



RMB Nigeria Social Media Policy

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RMB Nigeria Social Media Policy for Employees

This Policy governs the use of social media by RMB Nigeria (RMBN) employees and contractors, in both a personal and professional capacity. This includes, but is not limited to, our directors, managers, full time employees, independent contractors, part-time staff, temporary staff and assistants. Although you are required to read the entire Policy, please take note of the following key points:

- Nothing about social media changes your responsibilities and obligations to RMB. It does not matter if you are using a private account or using social media outside of work hours. Your obligations in terms of your contract of employment, as well as other applicable policies, apply to your conduct on social media.
- You have a contractual duty to act in good faith towards RMBN. You may therefore not do anything that brings RMBN into disrepute (ie. damages RMBN's reputation), and must always act in the best interests of RMBN. This duty extends to your use of social media. For example, you may not comment negatively on social media about anything associated with RMBN.
- You are the face and voice of RMBN. Everything you do and say both online and offline reflects on our brand and reputation. Always use sound judgment and common sense, act with professionalism and integrity, and adhere to the company values when conducting yourself online and on social media.
- You may not set up a social media account, blog or webpage carrying the RMBN identity using any RMBN name or logo.
- No persons other than those specifically mandated may use social media to interact, comment or release statements on behalf of RMBN.
- Direct violations of this Policy will be subject to disciplinary action, up to and including dismissal/termination of contract.



1. Introduction

Social media has become an important and powerful tool that, if used correctly, provides an opportunity for unprecedented levels of engagement with clients, customers and key stakeholders. However, the use of social media – in both a personal and professional capacity – has risks attached to it. Social media presents significant risks to the privacy, corporate security and reputation of RMBN, its clients and stakeholders. RMBN is under an obligation to limit and, wherever possible, avoid those risks.

With this in mind, this Policy aims to regulate your participation on social media by providing guidelines as to what constitutes acceptable and unacceptable use of these platforms. The purpose of this Policy is to ensure that your use of social media does not compromise the reputation of RMBN.

For purposes of this Policy, social media means any facility for online publication and commentary, including, without limitation, blogs, wikis and platforms such as Facebook, Google Plus, Instagram, LinkedIn, Whatsapp, Twitter, Flickr, YouTube, and any other forms of communication that may now and in the future be classified or generally regarded as social media.

This Policy supersedes any previous Policy.

2. Standard Personal Responsibility

RMBN fosters an open and expressive environment and encourages the use of social media in a personal capacity. In addition, RMBN provides internal social networking opportunities. First Rand Group companies are active on social media and you are invited to find and follow us on most major platforms.

However, in using social media, always remember that your relationship with RMBN is based on trust and confidence. You have a legal duty to act in good faith towards RMBN – this duty extends to not doing anything on social media that may bring the name of RMBN into disrepute, and requires you to always act in the best interests of the company.

The following principles and guidelines outline the conduct that must be followed when engaging in online communications:

- Communications on social media are no different from offline communications – Nothing about social media changes your responsibilities and obligations to RMBN. Your obligations in terms of your contract of employment and other applicable policies apply to your conduct on social media. The following policies must be respected and considered in every use of social media:
 - Code of Conduct
 - Code of Ethics
 - Sexual Harassment Policy
 - Information Risk Policy
 - Disciplinary Code
 - Policy for Acceptable Use of Information Systems
 - Conflicts of Interest Policy
 - PA Trading Policy



Make sure that you have read all the above policies and that you understand them. Discuss anything that is not clear with your line manager or RMBN Human Capital. These policies may be amended from time to time and new policies may be introduced. It is your responsibility to access and familiarize yourself with any amendments to the policies on each occasion that you receive a notice informing you that amendments have been made.

- Everything you say and do online reflects on RMBN – When engaging on social media, please remember that you are an RMBN ambassador. In the age of the Internet, your content is easily associated with RMBN. This association is even more likely where you affiliate yourself with RMBN on your social media profiles
 - Whether by listing us as your employer or associate, associating with your colleagues or making the affiliation apparent from the content you post. Before posting anything on social media, ask yourself whether your content is something that could reflect negatively on RMBN. If there is a chance that it will, don't post it. For example, distasteful jokes about rape, AIDS, bomb threats or the like are not acceptable.
- Respect the RMBN brand – While we acknowledge that you may wish to periodically post content on social media about your job, you may not comment negatively on social media about RMBN or any FirstRand company, their products/services, employees, or any of their operations, promotions, projects, events, activities or clients (whether directly or indirectly).
- Do not air your grievances online – You may not use your personal social media platforms to air personal grievances regarding RMBN or any FirstRand company, their policies, procedures, co-workers or otherwise. The companies have well-established internal procedures that must be followed, and disciplinary action will be taken should these procedures not be followed. If you wish to complain in your capacity as a customer of RMBN or any FirstRand company, social media is not the place to do it. Please follow the channels available to you internally.
 - ⊗ *My colleagues are too annoying! Get me out of here!*
- Do not share company secrets or intellectual property – Remember that the confidentiality obligations outlined in your employment contract and other applicable policies apply on social media too. Nobody is allowed to disclose information that is sensitive, confidential or protected including financial, operational or legal information or any competitive analyses, pricing data or any information pertaining to any clients or customers (even if referred to indirectly). For example, sensitive financial information cannot be shared (even if it shows the company in a positive light).
 - ⊗ *The financials are in and are looking goood. Great work Team RMBN!*
- Don't speak on our behalf – There is a big difference between speaking on behalf of RMBN, and speaking about RMBN.
 - ⊗ *Sorry to hear you're having problems with RMBN. I work there, let me see if I can help.*
 - ⊗ *I'm struggling to believe you have really had these problems with RMBN. It must've been a once-off. We train our staff well.*
- Respect the privacy of clients – We take the privacy of our clients seriously, and you have an obligation not to violate that privacy. Before you post anything on social media, think about whether the content is yours to share. Be particularly mindful of posting pictures of people without their permission.
- Respect the law and the rights of others – The public, your colleagues, RMBN employees, RMBN associates, stakeholders, clients, customers and other affiliates (including RMBN's competitors) all reflect a diverse set of cultures, values and points of view. Don't be afraid to be yourself on social media, but do so courteously and respectfully and be thoughtful about how others may be affected. In particular, don't post or link to any content that:



- Is defamatory, racist or insulting – for example, calling someone defamatory names or falsely accusing them of some action
- Amounts to hate speech – hate speech is harmful or hateful content that discriminates on the basis of prohibited grounds such as race, gender, ethnicity, sexual orientation or religion
- Is fraudulent or untrue
- Is harassing or threatening
- Is obscene, pornographic, indecent, lewd, suggestive or otherwise objectionable
- Is invasive of the privacy of others – before you post anything on social media, think about whether the content is yours to share (and be particularly mindful of posting photographs of others without permission)
- Infringes on intellectual property rights – for example, using written content, logos or pictures without permission

Even if you did not originate the content, remember that you will be held responsible for material that you retweet, share or “like” on social media.

You have the right to freedom of expression, but that right may not unjustifiably infringe on the rights of others – for example, someone else’s right to a good reputation, dignity or privacy. Before you post something on social media, think about the impact that it could have on your colleagues, clients, stakeholders, RMBN and the general public. If in doubt, either give it some time and reconsider it at a later stage, or simply don’t post it.

- Respect and adhere to RMBN values – Always represent yourself with dignity online, and do not say or do anything contradictory or in conflict with RMBN’s values. This includes commenting in an inflammatory or objectionable way on topics such as politics and religion, posting naked pictures of yourself, using bad language, or doing or saying anything that creates a hostile work environment.
- Don’t misuse the RMBN corporate identity – Your social media identity, login identity, profile picture, “handle”, username and “hashtags” may not use or incorporate the name or logo of RMBN or any abbreviated or shortened version of the name. You may not use any of RMBN’s trademarks (eg. RMBN logo or taglines) on any website or profile, reproduce any of RMBN’s material, or link to RMBN websites or pages. You may also not use the company name to endorse or promote any product, opinion, cause or political candidate on social media. You may, however, list RMBN as your employer on social media profiles.

❌ @JohnRMBN

❌ Joe Blog’s Blog: An RMBN insider

- Don’t speak negatively about competitors or any other companies – RMBN discourages any abuse of or attacks on other companies, particularly on our competitors, on social media. For the sake of clarity, competitors include, but are not limited to, any financial services provider, including insurance providers.

You may not engage in a competitor’s space unless they provide a service to you in a personal capacity and your interaction is based on personal service received.

- Protect RMBN’s security – Don’t compromise the integrity and security of RMBN’s assets by exposing them to viruses, hackers or malware or by giving unauthorised access to passwords. If you suspect a computer may have a virus, or have been exposed to a virus or other malware, or if you suspect that your password is no longer secure ie. someone else is accessing the computer using your login details, please contact the X4200 (IT Help desk) immediately. Be aware that external websites, blogs and third-party social media services use servers that are not hosted or controlled by RMBN. Don’t use any external social network or blogging sites to conduct RMBN business as this may pose a security risk (e.g. communicating with an agency over Facebook, Whatsapp or tweeting about your work-related meetings).



- Follow all Nigerian Laws – As a registered bank, financial services and credit provider, RMBN is subject to various laws. Please ensure that you are familiar with the laws that apply to your job and abide by them when communicating online.
- Be transparent – Avoid using social media anonymously, or using a pseudonym or false screen name. If questioned, be upfront about the fact that you work for RMBN.
- Be truthful and avoid misrepresentations – Do not say anything that is dishonest, inaccurate or misleading. If you have a vested interest in something you are discussing, point it out, and if you make a mistake, be upfront about the error and correct it quickly.
- As soon as you leave the employ of or end your association with RMBN, you are required to remove all social media references to RMBN as your current employer or associate. Remember, however, that if you do leave RMBN or the FirstRand Group many of these policy obligations will follow you, especially regarding the protection of confidential information.
- Remember your day job – Your online activities should never interfere with your job performance or commitment to clients, customers and colleagues.
- Avoid social media “disclaimers” – RMBN discourages the use of disclaimers such as “I tweet in my personal capacity” or “My views are not those of my employer”. If you do elect to use any of these disclaimers in your social media profiles, do not treat them like a magic wand that will prevent any liability in terms of this Policy.
- In the age of the Internet, even what you say and do offline has the potential to negatively impact on RMBN – We live in an age in which much of what we do is documented, photographed and filmed. What this means is that behaviour outside of work hours and offsite that is either unlawful or contradictory to RMBN’s values has the potential to land up online, thereby reflecting negatively on RMBN. For example, if you make a racial slur while out drinking, someone could overhear you or take a picture/video and turn to Twitter with: “Just heard some guy call the barman the k-word. He says he works at RMBN”.
- Understand that RMBN retains the right to examine the social media accounts (if accessible) of any individual associated with the RMBN brand.

It doesn’t matter that it was outside of work hours: there is always a chance that what you do in the real world ends up online. Should this happen, it could not only do serious harm to your personal and professional reputation, but could potentially result in disciplinary consequences.

The best advice we can give you is to have fun, but responsibly. Ultimately approach social media in the same way as you approach the “real world”: use sound judgment and common sense, act with professionalism and integrity, and adhere to the RMBN values. Most importantly, always remember that you are an ambassador for the company – whether you’re on social media or not – and that your conduct on and offline has the potential to cause serious damage, not only to the reputation of RMB, but also to your own reputation and career.



3. Escalation Procedure

If you become aware of a discussion thread, posting, comment, statement or misrepresentation that has the potential to impact on the reputation of an individual or the business as a whole, you are required to immediately notify the RMBN Corporate Marketing Team at communications@rmb.com.ng. This notification should, where possible, be accompanied by a screenshot of, and link to, the relevant content. At no point are you authorised to engage on behalf of RMBN (whether publicly or privately) with the person or entity responsible for the content. Please also advise your line manager or Human Capital Manager.

4. Uncertainty and queries

If you are in any way uncertain or unclear as to whether or not you are permitted to post something on social media, please consult the RMBN Corporate Marketing Team at communications@rmb.com.ng.

5. Disciplinary Action

You are contractually liable for everything you do, say or post on social media. Failure to adhere to this Policy could result in disciplinary action up to dismissal.

Disclaimer: This Directive is subject to change at any time, however all RMBN employees, contractors and associates will be notified and updated of any changes made.

Annexure 1: Guidance Note

Helpful tips and considerations when engaging on social media

The instructions set out in the RMBN Social Media Policy clarify what you can and cannot say on social media in terms of your obligations to RMB. We also want to help you get the full benefit of social media which is why we have compiled guidelines on how to use social media without landing yourself in trouble.

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1. Think before you post

The speed of being able to publish your thoughts at the click of a button on social media is both a great feature and a great downfall. Remember that the Internet never forgets – what you publish will be around for a long time, so you need to reflect on and edit your content carefully. Also remember that you have no control over your online audience. Messages can be read out of context or read by people they were not intended for. If in doubt over a post, or if something does not feel right:

- let it sit for a while and reconsider it at a later time
- ask someone's advice
- simply don't post it!
- Take personal responsibility for your actions and words on social media.

2. Be yourself

- Be interesting and have fun, but stay out of trouble.
- Write about what you know. You may find yourself embarrassed by an expert if you comment on topics that you are not properly informed about.

3. Take the time to do things properly

- Quality matters. Use a spell-checker. If you're not a designer, ask someone with design knowledge whether your blog looks decent, and take their advice on how to improve it.

4. Protect your privacy

- Be mindful of posting information that you would not want the public to see. There is no such thing as "privacy" on social media.
- Be cautious about disclosing personal details about yourself online.
- Change your passwords frequently.
- Never click on any links that seem untrustworthy. If a friend sends you something via a private message, rather confirm with them first that the link is safe.

5. Be upfront and honest

- Do not say anything that is dishonest, untrue, or misleading. If you have a vested interest in something you are discussing, point it out.

6. Respect the intellectual property of others

- Pictures, words, videos, logos and music are protected in terms of intellectual property law. Just because material is freely available online, it does not mean that you may use it without permission.
- You should never quote more than short excerpts of someone else's work, and always attribute such work to the original author/source.
- It is good general practice to link to others' work rather than reproduce it.

7. Be respectful of others

- If you speak about others, make sure what you say is factual and that it does not disparage that party.
- Avoid arguments. Don't try to settle scores or provoke others into inflammatory debates.



8. Be the first to respond to your own mistakes
 - If you make an error, be upfront about your mistake and correct it quickly. If you choose to modify an earlier post, make it clear that you have done so.