



Policy Document

Corporate Communication Policy

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Revision History

Version	Date	Section(s) Revised	Description of Changes	Author
4.0	June 2023	Whole document	Document formatting Table of contents	Corporate Communications & Marketing
3.0	May 2023	Whole document	Updated version	Corporate Communications & Marketing
2.0	January 2023	Revision History, - Responsibility Assignment	Updated version	Corporate Communications & Marketing
1.0	October 2022	Whole document	Document creation	Corporate Communications & Marketing

Document Location

All documents related to this Policy will be kept in the designated directory in the archives of the *Corporate Communication & Marketing Department*. An electronic copy will be hosted on the Bank's Intranet. Any amendment to this document must be signed by all relevant authorities and updated at the above location.

Reviews

Union Bank recognises that there will always be room for improvement, and as new and better ways of working are established, these processes and procedures will be formalised and included, as relevant, in this policy on an annual basis or as required by;

1. Applicable laws/regulations of the Federal Republic of Nigeria
2. Regulations of the Central Bank of Nigeria
3. Strategic direction of Union Bank
4. Industry practices
5. Force Majeure

Any addition(s) prior to a review shall be an addendum to the policy in the interim.

Responsibility Assignment

	Designation
Responsible	Team Members, Strategic Communication
Responsible	Team Lead, External Communication
Accountable	Head, Strategic Communication
Accountable	Head, Strategic Communication
Consulted	Head, Corporate Communications & Marketing
Informed	Business Unit Heads
Informed	Executive Management
Endorsed	Executive Management

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1. Overview

Union Bank of Nigeria (“UBN”) is one of Nigeria’s long-standing and respected financial institutions. Established in 1917, UBN offers a portfolio of banking services to individuals, SMEs, commercial and corporate clients. With a robust geographical network comprising over 290 service centres and no less than 950 ATMs spread across Nigeria, we have remained committed to enabling success for individuals, families and businesses and have done this for over a century.

Our goal is to be widely recognised as Africa’s most reliable and trusted banking partner. This ambition is hinged on successfully delivering against three strategic pillars including expanded networks and partnerships, improved service delivery and synergy and increased operational efficiency.

1.1 Purpose

This policy document exists to ensure an effective and efficient framework for the communication of information about Union Bank to all internal and external stakeholders, including customers, employees, executive management, board members, regulators, investors, mass media and the public. This information must be consistent, timely, accurate, and relevant. Employees must follow the instructions in this policy document considering the possible consequences that unlawful disclosure of information about Union Bank could have on the Bank, its clients, suppliers, the industry, and other stakeholders.

1.2 Scope

This communication policy applies to all employees of Union Bank and covers all internal and external communication including newsletters, bank-wide announcements, product, or service launches, press releases, media interviews etc.

1.3 Goals

- To establish a solid corporate reputation through high levels of transparency and consistency in communication
- To communicate with stakeholders in a timely manner while maintaining clarity, coherence, and credibility
- To disseminate information via the Bank’s official website as required

1.4 Guiding Principles

- Communication is primarily focused on issues relating to the Bank's priorities
- The Bank will try to communicate with its stakeholders via channels, like its website, primarily in English and if necessary, in the three major Nigerian languages (Yoruba, Ibo, and Hausa)
- From a communication standpoint, the Bank considers the government, regulators, investors, clients, employees, suppliers, service providers and the public to be its stakeholders.
- The Bank seeks to inform, convince, and/or involve all stakeholders in its activities and expansion using a combination of both internal and external communication tools.
- The guiding principles of Union Bank's communication policy are Transparency, thoroughness, relevance, and timeliness in the context of its vision to inform stakeholders about the Bank's various activities, products & services, financial markets, and regulatory & compliance matters relating to the Bank.
- Product information, customer service efforts of the Bank, customer service-related issues, market-related information, and regulatory compliance issues are amongst the various topics communicated by the Bank externally.
- The topics covered within the Bank to employees include product information, customer service initiatives, market related information and matters relating to regulatory compliance
- The Bank will try to put all relevant information in the public domain to discourage people from seeking information on a selective basis

3. External Communication

The Corporate Communications & Marketing Department is Union Bank's principal media contact. This department has expertise in public relations, media relations and other external communication weighing each media inquiry to determine the best response for each case.

The Corporate Communications & Marketing Department's responsibilities include but are not limited to the following:

- Increasing public awareness and understanding of Union Bank, the services that we provide to our customers, our impact in communities and our prospects for growth
- Promote a positive public image of Union Bank among existing and prospective customers, employees, vendors, shareholders, government, regulators, and industry peers
- Manage Union Bank's relationship with all media including Print Media Houses (newspaper, hard & soft sell magazines), Electronic News Media (online/social media) and Broadcast Media (TV & Radio).

3.1 Communication with the Media

It is the Bank's policy to manage its relations with the media in an open and pragmatic way. The company will be responsive to the legitimate interests of the media. It will also be proactive in disseminating information about the company, its policies, and products when it is judged to be in the best interests of the business by corporate, functional, or local management.

3.2 Media Calls

All requests from the media should be recorded accurately and passed on immediately to the Head of Corporate Communications & Marketing. This includes formal requests for interviews as well as enquiries, and includes all media – TV/Radio, newspapers, magazines, local/national media, blogs, social media, and internet news sites. The Head of Corporate Communications & Marketing will either respond behalf of Union Bank or assign appropriate individuals (as approved by the Managing Director or Executive Director), including key media facing Executives from the Bank to handle the responses.

3.3 Designation of Spokespersons

Union Bank's spokespersons will be selected by the Corporate Communications & Marketing department and top management departments on a case-by-case basis. Depending on the situation, an individual external to the Corporate Communications & Marketing Department may be asked to be a spokesperson on a specific issue due to their knowledge, experience and/or expertise.

Spokespersons for Union Bank will include but are not limited to:

- Corporate Communications - Communication with the media is to be undertaken by the Chief Brand & Marketing Officer. She/he may coordinate with other business heads to interface with media/prepare media release for product launch, new initiatives etc. based on published facts with restrictions on any kind of futuristic issues/views. This is subject to approval from the Executive Management (Managing Director and Executive Director)
- Executive Committee – The Managing Director & CEO is also a designated spokesperson for the Bank. Depending on the issues/events, the Managing Director & CEO may authorise a member of EXCO, business or functional head, to speak on behalf of the Bank.
- No comments/ views should be made on futuristic issues/views on the following:
 - Corporate Policy
 - Financial Results
 - Management Structure/Change
 - Plans of the Bank
 - Government Policy

- Any other information that is not in the public domain
- Employees – Employees are not allowed to speak with the media on behalf of the Bank. A strict disciplinary action will be taken against any employee found in violation of this policy. It is important to respond quickly, courteously, and professionally to all media enquiries, by directing them to the Corporate Communications & Marketing team.
 - Employees should not say “I’m not allowed to talk to a reporter” or “I have to get permission to do so”. Instead say: “Union Bank’s policy is to refer all media enquiries to the Corporate Communications & Marketing Department” and inform the Corporate Communications & Marketing Department providing details of the discussion and contacts where they can be reached.
 - For special reasons, an employee may be authorised by the Chief Brand & Marketing Officer, to make a statement for the Bank. In such circumstances, the External Communications unit will provide the necessary preparation and materials as well as attend the interviews.
 - Designated spokespersons may speak only on issues directly related to the subject of discussion and may not address reporter inquiries related to other topics or issues, as even the release of accurate information, provided at the wrong time, could put the company at a competitive disadvantage or pose business perception problems
 - The Bank’s spokesperson shall endeavour to use an approved script for all public presentations, designed or intended to disclose material information about the Bank’s financial performance, results of operations and the Bank’s current or expected financial results, such scripts will be reviewed and approved by the Chief Brand & Marketing Officer.
 - For all media interactions, within or outside the office, employees should dress in accordance with the Bank’s dress code

3.4 Guidelines for Pictures and Videos

Under no circumstance are employees allowed to grant media access to the Bank’s branches or service centres for a picture to be taken or video recorded, without approval from the Corporate Communications & Marketing Department. The Corporate Communications & Marketing Department will also not give approval the any media house, without informing the Head of Operations and Branch Services team.

A reporter or camera crew may show up unannounced at a branch/facility. This may occur for several reasons including but not limited to:

- An event at a branch/facility of interest to the media

- An incident at one of our branches/facilities
- A crisis in the communities we serve
- Information from an external source who has organised a demonstration or boycott

When faced with such situations, employees should take the following steps:

- Act with the same courtesy and professionalism that we extend to customers
- Contact the Corporate Communications & Marketing Department immediately
- Please note that in line with the Bank's social media policy, Employees are advised to get approval from the Corporate Communications Team before sharing any of the brand's content on social media

3.5 Guidelines for Photographing/filming external areas

It may not be practical to prevent filming or photography of common areas outside our branch/facilities such as roads, public parking lots, walkways, and courtyards. The same guidelines stated above should however be adhered to. Additional things to note include:

- The media cannot block the entrance to our branch/facility or prevent people from entering our branch/facility to conduct their business. If this occurs, the Branch Security team should be contacted immediately
- Employees can approach the media to make necessary adjustments if our customers complain about the inconvenience caused by common areas blocked outside our branch/facility
- Be courteous and professional. Remember that everything you say or do may be observed and reported by the media representative

3.6. Guidelines for Seeking Media Coverage

In situations where you believe that you have a positive story that will put the Bank in a good light that should be shared with the public, please contact the Corporate Communications & Marketing Department. This is the only department authorised to disseminate and approve news releases, pitch coverage of events or hold press conferences.

Do not call a reporter directly to pitch your story without first consulting the Corporate Communications & Marketing Department.

The Corporate Communications & Marketing Department will work with you to gather information and determine if and how the news media should be contacted

3.7 External Speaking Engagements and Publications

It is recognised that employees may be approached by external parties on topics related to their personal interests or non-work-related activities. Employees should take the following steps:

- Write to confirm if the organisers have invited them to speak in a personal capacity or as an employee of the Bank

- Where employees have been invited to speak in their personal capacity, they must inform the organisers that they may not reference Union Bank or their job roles/titles within the Bank in the publicity and conduct of the event. The External Communications unit within Corporate Communications & Marketing should be informed of the event
- Where employees have been invited to speak as employees of the Bank, the External Communications unit within Corporate Communications & Marketing should be informed for further guidance

3.8 Guidelines for External Presentations

In addition, to protect Union Bank's proprietary information and ensure that external communications conform to Union Bank's standards of accuracy, content, and style:

- All invitations for external speaking engagements that involve the company's corporate position, policies, or products with the potential to impact the corporate reputation should be referred to the Head Strategic Communications
- Proposed disclosures and announcements about significant new Union Bank business partnerships, including joint ventures with other companies, should be referred to the Head of Strategic Communication

3.9 Public Relations

The Bank's communication strategy will also include leveraging cost-effective opportunities for building brand image through media release, media interviews and coverage of various events and activities of the Bank. This will be undertaken with a focus to promote the performance of the Bank and its overall initiatives in the areas of product services and reach. In keeping with the guidelines of the regulators, no official of the Bank will be permitted to make any forward-looking statement or comment on the policies of the Bank.

3.10 Press Release

All media releases covering policy announcements such as change in interest rate; introduction/phasing out of products/services; overseas expansion; launch of national/international campaigns; CSR/Financial Inclusion initiatives, customer service initiatives at national/ international level, regulatory/compliance related matters and other information of national/international importance, are centrally issued by the Corporate Communications Department of the Bank.

3.11 Media Sponsorships/Activities

The Bank shall use the following modes of communication to disseminate information to its stakeholders

- Media release
- Website

- Speeches - Notifications
- One-on-One clarifications
- Briefings/ interviews by top management
- Interviews with Managing Director/CEO and Executive Directors

All media relations activity should always be strictly coordinated by the Corporate Communications Department. This will help ensure consistent information sharing and avoid selective disclosures.

3.12 Crisis Management and Response Plan for Adverse Reputation Events

The Managing Director/Chief Executive Officer will serve as the Bank's spokesperson in adverse situations. She/he will clarify and disseminate the true and fair stand of the Bank on any adverse reputation incident through media releases or statements using print, electronic or other media vehicle as deemed fit, to reach the Bank's stakeholders. This will be facilitated by the Corporate Communications Department.

This written statement should be circulated internally to the Executive Management to enable them clarify and disseminate the true and fair stand of the Bank under the guidance of the Corporate Communications department as per guidelines (stated at paragraph 2.2.3 of this policy).

The Chief Brand & Marketing Officer may speak on behalf of the Bank/issue media releases/media related communications with approval from the Managing Director/CEO. The Bank will also endeavour to immediately disseminate the true, fair, and adequate clarification through its own website. Where required, the Company Secretary may be informed to disseminate the Bank's statement to its Board and shareholders.

4. Stakeholder Communication Channels

S/N	Stakeholder	Communication Channels
1	Members	Seminars, bilateral contacts, website, letters, email correspondence, newsletter, media publications/interviews, corporate presentations, speeches, other publications, brochures, and advertisement
2	Investors/General Public	Publications, road shows website, media publications/interviews, press releases, investor presentations, other publications, brochures, leaflets and advertisement
3	Regulators Government and Authorities	Knowledge sharing sessions/Seminars, visits, website, newsletter, media, market reports, publications, Annual Report, brochures, leaflets and presentations

4	Media	Press releases, interviews, speeches, workshops/seminars, website
5	Staff	Intranet, emails, debriefings and information sessions, staff meetings, website, letters
6	Board of Directors	Email, letters, Board and Committee meetings
7	Shareholders	Email, letters, General Meetings

5. Official Language Policy & Implementation

The Bank shall adhere to the Nigerian Government's guidelines on our official language and implementation while undertaking various communications.

6. Dissemination of Communication Policy

Once approved, the Communication Policy will be circulated to all staff, saved in a central repository, and situated on the Bank's intranet site.

7. Storage and Retention of Communication Policy

All complaint data or files (physical or electronic) will be retained for a minimum of 10 years. Branch Service Managers and Unit Heads are responsible for safe keeping and storage of the Communication Policy document in their respective branches and departments.

8. Review & Amendments

This policy shall be reviewed whenever deemed necessary in response to brand evolution, business exigencies or regulatory requirements. Any additions prior to a review shall be done as addendums to the policy in the interim.