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Name:	<i>External Communication Policy</i>
Level:	<i>Stanbic IBTC Asset Management Limited</i>
Classification:	<i>External Use</i>
Owner:	<i>Head, Customer Experience Department</i>
Approved by:	<i>Executive Committee</i>
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Contact:	Head, Customer Experience investments@stanbicibtc.com

Classification

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External Communication Policy

1.0 Policy Statement

Stanbic IBTC Asset Management Limited (“the Company”) recognizes the importance of two-way communication in the long-term survival of an organization. Therefore, it is important that both internal and external communications are clear, and all stakeholders carried along. With our multiple communication channels, customers and non-customers can easily reach out to the organization.

1.1 Objectives

The External Communication Policy (policy) aims to enlighten both customers and non-customers of Stanbic IBTC Asset Management Limited on the rules of communication, the channels of communication, use of company’s communication facilities, representation of the company in the media and third parties, confidentiality of company information and procedures, as well as how customers and prospects can access their Mutual Fund Investments and other investments.

1.2. General Principles

1.2.1. All spokespersons who speak on behalf of Stanbic IBTC Asset Management Limited, its business units or subsidiaries must make media statements in line with the organization’s core values.

1.2.2. Employees who are not official spokespersons of the organization are NOT allowed to communicate with the media and upon receipt of a media enquiry, must refer such to the Corporate Communications Manager of the Company.

1.3. Guidelines

1.3.1. Hoisting of the Annual Financial Reports

- The Financial Reports of the organization are reviewed by the management and the External Auditors and recommended to the company board of directors for approval before hosting the abridged financial report on the company’s website.

1.3.2. External Communication

The Chief Executive (CE) is responsible for approving all external communications on behalf of Stanbic IBTC Asset Management Limited. All press releases, photo news etc. as regards the organization must also have the concurrence of the Corporate Communications Manager and the ED, Business Development Directorate.

1.4. Communication Channels

Stanbic IBTC Asset Management Limited is reachable via any of the channels listed below:

1.4.1. Website

The Company's website address is www.stanbicibtcassetmanagement.com. From our website, general information about our products and services can be accessed via our [Frequently Asked Questions](#) page.

1.4.2. Call Centre

The Stanbic IBTC Asset Management Limited contact centre is easily accessible in English. Simply dial 02012801266, 02012805595 or 0700 0080 0900 to speak with us.

1.4.3. Email Address

The Company's official email address is investments@stanbicibtc.com. Asset Management related enquiries can be channeled via this email address for prompt response.

1.4.4. Branch Network

Stanbic IBTC Asset Management Limited has its presence in Lagos, Port Harcourt and Abuja. Customers can also visit any Stanbic IBTC Bank Branch across the country for any Asset Management related request/issues.

1.4.5. Physical Letters

All physical/official letters to Stanbic IBTC Asset Management Limited should be delivered at the nearest Stanbic IBTC office or via email to investments@stanbicibtc.com. All letters should be addressed to:

The Chief Executive
Stanbic IBTC Asset Management Limited
First Floor, Building B
Walter Carrington Crescent, Victoria Island, Lagos

1.4.6. Digital Channels

Stanbic IBTC Asset Management Limited is reachable anytime and anywhere via the digital channels listed below:

- **The Stanbic IBTC Mobile App** – This is easily accessible on mobile devices via the iOS App Store and Google Playstore. With the Mobile App, clients can view their mutual funds investment account details, update their biodata, redeem their investments, top up their investment, buy new funds and request investment statement and many other service features.
- **Stanbic IBTC Web Portal** - Which is accessible via www.stanbicibtcfundmanagement.com and clients can view their mutual funds investment account details, update their biodata, redeem their investments, top up their investment, buy new funds, request investment statement and many other service features.
- **BluNest** - Which is accessible via www.blunest.stanbicibtcassetmanagement.com/ can be used to create mutual funds profile for onboarding, fund wallet, buy any new mutual fund product, buy other investments, view mutual funds account details, redeem from your investments, request for investment statements or reference letters, setup direct debit orders (Auto-save), update their biodata and many more features.

- **Social Media** - Stanbic IBTC Asset Management Limited equally has a strong online presence (@stanbicibtc) on social media platforms for example, X (Twitter), Facebook, LinkedIn, YouTube, etc.

2.0 Applicability

The policy applies to all employees of Stanbic IBTC Asset Management Limited (that is full-time employees, non-full-time employees, temporary/contract employees), its customers, prospects, third parties or vendors and the general public.

3.0 Minimum Requirements to Comply with this Policy.

3.1. Print Publication and External Media Relations

- The engagement of all new publications must receive the written approval of an Executive Director (ED) and the Corporate Communications Manager, or the CE. All such approved publications must clearly indicate who the editor(s) is (are) by showing the full name(s) at the end of each publication. Any publication with an unknown author is strictly prohibited.
- All official communications intended for external circulation must be approved by an ED, the Corporate Communications Manager, or the CE to ensure conformity with company regulations.
- All official Company publications, banners, flags, signposts, billboards, etc., using the Company's logo, must be in the format and colours approved by the Executive Director (ED), Business Development and the display must be in accordance with Stanbic IBTC Asset Management Limited policy relating to corporate and visual identity.
- Internal publications are restricted to the business activities of the department and are for internal circulation only with the approval of the "Head of Department and the Head, Human Capital & Administration".
- All Company communication and press releases shall emanate from such other person or entity authorised by the Corporate Communications Manager.

3.2 Media Relations

3.2.1. Departments or individuals are NOT authorised to speak to or write in the media directly or indirectly on matters concerning the organization unless so authorised by the CE. The Corporate Communications Manager is responsible for all official contacts and interactions with the media.

3.2.2 For the purpose of the Nigerian market, bearing in mind the peculiarities of our regulatory system, there are three sets of spokespersons with different groups of interaction with media.

Group A:

The CE is the official spokesperson for the company. Only the CE is allowed to speak to the media on behalf of the organization.

Group B:

This group consists of:

- The CE who can speak for ALL areas of the organization.
- The Executive Directors of the organization can speak for only areas of their businesses; for example, ED, Business Development Directorate (BDD) would speak for all areas of BDD.
- The Head of Finance can speak on the company financials and investor relations matters.

- iv. The Corporate Communications Manager can speak to the media with the approval of the CE.
- v. The Corporate Communications Manager is allowed to provide holding statements to the media without recourse to any of the group categories.

Media Quotes: Only the above persons may be quoted in news releases or advertorials on matters described above.

Group C:

This group consists of:

- i. Subject Matter Experts who can speak only on their areas of expertise in thought leadership capacities.
- ii. Group C spokespersons can only speak with approval from an Executive Director in their business areas. The Executive Director is accountable for the performance of the Group C spokesperson at any speaking engagement.
- iii. Group C spokesperson must undergo the staff media training prior being nominated to speak on behalf of the business.

3.3 Internet Communications

Employees are NOT authorised to publicly post confidential or proprietary information of Stanbic IBTC Asset Management Limited online e.g., on social media, blogs, and chatrooms. etc. Employees are prohibited from revealing sensitive information about the organization, its employees, clients that could result in breach of data privacy, information security or physical security. All content must be approved in accordance with section 3.1 above.

3.4. Reputational Risk Management

- i. It may happen, from time to time, that Stanbic IBTC Asset Management Limited receives publicity in the media that may have a damaging effect on its reputation. Such media could be newspapers, magazines, television, radio or the internet.
- ii. Unless the published comments directly mention Stanbic IBTC Asset Management Limited and not a general reference to the asset management industry, Stanbic IBTC Asset Management Limited will not respond.
- iii. In the event that Stanbic Asset Management Limited receives publicity that has a medium to high risk of harming its reputation, the Corporate Communications Manager will consult with the CE for a final position to take in responding to the media.
- iv. The Company and its business units are NOT to respond in writing to letters of criticism that are transmitted to the media by employees (current or past), stakeholders or customers without the express approval of the CE and the Corporate Communications Manager. Where possible, the Company prefers to come in direct contact with the writer/s of such letters in order to resolve the issue(s).

3.4 Crisis Communication

- Stanbic IBTC Asset Management Limited recognizes the importance of effective communication to its employees, customers, the media and other stakeholders during a crisis situation. In general, a crisis can be any incident that is likely to have a significant adverse, severe, or catastrophic impact on the business or reputation of the organization and its business units.
- During a crisis, the CE and the EDs (where relevant) are the **ONLY** authorised spokespersons for the organization. Other spokespersons may be selected and

assigned to communicate with any of the following groups: employees, customers, and shareholders- in line with the Business Continuity Management Policy.

- Crisis communication will be done in accordance with the Business Continuity Management Policy.
- When a crisis arises in Nigeria, the CE will communicate the crisis to the Risk Management Committee as soon as practically possible.

3.5. Outside Business Interest Communication

3.5.1. Stanbic IBTC Asset Management Limited recognizes that staff members may have outside business interests or hobbies that they engage in outside office hours. When a staff member receives a media request (print, electronic or digital) to speak on their personal business interests/hobbies, they **MUST** receive clearance from the Compliance team with appropriate notification to the Brand & Marketing Manager.

Staff members are also to ensure that they state categorically through a caveat statement that their views/utterances are personal and in no way representative of the views of their employer.

3.5.2. Where a member of staff who is part of an interest group or is representing an interest group as a spokesperson is requested to engage the media as part of his representation; the staff is required to seek approval from the Compliance team, notifying the Corporate Communications Manager.

4.0 Exceptions

- i. There are no exceptions to this policy.
- ii. In cases of crisis, please refer to session 3.4 (Crisis Communication).
- iii. It should be noted again that ignorance or claimed ignorance shall not be accepted as an excuse for acts or omissions contrary to these rules.
- iv. All breaches of these rules shall attract disciplinary action against the employee.

5.0 Roles & Responsibilities

5.1 Chief Executive

- Chief spokesperson for the organisation.
- Oversees and provides final approval to the Corporate Communications Manager on communication matters.

5.2 Executive Directors, Head of Finance, Business Heads

- EDs, Head of Finance and Business Heads are to speak on behalf of their business areas or as authorised by the CE.

5.3 Corporate Communications Manager

- Provides holding statements where required, speaks on marketing campaigns and other strategic issues as agreed.
- Ensures that the company is positively and accurately represented in public and the media, with coherent information that is in line with the company and its policies.

- Ensures that authorised information to be released to the media is coordinated centrally through company authorised channels to ensure proper and effective dissemination both externally and within the Company.
- Ensures that for the purposes of disseminating information, the Company engages strictly with publications that are properly defined and registered; and that the engagement with these publications contribute to the building and the positive promotion of the reputation and brand.
- Regulates the use of electronic media for dissemination of information and data. Clearly communicates all procedures relating to responses to third parties and the granting of press, radio, T.V., and public interviews on matters concerning the Company.

5.4 Board Risk Management Committee (BRMC)

- Approves Policy

5.5 Executive Committee (EXCO)

- Recommends the Policy for BRMC approval.

5.6 Head, Customer Experience

- Responsible for coordinating all forms of communication to customers.
- Responsible for managing information contained on the company's website.

5.7 Client Service Unit

- Responsible for responding to customers' enquiries via email, social media, live chats, and letters.

5.8 Human Capital & Administration Department

- Draws staff attention to their obligation of maintaining confidentiality relating to Company matters.
- Grants approval for dissemination of internal communication to all staff.

5.9 Compliance Unit

- Assesses requests for media engagement by staff on their outside business interest and provides the required approvals.
- Provides approval for Compliance related communication to customers.

5.10 Internal Audit Unit

- Responsible for reviewing the process and ensuring implementation and compliance with this policy.