

Access Bank (SL) Limited Policy on External Communication

TABLE OF CONTENTS

CONTENT	PAGE
Document Information	2
Table of Contents.	3
Executive Summary	4
Introduction.....	4
Scope	4
Related Documents.....	
Objectives.....	4
Period Review.....	4
Stakeholders.	5
General Guidelines.....	5
Outgoing Business Letters.	5
Electronic Mail	7
SMS	8
Brands & Advertising	8
Media.....	9
Social Media.....	10
External Presentations	12
Endorsements and use of Logo.....	12

Roles & Responsibilities..... 13 .
Definitions..... 14

Conclusion..... 15

Apendix... .. 15

1.0 EXECUTIVE SUMMARY

This document stipulate guidelines for external communication covering printed materials, electronic materials, digital content and media relations. The document outlines how stakeholders should manage all external engagements including outgoing letters, emails, SMS, advertising content (on radio, TV, print,), digital communications, social media and media management. It is aimed at ensuring standardization and professionalism in our engagement with customers, prospects, investors, media and the public. All employees, directors, contractors, advisors and consultants of the Bank and its affiliated entities are expected to comply with these with guidelines.

2.0 INTRODUCTION

Effective management and coordination of the Bank’s communication across touch points with a measure of clarity and consistency in tone, language, message, and manifestation is essential. This policy is intended to provide guidelines on external communication and ensure all engagements with customers, the media and the public are conducted professionally.

3.0 SCOPE OF THE POLICY

This policy applies to all employees of the Bank, directors on board of the Bank, contractors, advisors, investors, and consultants of the Bank and its affiliated entities and covers all external communications using various mediums including but not limited to:

- **Printed Materials** such as Print advert, Brochures, Proposals, Letters, etc.
- **Electronic Materials** such as SMS, Email, E-flyer, Newsletters
- **Digital Content** such as TV commercials, audios, videos postings to Social Media sites or Websites., online PR etc

- **Media relations** such as requests for interviews, news releases, and media inquiries and crisis management

4.0 RELATED POLICIES/DOCUMENTS

1. Operational Framework for Access Bank Communications Policy
2. Policy on Customer Engagement During Service Failures and Disruptions
3. Social Media Policy
4. Policy on Signing of Outgoing Business Letters and Emails

5.0 OBJECTIVES

- i. To provide guidelines on external communications and ensure compliance by all stakeholders to avoid negative exposures that could cause potential risks to the Bank's reputation
- ii. To ensure that all external engagements with customers and the media conform to the Bank's standards and are conducted professionally

6.0 PERIOD REVIEW

This policy shall be reviewed and revised as the need arises in line with trends and developments in the bank and financial service industry or regulations, but the document shall be reviewed annually at the minimum based on the risk rating.

7.0 STAKEHOLDERS/AFFECTS

- i. All staff of Access Bank Sierra Leone, directors on board of the Bank, contractors, advisors, investors, and consultants shall be guided by the provisions of this document
- ii. The policy applies to all external communications through email, SMS, print, online, including social media, radio, TV, all kinds of interviews, news releases and general media enquiries

8.0 GENERAL GUIDELINES

All external communications must be guided by the following:

- i. The Message- The message content must be Accurate, Current, Credible and Decent. This means:
 - ❖ the message must connect our brand with the emotions of our diverse market segment
 - ❖ the message should be relevant as at when deployed
 - ❖ the information must be accurate for credibility
 - ❖ the message should not be misleading
 - ❖ the message/promise should be credible to maintain or build the trust of our customers
 - ❖ the message should not in any way be offensive

- ❖ the message should not be obscene, indecent or contain any explicit text or graphic representation, pertaining to sexual contact or conduct or contain an offensive level of sexual under or overtone, religion and politics
 - ❖ the message must always be socially correct and responsible
 - ❖ the language and tone should not be offensive
- ii. The Brand - All external communication must be reviewed and approved by Country Managing Director, Head, Corporate Communications to ensure messages reflect the 'Access Brand' for consistency in our brand positioning and representation
 - iii. Tone of Voice - When we communicate with our customers, we are always positive, clear and supportive

9.0 OUTGOING BUSINESS LETTERS

Access Bank Sierra Leone recognizes that properly written letters can positively impact its business and effective communication can shape the Bank's reputation, develop clientele, improve productivity and promote operational efficiency. The Bank places high premium on the quality, content and style of business communication and therefore encourages employees writing on behalf of the Bank to be professional in their choice of words to achieve clarity. In addition, such business letters should be concise, positive in tone and able to persuade or influence the intended recipient of the correspondence.

A business letter is a letter written in formal language for and on behalf of Access Bank Sierra Leone to another business organization, regulatory bodies, other government agencies, suppliers, shareholders, customers, employees and other external parties. A business letter or correspondence may be originated by any Strategic Business Unit (SBU) and/or Strategic Support Unit when there is the need or requirement for the Bank to communicate ideas or information.

- i. All letters must be complete, clearly worded, accurate and consistent with the Bank's policy
- ii. All letters must have a minimum of two signatories, only the CMD, and Executive Directors can be sole signatories to any outgoing letter
- iii. Page number on the document shall be on the lower part of the right margin
- iv. Reference numbers on the document shall provide information on the originating division/branch or unit. The reference number shall be derived from the following components:
 - i. Originating Division and unit
 - ii. Initials of originator of correspondence
 - iii. Initials of person typing
 - iv. Serial number of the letter
 - v. Month
 - vi. Year
- v. The spacing between each paragraph shall be one-line space
- vi. The date on the document shall be in the following format: mm (month) dd (day) yyyy (year). The use of alternatives styles (i.e. 1st, 2nd, 3rd etc.) for denoting day of the month should be used
- vii. Formats below will be used for letters to ensure standardization and uniformity:

Description of item	Required task	Font size	Font type
Reference number	Use Uppercase	No. 12	Arial
Date	Use Title Case	No. 12	Arial
Title/Address	Use Title Case	No. 12	Arial
Attention	Use Uppercase (Bold)	No. 12	Arial
Dear Sir,	Use Title Case	No. 12	Arial
Subject	Use Uppercase (Bold & Underline)	No. 12	Arial
Contents of letter	Use Sentence case	No. 12	Arial
Closing	Use Sentence case	No. 12	Arial
Name of Authorised Signatory	Use Title case (Bold)	No. 12	Arial
Title of Authorised Signatory	Use Upper case (Bold)	No. 12	Arial

For additional details, please refer to Policy on **Signing of Outgoing Business Letters and Emails- ABP.CIC.0212.063**.

10.0 EMAIL

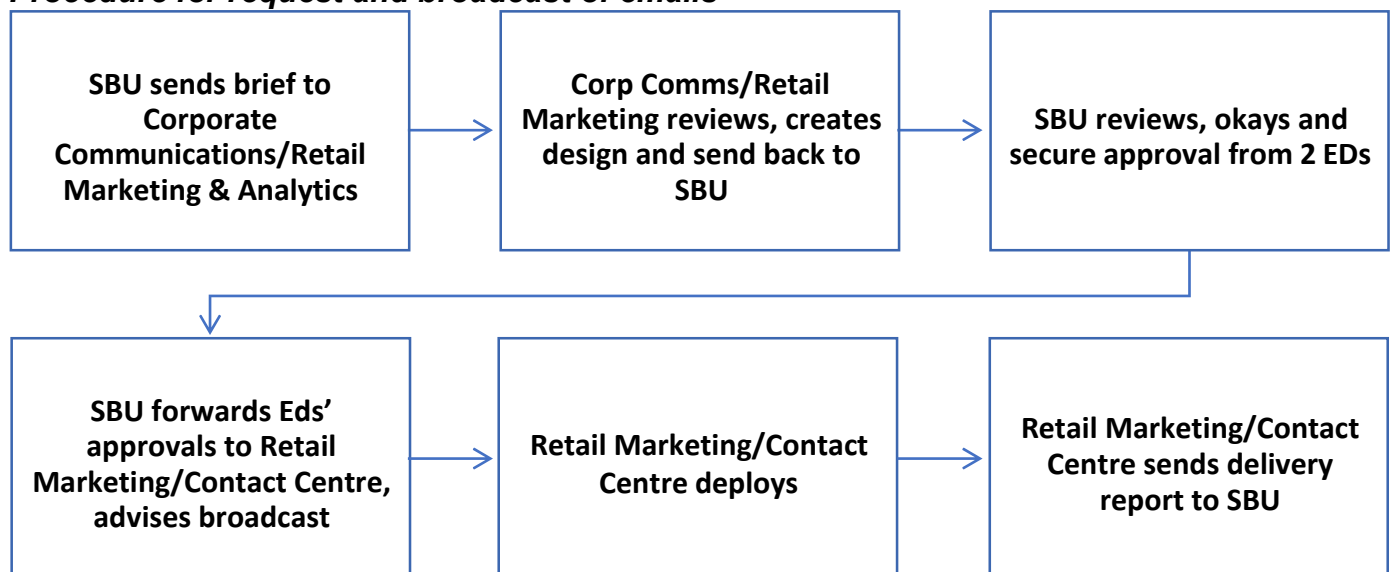
Email is an important channel of communication with our customers as it is fast, efficient and cost effective. Messages sent via email include but are not limited to: general information, product specific and Customer Relationship Management information

- i. All email drafts should be reviewed by the Head, Customer Experience for concurrence
- ii. All email to customers must be approved by Head, Corporate Communications or designated staff regarding content, design and style
- iii. Under no circumstance should bulk email messages be sent out to customers without the review and approval of Country Managing Director, ED Operations and I.T and Head, Corporate Communications or designated staff

- ❖ **The Frequency-** To prevent a wallpaper effect, while ensuring customers are not burdened with too many messages, the following guidelines must be followed:
 - E-mail – Not more than 2 emails will be sent to a customer in a week except in cases of emergencies e.g. unscheduled downtime or maintenances or regulatory notices

- ❖ *The Subscription Option* – In all unsolicited mails/newsletters, there must be an option for customers to unsubscribe (or opt out), unless it is an important notification on regulatory issues or account transaction
- ❖ *Important Notification- Customers must be notified of the following:*
 - *Service Downtime:* For all service disruptions customers must be notified a minimum of 2 days ahead of the start day and after
 - *Regulatory Notification:* All Bank of Sierra Leone regulatory circular concerning customers must be simplified and communicated to customers a minimum of one-week post Management's approval

Procedure for request and broadcast of emails



11.0 SMS

SMS (Short Message Service) is an important medium of communication with our customers. The SMS channel is employed when:

- a. Information targets a small group of customers
 - b. Database of targeted customers don't have email address
 - c. Information directly affects customer(s)
 - d. Invitation to an event
- I. SMSs must be reviewed and approved by Country Managing Director, E.D Operations and I.T, and Head, Corporate Communications/designated staff
 - II. Under no circumstance should bulk SMS be sent out without the review and approval of CMD, ED Operations and I.T and Head, Corporate Communications.

- III. Not more than 2 SMSs will be sent to a customer in a week except in cases of emergencies e.g. unscheduled downtime or maintenances or regulatory notices

Procedure for request and broadcast of SMS

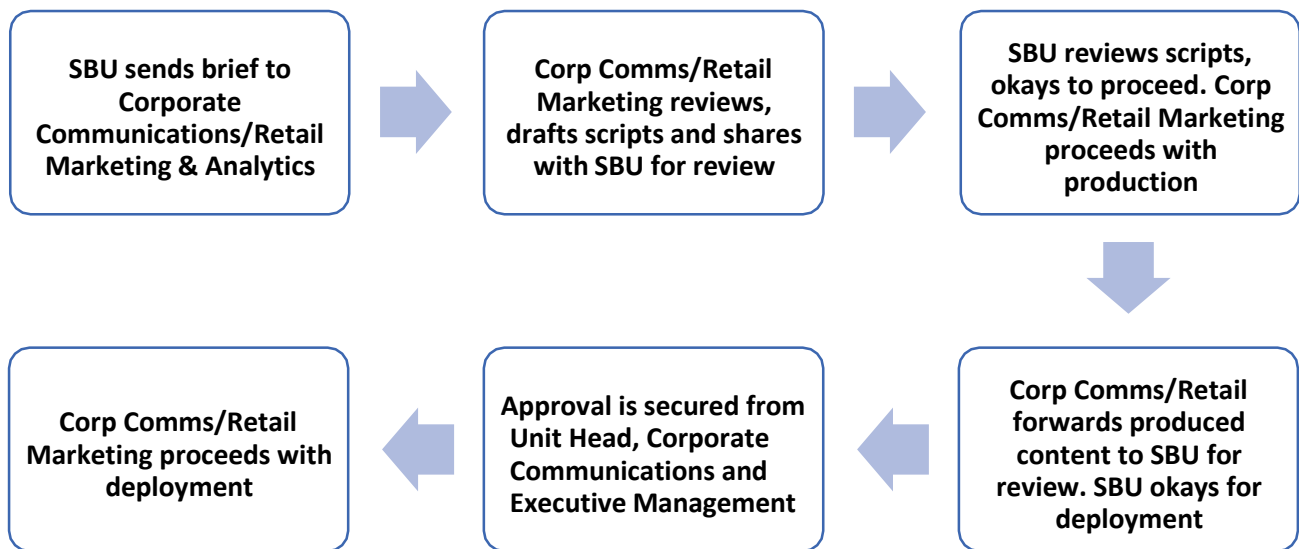


12.0 BRANDS & ADVERTISING

Access Bank Sierra Leone recognizes advertising as a very effective medium for reaching the target market. To ensure professionalism, the following guidelines shall apply to Brand and Advertising as an effective medium for product and corporate promotional activities:

- i. Corporate Communications is responsible for developing the Bank's annual communication plan
- ii. Corporate Communications shall liaise with Retail Marketing to harmonize Retail and Corporate brand plans. This is to ensure all marketing plans align with the global brand strategy and narrative
- iii. Corporate Communications shall ensure that the Bank's communication plan is approved by Management through Group Head, Corporate Communications or designate
- iv. All advertising requests/briefs shall be routed through Retail Marketing/ Corporate Communications
- v. All press ads, radio/TV/video scripts/production must be approved by CMD, E.D and Head, Corporate Communications
- vi. Request for publication in brochures should be routed through Retail Marketing/Corporate Communications to be advised on the appropriate material
- vii. Corporate Communications shall carry out a quarterly Brand Audit in all Access Bank locations (HO, Annexes, Branches and POS) with a full report made available to the relevant units for implementation of action points
- viii. All Access Bank Sierra Leone advertising (TV ad, Radio ad, print materials,) must be approved by CMD, ED and Unit Head, Corporate Communications or designate staff

Procedure for request and deployment of advertising content (TV, radio, print,)



13.0 MEDIA

Media requests include anything intended to be published or viewable to the public in some form such as television, radio, newspapers, newsletters, and web sites.

- i. Corporate Communications is responsible for cultivating and managing relationship with the media
- ii. All press conferences/releases will be coordinated and managed by Corporate Communications
- iii. Corporate Communications is responsible for organizing press/media activities around events to portray the bank's corporate image or products/services in a positive light
- iv. Only designated staff in Corporate Communications are mandated to respond to media inquiries about the Bank
- v. Employees should not speak to the press/media on matters relating to the Bank without clearance from Corporate Communications or Executive Management
- vi. Only Executive Management, Divisional Directors, Unit Heads and designated staff are authorized to represent the Bank in interviews, press conferences, news publications and press releases
- vii. Other employees may represent the Division if approved by one of these individuals to communicate on a specific topic
- viii. All information must be professional and true. Corrections must be issued when needed

- ix. Personal opinions generally do not belong in official Bank's statements. One exception is communication related to promoting the Division, its product or services. For example, if an employee posts on the Bank's Facebook page, *"My family went shopping this weekend at the Freetown International Airport Shopping Mall, and we were given a brand-new bike for paying with my Access Visa Card. We were pleasantly surprised"*
- x. All Employees should seek assistance from the responsible office/team on this topic
- xi. Where an employee of the Bank grants audience to the media in his private capacity, the name of the Bank and its business should not form part of the discussion

13.0 MEDIA- DO'S AND DON'TS

When in doubt, don't!

1. Do not speak to investors or the media on behalf of the Bank. You should not grant interviews or make any public statements without securing the permission of Corporate Communications
2. Never communicate confidential, market sensitive, business or client information to anyone outside the Bank; that includes family, friends and the press
3. Do not contribute to or engage in gossip, leaks, rumours or speculations about the Bank
4. If you are invited to do a speech or an external presentation where the Bank will be discussed, and that speech has the potential to impact on the corporate reputation of the bank, you must consult Corporate Communications
5. The name, logo or statements by employees cannot be used in the printed or electronic documents of suppliers, consultants, business partners or other partners, or other parties without the written permission of Corporate Communications

14.0 SOCIAL MEDIA & DIGITAL COMMUNICATIONS

Access Bank leverages on social media as a reliable channel of interaction with customers and potential customers. The major social media platforms include but are not limited to Twitter, Facebook, Instagram, LinkedIn, YouTube, Website and Blog. To ensure professionalism, the following guidelines shall apply to Social Media and Digital Communications:

- i. Corporate Communications is responsible for developing the Bank's Social Media Management Plan and policy
- ii. **New digital assets shall not be created without approval from Country Managing Director and Unit Head, Corporate Communications**
- iii. Corporate Communications will advise and oversee Access Bank Sierra Leone digital assets including website and social media platforms
- iv. Corporate Communications/ Retail Marketing and Analytics shall liaise with Contact Centre to respond to customers' complaints, enquiries and requests
- v. Corporate Communications shall ensure that the Bank's Digital Communication plan is approved by Executive Management through Country Managing Director, Corporate

- Communications or designate vi. All Social Media posts must be approved by Country Managing Director, E.D Operation & I.T and Unit Head, Corporate Communications
- vii. Request for website banner and page creations should be routed through Corporate Communications to be advised on the appropriate content
- viii. Corporate Communications is responsible for the management of the Bank's website and the digital sites
- ix. Corporate Communications shall book choice sites/platforms within or ahead of the next financial year for relevant digital advertising campaigns
- x. These sites/platforms will be managed by Corporate Communications and allocated for relevant campaigns

Guidelines for Employees' Personal behavior on social media: There is a big difference between speaking 'on behalf of' the Bank and speaking 'about' the Bank.

The following set of 5 principles refer to those personal or unofficial online activities where associates may refer to or speak about Access Bank:

1. Adhere to the Employees Code of Professional Conduct and other applicable policies. All Bank employees, Management, and officers are subject to the Bank's Code of Professional Conduct in every public setting. In addition, other policies, including the Confidential and Insider Information Policy, govern employees' behavior with respect to the disclosure of information; these policies are applicable to personal activities online
2. You are responsible for your actions. Anything you post that can potentially tarnish the Bank's image will ultimately be your responsibility. We do encourage you to participate in the online social media space, but urge you to do so properly, exercising sound judgment and common sense.
3. Scout for compliments and criticism. Even if you are not an official Digital Marketer for the Bank, you are one of our most vital assets for monitoring the social media landscape. If you come across positive or negative remarks about the Bank or its brands online that you believe are important, you are encouraged to share as indicated below.

Negative mentions: depending on the perceived severity, please forward to the under listed:

High

- operationalriskmanagement@accessbankplc.com
- StrategicReputationalRiskManagement@ACCESSBANKPLC.com
- legal@accessbankplc.com
- mediarelations@accessbankplc.com
- access.socialmediacomm@accessbankplc.com
- contactcenter@accessbankplc.com customerexperienceunit@accessbankplc.com
- sierraleonecorporatecommunication@accessbankplc.com

Medium

- sierraleonecorporatecommunications@accessbankplc.com
- mediarelations@accessbankplc.com
- access.socialmediacomm@accessbankplc.com

-sierraleonecontactcenter@accessbankplc.com

Positive mentions- please share with the under listed teams:

-sierraleonecorporatecommunication@accessbankplc.com

mediarelations@accessbankplc.com

-sierraleonecontactcenter@accessbankplc.com

4. Let the subject matter experts respond to negative posts. You may come across negative or disparaging posts about the Bank or its brands or see third parties trying to spark negative conversations. Unless you are an approved spokesperson or social media strategist, resist the temptation to react yourself. Pass the post(s) along to our officials as indicated in this section
5. Be conscious when mixing your business and personal lives. Online, your personal and business personas are likely to intersect. The Bank respects the free speech rights of all of its associates, but you must remember that customers, colleagues and supervisors often have access to the online content you post. Keep this in mind when publishing information online that can be seen by more than friends and family and know that information originally intended just for friends and family can be forwarded on.

Remember, NEVER to disclose nonpublic information of the Bank (including confidential information) and be aware that taking public positions online that are counter to the Bank's interests might cause conflict.

For additional details, please refer to policy on **social media**- ABP.CCG.0215.007.

15.0 EXTERNAL PRESENTATIONS

To protect Access Bank's proprietary information and ensure that external communications conform to the Bank's standards of accuracy, content, and style:

- i. All invitations for external speaking engagements that involve the Bank's corporate position, policies or products with the potential to impact on the corporate reputation should be referred to the Corporate Communications Team
- ii. Proposed disclosures and announcements about significant new Access Bank business ventures, including joint ventures with other companies, should be referred to the Corporate Communications Team or Investor Relations. This referral will be determined by the relevant context and reporting function
- iii. Except for marketing presentations, participation in public programs such as panels and conferences in collaboration with other organizations such as the BSL, FIU, SLACB, etc should be referred to Corporate Communications for guidance. The Media and PR Unit of Corporate Communications will review talking points to ensure protection of the Bank's reputation.

16.0 ENDORSEMENTS AND THE USE OF ACCESS BANK LOGO

- i. Access Bank does not allow the use of its name, logo or statements by its employees in the printed or electronic documents of suppliers, consultants, business partners or other partners or other parties without the written permission of the Bank's Corporate Communications department
- ii. Periodically, organizations external to Access Bank Sierra Leone may seek information from the Bank in the form of surveys, or other data-gathering exercises, entry in external competitions, or cite projects in marketing materials. Participation in such activities is expressly prohibited without the direct approval of Corporate Communications.

17.0 ROLES AND RESPONSIBILITIES

Item	Roles	Responsibility
Outgoing Correspondence	Design of letterhead and provision of guidelines	Corporate Communications
	Production & distribution of stationery	EBS
	Drafting, printing & deployment of letters	EBS
	Review & Approval	Corporate Communications/SBU
Emails	Drafts	SBU
	Review & design	CX/Retail Marketing & Analytics/Corporate Communications
	Approvals	2 EDs
	Deployment	Contact Centre/As approved
SMS	Drafts	SBU
	Review	CX / Retail Marketing & Analytics/Corporate Communications,
	Approval	2 EDs
	Deployment	Contact Centre/As approved
Print	Design	Retail Marketing & Analytics/Corporate Communications
	Review	SBU
	Approval	Corporate Communications & Executive Management
	Deployment	As approved

Radio ad	Script	Retail Marketing & Analytics/Corporate Communications
	Review	SBU (where applicable)
	Production	Retail Marketing & Analytics /Corporate Communications
	Approval	Corporate Communications, Executive Management
	Deployment	As approved
TV ad	Script/story board	Retail Marketing & Analytics /Corporate Communications
	Review	SBU (where applicable)
	Production	Retail Marketing & Analytics /Corporate Communications
	Approval	Corporate Communications, Executive Management
Billboards/Digital Screens/Lamp poles	Design/adaption	Retail Marketing & Analytics /Corporate Communications
	Approval	Corporate Communications, Executive Management
	Deployment	Corporate Communications/Retail Marketing & Analytics
	Monitoring	Corporate Communications
Press Release	Brief	SBU (where applicable)
	Draft	Corporate Communications/Retail Marketing
	Review	SBU/Retail Marketing & Analytics (where applicable)
	Approval	Executive Management
Press Conference	Brief	SBU/Retail Marketing (where applicable)
	Coordination	Corporate Communications
	Delivery	Corporate Communications
	Approval	Executive Management
Collaterals	Design	Corporate Communications
	Review	SBU/Retail Marketing (Where applicable)
	Approval	Corporate Communications
	Production	EBS
Architectural Designs	Design	EBS
	Review	Corporate Communications

	Approval	Corporate Communications/Executive Management
	Production	EBS

18.0 DEFINITIONS

Unless outrightly stated to have another meaning as expressed in this Policy, the following words have the following meanings:

External Communication is the transmission of information between a business and another person or entity in the company's external environment. Examples of these people and entities include customers, potential customers, suppliers, investors, shareholders, and society at large

Advertising: A marketing communication that is intended to influence the buying behaviour of customers and attract new customers to a product/service. Access Bank employs the use of traditional media such as TV, radio, prints, and new media such as social media, search, blogs, and websites

Media: Means of communication which have functions such as informing, raising awareness, education, socialization, entertainment, and agenda setting, including all kinds of oral, written and visual images

Social media: The use of online applications to facilitate networking and communication between individuals, groups, and organizations. This includes, but is not limited to blogs, microblogs, photo sharing sites, video sharing sites, online forums, chat rooms, wiki's, online media forums, online multiplayer game platforms, geospatial sites, and instant messaging

Website (where relevant): Refers to Access Bank's website, where information is available to employees and other interested persons or organizations

Associates: Includes all employees, agencies, vendors, and suppliers (and their staff or third parties)

Directors: All Directors of Access Bank Sierra Leone Limited

Staff and Employees of the Bank including employees engaged on full time permanent basis and employees who are contracted on a temporary basis

Customer/Client: an entity or person(s) whether organized for profit or not with whom Access Bank has a business relationship.

19.0 CONCLUSION

All guidelines stated in this Policy have been carefully drafted to protect Access Bank and positively position the brand in the minds of the public as a unified entity that communicates in a consistent, positive, clear and supportive manner.

Violation of this Policy by any Access Bank associate could lead to disciplinary action and/or termination of engagement. Hence, all associates are encouraged to take this policy seriously and ask for clarification if any of the terms stated seem ambiguous or unclear.

APPENDIX A

Negative Comment	Risk Rating
<ul style="list-style-type: none"> • Brand Related • Executive Management Team • Aggrieved Ex Staff • Service Failure (online banking failure, dispense error, debit alert, etc) 	High
<ul style="list-style-type: none"> • Account Closure • Fraud • Human Rights Abuse • Safety Incidences • Penalties/Fines/Sanctions • Financial crime (AML/CFT) 	High
<ul style="list-style-type: none"> • Bank Charges • Customer Services issues • Product related • Customer 	Medium