts, seminars, visits, Internet, newsletter, media, publications (in particular the Annual Reports), brochures, leaflets	Company Secretary
Print & Electronic Media	Press releases, interviews, speeches and seminars	Company Secretary and Managing Director
Staff	Intranet, debriefings, information sessions	Human Resources and Company Secretary

Newsletter

FirstTrust shall publish a newsletter to inform key target groups about its activities. The newsletter will also be published on the Bank's website.

Annual Reports

The Annual Reports detail an official account of the Bank's activities during a calendar year. They are comprehensive and serve as a future point of reference.

FirstTrust Website

The website is the central platform for communicating all external information that FirstTrust generates. Its contents are up-to-date, reader-friendly and it clearly communicates the Bank's statement of purpose.

Intranet

The intranet is the most important channel for the Bank's internal communication. FirstTrust staff can easily find the information they need to perform their daily tasks on this resource. Internal information is disseminated using this medium.

Seminars

FirstTrust organises and participates in seminars with key target groups. The Bank also participates actively on panels, providing speakers or discussants for relevant sessions.

The Company Secretary is responsible for updating the calendar of forthcoming events, which is to be published both internally and externally.

Speeches

Top management staff are often invited to give speeches on various topics. The most important public appearances are to be announced on the website. To the extent possible, short summaries of the speeches are to be published on the website and distributed at the venue to interested parties (including the press).

Media activities

FirstTrust periodically issues press releases on its activities. The Managing Director and the Company Secretary are responsible for the external communication and act as the spokespersons for the Bank. Interviews, background talks and trips to the locations of important projects are also organised to inform the media of the Bank's activities.

Advertising & Sponsorship

FirstTrust also uses advertising and sponsorship media to support its actions and to reach its key target groups. Advertising and sponsoring should support the activities of the Bank.

Social Media Platforms

The social media platforms (Facebook, Twitter, LinkedIn, Instagram, WhatsApp, etc) offer veritable and wide-reaching communication platforms that any modern organization can only ignore at its peril. FirstTrust has adopted this medium as a tool for both internal communication to facilitate ease of access in its operations and for external communication, to expand its reach and project its brand.

7. USE OF ELECTRONIC MAIL

Generally

- 7.1 Always use the email template which contains the appropriate disclaimer notice from the Bank and do not amend this notice in any way.
 - 7.1.1. Do not amend any messages received and, except where specifically authorised by the other person, do not access any other person's in-box or other email folders nor send any email purporting to come from another person.
 - 7.1.2 It is good practice to re-read and check an email before sending.
 - 7.1.3 If you copy an email to others, it may amount to a breach of duties of confidentiality if it reveals all the recipients' email addresses to each recipient (e.g. in the case of marketing and mailing lists). Accordingly, it may be appropriate to use the 'Bcc' (blind carbon copy) field instead of the 'Cc' (carbon copy) field when addressing an email to more than one recipient. If in doubt, seek advice from your [line manager/departmental head]

Business use

- 7.2 Each business email should include the appropriate FirstTrust business reference.
 - 7.2.1 If the email message or attachment contains information which is time-critical, bear in mind that an email is not necessarily an instant communication and consider whether it is the most appropriate means of communication.

- 7.2.1 If you have sent an important document, always telephone to confirm that the email has been received and read.
- 7.2.2 In every instance, file a hard copy of any email (including any attachments) sent to or received from the [customer/client] before filing or deleting the electronic copy. The same applies to all internal email transmissions concerning [customer/client] matters.
- 7.2.3 In light of the security risks inherent in some web-based email accounts, you must not email business documents to employees' personal web-based accounts. Employees may send documents to a [customer's/client's] web-based account if they have the [customer's/client's] express written permission to do so. [However, under no circumstances should an employee send price sensitive or highly confidential documents to a [customer's/client's] personal web-based email account, even if the [customer/client] asks him/her to do so.]
- 7.2.4 When you need to work on documents remotely they can be saved to a disk or retrieved over the internet.

Personal Use

- 7.3. Under no circumstances may FirstTrust's facilities be used in connection with the operation or management of any business other than that of the Bank or a [customer/client] of the Bank unless express permission has been obtained from a [line manager/departmental head/partner].
- 7.3.1 All personal email you send from a FirstTrust facility must be marked PERSONAL in the subject heading, and all personal email sent or received must be filed in a separate folder marked "Personal" in your inbox should you wish to retain it after reading. Contact IT Support if you need guidance on how to set up and use a personal folder. All email contained in your inbox and your sent items box are deemed to be business communications for the purposes of monitoring.

You must ensure that your personal email use:

- 7.3.1.1 does not interfere with the performance of your duties;
- 7.3.1.2 does not take priority over your work responsibilities;
- 7.3.1.3 is minimal and limited to taking place substantially outside of normal working hours (i.e. during any breaks which you are entitled to or before or after your normal hours of work);
- 7.3.1.4 does not cause unwarranted expense or liability to be incurred by FirstTrust;
- 7.3.1.5 does not have a negative impact on FirstTrust in any way; and
- 7.3.1.6 is lawful and complies with this policy.

- 7.3.2 As with any correspondence made using the Bank's electronic facilities, an employee may delete personal email from the live system, but they will have been copied (perhaps many times) onto the backup tapes and in that form will be retained indefinitely. It would be a very difficult, costly and time-consuming exercise to sift all those tapes in order to delete an individual's personal email, and if we were to agree to attempt this, it would be at our convenience, and only on the basis that all the very considerable costs involved were paid in advance by the person making the request.
- 7.3.3 By making personal use of our facilities for sending and receiving email, all employees signify their agreement to abide by the conditions imposed for their use, and signify their consent to FirstTrust monitoring your personal email in accordance with the terms of this Policy.

8. DATA PROTECTION

- 8.1 As an employee, consultant or stakeholder of FirstTrust who uses our communication facilities, you will inevitably be involved in processing personal data for FirstTrust as part of your job. Data protection is about the privacy of individuals. Some definitions of these terms according to our Policy are as follows:
- 8.1.1 "Data" generally means information which is computerised or in a structured hard copy form;
- 8.1.2 "Personal data" is data which can identify someone, such as a name, a job title, a photograph;
- 8.1.3 "Processing" is anything you do with data – just having data amounts to processing; and
- 8.1.4 "Data controller" is the person who controls the purposes and manner of processing of personal data – this will be the Managing Director of FirstTrust (or his nominee), in the case of personal data processed for the business.
- 8.2 Whenever and wherever you are processing personal data for FirstTrust you must keep it secret, confidential and secure, and you must take particular care not to disclose them to any other person (whether within or outside the Bank) unless authorised to do so. Do not use any such personal data except as authorised by the Bank for the purposes of your job. If in doubt get help from the Data Protection Officer or your [line manager/departmental head/partner].
- 8.3 While FirstTrust is a data controller of all personal data processed for the purposes of our business, you will be a data controller of all personal data processed in any personal email which you send or receive. Use for social, recreational or domestic purposes attracts a wide exemption, but if, in breach of this policy, you are using our communications facilities for the purpose of a business which is not the Bank's business, then you will take on extensive personal liability for the consequence of such use/misuse.

9. BASIC RULES FOR COMMUNICATION

Responsibility for external and internal communication

The Managing Director and the Company Secretary have the overall responsibility for the Bank's external and internal communication. However, the responsibility is shared depending on the key target groups. For the Bank's internal communication, responsibility is shared by the Human Resources Unit and the Company Secretary. Their respective responsibilities are defined in the Table above.

Spokespersons for the Bank

As regards public statements issued by the Bank, a basic rule is that the key spokespersons for the Bank (i.e., persons authorized to represent the Bank in relations with the mass media) are the Managing Director and the Company Secretary. However, the decentralisation of this process is permissible in such instances where there are valid arguments for it: e.g., subject-matter expertise or language skills. However, prior consultation with the Managing Director and Company Secretary is required to avoid divulging sensitive information that is not in the public domain. The management and staff of FirstTrust are encouraged to identify opportunities for external communication.

Coordination of communication

Communication is an integral part of the Bank's overall processes. Key policy messages are reserved for discussion at the Board level. Information on public appearances by FirstTrust's representatives are to be sent in a timely manner to the Company Secretary. All interview requests and media contributions are to be channelled through the Company Secretary.

10. APPLICATION OF THE POLICY

This Policy shall be applicable in respect of all official external and internal communication between the Bank and its employees, customers, shareholders, potential investors, other stakeholders and the general public.

11. ANNUAL REVIEW OF POLICY

Management will review and, if necessary, update this policy on an annual basis or as may be necessary to ensure compliance with changes in regulatory requirements.