



renewed for better
impact

87%

Access to financial services by unbanked rose to 1m subscribers

SUSTAINABLE FINANCE



ENGENDERING DIVERSITY

35.9%
female
employee

at *Manager level*

PEOPLE EMPOWERMENT



35,000
volunteering

hours expended in empowering 10,000 secondary school students

COMMUNITY SUPPORT



About 62%

reduction in IT energy consumption

ENVIRONMENTAL SUSTAINABILITY



What's inside this report?

2	GMD's Letter	66	Sponsorship platforms
4	Our business at a glance	70	Contributing to environmental sustainability
12	Renewed for Better Impact	74	Standards & Codes
14	Our Corporate Responsibility & Sustainability approach	84	Awards & recognition
20	Engaging our stakeholders	89	About the report
26	Corporate governance	90	Performance Management Metrics
30	Driving sustainable finance & Investments	92	GRI Conformity Table
40	Empowering people	99	Assurance
46	Supporting our communities		

01

GMD's Letter

Renewed for better impact



UK Eke, MFR
Group Managing Director,
FBN Holdings Plc

The financial services sector continues to experience challenging operating environment owing to the dwindling commodity prices and the associated impact on oil commodities-reliant economies such as ours. Despite these challenges, our commitment on building a sustainable business has remained unwavering. Since 1894, long before industry terminology focused on Corporate Social Responsibility which has evolved to a wider concept of corporate responsibility/Sustainability, FBN Holdings has continued to play a significant role in nation building and the development of the national and regional economy.

For us, being a sustainable business means a commitment to meeting the needs of our present and future stakeholders. It goes beyond financing economic activity in a responsible way to ensuring an inclusive, positive impact on our communities while minimising our negative impacts.

We have made important progress in some areas during the year. Particularly, we have further strengthened our foundations upon which to build our corporate responsibility & sustainability strategy. We have expanded our footprints across the West African coast including operations in Senegal, Democratic Republic of Congo, Gambia, Guinea, Sierra Leone and Ghana. We have also expanded the breadth of our offerings through our foray into the merchant banking space as well as making inroad into the general Insurance business through the acquisition of Oasis Insurance Plc which has now morphed into FBN General Insurance Limited. In addition, we are delighted to report that we have sought and obtained the approval of the

"...I believe that with the strong foundation we have put in place during 2015, we are better positioned to address challenges, as we renew our commitment to achieving more important milestones in our corporate responsibility & sustainability journey."

Board of FirstBank of Nigeria Limited to launch the environmental, social and governance management system (ESGMS) and we have commenced the full use this year. The deployment of the ESGMS is to effectively drive responsible lending and mitigate the associated environmental, social and governance risks.

Sustainability training, one of the key internal capability development opportunities is on-going. In partnership with First Academy and Accenture; FirstBank Sustainability Centre at the Lagos Business School and University of Edinburgh has developed specific modules designed to equip employees with the right knowledge, skills, attitudes and behaviours. We have phased the implementation of the training programme with a key goal to ensuring 70% of all employees are trained in 2016.

As a Group, we constantly strive to identify opportunities to create value for our numerous stakeholders and we are currently putting in place overarching policies and frameworks that will guide our corporate responsibility & sustainability programme in the future. We launched and published the FirstBank ESG policy; the FirstBank sustainability policy statement. We have also started drafting a Group Corporate Responsibility & Sustainability framework and policy for some of our subsidiaries, drawing from the broader sustainability framework from the holding company for the benefit of our stakeholders.

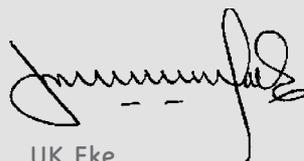
Financial literacy as well as sustainability thought leadership have remained fundamental focus areas of the Group and we have actively shown leadership in the

financial sector in 2015 driving our various partnerships with NGOs such as Junior Achievement Nigeria (JAN) and the Lagos Business School and University of Edinburgh with our FirstBank Sustainability Centre.

Despite the reasonable strides we have taken, we still have a significant way to go in our sustainability journey. One of the challenges we are currently dealing with is the aspect of sustainability performance management and reporting which has especially affected the way we measure our environmental sustainability initiatives. While we have clearly developed a performance and reporting process and have undergone some of the stages of the process which include defined key performance indicators (KPIs), data gathering has been a huge task given the size of the Group. We acknowledge that for effective reporting, we would require tools, and as such partnered with Accenture in putting this in place.

I believe that with the strong foundation we have put in place in 2015, we are better positioned to address these challenges, as we renew our commitment to achieving more important milestones in our corporate responsibility & sustainability journey.

Yours sincerely,



UK Eke
Group Managing Director,
FBN Holdings Plc

For us, being a sustainable business means a commitment to meeting the needs of our present and future stakeholders. It goes beyond financing economic activity in a responsible way to ensuring an inclusive, positive impact on our communities while minimising our negative impacts.

02

Our Business at a glance

*...FBN Holdings is the premier
and largest financial services
group in Nigeria.*





To become sub-Saharan Africa's financial services group



To provide the best financial services possible



Passion, People, Partnership

FBN Holdings Plc

FBN Holdings Plc (“FBNH”, “FBN Holdings” or the “Group”) is the premier and largest financial services group in Nigeria. FBN Holdings emerged from the erstwhile FirstBank group to effectively ring-fence the commercial banking business from other businesses, in compliance with regulation by the Central Bank of Nigeria (CBN). While retaining the diversity of the Group’s financial services businesses, the affiliates of FBN Holdings offer a full range of products and services across commercial banking, merchant banking, investment banking, and insurance business in 12 countries (Nigeria, United Kingdom, France, South Africa, China, UAE, Democratic Republic of Congo, Ghana, The Gambia, Guinea, Sierra Leone, and Senegal). The Group, employing over 18,660 staff, serves over 10 million active customers’ accounts, through more than 850 business locations and 2,750 ATMs. FBN Holdings boasts an excellent corporate governance structure underpinned by strong institutional processes, systems and controls.

FBN Holdings provides key levers for enabling development of the economies of Africa, beginning with its home base, Nigeria. The right mix of experience, business focus, excellent understanding of local environments, financial technology and competent people have translated the Group into one of Africa’s most dependable allies for long term growth and prosperity.

FBN Holdings provides key levers for enabling development of the economies of Africa, beginning with its home base, Nigeria

The Group maintains the drive to remain the undisputed leader in every business in which it participates; growing its franchise to become the financial services provider of first choice to all, including the next generation of Nigerians, and the broader sub-Saharan African market



10mn+

Active customer account base served through a large distribution network



7.5mn+ cards

*ATM Cards issued as at
December 2015

FBN Holdings' principal bank subsidiary is FirstBank of Nigeria Limited (FirstBank), a commercial bank with operations in 12 countries, which subsidiaries include FBNBank (UK) Limited, FBNBank in the Democratic Republic of Congo, Ghana, The Gambia, Guinea, Sierra-Leone and Senegal, First Pension Custodian Limited and FBN Mortgages Limited. Others are the Merchant Banking and Asset Management business group, which comprises FBN Merchant Bank Limited, FBN Capital Limited, FBN Securities Limited, FBN Capital Asset Management Limited, FBN Trustees Limited, FBN Funds Limited and FBN Capital Partners Limited; the Insurance business group which covers insurance-related subsidiaries: FBNInsurance, FBN General Insurance and FBN Insurance Brokers.

COMMERCIAL BANKING

The Commercial Banking group is led by FirstBank of Nigeria Limited (FirstBank), Nigeria's foremost and most valuable banking brand, which has operations in 12 countries. FirstBank is the largest banking group by assets in sub-Saharan Africa (SSA) excluding South Africa (i.e. 'middle Africa'), offering banking services to a rich network of both individual customers and businesses.

FirstBank represents the main legal entity and previously played an operating holding company function before the establishment of FBN Holdings. Other entities under FirstBank include FBN Bank (UK) Ltd – a fully licensed bank in the United Kingdom with offices in Paris; FBNBank in the Democratic Republic of Congo, Ghana, The Gambia, Guinea, Sierra-Leone

and Senegal. These recent acquisitions across Africa are major landmarks in FirstBank's plan for growing its sub-Saharan African footprint.

Other subsidiaries of FirstBank include First Pension Custodian Ltd (First Pension), providing pension fund custody services, and FBN Mortgages, a primary mortgage institution. The Bank also has a network of representative offices in Abu Dhabi, Beijing and Johannesburg set up to capture trade-related businesses between respective geographies.

The Nigerian banking business operates nationally and internationally, with active customer account base of over 10 million served through a large distribution network consisting of over 750 business locations, and more than 7.5 million cards in issue. Over the years, the Bank has led the financing of private investment in infrastructure development in the Nigerian economy by playing key roles in the Federal Government's privatisation and commercialisation schemes. With its global reach, FirstBank provides prospective investors wishing to explore the vast business opportunities that are available in Nigeria, an internationally competitive world-class brand and a credible financial partner.

FirstBank's brand purpose is to always put its stakeholders, customers and partners at the heart of its business, even as the Bank is poised to standardise customer experience and excellence in financial solutions across sub-Saharan Africa, in consonance with our brand vision "To be the partner of first choice in building your future". Our brand promise to our

Geographical reach

NIGERIA

Name:
FBN Holdings Plc
Type:
Licensed financial holding
company
Established:
2012 (formerly First Bank
of Nigeria Plc Established
1894)
Products/Services:
Commercial Banking
Merchant Banking &
Asset Management
Insurance.

Name:
First Bank of Nigeria Ltd.
(formerly First Bank of Nigeria
Plc.)

Type:
Licensed Bank
Established:
2012
Products/Services:
Commercial Banking

DEMOCRATIC REPUBLIC OF CONGO

Name:
FBNBank DRC

Type:
Licensed Bank

Established:
1994
Products/Services:
Commercial Banking

GHANA

Name:
FBNBank Ghana

Type:
Licensed Bank

Established:
1996

Products/Services:
Commercial Banking

GUINEA

Name:
FBNBank Guinea

Type:
Licensed Bank

Established:
1996

Products/Services:
Commercial Banking

THE GAMBIA

Name:
FBNBank The Gambia

Type:
Licensed Bank

Established:
2004
Products/Services:
Commercial Banking

SENEGAL

Name:
FBNBank Senegal

Type:
Licensed Bank

Established:
2014

Products/Services:
Commercial Banking

UNITED KINGDOM

Name:
FBNBank UK Ltd

Type:
Licensed Bank

Established:
2002

Products/Services:
International Banking
and Trade Services

FRANCE

Name:
FBNBank UK Ltd

Type:
Bank branch

Established:
2008

Products/Services:
Commercial Banking,
International Banking

REPRESENTATIVE OFFICES

Name:
FBNBank South
Africa
(2004)

FBNBank China
(2009)

FBNBank UAE
(2011)
Products/Services
Banking services



12 COUNTRIES
across **3** CONTINENTS



2,750
ATMs
Nationwide



9,327
EMPLOYEES



850
BUSINESS
Locations

We are a trusted and inspirational partner founded on innovation, a strong heritage and a pioneering spirit that drives us to help our clients look beyond today, and redefine tomorrow.



COMMERCIAL BANKING

FirstBank of Nigeria Ltd

FBNBank (UK) Ltd
FBNBank DRC Ltd
FBNBank Ghana Ltd
FBNBank Senegal Ltd
FBNBank Sierra Leone Ltd
First Pension Custodian Nigeria Ltd
FBN Mortgages Ltd

stakeholders is to always deliver the ultimate “gold standard” of value and excellence. This commitment is anchored on our inherent values of passion, partnership and people, to position our customers first in every respect.

Merchant Banking & Asset Management

The Merchant Banking and Asset Management businesses of FBN Holdings Plc comprise of FBN Merchant Bank Limited, FBN Capital Limited, FBN Securities Limited, FBN Capital Asset Management Limited, FBN Trustees Limited, FBN Funds Limited and FBN Capital Partners Limited.

Through our key business lines of Merchant/Investment Banking, Markets, Trust/Agency Services, Asset Management and Alternative Investments, we provide services in Advising, Financing, Trading, Investing and Securing to ensure we support the diverse financial needs of our clients. From securing wealth to financing business opportunities, we are constantly searching for what comes next so we can take our clients there first. We are a trusted and inspirational partner founded on innovation, a strong heritage and a pioneering spirit that drives us to help our clients look beyond today, and redefine tomorrow.

We understand that not everyone sees tomorrow the same way. That’s why our broad range of services in the Merchant Banking and Asset Management areas ensure we have a solution for everyone. So whether you are seeking advice, financing a new range of investment and trading options, or preservation of your wealth, our

world class team will work in partnership with you to understand, broaden and deliver your objectives.

Our key services include:

Advising

The Merchant Banking & Asset Management businesses of FBN Holdings Plc are leading transaction advisers across numerous sectors, providing independent and expert advice to small and large corporations, public and private institutions, and individuals alike. We partner with our clients to discover bold paths to financial success. Our advisory services include corporate banking solutions, sell-side M&A advisory, buy-side M&A advisory, corporate sales & divestitures, restructurings & recapitalization, financial modeling, PPP consulting & bid support, project risk due diligence analysis, preferred stock issuance, private placements, equity & convertible securities issuance, initial public offerings, rights issues, macroeconomic and equity research. Our industry footprint is widespread across financial services, energy and natural resources, infrastructure, consumer markets, and communication technology.

Financing

Economic growth within the African continent and the capability to leverage internal opportunities are contingent on the ability of financial institutions to provide innovative financing solutions. We have broad transactional experience, and a depth of expertise which enable us understand the needs of our clients and add value where it truly counts. Our offerings include acquisition finance, project finance, debt structuring & arranging, leveraged financing, supply chain finance,



MERCHANT BANKING AND ASSET MANAGEMENT

FBN Merchant Bank Ltd
FBN Capital Ltd
FBN Trustees Ltd
FBN Capital Asset Management Ltd
FBN Funds Ltd
FBN Securities Ltd

We have broad transactional experience, and a depth of expertise which enable us understand the needs of our clients and add value where it truly counts.

government, agency & corporate bond issues, high yield bond, asset backed securities, asset backed facilities, receivable financing, trade finance products, loans, working capital finance, distributor finance, letters of credit, bills for collection, current account, lease financing. We assist a variety of clients in structuring and arranging optimal financing solutions for both greenfield and brownfield projects spanning all sectors of the Nigerian economy.

Trading

Our best-in-class team of innovative and committed trading experts leverages our state-of-the-art technology to deliver value for our clients. We also pull from our Institutional knowledge and strong client partnership to provide our customers with expert services in various markets. Our aim is to maximize value for all our customers through our trading channels and activities, underpinned by a team of trading experts. Our solutions include stock broking, fixed income sales & trading, corporate broking, market marking, bonds trading, money market, and foreign exchange trading.

Investing

On the Merchant Banking and Asset Management platform, we take on the challenge of partnering with you on the path to financial success. Our flexible range of services ensures that we have an investment solution for every client, while our world-class team will work in partnership with you to understand, broaden and surpass your investment goals. We provide specialist portfolio, fund management and stockbroking services,

including managing investment accounts of high net worth individuals and institutional clients, insurance companies, pension funds, public and private mutual funds, public and private trusts, endowment and charity funds, as well as segregated and special accounts. We also provide growth capital to firms looking to finance expansion plans, with Investments cutting across several sectors including food and beverages, hospitality, travel and leisure, healthcare, leasing, telecommunications, real estate, and oil and gas. The team of specialists works with the priority of unlocking shareholder value through partnerships with entrepreneurial management teams.

Securing

As a leading trustee services provider for over 30 years, our Merchant Banking and Asset Management institutions have developed a strong history and market position driven by a seasoned team of experts. We have a strong track record of advising and assisting our clients to safeguard the financial future. From estate planning to endowment funds, trusts, wills and more, our innovative and resourceful team will leverage their expertise to deliver the best solutions. Our service offerings include Estate Planning, Trust & Wills, Endowment Funds, Trusteeship, Institutional/Government Bonds, Syndicated Loans, Share Warehousing, Custodial Services and Agency Services (Escrow)

FBNInsurance was instituted to provide the Nigerian Insurance market with best-in-class, innovative, solution-driven products and services that create value for all stakeholders whilst consistently demonstrating integrity, professionalism and confidence.



INSURANCE

FBN Insurance Ltd
FBN General Insurance Ltd
FBN Insurance Brokers Ltd

Insurance

The Insurance business group covers our insurance-related subsidiaries: FBNInsurance, FBN General Insurance and FBN Insurance Brokers. The business group offers Life and General insurance services as well as insurance brokerage services.

FBNInsurance Limited

FBNInsurance is a Limited Liability Company licensed to transact Life Insurance businesses in Nigeria. The Company is jointly owned by FBNHoldings Plc (65%) and the Sanlam Group, one of the largest financial institutions in South Africa (35%) and it officially commenced operations on the 1st of September 2010. FBNInsurance was instituted to provide the Nigerian Insurance market with best-in-class, innovative, solution-driven products and services that create value for all stakeholders whilst consistently demonstrating integrity, professionalism and confidence. It is poised to play a significant role in the development of the insurance industry in Nigeria through product innovations, efficient service delivery and prompt claims settlement.

FBN Insurance Brokers Limited

FBN Insurance Brokers Limited is committed to supporting businesses through expert broking knowledge in energy/special risks, aviation and domestic insurance, like property, liability, auto and construction. The company operates one of the most sophisticated insurance brokerage software applications. It is capable of updating clients' database, generating debit notes,

clients' statement of accounts and policy renewal alert. In addition, the company manages its special risks portfolio in active collaboration with reputable international reinsurance brokers, amongst which are HSBC and UIB Limited.

FBNGeneral Insurance Limited

In 2014, FBNInsurance bought a 100% stake in Oasis Insurance, and incorporated it into the FBNHoldings Group. The new company was re-christened FBNGeneral Insurance and is saddled with transacting general insurance business in Nigeria. FBNGeneral Insurance is a subsidiary of FBNInsurance Limited.

OUR PROPOSITION

Given the distinctive heritage of FBN Holdings Plc, the Group is well positioned to ensure the best possible returns and service to its shareholders, clients and other stakeholders. FBN Holdings is dedicated to supporting shareholders and clients to maximise the infinite opportunities inherent in its rich century-long heritage as a consolidated one-stop financial supermarket. The Group profiles industry trends to enable stakeholders leverage investment opportunities, whilst highlighting the specialisation of subsidiaries to enhance service delivery and consumer satisfaction.

Customers stand to benefit from the resultant increased efficiencies and optimisation of opportunities arising from shared services within the Group, accentuated by FBN Holdings' commitment to global best practices, good corporate governance, sustainable corporate

Given the distinctive heritage of FBN Holdings Plc, the Group is well positioned to ensure the best possible returns and service to its shareholders, clients and other stakeholders

citizenship, and thought leadership interventions, whilst it continuously leverages strategic partnerships to sustain its position as the bastion of ethical leadership.

The Group maintains the drive to remain the undisputed leader in every business in which it participates; growing its franchise to become the financial services provider of first choice to all, including the next generation of Nigerians, and the broader sub-Saharan African market. This ensures superior shareholder returns underpinned by solid near-term financial performance and strong long-term growth prospects.

Through increased specialisation and consolidation on the strengths of each business line, FBN Holdings Plc enhances the entire Group's ability to drive growth into the future.

2015 FINANCIAL HIGHLIGHTS

GROSS EARNINGS

N505.2bn

2014: N481.8bn

The 4.9% growth was driven by increased interest income on loans to customers and short-term investments.

NET INTEREST INCOME

N265.0bn

2014: N243.9bn

Net interest income increased by 8.7% mainly due to optimal pricing strategy resulting in improved yields on assets

PROFIT BEFORE TAX

N21.5bn

2014: N94.1bn

Profit before tax declined by 77.1% as a result of the high impairment charges taken in the 2015 financial year.

NON-INTEREST INCOME

N99.4bn

2014: N112.9bn

Non-interest income declined by 12.1%, essentially due to the decrease in earnings from foreign exchange transactions in view of a relatively steady exchange rate environment as well as the decline in commission on turnover (COT) following the implementation of a lower rate as guided by the Central Bank of Nigeria.

OPERATING EXPENSES

N223.6bn

2014: N236.8bn

Operating expenses declined by 5.6% in a 9.6% inflation environment. This achievement highlights our resolve to ensure sustainable operational efficiency across our business.

CUSTOMER DEPOSITS

N2,970.9bn

2014: N3,050.9bn

Customer deposits declined by 2.6% impacted by withdrawals of FGN deposits with deposit money banks (DMB) in compliance with the treasury single account (TSA) by ministries, departments and agencies in addition to our deliberate strategy of giving up expensive term deposits.



In 2015, final accounting for the acquisition of Kakawa Discount House Limited (now FBN Merchant Bank Limited) was concluded resulting in changes between the fair values of the identifiable assets and liabilities at acquisition date compared to those values adopted for provisional accounting in 2014. The impact of the changes have been retrospectively adjusted against 2014 numbers in line with IFRS 3.

CUSTOMER LOANS AND ADVANCES

N1,817.3bn

2014: N2,179.0bn

Customer loans and advances declined by 16.6% as a result of the challenging macroeconomic environment impacting business performance of obligors.

RETURN ON AVERAGE ASSETS*

0.4%

2014: 2.0%

Return on average asset declined to 0.4% driven by a decrease in profitability as average total assets grew by 3.6% year on year.

EARNINGS PER SHARE (EPS)*

N0.43

2014: N2.35

The soft performance was driven by the high impairment charges resulting from the adverse macroeconomic and regulatory environment.

RETURN ON AVERAGE EQUITY*

2.7%

2014: 16.9%

Return on average equity declined as a result of a decrease in profitability as average total equity increased by 10.7% year-on-year.

* Footnote: Post-tax returns

03

Renewed for better impact

...Corporate Responsibility & Sustainability goes beyond financing economic activity in a responsible way to ensuring an inclusive, positive impact on our communities. It is about creating long-term stakeholder value by adopting the opportunities and managing the associated environmental, social and governance risks.



OUR RESPONSIBLE APPROACH TO BUILDING RELATIONSHIPS

As we strive to enhance our heritage as the biggest financial services group in sub-Saharan Africa and Nigeria's foremost and largest developmental financial institution, FBN Holdings is committed to creating more value for our stakeholders. We attribute the successes at FBN Holdings mainly to the relationships with our stakeholders. Our ability to effectively manage the challenges resulting from the shocks in the global market place and the macroeconomic headwinds is due to our responsible approach to putting our stakeholders first. We believe in consistently building and nurturing mutually beneficial relationships which have enabled us provide the right products and services for our customers and their families, empower our employees as well as support the communities where we live and work.

FBN Holdings Plc has since the establishment of its flagship subsidiary, FirstBank of Nigeria Limited, in 1894, played a pivotal role in nation building and the development of the national and regional economy through its primary role of financial intermediation, projects financing and employment creation through entrepreneurship support as well as its extensive corporate responsibility and sustainability programmes.

Our heritage as the nation's foremost and largest developmental financial institution is apparent in the Group's contributions to economic growth and development. Our developmental philosophy is reflected in our business policy and is self-evident in the composition of our loan book as diversified in the nation's major economic development sectors. These include agriculture, manufacturing, oil & gas, services and public sector, amongst others.

As a firm believer in the brand Nigeria and a pioneer in national development, we have painstakingly engaged every sector of the economy for good, consistent with our century-long commitment to nation building as a fundamental pillar of sustainable business development. Our measured risks are undertaken in line with sound business realities and universally acknowledged as bold business moves as well as a private

institution's obligation to support focused national and global development.

Our Group's investments and interventions in the pivotal sectors are well-thought out and in the right direction. However, the current global economic trends, especially the case with the change in fortune in the macro economy as occasioned by the sharp decline in oil prices, have resulted in a significant review in growth projections.

We have retained our leadership and pioneering position over the years. Attesting to this are the many firsts and accolades we have received in the course of our century long commitment to sustainable development and nation building.

In the year 2015 alone, FirstBank of Nigeria Limited, the Group's flagship subsidiary, received 12 awards:



1. Most Valuable Bank Brand 2015 by The Banker Magazine/Financial Times
2. Best Trade Finance Bank Nigeria 2015 by Global Finance Magazine
3. The Best Retail Bank in Nigeria by The Asian Banker International Excellence in Retail Financial Services Awards 2015
4. Silver Award for "Best Impact by Corporate University on Implementation of Business Strategies" by Global Council of Corporate Universities
5. Global Reach Trade Finance Award Nigeria by Deutsche Bank Transaction Banking
6. Financial Support to Oil & Gas at the Sub-Saharan Africa Upstream Oil & Gas Summit by Africa Upstream in collaboration with ZP Training
7. Best Bank in Manufacturing in BusinessDay Banking Awards 2015
8. Best Bank in Retail Banking in BusinessDay Banking Awards 2015
9. Best Bank Supporting Agriculture in BusinessDay Banking Awards 2015
10. Best Private Bank in Nigeria by World Finance Magazine Awards 2015
11. Best Bank in Nigeria 2015 in the Global Finance Awards 2015
12. Best Bank in Nigeria Award 2015 by EMEA Finance

Looking ahead, we will continue to improve efficiency and entrench operational excellence across all our operating companies to ensure increase in customer satisfaction. We will leverage on our diversified product offerings throughout the group to enhance shareholders' value and we are sure to remain on top countrywide and beyond.

04

Our corporate responsibility & sustainability approach

...We have continued to focus on providing opportunities to empower people by getting them involved in the economy; while ensuring that we are integrating environmental, social and governance (ESG) criteria into the business or investment decisions enhancing their livelihoods as well as their families and communities.



CR&S goes beyond financing economic activity in a responsible way to ensuring an inclusive, positive impact on our communities. It is about creating long-term stakeholder value by adopting the opportunities and managing the associated environmental, social and governance risks

Corporate responsibility and sustainability involves meeting the needs of our stakeholders without compromising the ability of our future stakeholders to meet their needs and aspirations. It goes beyond financing economic activity in a responsible way to ensuring an inclusive, positive impact on our communities. It is about creating long-term stakeholder value by adopting the opportunities and managing the associated environmental, social and governance risks.

CR&S is not bolted on to our corporate strategy. It is embedded into our business strategy and our daily operations.

Our CR&S approach is three-pronged: citizenship, stakeholder management and impact management. Citizenship and stakeholder management involve putting into consideration the needs of stakeholders in making decisions, while impact management is basically about minimising our negative impacts and increasing our positive impacts on society.

The CR&S approach is contained in the Group's corporate responsibility policy. The policy clearly outlines our commitments and approach to corporate responsibility as well as the Group's CR&S governance framework. The scope of the policy and respective guidelines applies throughout the Group's operations and activities, including its subsidiaries in all locations; stakeholders and associated partners representing the Group.

The sustainability is designed to deliver value in a structured way along four key areas. These are: driving sustainable finance & investments; empowering people; supporting our communities and contributing to environmental sustainability.

Driving sustainable finance & investments

Our customers remain a vital element of our business. We constantly seek ways of providing products and services to meet their needs while ensuring that we manage our environmental, social and governance impacts in the process; thus, contributing to overall sustainable growth and development.

Empowering people

We are committed to growing our people; providing opportunities and a supportive environment and culture for personal development.

Supporting our Communities

We invest our time and resources as part of our responsibilities to enrich the communities in which we work and live.

Contributing to environmental sustainability

We are committed to avoiding or minimising environmental impacts beyond our responsible lending efforts.

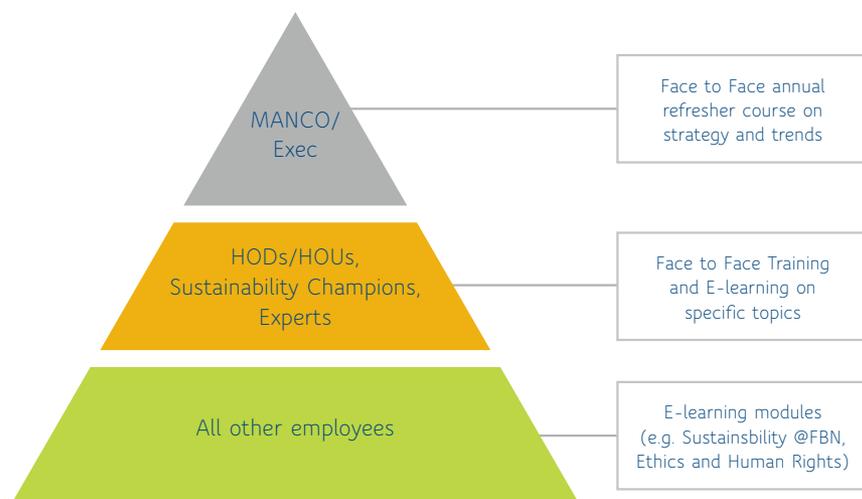
Our CR&S approach is three-pronged: citizenship, stakeholder management and impact management. Citizenship and stakeholder management involve putting into consideration the needs of stakeholders in making decisions, while impact management is basically about minimising our negative impacts and increasing our positive impacts on society

CORPORATE RESPONSIBILITY & SUSTAINABILITY ENABLERS

Our CR&S journey is enhanced by a set of enablers which help drive our priorities. They include CR&S capacity development, stakeholder engagement, partnerships and communications as well as CR&S performance management.

Capacity development requires developing the relevant policies, processes and tools, skills and capabilities to achieve the Group's sustainability and business objectives. Also, building trust, through effective stakeholder engagement enables the Group in achieving our sustainability priorities.

Equally important in meeting our sustainability goals is providing actionable performance data, producing sustainability reports and effectively managing performance.



Corporate Responsibility & Sustainability Capacity Development:

To effectively embed sustainability concepts into any organisation and deliver the strategy, it is important to provide employees with the right knowledge, skills, attitudes and behaviours.

To this end, the Group has defined and categorised the different sustainability training requirements based partly on the Nigeria Sustainable Banking Principles:

Sustainable banking training: Training for all employees on sustainable banking issues and principles. This is for all employees including specific training for senior leadership. Additional specific training is also required for:

- a. Sector specific employees: Training is delivered on specific issues for key industries (e.g. oil and gas; agriculture; power).
- b. Client relationship managers and risk team: Training is on environmental, social and governance risk management issues

Human rights training: Training for all employees on human rights and labour issues

Sustainability reporting requirements: Specific training on NSBP/Group sustainability reporting requirements.

Approach to training

The Group has developed an approach to manage the specific training requirements:

The E-learning courses have been particularly structured to ease the learning process given the need to ensure all employees are trained on sustainability. The

We have defined a sustainability performance management process to help the Group measure and deliver its strategy by effectively gathering and analysing data from multiple sources to help drive performance and improve reporting.

target for 2016 is to ensure that E-learning module is deployed to all employees categorised to receive the training.

As in 2014, we have improved the implementation of our policies. These include the Diversity policy, the sustainability and corporate responsibility policy; environmental, social and governance management system (ESGMS) which comprises an environmental, social and governance policy; procedures for screening transactions; roles and responsibilities to ensuring implementation; review and continuous improvement; reporting as well as guidance and record keeping.

Sustainability & Corporate Responsibility Performance Management & Reporting

Sustainability and corporate responsibility performance management and reporting is a key component of the Group's strategy as it enables us to effectively measure, manage and report sustainability performance and also meet the Nigeria Sustainable Banking Principles' (NSBPs) requirements to report a wide range of metrics.

We have defined a sustainability performance management process to help the Group measure and deliver its strategy by effectively gathering and analysing data from multiple sources to help drive performance and improve reporting. This includes employing a sustainability performance management software over the current manual excel solutions.

Partnerships and Communications

Partnerships and communications are essential parts of the Group's sustainability enablers. We believe that sustainability drives growth and one of the keys to embedding sustainability successfully is through partnerships.

Therefore, in integrating sustainability and driving corporate responsibility programmes, we are partnering with different credible and reputable international NGOs, sustainability consulting companies; educational institutions; governmental bodies and developmental finance institutions. In pursuit of our CR&S vision, we will continue to partner locally and globally to embed sustainability as a way of life in building the nation and enabling the continent take its rightful place.

Additionally, effective stakeholder engagement and partnership require good communication. To this end, we have articulated a CR&S communication plan designed to meet the requirement of our stakeholders

Our partners are secured based on CR&S strategic pillars: sustainable finance; people empowerment; community support and environmental sustainability.



STRATEGIC PILLARS	PARTNERS	FOCUS AREAS
<p>Sustainable finance</p>	<p>International Finance Corporation Lagos Business School of the Pan-Atlantic University (FirstBank Sustainability Centre) Accenture</p> <p>Central Bank of Nigeria & other financial institutions</p> <p>Junior Achievement Nigeria</p>	<p>Capacity building</p> <p>Capacity building and sustainability thought leadership. Development of sustainability strategy and opportunities inclusive of environmental, social and governance management system. Nigeria Sustainable Banking Principles (NSBPs). Financial literacy.</p>
<p>People empowerment</p>	<p>Accenture Lagos Business School of Pan-Atlantic University United Nations Global Compact</p>	<p>Sustainability capacity building</p> <p>Human Rights, labour and anti-corruption issues</p>
<p>Community Support</p>	<p>Junior Achievement LEAP Africa Wowe Wimbiz Fate Foundation Nigeria Leadership Initiative (NLI) Lagos State Empowerment & Resource Network (LEARN) Federal University of Technology, Akure University of Nigeria, Nsukka Obafemi Awolowo University University of Lagos University of Maiduguri</p>	<p>Promoting our programmes under the platforms of Education, Health; Economic empowerment, and the Environment</p>
<p>Environment Sustainability</p>	<p>Nigeria Conservation Foundation (NCF)</p>	<p>Conservation and preservation of wildlife and biodiversity</p>

Our CRS journey is enhanced by a set of enablers which help drive our priorities. They include CRS capacity development, stakeholder engagement, partnerships and communications as well as CRS performance management

The Sustainability Governance Structure

In the Group, our approach to conducting business is premised on high ethical standards and strict adherence to all provisions of the code of conduct guidelines. To ensure sustainability becomes embedded throughout the Group with strong leadership and support, the Board Risk & Management Committee of the FirstBank Board has been approved by the Board of Directors to provide oversight role and direction for FirstBank.

The current structure for FirstBank consists of the sustainability committee led by the Chief Risk Officer. This committee provides oversight to the strategy and operational delivery of sustainability across FirstBank. It also works with external stakeholders to provide input and ensure effective engagement. The roles and responsibilities of this committee are reflected in the Board charter on sustainability.

The process of approving the governance structure for the Group is on-going.

- Driving sustainable finance
- Empowering people
- Supporting our Communities
- Contributing to environmental sustainability



05

Engaging our stakeholders

...FBN Holdings is committed to creating more value for our stakeholders. We attribute the successes at FBN Holdings mainly to the relationships with our stakeholders.



Our stakeholders are broadly categorised into two groups: internal and external. Our internal stakeholders are our management and employees, while our external stakeholders comprise our investors, customers, NGOs, host communities, regulators, the media and different tiers of government.

As in previous years, we continued to engage our stakeholders in 2015. This provided opportunities for us to align our business practices further with societal needs and expectations, and drive long-term sustainability and shareholder value.

CASE STUDY

Meeting stakeholder needs through partnership

FutureFirst is one of the Group's key Corporate Responsibility & Sustainability (CR&S) programmes. It has two phases – career counselling and financial literacy – and focuses mainly on empowering secondary school students between the ages of 13 and 17. The key objectives are to help the students build fulfilling careers and equip them with the tools and knowledge for long-term financial independence. To achieve these objectives, the Bank is committed to delivering career counselling and financial literacy modules to the students through employee volunteers in partnership with NGOs. Given the growing relevance of NGOs in the business space, and in line

with the Group's CR&S approach, we have partnered with Junior Achievement Nigeria (JAN), the Nigerian arm of Junior Achievement Worldwide.

Junior Achievement (JA) is the world's oldest and largest non-profit economic education organisation, operating in 112 countries. JA is dedicated to building a bridge between the classroom and the workplace by encouraging young people to participate in a range of educational programmes designed to help them understand the world of work. JA started operations in Nigeria in 1999. Since then, with the help of over 700 teachers and volunteers, JA has reached over 380,000

students in more than 650 schools in Lagos, Sagamu, Ota, Abeokuta, Ibadan, Ilorin, Abuja, Jos, Kano, Kaduna, Bauchi, Port Harcourt, Warri, Uyo, Calabar and Enugu. FirstBank is not only on the board of JAN, but has also contributed significantly to the success of the organisation.



The engagement has helped improve the relationship as well as enhanced trust between the Group and the schools. This was seen in the increased support provided by the teachers, thus enabling the volunteers to exceed the 34,000 targeted volunteering hours.

The challenge

The main challenge of implementing the financial literacy phase of the FutureFirst programme was that volunteers were unable to consistently deliver the approved modules due to conflicting timing with their work schedule and sometimes, with the school schedule.

The solution

Our constant engagement with JAN helped identify the problem and a subsequent solution. One of JAN's key strengths is the relationship/affiliations it has with numerous schools. In partnership with the Group's CR&S team, JAN engaged the schools concerned to work out a flexible timing that will benefit all partners and this has produced the desired results. The mechanism of consultation was meeting with the schools' committees responsible for driving social activities. Facilitated by JAN, the meetings provided an opportunity to identify two reasons why there were clashes. Firstly, in the schools calendars, there are dedicated days for extra-

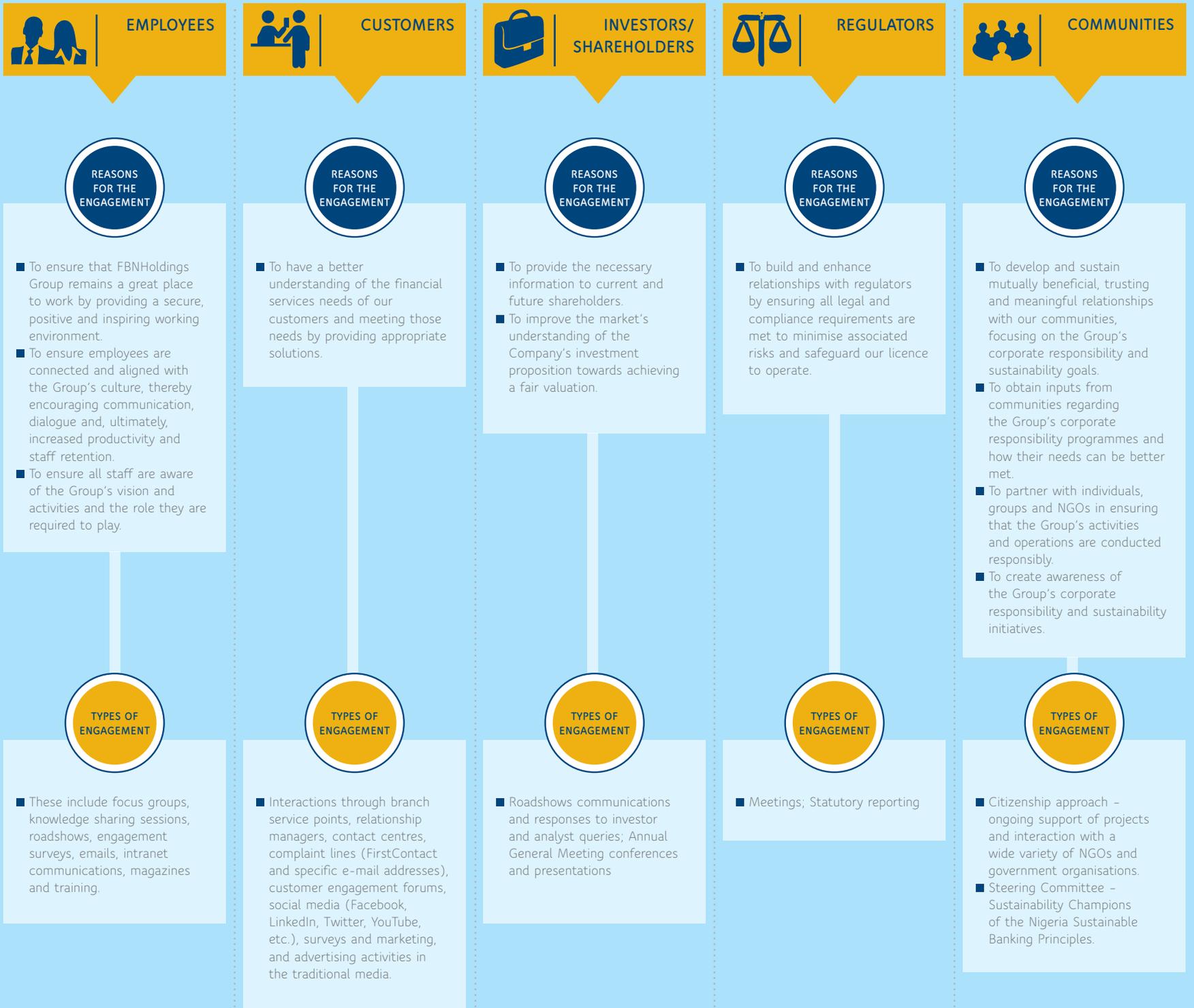
curricular activities and the FutureFirst programme should ideally be scheduled for these periods. Instead, the delivery time for the programme was often times in conflict with the regular time for class work. Secondly, because there was no clear directive on timing communicated appropriately, some of the teachers followed the established rules when there were conflicting timetables. It was agreed at the meeting to deliver the financial literacy sessions on the extracurricular days - this resolution solved the problem.

The engagement has helped improve the relationship as well as enhanced trust between the Group and the schools. This was seen in the increased support provided by the teachers, thus enabling the volunteers to exceed the 34,000 targeted volunteering hours.



Some volunteers at a training session facilitated by Junior Achievement in partnership with First Academy

An overview of how we engage with our key stakeholders





Prioritise focus areas by importance to FBN Holdings business interests and those most important to our key stakeholders

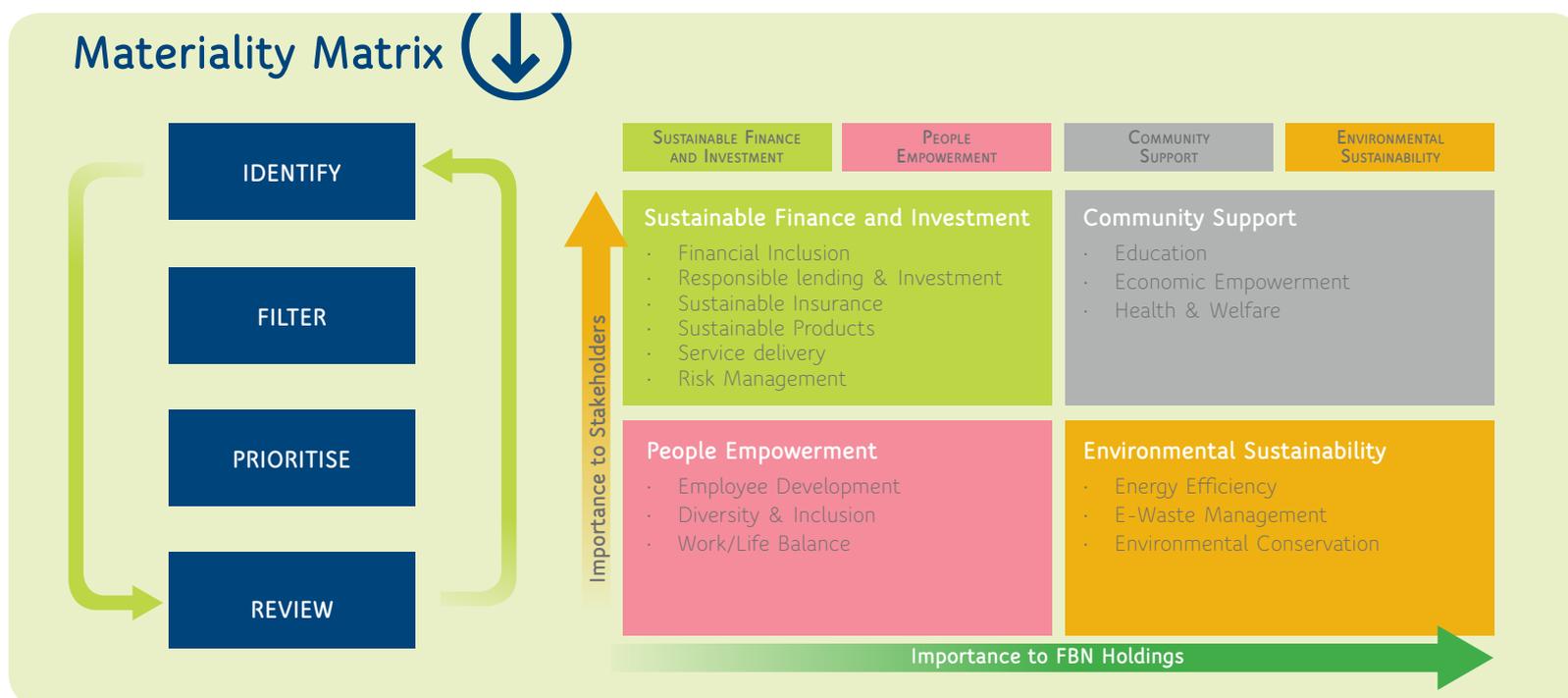
DEFINING MATERIALITY

In defining materiality in this report, we considered our social, environmental and economic impacts and how they significantly affect our current and future stakeholders' ability to meet their needs. Of the issues identified, we have prioritised eight. In identifying the issues, we employed an inclusive process that involved our key stakeholders as shown above.

Our materiality issues are aligned with our four corporate responsibility & sustainability strategic areas: sustainable finance and investment; people empowerment; community support and environmental

sustainability. The top sustainability issues according priority are as follows:

- Financial Inclusion
- Responsible lending; Investment & Insurance
- Service Delivery Excellence
- Diversity & Employee Development
- Education
- Economic Empowerment
- Health & Welfare
- Energy Efficiency
- Environmental Conservation
- Risk Management



06

Corporate Governance

*...Our governance structure/
framework is unparalleled in
the industry with Board and
management appointments,
including transitions at
executive levels, made with
ease and devoid of rancour and
business disruptions.*



In the Group, our approach to conducting business is premised on high ethical standards and strict adherence to all provisions of the code of conduct guidelines.

STRONG LEADERSHIP

Despite unfavourable and unstable macroeconomic indices in 2015, the Board stayed true to best corporate governance practices. In line with global best practice and in compliance with regulations and codes of corporate governance, the Board discharges its oversight function through the boards of directors of all operating companies within the Group. All operating companies have distinct Boards and ensure compliance with the statutory and regulatory requirements of the sectors in which they operate. At the Holding Company and in the other operating entities, the boards operate through various committees which are constituted in adherence to the various regulations and codes. Our robust framework ensures a good blend of Board autonomy and Group coordination at the operating company level.

The Board of FBNHoldings and indeed the boards of the operating companies remain strong and well-functioning. They compose of individuals who possess not only the right technical abilities and business experience, but also the personal qualities required to be effective, dedicated and committed stewards of the Company. A review of the current composition across the boards of the various operating companies will reveal these qualities

The Board of FBNHoldings is represented by distinguished individuals with in-depth and diverse experience. These eminent persons have displayed excellent, proven business knowledge and Board experience spanning an array of industries and

sectors. The primary purpose of the Board is to build long-term shareholder value and ensure oversight of appropriate controls, systems and practices to safeguard the assets of FBNHoldings in a sustainable manner. To ensure appropriate oversight function, the Group Managing Director sits on the Board of the key subsidiaries (business groups) of FBNHoldings.

Though these are trying times for the economy, the financial services industry and our Company, we are resolute in our desire and commitment to emerge stronger and more resilient.

RISK MANAGEMENT

The Group believes that managing risk effectively and selective risk taking are key element for survival and sustained growth that can ultimately create value for our shareholders. The risk management processes in the Group as contained in the Enterprise Risk Management (ERM) framework are designed to ensure that each business line understands the risks it faces, so that such risks can be effectively managed within a strong risk management culture and governance. Furthermore, the Group's strategy is governed by a willingness to take risk in the pursuit of value creation and, as such risk appetites form an integral part of the strategic decision-making and execution process.

Effective management of risk requires a robust governance structure in which everyone knows their individual and collective accountabilities for risk management, risk oversight and risk assurance. This is reinforced by appropriate delegation of authority

...the Board discharges its oversight function through the boards of directors of all operating companies within the Group.

from the Board, which sets the appropriate tone down through the management hierarchy, and is supported by a committee-based structure designed to ensure that the risk management system across the Group is in line with regulations and leading practices.

The Board of Directors of the holding company (assisted by the Board Audit & Risk Assessment Committee) provides robust oversight of the Group's risk strategy, approves the Group risk appetite, and reviews the adequacy of the risk management framework and control effectiveness. The Group Risk Stakeholders Committee comprises the Chief Risk Officers (CROs) and Chief Compliance Officers (CCOs) of the business units and the Group Risk Manager. The committee ensures a strong and effective relationship between the risk management function of the business units and the holding company, as well as enhances the risk coordination process across the Group.

We continually modify and enhance our risk management policies and systems to reflect changes in markets, products and international best practices..

ETHICS AND COMPLIANCE

The Group prides itself on having one of the most compliant and leading holding company structures in the industry. Its governance structure/framework is unparalleled with Board and management appointments, including transitions at executive levels, made with ease and devoid of rancour and business disruptions.

In the Group, our approach to conducting business is premised on high ethical standards and strict adherence to all provisions of the code of conduct guidelines (for further information, go to page). With an enviable corporate governance framework and also leveraging on the quality of its workforce, the Group has experienced continued growth in its various business operations in line with its strategic priority, which is 'to increase its share of the customer's wallet in the chosen market'.

Among other things, the ability to deliver and sustain this mandate is dependent on the commitment, engagement and ability of staff. In addition to the high quality of its staff, the conduct of the Group's workforce remains professional, based on well-established ethical and code of conduct frameworks that guide expected behaviour.

This ethical behaviour is driven from senior leaders who have worked relentlessly to build an ethical culture in the Group. This ethical culture is reinforced by rewarding employees who constantly embody the values and integrity that Group upholds.

Employees are regularly sensitised to expected behavioural patterns through several internal campaigns aimed at ensuring that our people operate in line with high ethical standards.

Board of Directors



Dr Oba Otudeko, CFR
Group Chairman



UK Eke, MFR
Group Managing Director



Oye Hassan-Odukale, MFR
Non-Executive Director



Dr Adesola Adeduntan
Non-Executive Director



Muhammad K Ahmad, oon
Non-Executive Director



Chidi Anya
Independent Non-
Executive Director



'Debola Osibogun
Non-Executive Director



Dr Hamza Wuro Bokki
Independent Non-
Executive Director



Omatseyin Ayida
Non-Executive Director



Tijjani Borodo
Company Secretary

07

Driving Sustainable Finance & Investments

...our responsible approach this year continued to focus on providing opportunities to empower people by getting them involved in the economy; while ensuring that we are integrating environmental, social and governance (ESG) criteria into the business or investment decisions enhancing their livelihoods as well as their families and communities

Our responsible approach to enhancing the quality of life and financial security of our customers and their families has seen us design sustainable products and services tailored to meet their needs and expectations. Inclusive finance is a good example

As in 2014, our responsible approach this year continued to focus on providing opportunities to empower people by getting them involved in the economy; while ensuring that we are integrating environmental, social and governance (ESG) criteria into the business or investment decisions enhancing their livelihoods as well as their families and communities.

To this end, FirstBank provided financial support to key players in the power & Infrastructure sector to enable the purchase of power assets put up for sales by the Federal Government during the privatization exercise.

In addition, FirstBank continued its financial support through a structured mechanism to the SMEs across multiple sectors of the economy inspite of the tough and harsh operating environment. For instance, we supported the SMEs with funding in excess of N70bn in sectors like Cement, Telecoms, FMCG, Oil & Gas Services and general commerce.

Despite the dwindling crude oil prices in the international market occasioned by glut in oil supplies from OPEC and non-OPEC member countries, FirstBank remained committed to capacity building in the oil and gas sector particularly to the indigenous contractors and vendors in line with the local content law. Strategically, FirstBank has consistently shown its commitment by way of an endorsement of MOUs with SPDC, NLNG & ExxonMobil to the tune of \$1bn, \$200m and \$125m respectively to fund the local contractors and vendors operating in Nigeria.

Promoting Financial Inclusion: Putting our Customers' Needs First

Our responsible approach to enhancing the quality of life and financial security of our customers and their families has seen us design sustainable products and services tailored to meet their needs and expectations. Inclusive finance is a good example. Through our mobile money platform, Firstmonie, as well as the employment of the agency banking model, we have provided financial services for the unbanked and under-banked.

Firstmonie boasts of about 1 million subscribers who are non-bank account holders. This represents an 87% growth when compared with 2014. In addition, we currently have about 15,000 agents spread all over the country to offer these financial services to our customers in their local environment.

We recognise that we have a diversified customer base and thus ensure that they have access to their accounts 24/7 by providing a wide variety of digital banking options. We have the largest ATM network in the country. Last year, we deployed 545 additional ATMs, representing a 21% increase and processing a total of 131.7 million transactions representing the total industry transaction volume as at December 2015.

To further enhance our customers' banking experience, FirstBank has launched a new mobile banking app in line with the global trend of digital banking. The new mobile app is designed be easily accessed any FirstBank card holder. Easy to download, setup, this service allows for instantaneous usage providing a wide range of banking services on-the-go.



87% Growth

Firstmonie boasts of about 1 million subscribers who are non-bank account holders. This represents an 87% growth when compared with 2014.

We acknowledge the fact that SMEs remain the driving force for the development of any economy and as the leading financial institution in Nigeria with the most diverse portfolio of SME owners and operators, staying committed to building SMEs' capacity in addition to other offerings is fundamental business objective



N19.6b
transaction
value

Since its launch in September 2015, the Bank boasts 70,970 customers on the mobile app, with transactions worth over N19.6 billion carried out in 241,407 transactions

This eliminates the need to visit the branch for activation thereby offering convenience without compromising our tight security controls. Since its launch in September 2015, the Bank boasts 70,970 customers on the mobile app, with transactions worth over N19.6 billion carried out in 241,407 transactions. Our existing internet banking platform (FirstOnline) also grew in the number of successful transactions processed, from 3.8million transactions in 2014 to 6.1 million transactions in 2015.

In addition, First Mobile offers a soft token mobile application – First Token. First Token is the Bank's mobile app which may be used to replace the physical token. Having the same functionality, the former has the added advantage of mobility over the latter as it puts the function of the token on our customers' mobile phone. Like the hardware token, the soft token can be used for both online banking transactions (FirstOnline) as well as mobile banking (FirstMobile) transactions. Offering the token in both forms (hard and soft token) reinforces our commitment to putting our customers first by offering convenience alongside security.

A combination of these digital products – our all-new First Mobile app and our First Token app, is designed to offer more secure and convenient 24/7 banking services to our esteemed customers

CAPACITY BUILDING FOR SMES

In line with the Group's financial inclusion strategy, FirstBank has continued to provide business management resources and tools for download and

use by SMEs on the FirstBank dedicated SME website and an e-commerce portal, where SMEs and individual entrepreneurs can advertise and sell their goods and services. In addition, the FirstBank Sustainability Centre at the Lagos Business School has continued in 2015 to build capacity for SMEs especially women-owned businesses.

We acknowledge the fact that SMEs remain the driving force for the development of any economy and as the leading financial institution in Nigeria with the most diverse portfolio of SME owners and operators, staying committed to building SMEs' capacity in addition to other offerings is fundamental business objective.

We are also aware that one third of all SMEs in developing countries are led by women and they are largely deprived of the already limited funding available. Therefore, providing more investment opportunities and building capacity for women-led SMEs are vital for developing economies. This is more so as research indicates that successful women-led SMEs do not only provide to employment opportunities, but also contribute to the growth of children and families as they spend a greater share of their income on education and health. So far 3000 SMEs have benefitted from the capacity building programme.

In addition, as in 2014, we have continued to partner with institutions and NGOs to drive the cause of women-led businesses. These include partnership with WIMBIZ (Women in Management, Business and Public Service).



Participants at the sustainability capacity building workshops at the FirstBank Sustainability Centre, Lagos Business School

HANDLING CUSTOMERS' COMPLAINTS

The Group, through its subsidiaries, has identified the achievement of service excellence as an important non-financial priority. Crucial to this is the enrichment of customers' experience through the proactive management of complaints and issues. We respond to requests and enquiries, and resolve complaints 24 hours a day, seven days a week through our contact centre and various other channels available to customers, such as emails via the online platform, SMS text alerts through the relationship managers, and direct contact with customer service officers in branches. We also ensure customers are aware of our complaints channels by displaying information about them in all our branches. These include escalation channels for complaints that are not adequately resolved. To further protect customers, the Bank renders customers' complaints to the Central Bank of Nigeria (CBN) on a daily basis and is expected to resolve outstanding issues within defined timelines.

We put structures in place to ensure that we have a holistic view of all complaints received. This resulted in an increase in the number of complaints received; over 270,000 were reported in 2015 compared to about 77,000 complaints recorded in the previous year. The use of the complaints dashboard has helped to identify recurring complaints, seasonal complaints and the source of these complaints, resulting in quick resolution while outstanding issues receive the required attention.

At FirstBank, to ensure customers' complaints are properly handled, every customer on the bank's book

has a relationship manager (RM). The RM is the main point of contact for the customer and ensures each account is functioning in accordance with the customer's expectations. As part of Know Your Customer (KYC) requirement of verifying the identity of our customers, the RM reviews the account with the customer, currently on an annual basis. This process is overseen by the Bank's Compliance department as part of its compliance monitoring programme.

In First Pension Custodian, however, complaints are lodged and logged with the relationship management team. In a bid to achieve effective and efficient turnaround time and contribute to a high level of customer experience, achievement of service excellence – of which complaint handling is a subset – remains an important priority across the Group.

Customer complaints received in 2015

Description	Number		Amount claimed (N)		Amount refunded (N)	
	2015	2014	2015	2014	2015	2014
Pending complaints brought forward	9,527	670	434,293,529.73	5,295,753,038.34	43,221,238.65	123,561,481.28
Received complaints	270,028	77,185	63,401,953,964.70	18,222,117,149.71	3,930,348,674.43	1,270,519,125.13
Resolved complaints	270,529	68,328	63,484,100,612.27	21,101,788,635.74	3,930,348,674.43	1,270,519,125.13
Unresolved complaints escalated to CBN for intervention	0	0	0	0	0	0
Unresolved complaints pending with the Bank carried forward	9,026	9,527	352,146,882.16	2,416,081,552.31	0	0



Over
270,000

2014: 77,185
complaints received

Our goal is to beyond our current basic levels of supplier compliance to ensuring integration of sustainability practices. We plan to improve our procurement process and ensure that the Group is on a journey towards a sustainable supply chain.

ETHICS AND COMPLIANCE

The Group prides itself on having one of the most compliant and industry-leading holding company structures. The Group has a robust governance structure with some Board and management appointments, including transitions at executive levels, made with ease and without rancour or business disruption. We are committed to the highest standards of openness, probity, accountability and high ethical behaviour by maintaining an environment where employees and other stakeholders can act appropriately, without fear of reprisal. In ensuring a high ethical standard, we established a code of ethics which sets out the minimum standards of conduct expected in the management of our businesses across the Group.

In the Group, our approach to conducting business is premised on high ethical standards and strict adherence to all provisions of the code of conduct guidelines. With an enviable corporate governance framework, and leveraging the quality of its workforce, the Group has experienced continued growth in its various business operations in line with its strategic priority 'to increase its share of the customer's wallet in the chosen market'. Among other things, the ability to deliver and sustain this mandate is dependent on the commitment, engagement and ability of staff. In addition to their high quality, the conduct of the Group's workforce remains professional, being based on well-established ethical and code of conduct frameworks that guide expected behaviour.

Employees are regularly sensitised to expected behavioural patterns through internal campaigns aimed

at ensuring that our people operate in line with high ethical standards.

SUSTAINABLE PROCUREMENT

Sustainable procurement is one of the opportunities identified as part of our stakeholder engagement designed to embed sustainability in the Group. We believe sourcing and engaging suppliers who support our Group's code of business ethics, commitment to environment stewardship and standards for labour can help us attain our sustainability ambitions. Our goal is to beyond our current basic levels of supplier compliance to ensuring integration of sustainability practices. We plan to improve our procurement process and ensure that the Group is on a journey towards a sustainable supply chain. Integrating sustainability across key dimensions of the procurement process requires strategy & planning, sourcing and category management; supplier relationship management; workforce transformation; process excellence and technology as well as risk management which include identifying and quantifying risks existing in the sourcing and procurement from a sustainability perspective.

INFORMATION SECURITY AND CUSTOMER PRIVACY

The internet has opened up organizations as well as consumers of product and services to unprecedented opportunities never experienced before with the dawn and evolution of the World Wide Web, entry of the smart phones and other electronic methods of mass communications, consumer privacy has become a major issue. Personal information, when misused or inadequately protected, can result in identity theft, financial fraud, and other problems that collectively cost people, businesses,

the Group has been committed to FirstBank following the implementation of the ISO 27001 Information Security Standard and being the First Financial institution in Nigeria to achieve this prized certification has pioneered the engagement of the generality of banking product consumers through various mass communication channels

and governments millions of Naira per year. In addition, Internet crimes and civil disputes consume huge resources, confound legislators and police departments, and produce untold personal aggravation.

Information security has never been so important as it has become today, the practice of preventing unauthorized access, use, disclosure, disruption, modification, inspection, recording or destruction of information which hitherto the preserve for the protection of enterprises data has changed, today focus is on educating customers on the handling and protection of their Personally Identifiable information (PIIs) which are sensitive personal information that individuals provide in the course of everyday transactions online and through mobile services which has become the target of cyber criminals as the customer appears to be the weak link in the chain of security.

From the foregoing, the Group has been committed to FirstBank following the implementation of the ISO 27001 Information Security Standard and being the First Financial institution in Nigeria to achieve this prized certification has pioneered the engagement of the generality of banking product consumers through various mass communication channels such as news prints, radio jingles, bank service touch points such (ATMs and banners displayed across its branch network and the internet to educate and crate a cyber-literate consumers which remains the only defense for cyber criminality. FirstBank has remained unrelenting in its drive to ensure the safety of customer's data with various laudable security best practice and systems implementation.

While all over the world criminal syndicates have leveraged on the competition between organisation to profiteer from the act of criminality which include the sale of stolen information, sponsorship of espionage and other internet criminality with the key source of these information leakages being end users and insiders within these organisation. FirstBank through its information security implementations and staff awareness initiatives have continued to build an IS aware staff, third party services providers and contractors with set service level agreement to choose to do the right thing as regards ethics in a world of technology which the ease and anonymity with which information can be communicated, copied, and manipulated in online environments are constantly challenging traditional rules of right and wrong behavior. Ethical issues confront individuals who must choose a course of action, often in a situation in which two or more ethical principles are in conflict and only superior knowledge of what constitutes best practice will win results

PRODUCTS & COMPLIANCE

In line with our 'YOU First' promise to its customers lives in their world and constantly provides tailor-made products and services to the financial needs of our customers. First Bank for instance has bouquets of products and services which are grouped as follows:

- Current Accounts
- Savings Account
- Domiciliary Accounts
- Term Deposits
- Overdrafts



**ISO
27001**
**Information
Security Standard**

*First Financial
institution in Nigeria
to achieve this prized
certification*

...our Compliance Team conducts independent due diligence to ensure that the business and operations of the MTOs are in consonance with extant global laws and International best practices

- Debit Cards
- Credit Cards
- Prepaid Cards
- Channels (digital & physical)
- Vehicle Finance
- Mortgage
- Working Capital Finance for Businesses
- Import and Export Finance
- Payment and Collection Solutions
- Money Transfer Services
- Services to other financial institutions

In developing and deploying these products and services, we adhere to regulatory guidelines set by the Central Bank of Nigeria (CBN). To ensure we operate within the regulatory framework, our Compliance Department regularly sensitizes staff on regulatory policies via various platforms and monitors to ensure strict adherence so as to guide the interest of Customers and prevent the Bank from being sanctioned. This ranges from compliance to required KYC for account opening, compliance to directives from regulators, fulfillment of product offerings/benefits etc.

The Bank is noted for its exemplary regulatory compliance. For instance, in Money Transfer Services, apart from the license given by the CBN to our partner Money Transfer Organizations (MTOs), our Compliance Team conducts independent due diligence to ensure that the business and operations of the MTOs are in consonance with extant global laws and International best practices. This is meant to comply with Money Laundering and Counter Terrorism provisions. The

payments of money transfers are also subject to pre- and post-compliance controls, both at the send and receive sides in line with global best practices.

A proof of our excellent compliance with CBN regulations led to the appointment of FirstBank as the only Bank authorized to sell foreign exchange to Bureau de Change operators in the country.

MARKETING COMMUNICATIONS: COMMUNICATING IN A RESPONSIBLE WAY.

At FBN Holdings, we are committed to responsible communication. In communicating the benefits of our products and services to our stakeholders, we ensure no misleading information is conveyed. This means that, we do not employ a deceptive approach to informing our stakeholders of our products and services by reporting false and unsubstantiated information. We strive to constantly identify the needs of customers and provide financial solutions to meet these needs with the goal of improving the society.

Advertising and Required Standards

All adverts must be submitted for vetting for a formal and thorough examination by the Advertising Standards Panel (ASP) of the Advertising Practitioners Council of Nigeria (APCON) prior to the granting of approval or clearance for such materials to be publicized, aired or printed.

Advertisements will not be approved for or permitted to remain on behalf of any of the FBN Holdings brands if in the Brand Clearing or Brand Council reasonable

At FBN Holdings, we are committed to responsible communication. In communicating the benefits of our products and services to our stakeholders, we ensure no misleading information is conveyed.



opinion, the advertisement falls within any of the following categories.

- The advertisement does not comply with the law or incites to break the law.
- The advertisement does not comply with the obligations of the banking group.
- The advertisement is inconsistent with global and local standards of advertising regulations.
- The advertisement is likely to cause widespread or serious offence to members of the public on account of the nature of the product or service being advertised the wording or design of the advertisement or by way of inference.
- The advertisement depicts men, women or children in an inappropriate manner.
- The advertisement depicts or refers to indecency or obscenity or uses obscene or distasteful language.
- The advertisement depicts direct or immediate violence to anyone shown in the advertisement.
- The advertisement condones or promotes anti-social behaviour.
- The advertisement contains images or messages, which relate to matters of public controversy and sensitivity.
- The advertisement refers to or portrays (or gives the impression of portraying) a living person unless the written consent of that person is obtained.
- The advertisement contains negative references to FBN Holdings services or those services provided by any if the banking group.
- The advertisement may adversely affect in any way the interests of FBN Holdings.

- The advertisement relates to a political party or parties of a political cause.
- In the case of digital media, the advertisement must not pose a health or safety risk as a result of flicking or other visual imagery.

Approval or rejections of all FBN Holdings advertising shall be in accordance with the Brand Council and Clearing House purpose, framework, methodology and process flow detailed in this document.

Advertisement Development Guidelines

- All material should be developed using the project activation flow and cleared through the brand clearing house.
- All advertisement development should be accompanied by a relevant and formal creative brief and follow the creative briefing process flow as detailed in this document.
- All timing schedules for all advertising campaigns and singular formats should be accompanied by a corresponding timing schedule that is pre-agreed by the client and all external agencies and partners in advance.
- All budgets and costing for all advertising campaigns and singular formats should be pre-agreed in advance with the client and all external agencies and partners and adhered to as detailed in the process flow of this document.

We adhere to international guidelines for engaging in the three priority sectors, Agriculture, Power and Oil & Gas. As a Debt Arranger, we are guided by the IFC Equator Principles and by virtue of other associated lending institutions...

- All material and artwork should be converted to the format required for production before submission to the production agencies.
- Only FBN Holdings approved creative and production agencies must be used
- If the client gives final approval for a project and then discovers error after production, the client will assume responsibility for all costs associated with reproduction
- Production request form should be used for production, specifying the production details.
- Only FBN approved production agencies and partners must be used for printing / production.
- The Head of Functional Unit and the Brand Clearing House must approve all productions.

RESPONSIBLE LENDING & INVESTING

The Journey of Embedding Sustainability within the Group

Having developed and gotten approval from management on the environmental, social and governance management system (ESGMS), FirstBank has begun the full use of the ESGMS as promised in 2014. The employment of the ESGMS is to effectively drive responsible lending and mitigate the associated environmental, social and governance risks. The ESGMS document was developed in partnership with the management experts, Accenture. The ESGMS consists of Environmental, Social and Governance (ESG) Policy, procedures for conducting ESG due diligence on potential transactions, guidance on how the Bank can monitor performance and maintain ESGMS records, overview of the types of roles and responsibilities for

implementing the Bank's ESGMS amongst others. This document has been reviewed and signed by relevant stakeholders in the Bank including the Chief Risk Officer, Group Executive, Institutional Banking; Head, Compliance; Head, HCMD; Head, Legal; GMD/CEO.

The relevant implementation documents such as the environmental, social and governance risks screening checklist (which is to be completed by a relationship manager and verified by analyst against the EIA report) are currently in use.

In addition, given that our responsible approach to investment explicitly acknowledges the relevance to the investor of environmental, social and governance factors, and of the long-term health and stability of the market as a whole, the Merchant Banking & Asset Management Group has begun the process of incorporating social, environmental and governance considerations in making effective operational and capital investment decisions. We adhere to international guidelines for engaging in the three priority sectors, Agriculture, Power and Oil & Gas. As a Debt Arranger, we are guided by the IFC Equator Principles and by virtue of other associated lending institutions, which benchmark their performance standards against the Nigerian Sustainable Banking Principles and/or IFC Equator Principles. One of our key requirements for deal promoters during the project development and especially post-construction, is to have prepared an Environmental Impact Assessment ("EIA") report, in compliance with the local & international regulation and best practices.



LEFT:
ERM carrying out a site survey for the International Cement Company Limited cement project (Ogun State).

RIGHT:
ERM visiting the local chiefs and community heads at the ICCL site visit (Ogun State).

While, the Merchant Banking & Asset Management Group currently adhere to strict regulatory and investment guidelines set by our in-house compliance team and external authorities such as the Securities Exchange Commission (SEC), the Central Bank of Nigeria (CBN); the Nigerian Stock Exchange (NSE) and International Finance Corporation (IFC), we have set in motion ways of improvement.

Based on the Group's strategic framework FBN Quest have developed a five-year plan which include ESG policies and frameworks that will help drive the various businesses' positive impacts and minimize their negative operational impacts. Furthermore, this is consistent with our vision to continue to build a world class risk management culture, in which risk is considered across all business decisions, and where we protect against unforeseen losses to maximize opportunities.

Staff training on sustainability for FirstBank is on-going. Apart from the Board of directors (BOD), over 600 staff have been trained on modules/requirements recommended for employees in partnership with First Academy, Accenture; FirstBank Sustainability Centre at the Lagos Business School and University of Edinburgh. The modules are designed to provide employees with the right knowledge, skills, attitudes and behaviours. These include NSBP specific requirements for employee training on sustainability such as sustainable banking training and reporting. These are structured for MANCO/executive, HOD/HOUs/sustainability champions/experts; and all other employees. The goal for 2015 is to ensure that all key staff are trained on sustainability as well as 60% of other employees.

To help deliver the sustainability strategy, a clear approach to customer education as part of the stakeholder engagement has been crafted. A key aspect of this is the partnership the Lagos Business School with the FirstBank Sustainability Centre as a vehicle for customer and wider stakeholder engagement. The Centre, since the partnership has delivered programmes through workshops, seminars and conferences. Apart from students in LBS, the Centre has focused on customers and stakeholders in the oil & gas, financial; power, agricultural and telecommunications sectors with priority for SMEs.

The FBNQuest Legacy series is an interactive outreach program developed by FBN Trustees Limited to help educate the Nigerian audience about estate planning and the generational wealth transfer. The program leverages storytelling to engage the audience and discuss culturally related scenarios and has empowered and impacted many beneficiaries since commencement

Sustainability performance management and reporting is a key component of the sustainability strategy as it enables the Bank to effectively measure, manage and report its sustainability performance and also meet its NSBP obligations to report a wide range of metrics. To this end, we have partnered with Accenture in the provision of performance management, reporting and implementation software. The sustainability performance management and reporting process is made of seven steps which consist of planning and delivery. We are currently at the last stage of planning.



ESGMS

The employment of the ESGMS is to effectively drive responsible lending and mitigate the associated environmental, social and governance risks.

08

Empowering People

...At FBN Holdings, we know that our people are critical to the success of our business. We are therefore committed to ensuring that the skills and talents of our people are properly harnessed to achieve the business goals of the organisation.



To ensure that we sustain a learning and development culture, whilst ensuring that staff (irrespective of their location) are adequately equipped to perform optimally on the job, we continued this year the commitment to building staff capacity across the Group based on training needs analysis for staff

EMPLOYEE EMPOWERMENT, ENGAGEMENT & INCLUSIVE WORK PLACE

At FBN Holdings, we know that our people are critical to the success of our business. We are therefore committed to ensuring that the skills and talents of our people are properly harnessed to achieve the business goals of the organisation. Further to the above, the Group has a talent management framework which provides guide on hiring, staff development and training and matching competencies with job requirements. Added to the Talent Management Framework is the Competency Framework/Catalogue for the Group. It indicates the competencies, attitude and behavior required by every employee at work.

To ensure that we sustain a learning and development culture, whilst ensuring that staff (irrespective of their location) are adequately equipped to perform optimally on the job, we continued this year the commitment to building staff capacity across the Group based on training needs analysis for staff. To this end, to achieve the Group business goals the right set of skills and competencies required were implemented 2015. These include:

- Leveraged skills of Structured Trade & Commodity finance (STCF) desk of FBNBank UK to organise STCF Training for relevant Strategic Business units. All staff from FBN UK were also trained during the programme.
- Rolled out an intensive French language Training programme aimed at building French Language capabilities in staff to enable the Group play

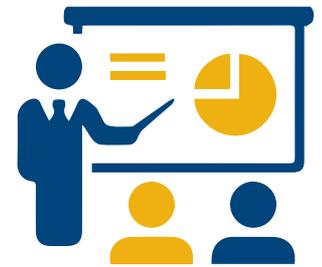
effectively in the sub-Saharan Africa Francophone countries. 36 targeted Africa Integration Project staff were trained.

- Conducted an Advanced International Financial Reporting Standards (IFRS) Training Programme for about 30 delegates from Financial Control, Internal Audit, Business Performance Monitoring, Treasury, Internal Control, Subsidiaries Finance Coordination, Market & Liquidity Risk, FBN Mortgages and Credit Risk Management.

In addition, the Banking Awareness Test designed to ensure that every employee in the Bank has a balanced and updated knowledge of Banking and developments in the environment was implemented based on a training module. We have so far trained and tested a total of 3,557 out of 5460 staff in the Bank representing 65.1%.

We have an organizational culture that encourages an open and clear line of communication between superiors and subordinates in order to foster collaboration and teamwork as well as exchange of ideas. Implementing this has seen us develop an interactive platform where everyone across FBN Holdings can easily access the portal.

Our efforts at engendering diversity in the workplace include having in place a diversity policy that encourages inclusion. The Diversity & Inclusion objective of the Group is to be a recognized industry leader in workforce diversity and leverage diversity for the growth of the Group and the success of the



100%

Trained 100% of staff



Participants at the sustainability capacity building workshops at the FirstBank Sustainability Centre, Lagos Business School

The Diversity & Inclusion objective of the Group is to be a recognized industry leader in workforce diversity and leverage diversity for the growth of the Group and the success of the customers and communities we serve.

GENDER POPULATION

35.9% female

Towards the goal of engendering diversity and inclusion in our business practices we continue to improve our Board composition

customers and communities we serve. We have a diversity team responsible for ensuring the Bank/Group has a diverse workforce and an inclusive workplace with opportunity for the talents of all employees to create value, deliver a superior client experience and develop innovative solutions for the markets and the communities we serve

Towards the goal of engendering diversity and inclusion in our business practices we continue to improve our Board composition. Our board composition consists of 21% female, the highest in any holdings company in Nigeria. At the management level, gender population is 35.9% female to 64.1% male while our workforce comprises of persons of every tribe and culture in Nigeria including expatriates from other countries.

Through our Employee Volunteering & Giving programme, the Group's staff are provided with a platform that allows them to participate in socially responsible initiatives that impacts their community, giving them a sense of ownership in building the brand and at the same time fulfilling their yearnings to show care and support for the needy. We are also committed to fostering a safe work environment where the safety, security and wellbeing of our workers are protected. Part of this includes the operation of a clinic where ailing staff can have access to first aid and preliminary medical treatments before visiting the hospital.

Employee Giving & Volunteering



TEACHING



TREE PLANTING



SANITATION



*LEFT:
Employee Volunteers
imparting knowledge at the
financial literacy sessions
targetted at secondary
school students.*

*RIGHT:
Employee Volunteers at the
Down Syndrome Foundation
in Surulere, Lagos*

Enhancing Human Rights through Collaborative Partnerships

The Universal Declaration of Human Rights, Article 26 emphasizes the significance of education in the development of human personality as well as the enhancement of human rights and fundamental human freedom.

Our responsibilities to our people and stakeholders include protecting, respecting and upholding their rights. We believe our responsibilities go beyond legal compliance to moral obligations. We ensure human rights are not abused and make it our responsibility not to get involved in the violations of human rights. We are committed to dealing fairly with all our stakeholders which include our employees, customers, shareholders, government agencies amongst others. We do not encourage staff to take advantage of each other or manipulate one another based on superiority rather respect for each other's dignity is encouraged. Gender discrimination (as highlighted in our Diversity program) and discrimination of minority group is not allowed. Harassment of staff in any form is strongly discouraged and culprits are usually handed over to the established disciplinary committees for sanctioning.

Furthermore, the Group maintains an organizational culture that encourages an open line of communication between superiors and subordinates. The Group carries out induction for new staff to acquaint them with values and vision of the Group so as to understand how to behave with other staff in the course of their stay in the Group.

Upholding Freedom of Association

At FBN Holdings, we ensure that in everything we do, our people feel a genuine sense of fairness, equality, freedom and participation. The Group creates and sustains an environment that supports and encourages human rights/freedom of association as well as collective bargaining. For instance, at FirstBank, employees have the opportunities to belong to unions such as (ASSBIFI; NUBIFE) and the employees are at liberty to either become members or not. Management of the Bank hold quarterly meetings with the executives of these unions who are also representatives of staff. These meetings provide a platform for management and union to discuss on all aspects of employees' employment relationship and also serve as collective bargaining mechanism to resolve issues.

FirstBank also practices a Pay for Performance Principle where bonuses are tied directly to staff performance. The Bank encourages staff to hold regular meetings, engage in open discussions and consultations so as to engender flow of information.

Across the Group, all employees get same remuneration regardless of gender or region.

Employees of the Group are hired based on their free will and there is no forced, bonded or involuntary prison labour. Employees are allowed to resign based on the terms in their contracts



No forced labour

Our recruitment process is carried out in line with global best practice devoid of all forms of bias

Elimination of All Forms of Forced labour

In carrying out our day-to-day operations, we understand the importance of not only having the right talents at the right places, but also an environment where people are willing to work without coercion. Employees of the Group are hired based on their free will and there is no forced, bonded or involuntary prison labour. Employees are allowed to resign based on the terms in their contracts. We have been able to achieve this by developing the right policies and frameworks which have ensured that our recruitment process is carried out in line with global best practice devoid of all forms of bias.

In the case of conflict amongst staff, inquiries are made regarding the dispute or conflict there are disciplinary committee within the respective SUBCOs to resolve such issues. Through this, the rights of employees are upheld and no single individual is treated unfairly. For existing employees, we have established a clear framework for escalation enabling our people to freely relate with their Human Resource (HR) business partners on any issue around supervisor-subordinate relationship. We have also reinforced acceptable workplace behaviours through series of campaigns (Jerk behavior campaign, etc). All these initiatives are strategically aimed at ensuring that we have a workforce that is not only emotionally connected to

our brand, but also willing to effortlessly champion the cause of the brand.

Also, as a matter of principle, the Group does not maintain partnerships with any organization or group that uses forced or compulsory labour. We carry out intensive due diligence checks on our partners employment policies before building relationships with them.

Anticorruption

The Group is committed to working against all forms of corruption including bribery and extortion. To demonstrate our commitment to anticorruption, the code of ethics rolled out in FirstBank in 2007 remained in force during 2015.

The board of directors, in conjunction with its committees, oversees compliance programs by:

- Setting the tone at the top, both internally and externally, and promulgating a compliance charter or values statement
- Focusing attention on critical risk areas
- Ensuring the institutionalization of the whistleblower helpline process and taking active control when appropriate
- Working with management to incorporate leading practices (e.g., protocols for investigating complaints, helpline statistics, and internal reporting).

The Group is committed to working against all forms of corruption including bribery and extortion.



To influence culture and tone, the board:

- Reviews metrics and key performance indicators with respect to the company's compliance with law and policy
- Maintains a deep understanding of the compliance monitoring, testing, and issue resolution processes
- Assesses the adequacy of management's response to specific issues and areas of internal control weakness.

Management takes the lead in developing tools to establish the company's culture, through messaging, updating, and distributing codes of conduct, communicating helpline processes, and carrying out annual cultural surveys to test the effectiveness of the program. The board and management, working together, have been able to strengthen ethics and compliance in the organization, thus leading to higher-quality information, process optimization, improved effectiveness, a protected reputation, and reduced costs.

09

Supporting Our Communities

...Our commitment to our host communities forms a greater core of our corporate responsibility and sustainability efforts which we have structured along Education Health & Welfare; and Economic Empowerment to deliver long lasting impact.



FirstBank is committed to the community in which it operates. Our involvement with our various stakeholders, our host communities inclusive is not just about profit generation rather the realization that often our most effective currency is the skills and opportunities we can share with them

FirstBank is committed to the community in which it operates. Our involvement with our various stakeholders, our host communities inclusive is not just about profit generation rather the realization that often our most effective currency is the skills and opportunities we can share with them. This, we have aptly expressed and weaved around our mantra of people, passion and partnership and our brand promise- 'You First' signaling our resolve to constantly build broader, deeper and more enduring symbiotic relationships to deliver long-term value for our shareholders through putting our stakeholder's needs first.

We realize that strengthening the communities we serve is fundamental to the future of our business. With over 13,000 staff, 750 business locations (623 branches, 61 quick service points and 69 cash centers/agencies), over 2,600 ATM's, over 10 million customer and international presence through our subsidiaries; FBN Bank (UK) Limited in London and Paris, FBNBank DR Congo, FBNBank Ghana, FBNBank Gambia, FBNBank Guinea, FBNBank Sierra-Leone and FBNBank Senegal as well as Representative Offices in Johannesburg, Beijing and Abu Dhabi, our economic, human, physical and social resources give us enormous reach to make a significant impact on people and communities around the world and effectively contribute towards more sustainable growth.

Our commitment to our host communities forms a greater core of our corporate responsibility and sustainability efforts which we have structured along four key priorities to deliver long lasting impact.

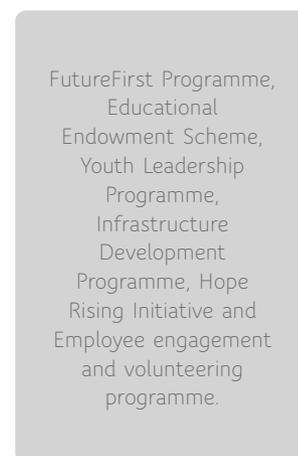
These are Education, Health and Welfare, Economic Empowerment and the Environment. These are further subdivided into the following programmes: FutureFirst Programme, Educational Endowment Scheme, Youth Leadership Programme, Infrastructure Development Programme, Hope Rising Initiative and Employee engagement and volunteering programme.

EDUCATIONAL ENDOWMENT PROGRAMME

Empowering Youths and Stakeholders through Education

The FirstBank Endowment Programme was initiated in 1994 with the establishment of the Samuel Asabia Endowment in Business Ethics at the University of Lagos. Presently, the Bank has endowed sixteen federal universities each located in the different geopolitical zones of the country. Some of these endowments have been converted to infrastructural projects including the University of Abuja Entrepreneurial Centre, ICT Park at the Ahmadu Bello University Zaria, Lecture Theatre at the Federal University of Technology Minna amongst others. Currently, the Bank's total endowment portfolio is an approximate N450m.

In 2015, the Bank engaged the services of its sister company FBN Capital (now FBNQuest) to manage the investment portfolio of the various endowments. As part of its first phase, FBN Capital (now FBNQuest) is currently managing the investment portfolios of the Samuel Asabia Endowment in Business Ethics of the University of Lagos, FirstBank Professorial Chair Endowment in Computer Science at the



LEFT:

L to R – Emmanuella Ekhaguere, Associate, Channels Management, FBN Capital Asset Management; Lolade Sasore, Head, Marketing and Corporate Communications, FBN Merchant Bank at the Women Rising Initiative.



RIGHT:

Toni Kan and other journalists at a team bonding session at the FirstBank Sustainability Centre Workshop for media practitioners.



N450m

The FirstBank Endowment Programme was initiated in 1994... and has endowed sixteen federal universities each located in the different geopolitical zones of the country. Currently, the Bank's total endowment portfolio is an approximate N450m.

Federal University of Technology Akure and FirstBank Professorial Chair in Department of Petroleum Engineering, University of Uyo to ensure maximum yield for each endowment investment in order to promote research and learning in the universities.

The Samuel Asabia Endowment of the University of Lagos is currently advertising for a professorial chair occupant to ensure that the endowment is fully re-engineered to carry our ground breaking research activities.

Also, FirstBank Professorial Chair (PC FUTA) continued its meritorious contribution to knowledge through publication of research papers and winning awards for some of the papers published. Some of these papers have been articulated in carefully organized public lectures. To bolster the activities of the PC Occupant, a brand new operational vehicle was procured to ensure ease of mobility for the professorial chair occupant while carrying out his duties. Some of the papers published by the professorial chair occupant of PC FUTA and his colleagues include the following:

1. Alese, B. K., Ibidunmoye, E. O., Haruna I. D., Thompson A. F. and Iyare O. (2014); Game-Based Analysis of Network Attack-Defense Interaction; The 2014 International Conference of Information Security and Internet Engineering; World Congress on Engineering, ISBN 978-988-19252-7-7; 481-487 (UK,) (Merit Award Winning Paper)
2. Alese, B. K., Iwasokun, G. B. and Haruna, I. D. (2013), DGM approach to network attacker and defender strategies, International Conference on Internet Conference Technology and Secured Transaction, (UK), (Best Paper out of 1236 from 96 Countries)
3. Alese, B. K., Thompson, A. F., Owa, K. V., Iyare O. and Adebayo, O. T. (2014); Analyzing Issues of Cyber Threats in Nigeria; The 2014 International Conference of Information Security and Internet Engineering; World Congress on Engineering, ISBN 978-988-19252-7-7; 492-493 (UK,)
4. Alese, B. K., Gabriel, J. A., Olu Kayode, O and Daramola, O. O. A. (2014); Modelling of Risk Management Procedures for Cybercrime Control Systems; The 2014 International Conference of Information Security and Internet Engineering; World Congress on Engineering, ISBN 978-988-19252-7-7; 505-509 (UK).
5. Adu, M. K., Alese, B. K. and Adetunmbi, A. O. (2014); Design of Software User Identity Module (SUIM) For Preventing Software Piracy. The 2014 International Conference of Information Security and Internet Engineering; World Congress on Engineering, ISBN 978-988-19252-7-7; 525-529 (UK)
6. Alese B. K., Oyebade O., Osuolale A. Festus, Iyare O., Thompson A. F. (2014), Evaluation of information security risks using hybrid assessment model, The 9th International Conference for Internet Technology and Secured Transactions (UK)
7. Alese B. K., Dahunsi F.M., Akingbola R.A, Adewale O.S., Ogundele T. (2014), Improving Deception in Honeynet: Through Data Manipulation,



LEFT:
Mr. Ismail Omeigbe,
(2nd left) Head Corporate
Responsibility and Sustainability
and Centre Manager, FirstBank
Sustainability Centre with
media practitioners at the
Sustainability Workshop for
Media Practitioners.

RIGHT:
Participants at the
sustainability workshop for
media practitioners.

8. The 9th International Conference for Internet Technology and Secured Transactions (UK)
9. Dauda Adenusi, Boniface Kayode Alese, Bamidele Moses Kuboye and Aderonke Favour-Bethy Thompson (2015), Development of Cyber Situation Awareness Model; International Conference on Cyber Situational Awareness, Data Analytics and Assessment(UK)
10. Moyinoluwa Abidemi Bode, Boniface Kayode Alese, Samuel Adebayo Oluwadare, Aderonke Favour-Bethy Thompson, (2015), Risk Analysis in Cyber Situation Awareness using Bayesian Approach; International Conference on Cyber Situational Awareness, Data Analytics and Assessment(UK)
11. Bode Moyinoluwa A., Alese Boniface K., Thompson Aderonke F. and Iyare Otasowie (2014), A Bayesian Network Model for Risk Management
12. in Cyber Situation, World Congress on Engineering and Computer Science
13. 2014 Vol I WCECS 2014, 22-24 October, 2014, San Francisco, USA.
14. Alese Boniface, K., Adu Michael, K. and Owa Victor, K. (2015),
15. Cyber Security in Nigeria: A Collaboration between Communities and Professionals, World Academy of Science, Engineering and Technology
16. International Journal of Computer, Electrical, Automation, Control and Information Engineering Vol:9, No:5, 2015 (Singapore)
17. Adu Michael K, Alese Boniface K and Adewale Olumide S. (2014), Mitigating Cybercrime and Online Social Networks Threats in Nigeria, World Congress on Engineering and Computer Science 2014 Vol I WCECS 2014, 22-24 October, 2014, San Francisco, USA (Merit Award Winning Paper)
18. PUBLIC LECTURE: Security Issues in Nigeria: Getting Ready for the digital challenge.

The FirstBank Sustainability Centre

In 2013, the Bank partnered with the Lagos Business School Pan Atlantic University to establish the FirstBank Sustainability Centre as a centre for knowledge creation, application and dissemination.

The establishment of the FirstBank Sustainability Centre is a demonstration of the Bank's commitment to promoting sustainable finance and adhering to global best practices in its business operations especially in the aspects of Collaborative Partnerships and Capacity Building.

The Centre is designed to empower staff of the Group and other financial institutions who are signatories to the Nigeria Sustainable Banking Principles (NSBP), FBN Holdings Customers and other stakeholders including NGOs, Media Practitioners, SME operators amongst others.

These are achieved through relevant applied research in specified areas of interest; open and in-company seminars, workshops; and International and local conferences for the cross fertilization and exchange of ideas on sustainability.

The following activities were carried out at the FirstBank Sustainability Centre in 2015:

The FirstBank Sustainability Centre is a demonstration of the Bank's commitment to promoting sustainable finance and adhering to global best practices in its business operations.

LEFT:

One of the sessions at the Sustainability Workshop for Media Practitioners at the FirstBank Sustainability Centre, Lagos Business School.

RIGHT:

L-R: Dr. Ken Ameshi, Dr. Ijeoma Nwagwu, Centre Manager FirstBank Sustainability centre and Mr. Timothy Arowogun Group Head, Retail Banking Lagos & West after the FirstBank Sustainability Centre's Workshop for NGOs.



The Sustainability workshop for NGOs and Corporate Organization espoused approaches with which the media, investors and corporate organisations can work together to address social and environmental concerns.

Sustainability Workshop for SMEs (1st and 2nd Run)

The Centre hosted two workshops for SME practitioners in the course of the year. This is on realization that in spite of SMEs ability to create employment opportunities in the country, they are underutilized as a result of several challenges in the economy such as inadequate infrastructure, skill gap, lack of adequate credit facilities and the likes.

The FirstBank Sustainability Centre therefore hosted the Sustainability Workshop for SME practitioners to drive capacity building on embedding sustainable business practices into SME operations in order to ensure the survival and success of their enterprises.

Sustainability Workshop for Media Practitioners

The mass media is often regarded as the fourth estate of the realm because of the all too important role it plays in the dissemination of information through various channels and across diverse social strata sometimes setting the agenda for social and political actions.

The sustainability workshop for media practitioners was organized to enable participants understand the trend and practices of sustainability in Nigeria. The workshop offered journalists the opportunity to understand the fundamentals of sustainability and their role in reporting sustainability activities. The themes explored during the programme included: Sustainability Trend/Practices in Nigeria, the Role of the Media in the advancement of Sustainability, Reporting Sustainability Concerns/ Programmes/Initiatives and Building stakeholder communication.

Leading a Sustainable Business (Lagos & Edinburgh Edition)

This is an Executive Programme organized by the FirstBank Sustainability Centre featuring the Lagos and Edinburgh editions. Participants were taught how to integrate sustainability into their organisation's operations, supply chain and community. Also, the programme blended personal capacity building and application to real issues through a series of practice sessions using tools for systems thinking and collective learning.

Sustainability Workshop for Women in SMEs (1st and 2nd Run)

Due to the upsurge in the number of women starting and running businesses and notable contribution to the development of the country, poverty reduction and promotion of self-reliance, the Bank hosted the Sustainability Workshop for SME practitioners to enlighten female entrepreneurs that sustainability is not just about the environment but an important step towards an efficient business model that reduces waste, cuts costs and increase profit.

Participants were also equipped with knowledge and skills on how to combat the harsh economic terrain and imbibe sound management practices in order to maximize profit. Furthermore, they were equipped with knowledge on the sustainability model which considers financial success vis a vis societal and environmental progress and offers a better growth strategy for SMEs.



Sustainability Workshop for NGOs

The Sustainability workshop for NGOs and Corporate Organization espoused approaches with which the media, investors and corporate organisations can work together to address social and environmental concerns. It highlighted methods with which leading companies in the private sector can recognize and develop strategies to meet social and environmental needs while remaining profitable. Topics such as: Sustainability Strategy for NGOs, Social Entrepreneurship, NGO-Private Sector Partnership amongst others were delivered by experts in Sustainability.

The workshop critically examined the emerging shift in the NGO/private corporation relationships and how it creates an exciting new landscape of opportunities for both parties to collaborate, boost capacity and sustainability, and deliver service to the community. It espoused why such partnerships must not be entered into lightly.

*TOP:
One of the sessions at the Sustainability Workshop for Media Practitioners at the FirstBank Sustainability Centre Lagos Business School.*

LEFT:
Intending participants registering to take part in the International Conference on Sustainability organized by FirstBank Sustainability Centre Lagos Business School.



RIGHT:
A CEO Roundtable Session on Sustainability hosted by the FirstBank Sustainability Centre Lagos Business School.



Hope Rising Initiative is one of the key programmes of the Group designed to empower people living with disabilities.

CEO Roundtable on Sustainability

The CEO Roundtable on Sustainability provided a unique platform for CEOs from leading organizations to rub minds and share their experiences on a wide variety of sustainability topics. Participants included MD/CEOs, top government officials, top officials of international organisations and NGOs as well as leading members of the academia. In 2015, Causes of Skill Gap in the Workforce was deliberated upon. The absence of skilled talent to fill open jobs - coupled with high rates of unemployment among young people in the environments businesses operate. Solutions to this problem were proffered and participants were measurably impacted.

International Conference on Sustainability

This conference series is an annual event designed to elevate and mainstream the contemporary discourse on sustainability in emerging markets - particularly Nigeria. Top sustainability business leaders, government officials and members of academia shared knowledge on how to advance the sustainability agenda in a turbulent world.

Hope Rising Programme

Hope Rising Initiative is one of the key programmes of the Group designed to empower people living with disabilities. Its key objective is engendering inclusivity and diversity through education, advocacy and enlightenment; skills acquisition through training; as well as inclusive events. Some of the initiatives we supported in 2015 under this programme include:

- Continued higher education support for Mr. Alani Azeez for his HND III education in Osun State Polytechnic Iree as a part time student. The Bank had previously supported him for his HND I & II in the same higher institution.
- Supported the Chike Okoli Foundation in its 4th edition of cardiovascular health campaign in ten secondary schools in Lagos State and the 9th edition of its Heart and Soul Gala.
- Continued support for Mr. Folawiyo Jimoh Adisa, Nigeria's Para-Badminton Gold medallist to attend para-badminton sports in Europe.
- Maintained partnership with the Down Syndrome Foundation Nigeria and supported them in their annual Inter House Sports Competition, Children's Day Commemoration, provided advert support for the World Down Syndrome Day, and participated in the Down Syndrome Awareness Week.
- Supported the Benola Cerebral Palsy Initiative for its implementation of advocacy campaigns and capacity building programmes as well as provision of infrastructure to care for persons with cerebral palsy.



- Partnered with Theseabilities Ltd. In hosting a Children's day celebration for children with disabilities at Freedom Park Lagos Island. Participants include children from the Pacceli school of the Blind and school for the hearing impaired Meiran.
- The Bank supported the Nigeria Society for the Blind on its Diamond Jubilee May Ball designed to raise funds for the activities of the Vocational Blind Centre in Oshodi Lagos.
- Supported the Pacceli School of the Blind on their graduation ceremony and end of year activities.
- Provided support to Star Children's Development Initiative for the provision of medical intervention for Ms. Jomiloju Ibiyemi, a disabled girl with hole in the heart.
- Supported the International Association of the Scientific Study of Intellectual Disabilities for hosting its International Conference on disabilities event aimed at promoting the cause of people living with disabilities.
- Supported the Sickle Cell Foundation Nigeria in the Commemoration of the World Sickle Cell Day to provide advocacy and public enlightenment on the sickle cell disorder.
- Provided Support to Golden Hearts Touching Lives Initiative for its medical outreach to Od-Olowo town Mushin Lagos.

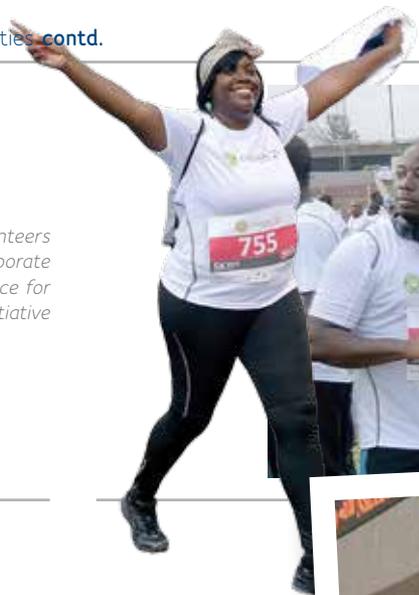


- Provided support to Sebbecky Cancer Care Initiative for its Light Lagos Pink Campaign with the aim of providing advocacy and public enlightenment on the cancer ailment through the human pink ribbon – a gathering of 12,000 people wearing pink to form a ribbon in attempt to break the Guinness World Record of the human pink ribbon.
- Support to Segun Aina Foundation in hosting a Christmas party event for less privileged children.
- Support to Mr. Ade Adelekan, a physically challenged youth in completion of his final year project thesis at the Lagos State University.

RIGHT:
Staff of the Bank with children from the Down Syndrome Foundation Nigeria commemorating World Down Syndrome Day 2015

LEFT:
Winners of the quiz competition on the Bank's Radio Drama Series on Down Syndrome display their win. With them are two staff of the Bank and an official of the Down Syndrome Foundation Nigeria.

Employee Volunteers at the NSE Corporate Challenge Race for Cancer initiative



The NSE Corporate Challenge is a Corporate Social Responsibility (CSR) initiative of the Exchange, aimed at promoting the health & wellbeing of the operating community. This initiative enhances the concept of volunteerism within participating companies as proceeds from the competition is donated to support the national drive aimed at providing Mobile Cancer Centres (MCCs) across Nigeria



LEFT:
One of the Bank's several initiatives to promote education.

RIGHT:
A LEAP Africa CEO Roundtable discussion session on maximizing profit and mitigating risks supported by the Bank.

Youth Leadership and Development Programme

The Youth Leadership and Development programme is designed by the Bank for young people between the ages of 14 and 35 years old. The key objectives of the programme are providing: a platform for the youth to imbibe a deeper understanding of the necessary but rewarding sacrifices and qualities of great leadership and equipping them with the relevant tools, skills to become great leaders; creating opportunities for youth participation in developing the country through sustainable community development programmes; mentorship for the youth and value based leadership. The Bank currently partners with the Nigeria Leadership initiative (NLI); Junior Achievement Nigeria (JAN); and LEAP Africa in driving this initiative.

Partnership with Nigeria Leadership Initiative (NLI)

The Bank has partnered with the Nigeria Leadership Initiative since 2008. Since the commencement of the Bank's partnership with NLI, about 400 NLI associates have been trained and mentored as future leaders. Through the annual Future Leaders Seminar which sees the Bank nominating two outstanding staff to participate alongside other Nigerians outstanding in their different professions across the globe all under the age of 35, both the Future Leaders Seminar and Guest Speaker Forum serve as platforms for promoting value based leadership amongst Nigerians through seminars, workshops, Leadership Projects, and Essay Competitions designed to increase engagement between the citizenry and leadership.

Partnership with Leap Africa

The Bank continued its partnership with LEAP Africa to implement the Youth Development Training Programme in 2015 in different schools in Lagos State. The programme was executed under the employee volunteering scheme which saw staff of the Bank teaching an approximately 2,000 students about leadership and ethics after undergoing a 'training of trainers' exercise. Also, about 6000 volunteering hours were expended. Topics taught includes: The Act and Art of Leadership, Connecting to your inner self, Building Self Confidence, Developing your personal mission statement amongst.

The Programme focuses on ensuring that youths become socially responsible and responsive and strategically positioned to achieve life goals and effect positive change in their local communities across Nigeria through the inculcation of knowledge on Leadership, Ethics and Civics.

The Youth Leadership Program fosters mutual understanding, respect, and civic engagement among young Nigerians. Also, the Bank supports LEAP Africa to host the LEAP Africa CEO forum designed to promote entrepreneurship amongst young entrepreneurs through the provision of cutting edge solutions by industry experts.



2,000 students

We continued our partnership with LEAP Africa to implement the Youth Development Training Programme... executed under the employee volunteering scheme which saw staff of the Bank teaching an approximately 2,000 students about leadership and ethics.

LEFT:

A train the trainer session for the Bank's FutureFirst Volunteers.



RIGHT:

A FutureFirst volunteer from the Bank teaching Financial Literacy to students of Fountain Heights School Surulere Lagos.



Financial literacy

Students in secondary school are taught about the importance of having a savings culture and early entrepreneurship.

FUTURE FIRST PROGRAMME

FutureFirst has two legs: Financial literacy and career counseling. The FutureFirst Financial Literacy Programme is part of the Group's efforts at engendering financial inclusion amongst the unbanked. It is also a platform where students in secondary school are taught about the importance of having a savings culture and early entrepreneurship. A total of 10,000 secondary school students have been reached so far with over 35,000 volunteering hours expended.

Partnership with Junior Achievement Nigeria (JAN)

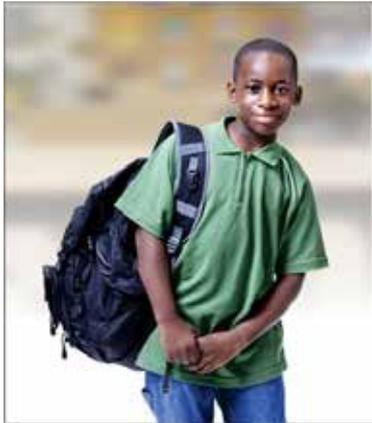
As in previous years the Bank in 2015 partnered with Junior Achievement Nigeria to implement the Company programme. The programme held in four locations in the country; Lagos, Port Harcourt, Enugu and Abuja.

The Company Program (CP) provides senior secondary school students with practical business experience through the organization and operation of an after-

school business enterprise. It provides an experiential supplement to the business and economics' education of high school students, help them to better understand how businesses are organized and operated, help students develop critical thinking, speaking, and leadership skills, demonstrate the rewards of the free enterprise system, introduce students to career opportunities, teach basic workforce-readiness skills and foster a positive relationship between youth and the business community.

EMPLOYEE GIVING & VOLUNTEERING

The Employee Giving & Volunteering Scheme is designed to provide a platform for staff to dedicate their time, knowledge and experience to address short and long term development needs/challenges of the community in which they live and work. This is through participation in various initiatives based on their areas of interest and in line with the EVS focus areas which are directly linked with the core pillars of the Group's CR&S strategy.



FutureFirst

Career Counseling & Financial Literacy For Young Ones.

FirstBank
Since 1894 

Supporting the dreams of the younger generation.

In Partnership with:



Join / Follow / View Us On   
www.firstbanknigeria.com



*LEFT:
Employees visit and donate to a care home as part of the Bank's Employee Giving and Volunteering Programme.*

*RIGHT:
Students from the Paccelli School for Blind and School for the Hearing Impaired Meiran pose for photographs after a children's day event organized for them by the Bank on children's day.*



In 2015, staff volunteers from the Bank participated in the annual Down Syndrome Inter House Sports Competition by taking part in some of the sporting activities alongside the children such as March Past. Volunteers from the Bank also encouraged and cheered the children in the different sporting activities thus making them feel loved and appreciated. The Annual Inter House Sports Competition of the Down Syndrome Foundation is aimed at improving the physical and intellectual development of persons living with Down syndrome through sporting activities designed to inculcate appropriate skills and values such as good sense of judgment, hard work, integrity, confidence and inter-relationship.

Also, volunteers from the Group visited the City of Refuge Orphanage in Abuja donating gift items to the children and generally participating in fun outdoor activities with the children.

Due to the need to increase public awareness on the Down Syndrome disorder by breaking the myths surrounding the disorder, staff volunteers from the Bank again participated in the Down Syndrome Awareness Week designed to provide advocacy and public enlightenment about the Down Syndrome Disorder. As part of activities commemorating the week, an Employee Volunteering Scheme Visit was also made to the Down Syndrome Foundation Resource Centre where gift items were also donated to the children.



Employee Giving & Volunteering

Provides a platform for staff to dedicate their time, knowledge and experience to address short and long term development needs/challenges of the community in which they live and work.

*LEFT:
A Train the Trainer session for FutureFirst Volunteers organized by the Bank to equip FutureFirst Volunteers with skills to impact Financial Literacy knowledge on students.*



*RIGHT:
Infrastructural Support by the Bank.*



The Bank's FutureFirst Programme is designed to inculcate knowledge of financial literacy on youths and Leadership Ethics and Civics Programme (In partnership with LEAP Africa) designed to inculcate leadership skills on youths were also implemented under the Employee Volunteering Scheme.

OTHER COMMUNITY SUPPORT PROGRAMMES

Other one-off youth leadership programmes embarked upon by the Bank in 2015 are: Support to the League of Abiriba professionals in the construction of their permanent site - Abiriba Skills and Enterprise Centre, support to Ajumogobia Science Foundation Concert designed to raise funds for the promotion of the teaching and learning of science, support to Youths Rescue and Care Initiative for its Rescue the Scholars Educational Programme designed as a vocational learning opportunity for youths during the holidays, Support to Elderberry Integrated Services for its Invent Leadership Summit and Mentorship Programme for intermediate youths in secondary schools, Support to Advanced Graduate Development Centre for Teacher Training Programme in Lagos State, Support to Unsearchable Technology for the U-search Spelling Bee Competition amongst children and youths and donation of 1,019 copies of Sound Character: Maxim for a successful future to students of GSS Wamba Nassarawa State.

Different editions of volunteer impact magazine showcasing the activities of outstanding volunteers from the Group.

INFRASTRUCTURE DEVELOPMENT PROGRAMME

As part of efforts at improving the quality of lives of members of our host communities, the Bank initiated the FirstBank Infrastructural Development Programme aimed at promoting infrastructural development under identified areas of support. This includes providing infrastructural facilities in schools, hospitals and the community.

Some of the infrastructural projects constructed by the Bank includes: the Remi Babalola Red Cross Clinic, Information and Communication Technology Park at the Ahmadu Bello University Zaria, Faculty of Dentistry Building at the University of Nigeria Nsukka, Renovation of class room blocks at the Police College Kaduna, Lecture theatres at the Obafemi Awolowo University and Cafeteria at the University of Calabar amongst others.





LEFT:
DMD of the Bank and students of Tinuola College Ado Ekiti at the 2015 Financial Literacy Day.

RIGHT:
The DMD of the Bank teaching students of Tinuola College Ado Ekiti Financial Literacy as part of activities commemorating the 2015 Financial Literacy Day.

THE REMI BABALOLA RED CROSS CLINIC

The Bank as part of its Corporate Responsibility and Sustainability Initiatives for healthcare Infrastructure development in the country constructed the Remi Babalola Red Cross Clinic in 2012. Located at New Gbagi Market Ibadan Oyo State, the clinic in partnership with the University College Hospital Ibadan provides accessible health care to people who are not financially endowed. This is in line with its humanitarian objective. Treatment so far administered at the center have been done free of charge. This is including registration, consultation and some laboratory tests except for drugs only which is procured. The medical personnel at the clinic work with professional standard and competence obtainable in any profit oriented medical outfit in the country.

In the last three years, the Remi Babablola Red Cross Clinic has treated over thirteen thousand patients on non-profit basis. Please see summary in the table below:

PERIOD	NEW PATIENTS	FOLLOW-UP PATIENTS	SERVICES RENDERED
Dec. 2012 to Dec. 2013	6,013	3,616	<ul style="list-style-type: none"> Affordable health care services to the vulnerable and less endowed. Medical Emergencies Routine General Clinic Dental Care Laboratory Services Immunization
Jan. 2014 to Dec. 2014	6,388	6,227	
Jan. 2015 to Aug. 2015	1,206	1,640	
TOTAL	13,607	11,483	



Students from Lagos Business School using the FBN Capital Bloomberg Terminal.

THIRD RIGHT: Gbagada General Hospital, recipient of a Dialysis Machine from FBN Insurance.



MERCHANT BANKING & ASSET MANAGEMENT GROUP

In line with the FBN Holdings Community Support strategic focus, our Merchant Banking & Asset Management (MBAM) Group continued its community development initiatives in 2015. From participating in the Nigerian Stock Exchange (NSE) Corporate Challenge, (a 5km run initiative organized by the NSE to support cancer victims in Nigeria in which employees from organizations listed on the Nigerian Stock Exchange and companies from the capital market community participate) to partnering with 234give.com, MBAM Group has actively driven the Employee Giving & Volunteering programme.

LBS Bloomberg Terminal

The Merchant Banking & Asset Management Group believes that education is a fundamental catalyst for sustainable economic growth and progress. We are particularly committed to supporting reputable educational establishments with strong business and finance faculties, of which LBS ranks at the forefront. In January 2013, Merchant Banking & Asset Management Group commenced a long-term partnership with Lagos Business School (LBS) to fund the provision and maintenance of Bloomberg Terminals at the institution.

Bloomberg Terminals are one of the financial sector's most widely used sources for real-time financial data in the world of finance. The aim of the initiative is to help students in relevant financial disciplines gain access and exposure to the tool. This constitutes part of our sustainability thrust in supporting education and capacity-building across relevant financial industries within the communities in which we operate.

Since the installation of the terminals in March 2014, the Bloomberg database has been an integral part of the library patronage. Several trainings on how to use the terminals have been held periodically by an international Bloomberg representative. These trainings focus on how to operate the database, as well as some navigation techniques. Users, comprising staff, visiting researchers and students, have used the database to analyze real-time financial market data, financial analysis of banks, and to extract economic data on Nigeria and other countries and sectors within the financial system.

Another profound impact of the database is the certificated online courses on markets and other financial concepts available via the terminal. This has also fuelled the usage of the terminals as users avail themselves of this rare opportunity to increase knowledge and expertise, as well as get a certificate that could form part of their curriculum vitae.

The average usage of the terminals is 80 users per month and this has impacted heavily on the learning process of the students.

LBS Industry Days

The Merchant Banking & Asset Management Group in line with the FBN Holdings CR&S strategic pillars has identified education as a fundamental catalyst for economic growth and sustained economic progress. In a bid to facilitate this, MBAM Group provides resource towards the development and delivery of an Investment Banking and Asset Management Industry Day, or



other relevant financial services industry theme to be mutually agreed with LBS, we actively support research and capacity/knowledge building in the area of finance on the platforms of reputable organizations in the country, hence, our support of the LBS Industry Day's initiative.

MBAM Group provides resources towards the development and delivery of an Investment Banking and Asset Management Industry Day at the Lagos Business School, and other relevant financial services industry which are mutually agreed.

MBAM Group Internship Programme

As one of the leading industry players, MBAM Group offers a unique opportunity to aspiring finance graduates to experience the real world of investment banking and asset management through its internship program. In view of the partnership with LBS, MBAM



TOP:
Staff donations to Lagos State Old People's Home



Group has committed to admitting a minimum of 3 interns per year on 3-month programs. As an LBS partner, MBAM Group participated in the LBS Career Day events and identifies potential interns, as well as candidates from your MBA program to serve as interns in the organization.

FBN INSURANCE

FBN Insurance Limited, an FBN Holdings company in partnership with Sanlam of South remained committed to supporting communities where it operates. In 2015, FBN Insurance made several donations to different organisations in line with the Group's CR&S strategy. These include the donation of a dialysis machine to Gbagada General Hospital, Lagos to boost patient's access for medicals.

The donation which was part of activities to mark the underwriting firm's 5th anniversary, was borne out of the Group's passion to care for the poor and vulnerable in the society who may not be able to pay for the full cost of dialysis. This we believe will hopefully make some positive impact given that there no fewer than 800 to 1000 patients coming for dialysis on day to day basis and about 21,000 monthly. Other support activities include Mother' Day Fiesta; Young Scholars Children's Day Bash for peace; Benola Cerebral Palsy Initiative and the Lagos Old People's Home.

TOP:
L-R: Director, FBNInsurance, Mr. Wale Ariyibi; Representative of Apex Nurse, Gbagada General Hospital, Mrs. Aderonke Adeniyi; Managing Director/CEO, FBNInsurance, Mr. Valentine Ojumah; Chairman, FB-NInsurance Limited, Mrs. Aderenle Kehinde and Medical Director, Gbagada General Hospital, Dr. Tayo Lawal during the commissioning ceremony of the Dialysis Machine at Gbagada General Hospital, donated by FBNInsurance as part of the 5th year anniversary of the company in Lagos on Friday, November 13, 2015.



21,000
patients monthly
...about 800 to 1000
patients coming for dialysis
on day to day basis



Community Support Score Card

	OBJECTIVE/PROGRAMME MEASURE	THIS YEAR'S ACCOMPLISHMENT	MEASURE	NUMBER OF PEOPLE REACHED/BENEFICIARIES	2016 TARGETS	
1. Infrastructure Development Programme	Promoting and Supporting Infrastructure Development in Schools and the Society	Maintenance of Ivory Park at Banana Island	Number of projects and number of people that benefitted from the projects.	N/A. Residents and visitors of the estate.	3 infrastructural projects.	
2. Hope Rising Initiative	Engender Inclusivity & Diversity through education, advocacy & Skills Acquisition	<p>Consistent partnership with the Down Syndrome Foundation Nigeria</p> <p>Supported DS Annual Awareness Week, EVS to Down Syndrome Foundation Resource Center, provided advert support for World Down Syndrome Day.</p> <p>Partnership with theseabilities ltd. in hosting a children's day event for children with disabilities.</p> <p>Support to Chike Okoli Foundation Cardiovascular Health Campaign in select secondary schools in Lagos State.</p> <p>Support to Para-Badminton Sports and physically handicapped student.</p> <p>Several one-off projects designed to add value to the lives of stakeholders</p>	Number of people reached	<p>Demonstrated care and support for children with down syndrome at the DSNF resource centre numbering over 200. Advert provided public enlightenment on the DS disorder to hundreds of thousands of Nigerians who saw the advert.</p> <p>About 50 visually and hearing impaired children were reached out to and taught vocational skills such as painting, weaving etc. on children's day.</p> <p>An approximate 10,000 secondary school students were reached through the health campaign.</p> <p>2 persons and thousands of people who were inspired by their story of ability existing in disability.</p>	<p>Increase support to the DSNF to an 80% rating.</p> <p>Reach out to about 150 physically challenged persons by hosting an event to impact their lives.</p> <p>To provide support to at least five NGOs and thereby reaching out to 25,000 persons on different health matters.</p> <p>Provide support for 10 physically challenged persons/individuals.</p>	
3. Youth Leadership & Development Initiative	Provide platform & relevant tools for youth to imbibe qualities of great leadership	<p>Partnership with NLI: Future Leaders Seminar</p> <p>Partnership with LEAP Africa: Youth Leadership Development Programme.</p> <p>Supported several one-off youth events.</p>	% of positive feedback from participants. Number of youths that participated in the different youths initiatives and reach via the mainstream media and digital media	<p>About 350 associates inducted so far as NLI fellows.</p> <p>Over 1,500 students impacted through LEAP Africa program</p>	<p>95%</p> <p>92%</p>	<p>100%</p> <p>100%</p>

	OBJECTIVE/PROGRAMME MEASURE	THIS YEAR'S ACCOMPLISHMENT	MEASURE	NUMBER OF PEOPLE REACHED/BENEFICIARIES	2016 TARGETS	
4. Future First Programme	Ensure Financial Literacy and Career Counseling for Young Ones	Partnership with JAN on financial literacy	Number of Students Impacted	12,000 students impacted	Programme held in 36 schools in Lagos, Port Harcourt, Enugu and Abuja	To hold programme in at least 50 schools in the different part of the country and impact an approximate 25,000 students
5. Educational Endowment Programme	Enhance sustainability & academic excellence towards long-term development of Nigeria	FUTA Endowment Samuel Asabia Endowment of the University of Lagos University of Uyo Endowment FirstBank Sustainability Centre	No of people impacted	Over 6,000 people impacted About 2,000 participants attended the FirstBank Sustainability Centre's conferences, workshops and seminars.	Endowment when fully commenced will reach out to an approximate 35,000 students and lecturers of the University of Uyo and University of Lagos.	
6. Employee Giving and Volunteering	Provide a platform for employee giving, volunteering and engagement	Volunteering on Future First, Youth Leadership Programme, EVS visit to Lagos and Abuja and other one-off health programmes.	No. of volunteering Hours	34,000 hours	40,000 hours.	



Sustainable Development Goals: An Awareness & Education Approach

Of the 17 SDGs, five are more related to our business and sustainability approach which include driving sustainable finance and investments; empowering people; supporting our communities and sustaining the environment



What are SDGs?

The Sustainable Development Goals (SDGs) as the new global development framework were adopted by heads of states of 193 countries at the 70th session of the UN General Assembly in September 2015.

The SDGs are a set of 17 integrated goals and 169 time-bound targets to end poverty, fight inequality and injustice, and tackle climate change by 2030.

They are built on the Millennium Development Goals (MDGs), which were implemented mostly in developing countries from 2000 to 2015.

The SDGs are designed to continue where the MDGs left off and have been regarded as the platform that will propel the transformation of the world in the next 15 years.

Ms. Amina Mohammed, the current Minister of Environment and a former Special Assistant to President Jonathan on MDGs as well as the Special Adviser to the UN Secretary-General on Post-2015 Development Planning, played a crucial role in developing the MDGs.

SDGs: What is Our Role?

Of the 17 SDGs, five are more related to our business and sustainability approach which include driving sustainable finance and investments; empowering people; supporting our communities and sustaining the environment.

The five SDGs are:

Goal 2: End Hunger, achieve food security and improved nutrition and promote sustainable agriculture

Goal 3: Good health & wellbeing – Ensure healthy lives and promote wellbeing for all at all ages

Goal 4: Quality Education – Ensure inclusive and equitable quality education and promote lifelong learning opportunities for all.

Goal 5: Gender Equality – Achieve gender equality and empower all women and girls

Goal 8: Decent work and economic growth – promote sustained, inclusive economic growth full and productive employment and decent work for all.

We have started our awareness and education journey by engaging and partnering with NGOs; government and the private sector such as Junior Achievement, Pan-Atlantic University and Ministry of Environment.

Our Approach

Our approach is two-fold: drive education and engagement internally on the one hand as well as create awareness and engage external stakeholders.

INTERNAL:

- We have begun our internal engagement approach through the deployment of specially designed flier. The key messages include:
- Highlighting the five goals and how they are related to our business and sustainability objectives.
- Staff competitions to facilitate engagement
- Employees sharing their unique experiences regarding SDGs

EXTERNAL:

- Through partnerships, we have employed a two-pronged approach to educating and engaging our external stakeholders:
- Educate students in secondary schools through the financial literacy and career counseling of the Future First programme
- Promote the SDGs through the First Bank Sustainability Centre
- Drive engagement via our digital platforms.



10

Sponsorship Platforms

...At the heart of our sponsorship drive lie our consistent and impacting efforts in the Arts space. First@arts Initiative is our key platform in our empowering journey.



We are supporting the entire value chain of the creative arts, providing much needed financing and advisory services, showcasing and facilitating the successes of the industry, and enabling our customers explore the wealth of opportunities the creative industry has to offer.

First@arts Initiative is FirstBank's platform for consolidating its efforts in the arts space. Following the rebasing of the economy in 2014, the creative industry was identified as a major contributor to economic growth, contributing about 1.42% to the national GDP, with huge potential for reducing the rate of unemployment in Nigeria.

FirstBank is supporting the entire value chain of the creative arts, providing much needed financing and advisory services, showcasing and facilitating the successes of the industry, and enabling our customers explore the wealth of opportunities the creative industry has to offer. In line with this, FirstBank has established First@arts, an initiative under which the Bank consolidates all its efforts in the arts.

Through First@arts, FirstBank is able to better meet the growing business, occupational and entertainment needs of her customers. It is another platform through which the Bank ensures that we put the customer First'.

In driving this initiative FirstBank partnered with British Council and The Lork Enterprise, managers of Freedom Park who are recognized for their roles in sustaining the arts in Nigeria.

The British Council is the world's leading cultural relations organization, a component of international relations which focuses on developing people-to-people links and complements government-to-people and government-to-government contact. Using English, Arts, and Education and Society – considered the best

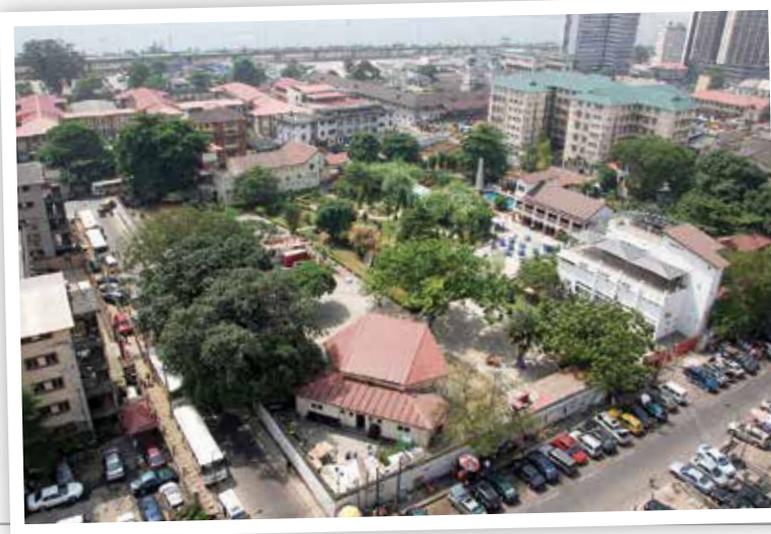
of UK's great cultural assets – to bring people together and to attract partners to working with the UK.

Freedom Park is a Memorial and Leisure Park dedicated to the preservation of Lagos heritage and history of the Old Board Street prison.

The park provides venues and grounds for theatre performances, events and recreational entertainment, with relevant facilities including an open Air Stage, Amphi-theatre, Food Court, Museum Complex and the Wole Soyinka Art gallery.

Projects under First@arts in 2016

Lagos Theatre Festival- Lagos Theatre Festival is a yearly performing arts festival created by British Council in line with the vision to transform Lagos state into a theatre capital for sub-Saharan Africa by 2024, and as a platform for growing performing art industry in Nigeria.



In driving this initiative FirstBank partnered with British Council and The Lork Enterprise, managers of Freedom Park who are recognized for their roles in sustaining the arts in Nigeria

*LEFT:
An aerial view of
Freedom Park,
Broad Street, Lagos*

*Performance scenes
at the Ajumagobia
Science Foundation
(ASF) Memorial Concert
supported by the Group*



The Festival was inaugurated in 2013 with only four companies performing at the festival while in 2014 the festival hosted six companies, by 2016 the outcome was outstanding with over forty companies participating to create 100 performances within 6 days across 15 unconventional venues across including Freedom Park, Muson Center, Terra Kulture and the University of Lagos and was well attended by a greater number of performing arts lovers and artists. The event held between the 23rd to the 28th of February, 2016, In addition to the theatric performances there were 6 outstanding workshops with performing arts professionals and students which created room for mentorship and skills development. FirstBank through the First@arts initiative partnered with British Council in this years festival.

First@arts Monthly Engagement:

Right after the Lagos Theatre Festival in February 2016, monthly sessions were held at the partner location, Freedom Park for entrepreneurs looking to grow their businesses, hone their skills and grow capacity in their area of specialty within the arts. These monthly sessions are held in small numbers, for impact, hosting about 50 or more guests each month. Five of these sessions have held so far in 2016 reaching out to over 300 attendees onsite, and over 500,000 on print and social media.

FirstStars:

FirstBank partnered with Ebony Live Television to develop and broadcast a 6 episode talent program called First Stars. The show seeks to find and nurture

creative talent in the film making business (Directors, Producers, Director of Photography, Actors and Scriptwriters). First Stars will document the journey from auditions to the production of a 60-minute feature film premiered by FirstBank, to be shown on television and in theatres.

With First Stars, viewers will be exposed to more aspects of the film industry than they may be aware of. We know that there are many uncelebrated roles that are integral to the entire process of film making, we will use the First Stars tv show to help viewers see the many undiscovered opportunities within the film industry. While we are auditioning for Directors, Producers, Actors, Scriptwriters and DOP's we go a step further. First Stars provides the opportunity to expose Nigerians to the role of set designers, costume designers, acting coaches, set coordinators and other careers that may not make it on screen. This is another way we put our customers first – by exposing them to opportunities that could facilitate the realization of their dreams.

Through these sessions and engagements FirstBank has contributed immensely to the development human capacity and skills development in the arts industry. FirstStars for instance will produce writers, art directors, producers, actors who are ready to join the growing Nollywood industry and continue to contribute to an evolving entertainment industry with huge potentials for boosting national income and global recognition.



LEFT:
FirstBank's Women Basketball Team – The Elephant Girls – Champions of the just concluded 2015/2016 Zenith Bank Women's Basketball Championship for the 7th time out of 12 editions..

BOTTOM:
The Georgian Cup (biggest cup in the picture) Polo Tournament, Kaduna - supported by FirstBank for 95years.

Mr. Adesola Adeduntan, Managing Director, FirstBank of Nigeria Limited and Subsidiaries; Mr. Uche Eze, Winner of the 54th FirstBank Lagos Amateur Open Golf Championship in 2015, and Mr. Gbenga Shobo, Deputy Managing Director at FirstBank of Nigeria Limited.



Blessing Okagbare
FirstBank's Brand Ambassador and Nigeria's Queen of Track.



11

Contributing to Environmental Sustainability

...Part of the Group's long-term approach to sustainability is minimising its direct and indirect impact on the environment. This has informed the Group's efforts in partnering with key stakeholders in environmental conservation.



Environmental sustainability remains a key strategic pillar of our corporate responsibility & sustainability.

Environmental Sustainability

Environmental sustainability remains a key strategic pillar of our corporate responsibility & sustainability. Our focus on contributing to the sustainability of the environment is partly a result of our belief that the sustenance and survival of the Group is to a great extent dependent on the sustainability of the environment and communities where we operate. The global effects of climate change (from the shrinkage of glaciers; early breaking up of ice on rivers and lakes to the shifting ranges of plants and animals; as well as accelerated sea level rise and longer, more intense heat waves), it has become imperative for us to be partner with environmental sustainability champions to make the world a greener place to live in.

Nigeria specifically is not left out of the increasing effects of the greenhouse gasses which are produced by human activities and are largely responsible for rise in global temperatures. Studies have shown that various sectors of the Nigerian economy are vulnerable to climate change. These include:

- Human settlements and health;
- Water resources, wetlands, and freshwater ecosystems;
- Energy, industry, commerce, and financial services;
- Agriculture, food security, land degradation, forestry, and biodiversity; and
- Coastal zone and marine ecosystems

Priorities

- Minimise Carbon footprint
- Carbon Offsetting
- Conservation and Preservation of wildlife and biodiversity

Our approach to environmental sustainability is two-fold based on our direct and indirect impacts.

The approaches to reducing the direct impacts of our operations include minimize carbon footprints; work towards carbon neutrality as well as promote wildlife and biodiversity conservation and preservation. Approach to minimizing carbon footprints & Carbon offsetting:

Minimize waste:

We are setting targets to improve energy efficiency in our data centres; offices as well as reduce air travels; paper use initiatives

Go Green:

Purchase renewable energy; tree planting initiatives
And the indirect impact of our activities focuses largely on responsible lending.



...The conservation initiative employs the tree planting and students' conservation clubs as vehicles to drive environmental protection and conservation.

Initiatives to Promote Environmental Responsibility

Part of the Group's long-term approach to sustainability is minimising its direct and indirect impact on the environment. This has informed the Group's efforts at conserving energy to reduce global warming by reducing its CO2 emissions; as well as conserving resources. FirstBank has embarked on a reduction in the use of paper in its business operations, anchored on our print optimisation programme.

The Bank is constantly seeking opportunities to manage environmental and social footprints through the use alternative energy sources.

Partnership with Nigeria Conservation Foundation

Our responsible approach to protecting the environment has seen us partner with National Conservation Foundation (NCF), Nigeria's premier non-governmental environment conservation foundation dedicated to nature conservation and sustainable development in Nigeria. FirstBank has an on-going partnership with NCF and actively supports its activities annually in its conservation and preservation of wildlife and biodiversity.





LEFT:

From 2nd left, Head Corporate Responsibility and Sustainability, NCF, a staff of the Bank (second right) and stakeholders at Imaguero Secondary School at the Tree planting Programme that took place at the school as part of the FirstBank Conservation Initiative.

RIGHT:

A staff of the Bank planting a Tree at Imaguero Secondary School Benin City during the second leg of the Bank' Tree Planting Campaign under the FirstBank Conservation Initiative..

FirstBank Conservation Initiative

The FirstBank Conservation initiative is one of the key programmes of the Bank and is part of our long-term approach to promoting sustainability which involves minimizing our direct and indirect impacts on the environment. The conservation initiative employs the tree planting and students' conservation clubs as vehicles to drive environmental protection and conservation.

The key objectives are:

- To minimize carbon footprint through planting of trees
- To create awareness of the need to preserve wild life and biodiversity among school children.
- To educate and build environmental conscious students through partnerships with reputable NGOs and institutions.

The first phase of the initiative began in Lagos, Ogun and Edo states respectively. In partnership with Nigeria Conservation Foundation (NCF), the Bank launched the Lagos leg of the first phase at Lagos State Civil Service Model College, Igbogbo, Ikorodu with the planting of 120 trees and formally setting up a conservation club. This was followed by the planting of another set of 120

trees at Evboesi Mixed Secondary School Benin City and the setting up of another conservation club amongst the students of the school. The final part of the first phase will take place at an identified secondary school in Ogun State.

The planting of 120 trees is a symbolic representation of the Bank's 120 years in existence and it's a commemoration of the anniversary of the Bank with regards to its contributions to Nigeria on the green economy as well as combating deforestation/ desertification, while recognizing the key role of children/youth in the sustainability agenda.



120 trees

The planting of 120 trees is a symbolic representation of FirstBank's 120 years in existence



12

Standards and Codes

...Our commitment to international standards has made us adopt only principles that can be supported by the relevant frameworks as well as those that are strategically aligned to our business.



ISO 26000

Our commitment to international standards has made us adopt only principles that can be supported by the relevant frameworks as well as those that are strategically aligned to our business.

ISO 26000 is an international standard giving guidance on social responsibility. It is intended for use by organisations of all types, in both public and private sectors, in developed and developing countries, as well as in economies in transition. It is designed to help organisations in their efforts to operate in a socially responsible manner. ISO 26000 contains voluntary guidance, not requirements, and therefore is not for use as a certification standard.

FirstBank, one of the subsidiaries of FBNHoldings, is a technical partner in the Nigerian adoption process tagged 'ISO 26000: NAP', which began in 2013. As a technical partner, we are fully committed to the seven key underlying principles of social responsibility and the seven core subjects of ISO 26000 guidance. These are centred around: accountability, transparency, ethical behaviour, respect for the rule of law, respect for international norms of behaviour, community

involvement and development; human rights; labour practices; the environment; fair operating practices; consumer issues; and organisational governance. Clearly, being part of the process has allowed us to shape the thinking and outcomes in line with local understanding and relevance.

The Nigerian Sustainable Banking Principles (NSBP)

The NSBP programme was constituted under the auspices of the Central Bank of Nigeria and the Bankers' Committee to formulate sustainable banking standards and guidelines for Nigerian banks. This led to the birth of the Strategic Sustainability Working Group (SSWG), of which FirstBank of Nigeria, a subsidiary of FBNHoldings, is a member.

The Bank actively participated in two of the sub-committees (agriculture and oil and gas), which made submissions that were approved by the Bankers' Committee for implementation by the sector regulators, banks and other related financial institutions. FirstBank is a member of the steering committee responsible for providing implementation guidance on the NSBP for signatories to the principles.



ISO 26000 is an international standard giving guidance on social responsibility. It is intended for use by organisations of all types, in both public and private sectors, in developed and developing countries, as well as in economies in transition.

NIGERIAN SUSTAINABLE BANKING PRINCIPLES IMPLEMENTATION UPDATE

In 2015 as in the previous year, we have worked towards meeting the requirements of the principles. While there has been a general improvement regarding the requirements (such as beginning the process of putting in place a performance management and reporting tool); we have made reasonable progress especially in four of the nine principles. These are principles one, four, seven and eight. In principle one for example, the Board of Directors did not only approve the use of the document, but also potential transactions were truly screened for ESG risks and tracked. We plan to improve on our performance in 2016. Below is the status update.

Principle	Requirements	Status Update
<p>Principle 1: Our Business Activities: Environmental and Social Risk Management</p> <p>To integrate environmental and social considerations into decision-making processes relating to our business activities to avoid, minimise or offset negative impacts.</p>	<ul style="list-style-type: none"> ■ Development of appropriate environmental and social (E&S) policies ■ Development of appropriate E&S procedures ■ Development and customisation of E&S due diligence procedures ■ Articulation of E&S governance and approval authority measures ■ Monitoring E&S risks and reviewing E&S conditions ■ Provision of client engagement guidance on E&S issues ■ Development of appropriate E&S reporting criteria ■ Reporting on implementation progress ■ Support for investment in sustainable, innovative business opportunities 	<ul style="list-style-type: none"> ■ Environmental, Social & Governance Management System (ESGMS) document has been developed ■ This document has been reviewed and signed by relevant stakeholders in the Bank, and a framework for implementation has been developed ■ A total of 32 transactions worth N171,042,918.40 have been screened for ESG



Principle

Requirements

Status Update

Principle 2: Our Business Operations: Environmental and Social Footprint

We will avoid, minimise or offset the negative impacts of our business operations on the environment and local communities in which we operate and, where possible, promote positive impacts

- Development of an environmental management programme with facilities management; this should address climate change and greenhouse gas (GHG) emissions reduction, water efficiency, waste management and environmentally friendly construction and management
 - Compliance with relevant labour and social standards
 - Implementation of a community investment programme
 - Application of E&S standards to relevant party
- Print optimisation monitoring team in place with staff of the CR&S to chair and observe paper usage by other members of staff. Reduction in printer access by staff,, especially colour printing
 - Increase in the use of conference calls rather than travelling to attend face-to-face meetings, thereby minimising fuel consumption and carbon emission from vehicles
 - Implementing community development programmes to promote positive impacts on stakeholders, including infrastructural development, Future First and HopeRising initiatives, youth development programmes, etc.

NIGERIAN SUSTAINABLE BANKING PRINCIPLES IMPLEMENTATION UPDATE **contd.**

Principle	Requirements	Status Update
<p>Principle 3: Human Rights</p> <p>We will respect human rights in our business operations and business activities</p>	<ul style="list-style-type: none"> ■ Development and implementation of a human rights policy (including labour and working conditions) ■ Integration of human rights due diligence into E&S procedures ■ Investment in resources and training of staff on human rights issues 	<ul style="list-style-type: none"> ■ The ESGMS consists of a policy and procedures for screening transactions. 'Human Rights' is one of the nine ESG categories that FBN commits to screening potential transactions. ■ The Bank maintains an organisational culture that encourages an open line of communication between superiors and subordinates ■ Maintenance of a fair and efficient procedure for resolving disputes within the Bank and ensuring disciplinary measures that are fair and effective without breaching labour laws or standards



Principle

Requirements

Status Update

Principle 4: Women's Economic Empowerment

We will promote women's economic empowerment through a gender-inclusive workplace culture in our business operations, and seek to provide products and services designed specifically for women through our business activities

- Developing and implementing a women's economic empowerment policy
- Establish a women's economic empowerment committee
- Develop initiatives and programmes to promote and celebrate women's empowerment
- Invest and dedicate resources for female talent
- Support the establishment of a sector-wide women's empowerment fund

- The Group's Corporate Responsibility & Sustainability Policy covers this principle.
- The Bank has a market share of 26% under the Federal Government's Growth Enhancement Support Scheme for SMEs.
- Over 3,000 SMEs run by women get support from FirstBank
- Female composition at the management level is 116 out of 323, representing 36%
- Women economic empowerment policy formulated
- The Bank partners with Women of West Africa Entrepreneurship (WOWE) and WIMBIZ on women's development
- Diversity policy for promoting inclusion and diversity

NIGERIAN SUSTAINABLE BANKING PRINCIPLES IMPLEMENTATION UPDATE **contd.**

Principle	Requirements	Status Update
<p>Principle 5: Financial Inclusion</p> <p>We will promote financial inclusion, seeking to provide financial services to individuals and communities that traditionally have had limited or no access to the formal financial sector</p>	<ul style="list-style-type: none"> ■ Developing and implementing a financial inclusion policy ■ Providing development and growth support to SMEs ■ Improving financial literacy and institutional practices ■ Improving access to Bank facilities and services 	<p>Principle 5: Financial Inclusion</p> <ul style="list-style-type: none"> ■ Financial inclusion is part of the Group's Corporate Sustainability Policy ■ Provided financial services, including loans for about 200,000 SMEs ■ Provided financial services for over 660,000 unbanked through Firstmonie and FirstInstant accounts ■ Promoting financial literacy through Future First and other programmes
<p>Principle 6: E&S Governance</p> <p>We will implement robust and transparent E&S governance practices in our respective institutions and assess the governance practices of our clients</p>	<ul style="list-style-type: none"> ■ Establish E&S governance responsibility ■ Develop institutional E&S governance practices ■ Actively support key industry initiatives that aim to address E&S governance issues with clients operating in sensitive sectors ■ Implement E&S performance-linked compensation and incentive schemes ■ Establish internal and, where appropriate, external E&S audit procedures 	<ul style="list-style-type: none"> ■ Developed sustainability governance chaired by the Chief Risk Officer ■ A member of the NSBP steering committee



Principle

Requirements

Status Update

Principle 7: Capacity Building

We will develop individual institutional and sector capacity necessary to identify, assess and manage the environmental and social risks and opportunities associated with our business activities and operations

- Identify relevant roles and responsibilities for delivery against sustainable banking commitments
- Provide sustainable banking training sessions
- Create practical E&S training tools and resources
- Multi-stakeholder capacity building

- Board and executive management have been trained on sustainability
- Forty strategic key heads of Strategic Business Units (SBUs) and departments who were part of the team that developed the sustainability strategy have been trained
- Partnering with NSBP and IFC in training key staff. Plans within Group to ensure each staff member is trained in sustainability

Principle 8: Collaborative Partnership:

We will collaborate across the sector and leverage international partnerships to accelerate our collective progress and move the sector as one, ensuring our approach is consistent with international standards and Nigerian development needs

- Collaborate and coordinate with other banks
- Convene sector-wide workshops and events
- Commit to international standards and best practice initiatives
- Establish and participate in Nigerian sector-level initiatives

- A member of NSBP steering committee
- Participate in industry-wide workshops
- Member of the United Nations Global Compact (UNGC; submitted COP report for 2014. To submit 2015 report in April 2016
- Financial Secretary of Local Network. The Bank has participated in developing a work plan for the Local Network aimed at energising the activities of the network among business actors in Nigeria and encouraging non-participants to adopt the UNGC principles

NIGERIAN SUSTAINABLE BANKING PRINCIPLES IMPLEMENTATION UPDATE **contd.**

Principle	Requirements	Status Update
<p>Principle 9:Reporting:</p> <p>We will regularly review and report on our progress in meeting these Principles at the individual institution and sector level</p>	<ul style="list-style-type: none"> ■ Establish a Sustainable Banking reporting template ■ Set clear targets and relevant performance indicators ■ Ensure the necessary systems are in place to collect data ■ Agree the frequency, nature and format of internal and external reporting ■ Contribute to sector-level reporting 	<ul style="list-style-type: none"> ■ Developed a reporting template ■ Targets and KPIs set. implementation from 2014 ■ Developing a system to collect data: internal reporting yearly; external quarterly ■ Internal report – quarterly; external, yearly. 2013 and 2014 Citizenship Reports published and distributed to stakeholders. These can be found on FBN Holdings website under Citizenship page.

UNITED NATIONS GLOBAL COMPACT

The UN Global Compact (UNGC) is currently the highest body for corporate citizenship in the world today. Established in 2000 to serve as a platform for dialogue, learning and partnership for organisations willing to commit to adopting corporate responsibility as part of their business strategy and daily operations, the UNGC has successfully attracted and mobilised over 7,000 businesses in over 130 countries across the world to become members.

Membership into the UNGC implies an organisation's willingness to align with UN values and support initiatives that advance the UN goals as contained in the Millennium Development Goals (MDGs) – now Sustainable Development Goals (SDGs). Participants simply commit to align their strategies and operations with 10 principles in the areas of labour, human rights, environment and anti-corruption.

We started the process for UNGC membership in late 2012 with the goal of supporting the principles of the organisation. We became a member in the first quarter of 2013.

As part of our commitment to go beyond meeting the minimal membership requirements and play an active role in advancing the global corporate sustainability agenda, in 2013 Bisi Onasanya, former Group Managing Director/CEO of FirstBank of Nigeria Limited, joined global political and business leaders in New York for the Africa Private Sector Forum in consideration of a new global architecture for the private sector on sustainability and contribution to global priorities and the public good. In the same year, Onasanya chaired a session on Innovative and Sustainable Financing at the UN Triennial Global Compact Leadership Summit in New York.

This 2015 annual report serves as a Global Compact Communication on Progress (COP) https://www.unglobalcompact.org/system/attachments/cop_2016/278121/original/COP_APRIL_2016_pdf_2.pdf?1461147209



13

Awards and Recognition

...We have consistently won awards as well as recognised for our efforts in advancing corporate responsibility & sustainability.



The Bank in 2015 was awarded the Best Company supporting SMEs in recognition of its roles in promoting SMEs development in Nigeria

Best Company in Support for SMEs at the 2015 Sustainability Entrepreneurship and Responsibility Awards (SERAs)

The Sustainability Entrepreneurship and Responsibility Awards (SERAs) is an annual project which aims to promote as well as raise awareness about the roles organizations play with emphasis on their responsibility towards stakeholders and the social development of Nigeria and Africa.

The SERAs is Nigeria's first and premier Corporate Social Responsibility (CSR) Awards. Presently, it also features participation from countries around Africa. The aim of the award is to substantiate the case that corporations who are socially responsible stand to gain huge benefits in regards to the triple bottom line – economic, social and environmental capital.

The Bank in 2015 was awarded the Best Company supporting SMEs in recognition of its roles in promoting SMEs development in Nigeria. With a heritage of over 120 years of banking experience, the Bank having started small and grown through various stages understands the business journey for SMEs and is passionate about supporting them to ensure continuous business growth.



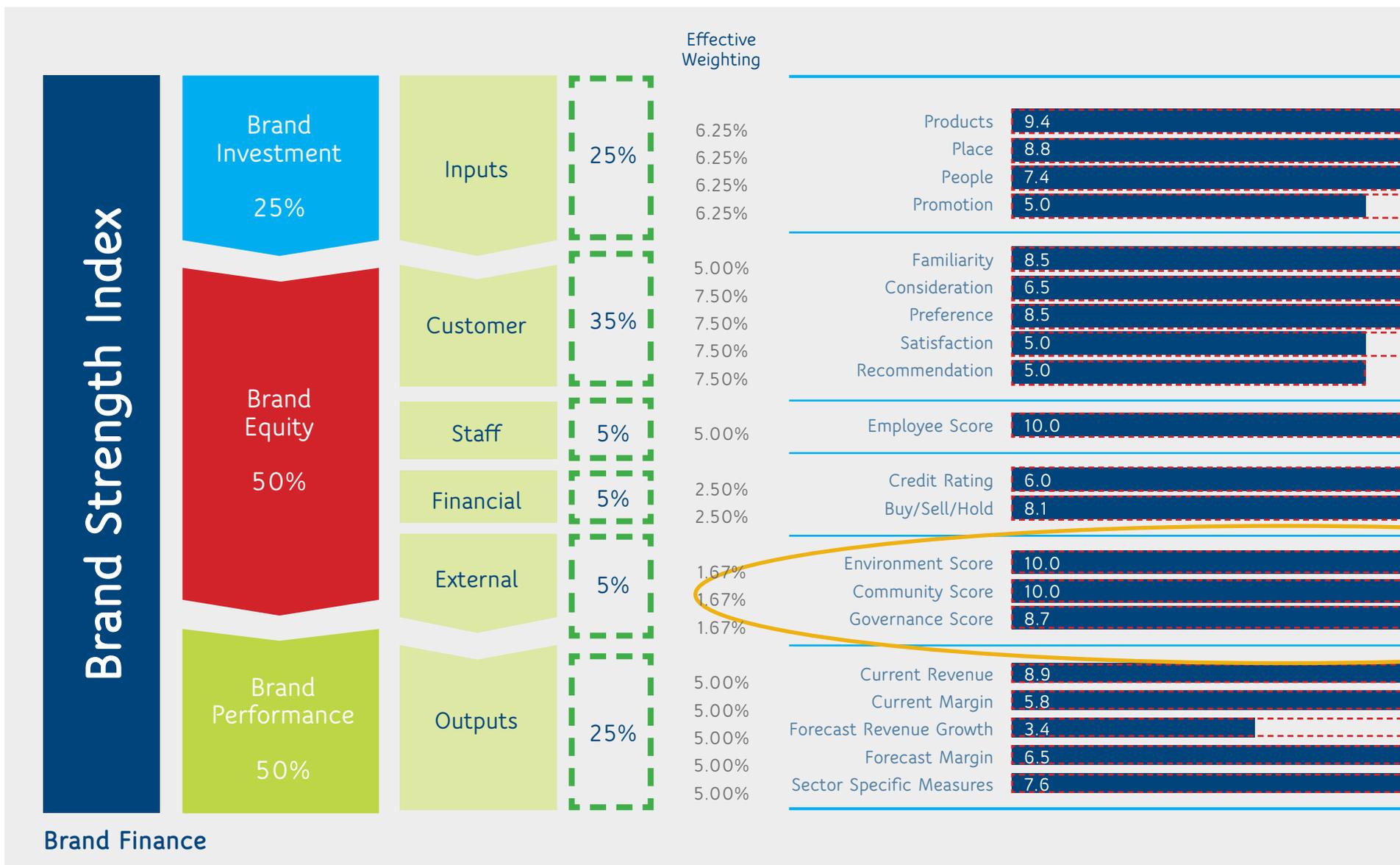
Presently, the Bank has about 24 product offerings for its SME customers. About 500,000 SME operators are beneficiaries of loans from the Bank and the total loan portfolio for SME operators' amounts to an approximate N87.3B. Also, the Bank has organized several capacity building initiatives for SME operators and engages with them via several platforms such as the SME Connect Platform. African Start Up which airs on CNN is also another platform which the Bank uses in empowering SME operators.

*PICTURE:
(Middle) Ms. Obianuju Akanbi of the Bank's Corporate Responsibility and Sustainability Unit receives the best bank supporting SMEs award at the 2015 SERAs Awards.*

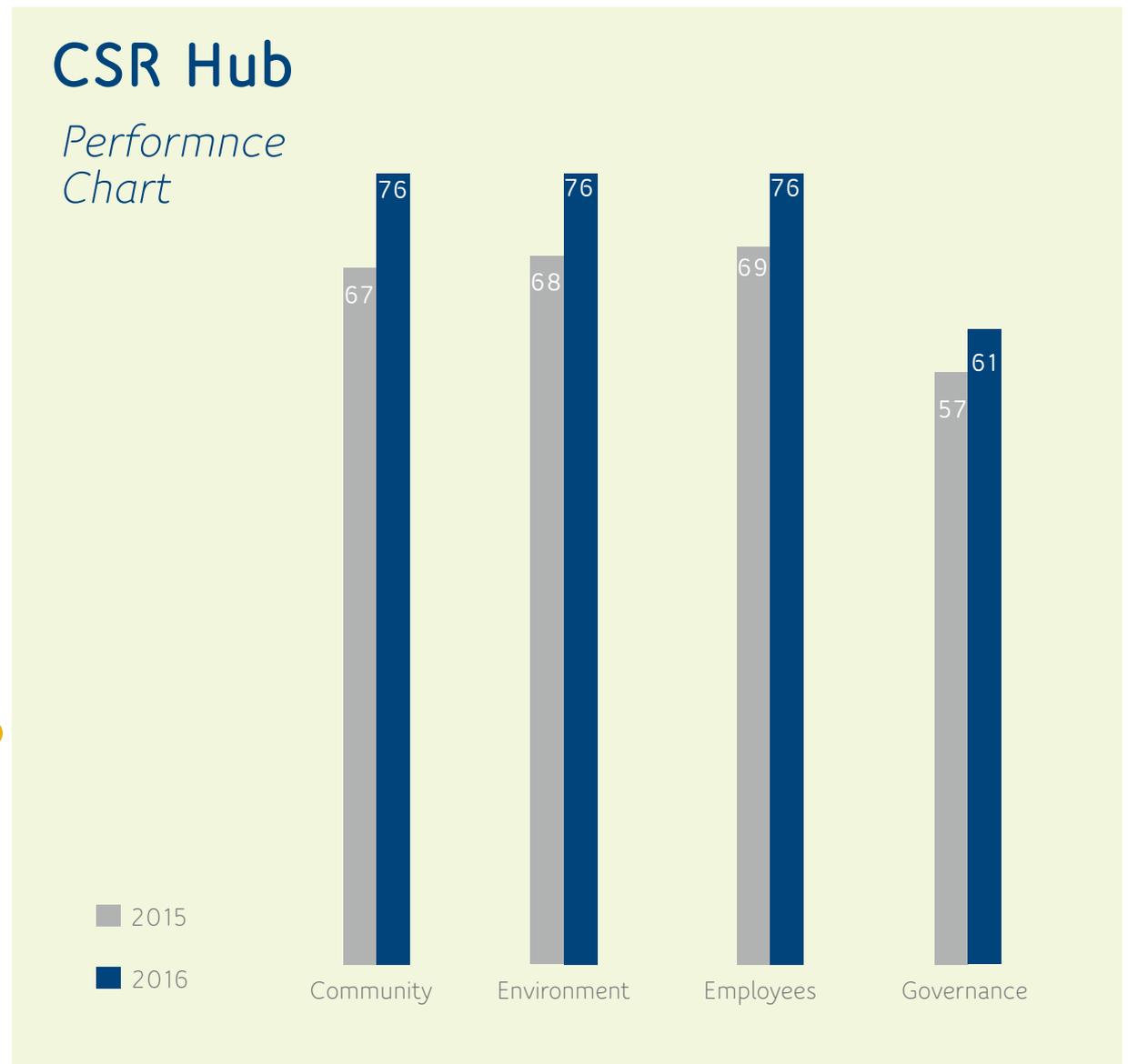
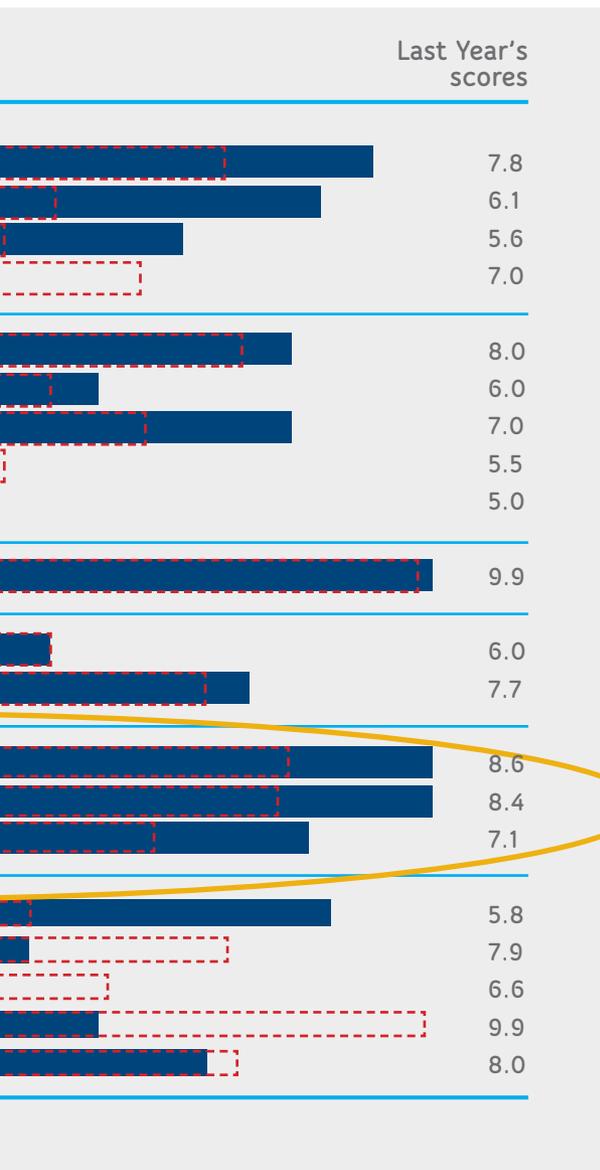
REPUTABLE BODIES SUCH AS BRAND FINANCE HAVE RECOGNIZED OUR CORPORATE RESPONSIBILITY & SUSTAINABILITY PERFORMANCE.

Brand Strength Index 2016

An ideal balanced scorecard of fundamental brand related measures



The criteria for winning the Best Bank Brand award by the Banker Magazine of the Financial Times, which the Bank has won consecutively for five years involve CSR as key elements as shown below. In the areas measured, the Bank has excellent score up from the previous year.



* The sources of the information used for these ratings are **Bloomberg** and **CSRHUB**



FirstBank
Since 1991

THE NEW LOOK
is only the beginning

THE BOLD STEP
says we are putting our best foot forward for you

THE GOLD STANDARD
our benchmark

OOFCB

14

About the report scope and boundary



Reporting Year

Information in this report is related to the fiscal year 2015. That is between the months of January 2015 and December 2015.

Scope

This report covers FBN Holdings non-financial performance and impact relating to the Group's corporate responsibility work in the financial year 2015. The report covers material issues regarding corporate responsibility & sustainability based on:

- Internal assessments
- Continuous engagement with a broad range of stakeholders including employees, non-governmental organisations; investors; regulators and communities
- Information requests from global and local reporting and rating agencies

Hence, the report is structured around our most important issues for business:

- Sustainable finance & investment
- People empowerment
- Community support
- Environmental sustainability

As stated in our previous report, in addition to employing the standards of the Nigerian Sustainable Banking Principles (NSBPs) and the United Nations Global Compact we have begun in this financial year the use of the Global Reporting Initiative (GRI) Sustainability Reporting Guidelines aimed at constantly improving on the reporting process and content. We have continued to enhance our performance management system and we have taken necessary

steps towards ensuring a more holistic and structured performance indicators with the purpose of ensuring a more transparent reporting.

We have also in 2015 submitted our report for independent assurance.

Additional Reporting

This report complements the Group's Annual Report and Accounts and both reports provide a better picture of our performance over the year.

In addition to this report, we report our corporate responsibility & sustainability impact in some of the following ways

- Citizenship updates on our websites, blogs; twitter; facebook
- Research findings and white papers on corporate responsibility and sustainability issues
- Annual submission of COP to the UNGC
- Quarterly submission of corporate responsibility & sustainability reports to Central Bank of Nigeria.

Feedback

Your feedback on the report and FBN Group Corporate Responsibility & Sustainability approach is welcomed.

Please email your comments to

citizenship@fbngroup.com or

you can write to us on the following address:

The Group Head, Marketing Corporate Communications
Marketing & Corporate Communications Department
FirstBank of Nigeria Limited,
14th Floor, Elephant House, Broad Street, Lagos

15

FirstBank Performance Management Metrics

	KEY PERFORMANCE INDICATOR	JANUARY - DECEMBER 2015
Sustainable Finance & Investments	Total number of transactions approved during reporting period	766
	Total value of the transactions (₦)	2,602,739,963,000
	Number of transaction screened/asses for E&S risks (₦)	32
	Value of transactions assessed for ESG risks	171,032,918,000
	Percentage of portfolio screened/assessed for E&S risk	27.39
	Number of clients or relationships exited for poor performance, on-compliance with agreed E&S Action plans, or breach of loan documentation covenants/ conditions	NIL
	No of client engagements on E&S issues which resulted in positive outcomes for the client and bank	NIL
People Empowerment	Number of female staff	2983+
	Total percentage of female (management) staff	40%+
	Number of physically challenged employees in the workforce	15
	Number of employee trainings (during reporting period)	66 courses (18,575)
	Total expenditure on capacity building for female employees	NGN301m
	Average employee age	37
	Average training hours	282,917
	% of male to female employees	61.39

Performance Management and Reporting is a key component of the FBN Holdings' strategy, as it enables the Group to be able to effectively measure, manage and report its Corporate Responsibility and Sustainability performance and also meet its NSBP obligations which include reporting a wide range of metrics.

	KEY PERFORMANCE INDICATOR	JANUARY - DECEMBER 2015
Community Support	Total value of Community support programs (₦)	127,309,400.00
	Total number of people impacted by programs	27500
	Total number of employees involved in voluntary communities activities	350
	Total time (hours) spent by employees in voluntary communities activities	34550
	Number of initiatives to enhance customers' financial literacy/efforts to attract unbanked	6
Environmental Sustainability	Number of buildings/branches and facilities in use by the bank	819
	Total number of employees	7616
	Total amount of electricity purchased from the national grid in Gwh or Kwh	11570245
	Total amount used per employee in kilowatts hour	1985.04
	Total litres of fuel used to run the Generator	963089
	Total litres used per employee	993.60
	Number of ATMs powered by alternative sources of energy (eg solar energy)	120
	Total paper consumption in kilograms	58,716.06

16

GRI Content Index General Standard Disclosures

General Standard Disclosures

G4 INDICATOR AND DMA	DESCRIPTION AND DISCLOSURE	COMMENTS	PAGE NUMBER
STRATEGY AND ANALYSIS			
G4-1	Statement from the most senior decision makers	GMD's Letter	2
ORGANIZATIONAL PROFILE			
G4-3	Name of the organization	FBN Holdings	Cover Page; Our Business at a Glance
G4-4	Primary Brands, Products and Services	Our Business at a Glance; Sustainable Finance & investment	5, 31
G4-5	Location of the Organization's Headquarters	Our Business at a Glance; Back cover	5
G4-6	The names and number of countries where the organization has significant operations	Our Business at a Glance	5
G4-7	Nature of ownership and legal form	Our Business at a Glance	5
G4-8	Markets served	Our Business at a Glance;	5
G4-9	Scale of the organization size	Our Business at a Glance;	5
G4-10	Employee's Data	Empowering People	41
G4-11	Percentage of total employees covered by collective bargaining agreements	Empowering People	41
G4-12	Organization's supply chain		
G4-13	Organizational changes during the reporting period	Corporate Governance; GMD's Letter (FBN Holdings 2015 Annual Report & Accounts)	Annual Report Pg. 18 – 20

G4 INDICATOR AND DMA	DESCRIPTION AND DISCLOSURE	COMMENTS	PAGE NUMBER
G4-14	How precautionary approach or principle is addressed by the organization	Empowering People Engaging our Stakeholders Health Safety & Wellbeing (2015 FBN Holdings Annual Report & Accounts)	41 Annual Report Pg. 70 Cover Page; Our Business at a Glance
G4-15	Subscription to externally developed economic, environmental and social charters or principles	Standards & Codes	75
G4-16	Membership associations	Standards & Codes	75

IDENTIFIED MATERIAL ASPECTS AND BOUNDARIES

G4-17	Entities included in the financial statements	Financial Highlights; performance FBN Holdings 2015 Audited Financial Report	
G4-18	Process for defining report boundaries and content	About the Report: scope & boundary; Engaging our Stakeholders	89, 21
G4-19	Material aspects included in the report	About the report: scope & boundary; Engaging our Stakeholders	89, 21
G4-20	Descriptions of material aspect boundaries within the organization	About the report: scope & boundary; Engaging our Stakeholders	89, 21
G4-21	Descriptions of material aspect boundaries outside the organization	Engaging our Stakeholders; Defining Materiality Matrix	21, 25
G4-22	Any restatements of information provided in previous reports	There are no restatements of information in previous reports	
G4-23	Significant changes from previous reporting periods in the Scope and Aspect boundaries	There are no significant changes from previous reporting periods in the Scope and Aspect boundaries	

STAKEHOLDER ENGAGEMENT

G4-24	List of stakeholders groups engaged	Engaging our Stakeholders	21
G4-25	Basis for identification and selection of stakeholders	Engaging our Stakeholders; Defining Materiality Matrix	21, 25
G4-26	Approach to Stakeholder Engagement	Engaging our Stakeholders	21
G4-27	Topics raised during stakeholder engagements	Engaging our Stakeholders; Driving Sustainable Finance & Investments; Handling Customer Complaints	21, 31,33

G4 INDICATOR AND DMA	DESCRIPTION AND DISCLOSURE	COMMENTS	PAGE NUMBER
REPORT PROFILE			
G4-28	Reporting Period	January 1 to December 31, 2015	
G4-29	Date of most recent report	First time adoption of GRI Sustainability Reporting Standards and Guidelines	92
G4-30	Reporting Cycle	Annual	
G4-31	Reporting Contact	Contact Information	89
G4-32	The G4 'in accordance' option chosen	Core	
	GRI Content Index	GRI Content Index Data Table	92
G4-33	External Assurance Report Policy regarding report assurance	Independent Assurance Statement Ernst & Young carried out an independent external assurance on this report (Independent Assurance Statement)	99
		About the Report: scope & boundary	89
GOVERNANCE			
G4-34	Governance structure of the organization	FBN Holdings Corporate Governance	27
ETHICS AND INTEGRITY			
G4-56	Organization's values, principles, standards and norms of behavior	Corporate Governance; Ethics and Integrity	27,28
SPECIFIC STANDARD DISCLOSURES			
STANDARD DISCLOSURE	DESCRIPTION	COMMENTS	PAGE NUMBER
CATEGORY: ECONOMIC			
Aspect: Economic Performance			
G4-DMA	Generic Disclosure on Management Approach	(2015 FBN Holdings Annual Report & Accounts); Market place; our business model; what makes our business model sustainable	Annual Report pg. 24 – 30
G4-EC1	Direct economic value generated and distributed	(2015 FBN Holdings Annual Report & Accounts); Financial Highlights	Annual Report pg. 13; 11
Aspect: Market Presence			
G4-DMA	Generic Disclosure on Management Approach	Empowering people	41
G4-EC5	Ratios of standard entry level wage by gender compared to local minimum wage at significant locations of operation	Empowering people: Employee Empowerment, Engagement & Inclusive Workplace	41

STANDARD DISCLOSURE	DESCRIPTION	COMMENTS	PAGE NUMBER
Aspect: Indirect Economic Impacts			
G4-DMA	Generic Disclosure on Management Approach	Sustainable Finance & Investments	31
G4-EC7	Development and impact of infrastructure investments and services supported	Sustainable Finance & Investments: promoting financial inclusion, putting our customers' needs first;	31
		Our Social Role(2015 FBN Holdings Annual Report & Accounts)	Annual Report pg. 66 -67
Aspect: Procurement Practices			
G4-DMA	Generic Disclosure on Management Approach	Sustainable Procurement	34
G4-EC9	Proportion of spending on local suppliers at significant locations of operation	Building Supplier Relationships (2015 FBN Holdings Annual Report & Accounts)	Annual Report pg. 76
CATEGORY: ECONOMIC			
Aspect: Economic Performance			
G4-DMA	Generic Disclosure on Management Approach	Contributing to Environmental Sustainability	71
G4-EN6	Reduction of energy consumption	Environmental Sustainability	71
Aspect: Emissions			
G4-DMA	Generic Disclosure on Management Approach	Contributing to Environmental Sustainability	71
G4-EN19	Reduction of greenhouse gas (GHG) emissions	Initiatives to minimize waste	71
Aspect: Effluents and Waste			
G4-DMA	Generic Disclosure on Management Approach	Contributing to Environmental Sustainability	71
G4-EN23	Total weight of waste by type and disposal method	Initiatives to minimize waste	71
Aspect: Products and Services			
G4-DMA	Generic Disclosure on Management Approach	Sustainable Finance & Investments	31
G4-EN27	Extent of impact mitigation of environmental impacts of products and services	Responding Lending & Investing	38
Aspect: Compliance			
G4-DMA	Generic Disclosure on Management Approach	Contributing to Environmental Sustainability	71
G4-EN29	Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with environmental laws and regulations	Responsible Lending & Investing; NSBP Update	38, 76

STANDARD DISCLOSURE	DESCRIPTION	COMMENTS	PAGE NUMBER
Aspect: Transport			
G4-DMA	Generic Disclosure on Management Approach	Contributing to Environmental Sustainability	71
G4-EN30	Significant environmental impacts of transporting products and materials for the organization's operations, and transporting members of the workforce	Contributing to Environmental Sustainability; FirstBank Performance Management Metrics	71 90
Aspect: Overall			
G4-DMA	Generic Disclosure on Management Approach	Contributing to Environmental Sustainability	71
G4-EN31	Total environmental protection expenditures and investments by type	Contributing to Environmental Sustainability	71
Aspect: Equal Remuneration for women and men			
G4-DMA	Generic Disclosure on Management Approach	Empowering people	41
G4-LA13	Ratio of basic salary and remuneration of women to men by employee category, by signification locations of operation	Empowering people: Upholding Freedom of Association	41, 43
SUB-CATEGORY: HUMAN RIGHTS			
Aspect: Investment			
G4-HR2	Total hours of employee training on human rights policies or procedures	Empowering people: Employee Empowerment, Engagement & Inclusive Workplace; Human Rights	41, 43
Aspect: Non-Discrimination			
G4-DMA	Generic Disclosure on Management Approach	Empowering people: Employee Empowerment, Engagement & Inclusive Workplace; Enhancing Human Rights through Collaborative Partnerships	41, 43
G4-HR3	Total number of incidents of discrimination and corrective actions taken	Enhancing Human Rights through Collaborative Partnerships	43
Aspect: Forced or Compulsory Labour			
G4-DMA	Generic Disclosure on Management Approach	Empowering people: Employee Empowerment, Engagement & Inclusive Workplace	41
G4-HR6	Operations and suppliers identified as having significant risk for incidents of forced or compulsory labour	Elimination of Forced Labour; Enhancing Human Rights through Collaborative Partnerships	44, 43

STANDARD DISCLOSURE	DESCRIPTION	COMMENTS	PAGE NUMBER
SUB-CATEGORY: LABOUR PRACTICES AND DECENT WORK			
Aspect: Diversity and Equal Opportunity			
G4-DMA	Generic Disclosure on Management Approach	Empowering people: Employee Empowerment, Engagement & Inclusive Workplace; Enhancing Human Rights through Collaborative Partnerships	41, 43
G4-LA12	Composition of Governance bodies and breakdown of employees per employee category according to gender, age group, minority group membership and other indicators of diversity	Empowering people: Employee Empowerment, Engagement & Inclusive Workplace; Enhancing Human Rights through Collaborative Partnerships	41, 43, 90
G4-LA9	Average hours of training per year per employee by gender and by employee category	Empowering people: Employee Empowerment, Engagement & Inclusive Workplace; Enhancing Human Rights through Collaborative Partnerships	41, 43, 90
Aspect: Supplier Human Rights Assessment			
G4-DMA	Generic Disclosure on Management Approach	Elimination of Forced Labour; Enhancing Human Rights through Collaborative Partnerships	44, 43
G4-HR10	Percentage of new suppliers that were screened using human rights criteria	Elimination of Forced Labour; Enhancing Human Rights through Collaborative Partnerships	44, 43
SUB-CATEGORY: SOCIETY			
Aspect: Local Communities			
G4-DMA	Generic Disclosure on Management Approach	Supporting our Communities	47
G4-SO1	Local community engagement, development programs and impact assessments	Supporting our Communities	47
Aspect: Anti-Corruption			
G4-DMA	Generic Disclosure on Management Approach	Empowering People: Anti-Corruption	41, 44
G4-SO4	Communication and training on anti-corruption policies and procedures	Empowering People: Anti-Corruption	41, 44
Aspect: Compliance			
G4-DMA	Generic Disclosure on Management Approach	Ethics & Compliance;	28
G4-SO8	Significant fines and non-monetary sanctions in 2015	Products & Compliance	35

STANDARD DISCLOSURE	DESCRIPTION	COMMENTS	PAGE NUMBER
Aspect: Supplier Assessment for Impacts on Society			
G4-DMA	Generic Disclosure on Management Approach	Sustainable Procurement	34
G4-SO9	New suppliers screened using criteria for impacts on society	Building Supplier Relationships (FBN Holdings 2015 Annual Reports & Accounts)	Annual Report pg. 76
Aspect: Grievance Mechanisms for Impacts on Society			
G4-DMA	Generic Disclosure on Management Approach	Supporting our Communities; Engaging our stakeholders	47, 21
G4-SO11	Grievances about impacts on society filed through formal grievance mechanisms during the reporting period	Supporting our Communities; Engaging our stakeholders	47, 21
SUB-CATEGORY: PRODUCT RESPONSIBILITY			
Aspect: Product and Service Labeling			
G4-DMA	Generic Disclosure on Management Approach	Promoting financial Inclusion, putting our customers first;	31
G4-PR5	Results of surveys measuring customer satisfaction	Measuring our service performance (2015 FBN Holdings Annual Report & Accounts)	Annual Report pg. 62
Aspect: Marketing Communications			
G4-DMA	Generic Disclosure on Management Approach	Marketing Communications	36
G4-PR7	Marketing communication and regulation	Marketing Communications	36
Aspect: Customer Privacy			
G4-DMA	Generic Disclosure on Management Approach	Information Security & Customer Privacy	34
G4-PR8	Complaints regarding breaches of customer privacy and loses of customer data	Information Security & Customer Privacy	34
Aspect: Compliance			
G4-DMA	Generic Disclosure on Management Approach	Ethics & Compliance; Compliance Risk (2015 FBN Holdings Annual Report & Accounts)	Annual Report pg. 173 -177
G4-PR9	Monetary value of significant fines for non-compliance with laws and regulations concerning the provision and use of products and services		

17

Independent Assurance Report

TO THE DIRECTORS OF FIRST BANK OF NIGERIA
FOR THE YEAR ENDED 31 DECEMBER 2015



Ernst & Young
10th Floor
UBA House
57 Marina
P. O. Box 2442, Marina
Lagos Nigeria.

Tel: +234 (01) 63 14500
Fax: +234 (01) 46 30481
Email : services@ng.ey.com
www.ey.com

We have completed our independent assurance engagement to enable us to express our limited assurance conclusions on whether specified Key Performance Indicators (“KPIs”) contained in the First Bank of Nigeria Sustainability Report (“the Report”) for the year ended 31 DECEMBER 2015, has been prepared, in all material respects, in accordance with managements’ criteria as derived from the GRI G4 reporting guidelines:

G4-LA12: Composition of Governance bodies and breakdown of employees per employee category according to gender, age group, minority group membership, and other indicators of diversity.

- Total number of female staff (Page 90)
- Percentage of female (management) staff (Page 90)

The specified KPIs noted above have been highlighted for identification purposes in the Report through the symbol “+”.

Our responsibility in performing our independent limited assurance engagement is to First Bank of Nigeria only

and in accordance with the terms of reference for this engagement as agreed with them. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than First Bank of Nigeria, for our work, for this report, or for the conclusions we have reached.

Directors’ Responsibility

The directors are responsible for implementing a stakeholder engagement process to identify all relevant stakeholders, to identify key issues, to respond appropriately to key issues identified, to determine those key performance indicators which may be relevant and material to the identified stakeholders, and to design and apply appropriate sustainability reporting policies. The directors are also responsible for the preparation and presentation of the Report and the information and assessments contained in the Report in accordance with the relevant criteria. This responsibility includes: designing, implementing and maintaining appropriate performance management and systems to record, monitor and improve the accuracy, completeness and reliability of the sustainability data and to ensure that the information and data reported meet the

requirements of the relevant criteria, and contains all relevant disclosures that could materially affect any of the conclusions drawn.

Assurance Provider's Responsibility

Our responsibility is to express our limited assurance conclusions on the specified KPIs in the Report based on our independent limited assurance engagement. Our independent limited assurance engagement was performed in accordance with *The International Framework for Assurance Engagements and International Standards on Assurance Engagements 3000: Assurance Engagements Other Than Audits or Reviews of Historical Financial Information (ISAE 3000)* developed by the *International Auditing and Assurance Standards Board* and in accordance with *The International Standard on Assurance Engagements 3410: Assurance Engagements on Greenhouse Gas Statements* under the auspices of the *International Federation of Accountants (IFAC)*. This standard requires us to comply with ethical requirements and to plan and perform our engagements to obtain limited assurance regarding the specified KPIs contained in the Report.

Basis of Work and Limitations

We have complied with the International Federation of Accountants (IFAC) Code of Ethics for Professional Accountants, which includes comprehensive independence and other requirements founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour. Our engagement was

conducted by a multi-disciplinary team of health, safety, social, environmental and assurance specialists with extensive experience in sustainability reporting.

The procedures selected depend on our judgement, including the assessment of the risks of material misstatement of the subject matter and the purpose of our engagement. In making these assessments, we have considered internal control relevant to the entity's preparation and presentation of the Report and the information contained therein, in order to design procedures appropriate for gathering sufficient appropriate assurance evidence to determine that the information in the Report is not materially misstated or misleading as set out in the summary of work performed below. Our assessment of relevant internal control is not for the purpose of expressing a conclusion on the effectiveness of the entity's internal controls.

Non-financial performance information is subject to more inherent limitations than financial information, given the characteristics of the subject matter and the methods adopted for the definition and gathering of information. Qualitative interpretations of relevance, materiality and the accuracy of data are subject to individual assumptions and judgements.

We planned and performed our work to obtain all the information and explanations that we considered necessary to provide a basis for our limited assurance conclusions pertaining to the Report and the specified KPIs, expressed below.

Where a limited assurance conclusion is expressed, our evidence gathering procedures are more limited than for a reasonable assurance engagement, and therefore less assurance is obtained than in a reasonable assurance engagement.

Summary of Work Performed

Set out below is a summary of the procedures performed pertaining to the specified KPIs which were included in the scope of our limited assurance engagement.

- We obtained an understanding of:
 - > The entity and its environment;
 - > Entity-level controls;
 - > The selection and application of sustainability reporting policies; and
 - > The significant reporting processes including how information is initiated, recorded, processed, reported and incorrect information is corrected, as well as the policies and procedures within the reporting processes.
- We made such enquiries of management, employees and those responsible for the preparation of the Report and the specified KPIs, as we considered necessary.
- We inspected relevant supporting documentation and obtained such external confirmations and management representations as we considered necessary for the purposes of our engagement.
- We performed analytical procedures and limited tests of detail responsive to our risk assessment and the level of assurance required, including

comparison of judgementally selected information to the underlying source documentation from which the information has been derived.

We believe that the evidence obtained as part of our limited assurance engagement, is sufficient and appropriate to provide a basis for our limited assurance conclusions expressed below.

Conclusions

Based on the work performed and subject to the limitations described above, nothing has come to our attention that causes us to believe that:

- The specified KPIs have not been prepared, in all material respects, in accordance with management's criteria as described in the Sustainability Report for the period ending 31 December 2015.

Other matter

The maintenance and integrity of the First Bank of Nigeria's Website is the responsibility of First Bank of Nigeria's management. Our procedures did not involve consideration of these matters and, accordingly we accept no responsibility for any changes to the information in the First Bank of Nigeria Sustainability Report.



Samuel Agbevem

For Ernst & Young
Lagos, Nigeria

Notes



FBN Holdings Plc
Samuel Asabia House
35 Marina, Lagos
P.O. Box 5216, Lagos, Nigeria.

www.fbnholdings.com