

## **FirstBank UK Limited Conflicts of Interest Policy Summary**

### **1. INTRODUCTION**

This is a summary of FirstBank UK Bank Limited's ("FirstBank UK") policy for identifying and managing conflicts of interest which are likely to occur during its business activities. The policy includes implementing adequate systems and controls to mitigate actual and potential risks of conflicts of interest.

A conflict of interest typically arises when two or more persons have competing interests and a duty of care or trust exist between those persons. Conflicts of interest relevant to FirstBank UK include those that arise between:

- FirstBank UK and one or more customers
- Two or more customers
- An employee and one or more customers
- Between FirstBank UK and First Bank of Nigeria
- FirstBank UK and associated companies within First Bank of Nigeria Group
- A third-party service provider or outsourcer and FirstBank UK

### **2. CONFLICT OF INTEREST ASSESSMENT**

The risk inherent in a situation of conflict or having conflicting interests is that decision making may become impaired resulting in bad outcomes for customers, colleagues, FirstBank UK and the financial market in general.

In assessing whether a conflict of interest has arisen, FirstBank UK will consider whether an employee, any individual connected to FirstBank UK or a third party:

- a) is likely to make a financial gain, or avoid a financial loss, at the expense of a customer or FirstBank UK;
- b) is likely to make a personal gain or advantage at the expense of a customer or FirstBank UK;
- c) has an interest in the outcome of a service provided to a customer or of a transaction carried out on behalf of a customer, which is distinct from the customer's interest in that outcome;
- d) has a financial or other incentive to favour the interest of a customer or group of customers over the interests of another customer;
- e) carries on the same business as the customer;
- f) receives or will receive from a person other than FirstBank UK, an inducement in relation to a service provided to FirstBank UK, in the form of monies, goods or services, other than the standard commission or fee for that service; and/or
- g) Could make a decision which undermines or prejudices FirstBank UK's reputation, credibility or commercial interests; and or
- h) could make a decision that creates conduct risk such as, detriment to customers, FirstBank UK and the financial markets.

### **3. MANAGING CONFLICTS OF INTEREST**

FirstBank UK seeks to ensure that a conflict of interest does not adversely affect the interest of customers, FirstBank UK or other stakeholders through the identification, prevention, or management of the conflict of interest.

Where an FirstBank UK employee or representative believes (or has reasonable grounds to believe) that a conflict of interest exists in relation to a service provided by or received by FirstBank UK, or other contract or relationship between FirstBank UK and a third party, then FirstBank UK requires that person to declare and clear such conflict before the provision of the service or engagement in decision making takes place.

FirstBank UK may utilise a number of means to manage a conflict of interest including:

- Organisational arrangement, systems, controls, policies, and procedures designed to prevent the conflict of interest arising or to mitigate the associated risks;
- Ensuring that services are provided, and transactions are entered into on arms' length terms;
- Conflicted individuals not participating in relevant decisions or processes; or
- Avoiding the service, activity or matter giving rise to the conflict of interest where the conflict of interest cannot be prevented or managed effectively using any other means.

To ensure there are effective systems and controls in place for managing conflicts of interest, FirstBank UK has appointed a Conflicts of Interest Officer with oversight responsibility for conflicts of interest that may arise.

### **4. RECORDING CONFLICTS**

FirstBank UK maintains a Conflicts of Interest Register for:

- a) Recording actual conflicts of interests or potential.
- b) Updating details of existing conflicts of interests.

Information contained in the register facilitates effective identification and management of conflicts of interest.

### **5. DISCLOSURE OF CONFLICTS**

Where FirstBank UK has used all reasonable efforts to manage a conflict, but the risk of damage to a customer or third party's interest remains, a specific disclosure to the third party about the presence of the conflict will be made.

Disclosures will be made prior to the conclusion of a contract, in a durable medium, and include sufficient detail, taking into account the nature of the customer, to enable the customer to take an informed decision.

## 6. POLICY STATEMENT ON CONFLICTS

When dealing with customers and business partners all FirstBank UK employees, any contractors and any FirstBank UK Directors must:

- Carry out business activities with fairness and integrity.
- Conduct business activities to ensure the fair treatment of customers.
- Enter into contracts and select business partners using ethical and objective criteria.
- Adhere to regulatory and statutory obligations in the giving and receiving of corporate hospitality and gifts.