




GREENWICH MERCHANT BANK LIMITED
STAKEHOLDER COMMUNICATIONS POLICY

VERSION CONTROL

Revision of this document is the principal way of implementing and communicating changes that may arise in response to the changing needs and requirements of the Bank overtime. The Head, Corporate Communications shall recommend the review of this document for its completeness, adequacy, and alignment to business imperatives (current and future) on an annual basis as specified in the guidelines, or as the need arises.

POLICY AUTHORIZATION

Name	Representing	Approval	Date
CHAIRMAN Mr. Kayode Falowo	BOARD OF DIRECTORS		August 6, 2024
CHAIRMAN Mrs. Yemi Lowo-Adesola	GOVERNANCE & NOMINATIONS COMMITTEE		July 5, 2024
AG. Managing Director Mr. Benson Ogundeji	EXECUTIVE MANAGEMENT		July 5, 2024
Chief Compliance Officer Mr. Tayo Lawal	Compliance		July 5, 2024

1. Introduction

Greenwich Merchant Bank Limited (GMBL), including Greenwich Securities Limited and Greenwich Asset Management Limited (collectively, "GMBL"), recognizes the importance of open, transparent, and consistent communication with all its stakeholders. This policy establishes the principles and practices that guide our communication efforts to foster trust, enhance understanding, and build strong relationships with all stakeholders.

This Stakeholder Communication Policy is a public document and is available on the Bank's website at [<https://www.greenwichbankgroup.com/>].

2. Our Stakeholders

GMBL recognizes a diverse range of stakeholders whose interests and needs we strive to understand and address. These stakeholders include:

- i. **Customers:** Individuals, businesses, and institutions who utilize our banking products and services.
- ii. **Investors:** Individuals and institutions who have invested in GMBL's equity or debt instruments.
- iii. **Employees:** The talented individuals who drive GMBL's ongoing success and innovation.
- iv. **Regulators:** Governmental bodies such as the Central Bank of Nigeria (CBN), Nigeria Deposits Insurance Corporation (NDIC), Securities and Exchange Commission (SEC), and Nigerian Stock Exchange (NSE) who oversee the banking industry and ensure financial stability.
- v. **Media:** Journalists and media outlets that play a vital role in informing the public about GMBL's activities and the financial sector.
- vi. **Analysts:** Financial analysts who provide research and insights to investors about GMBL's performance and future prospects.
- vii. **Local Communities:** The communities where GMBL operates and has a social responsibility to contribute positively.

3. Communication Objectives

The overall objective of the policy is to:

- i. Build trust and credibility with all stakeholders by providing accurate, timely, and transparent information, as required by applicable regulations.
- ii. Enhance transparency and accountability for investors and the public by clearly communicating GMBL's business activities, financial performance, and decision-making processes through quarterly reports, press releases, and investor calls.
- iii. Promote understanding of GMBL's offerings, strategies, and long-term vision, particularly for potential customers, by highlighting how GMBL's products and services can add value to their businesses.
- iv. Encourage open dialogue and feedback: GMBL values two-way communication and actively seek feedback from stakeholders to improve our operations and services.
- v. Manage reputation effectively: Proactive and transparent communication is essential for maintaining a positive reputation and mitigating potential reputational risks.

4. Communication Channels

GMBL utilizes a variety of communication channels tailored to reach each stakeholder group effectively:

- i. **Website:** The Bank maintains a website with readily accessible information, including financial reports, press releases, investor presentations, and other relevant materials. This policy itself will be hosted on the Bank's website.
- ii. **Annual Report:** The annual report provides a comprehensive overview of the Bank's financial performance, strategies, and governance practices.
- iii. **Press Releases:** GMBL issues press releases to announce material information, such as financial results, strategic initiatives, and regulatory updates.
- iv. **Media Relations:** The Bank maintains a professional relationship with the media to facilitate accurate and timely reporting.
- v. **Investor Relations:** GMBL is committed to clear and open communication with investors and analysts through regular conference calls, meetings, and presentations.
- vi. **Social Media:** While not a primary channel in this policy, GMBL may utilize social media platforms to share relevant content and engage with stakeholders.

5. Communication Strategies

GMBL employs various communication strategies based on the stakeholder group, the nature of the information, and the specific situation:

- i. **Proactive Communication:** Regularly disseminating information about the Bank's activities, performance, future plans, and industry trends through various channels.
- ii. **Reactive Communication:** Responding promptly and effectively to inquiries, complaints, media requests, and market developments.
- iii. **Crisis Communication:** Having a clear and well-rehearsed plan to communicate effectively during crisis situations to minimize reputational damage and ensure stakeholder safety.
- iv. **Two-way Communication:** Encouraging open dialogue and feedback from stakeholders through surveys, suggestion boxes, designated communication channels, and town hall meetings.

6. Disclosure of Information

GMBL is committed to timely and accurate disclosure of material information. We adhere to the following principles:

- i. **Continuous Disclosure:** We will disclose all material information in our annual and quarterly reports and other continuous disclosure documents in accordance with applicable regulations.
- ii. **Material Changes:** Upon the occurrence of a material change, the Bank will immediately file a report with the Central Bank of Nigeria (CBN) and other relevant regulators and issue a press release to inform stakeholders.
- iii. **Accuracy and Completeness:** All information disclosed will be accurate, complete, and free from misleading omissions.
- iv. **Non-Selective Disclosure:** Material information will not be selectively disclosed to specific individuals or groups. Any inadvertent disclosure will be promptly corrected and publicly announced.

- v. **Forward-Looking Information:** Any forward-looking statements will be clearly identified and accompanied by disclaimers outlining inherent risks and uncertainties.

7. Stakeholder Concerns

GMBL recognizes the importance of providing stakeholders with a mechanism to raise concerns about potential illegal or unethical practices. We encourage stakeholders to report such concerns through the following channels:

- i. Whistleblowing Hotline: Using the Bank's channels for whistle blowing as shown below:

Phone: 01-6370000

Whistleblowing: whistleblowing@greenwichbankgroup.com

- ii. Central Bank of Nigeria (CBN): Stakeholders have the right to report concerns directly to the CBN if they relate to the activities of the Board of Directors. By using the CBN whistle blowing channel below:

Email: anticorruptionunit@cbn.gov.ng

ethicsoffice@cbn.gov.ng

Phone contact: 09-46239246 & 09-46236000

- iii. Management: Concerns can be directed to any member of Bank management.
- iv. Chief Internal Auditor: The Bank's Chief Internal Auditor shall be responsible for receiving and investigating reports of potential misconduct.

8. Responsibilities

- i. **Board of Directors:** The Board is responsible for overseeing the development and implementation of this policy.
- ii. **Management:** The Executive Management Committee is responsible for approving key communication messages, ensuring alignment with the Bank's overall strategy, and providing resources for effective communication initiatives.
- iii. **Corporate Communications Department:** Leads the development and implementation of the communication strategy, coordinates communication activities across departments, serves as the primary point of contact for media inquiries, and manages GMBL's social media presence.
- iv. **Departmental Heads:** Collaborate with the Corporate Communications department to develop targeted communication plans for their respective areas.
- v. **All Employees:** Uphold the principles of this policy by communicating accurately, consistently, and professionally with stakeholders within their roles.

9. Contact Information

For questions regarding this policy or to communicate concerns, please contact us at:

HEAD OFFICE:

Address: Plot 1698A Oyin Jolayemi Street
P. M. B. 80074
Victoria Island
Lagos

Phone: 01-6370000

Contact us: customercare@greenwichbankgroup.com

Enquiries: info@greenwichbankgroup.com

Whistleblowing: whistleblowing@greenwichbankgroup.com

Cybersecurity: infosec@greenwichbankgroup.com

Data Protection: dpo@greenwichbankgroup.com

10. Monitoring and Review

This policy will be reviewed periodically, at least annually, to ensure its effectiveness in the evolving communication landscape. Feedback from stakeholders and industry best practices will be considered during such reviews.