



STAKEHOLDER ENGAGEMENT POLICY

Revision History

Version	Author	Approving Authority	Date of Approval	Next Review Date
Version 1	Chief Legal Officer	Shareholders		

Reviews and Approvals

Prepared By:	Chief Legal Officer & Company Secretary	Sign..... Date.....
Reviewed By:	Chief Risk Officer	Sign..... Date.....
Reviewed By:	Executive Committee	Chairperson Sign..... Date.....
Recommended By:	Board Risk Management Committee, Board	Chairperson Sign..... Date..... Chairman Sign..... Date.....
Approved by:	Shareholders	Chairman Sign..... Date.....

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2 INTRODUCTION

Family Bank Limited is committed to engaging stakeholders in a transparent, accountable, and structured manner. This Policy provides the framework for identifying, communicating with, and responding to stakeholders, ensuring their feedback and concerns are addressed to support ethical conduct, regulatory compliance, and the Bank's long-term success.

3 PURPOSE

The purpose of this policy is to establish a consistent and effective approach to stakeholder engagement, ensuring that the bank's stakeholders are informed, involved, and consulted in the bank's activities, as relevant. This policy is designed to ensure that the bank is transparent, responsive, and accountable to its stakeholders.

4 SCOPE

This policy applies to all the Bank's stakeholders including Board of Directors, investors, lenders, employees, customers, government regulatory bodies, suppliers, media and shareholders.

5 POLICY STATEMENT

With a focus on accountability, compliance, and innovation, we aim to create a robust ecosystem of partnerships that fosters growth while mitigating potential disruptions. Through collective commitment and adaptability, we uphold ethical business practices, regulatory compliance, and the security of FBL's operations.

6 POLICY OBJECTIVES

The objectives of this policy include:

- a) Safeguard and enhance the Bank's reputation by maintaining effective, structured and ethical relationships with all key stakeholders.
- b) Ensure timely, accurate, and transparent communication with stakeholders in line with regulatory and governance requirements.
- c) Establish mechanisms for obtaining and appropriately responding to stakeholder feedback on the Bank's activities and strategic initiatives.
- d) Promote stakeholder awareness and understanding of Family Bank's operations and impact in line with disclosure obligations.
- e) Ensure accountability, responsiveness and transparency in stakeholder engagements, in accordance with CBK governance guidelines and best practice.
- f) Define and implement approved methodologies, systems, and processes for the identification, classification and engagement of stakeholders.

7 RESPONSIBILITIES

7.1 Board of Directors

The Board has responsibility to:

- a) Approve the Stakeholder Engagement Policy and any material amendments thereto, ensuring alignment with the Bank’s strategy and regulatory obligations.
- b) Provide strategic direction and oversight on how the Bank identifies, prioritizes, and engages with its stakeholders in a manner that protects the Bank’s reputation and long-term sustainability.
- c) Ensure that stakeholder engagement practices comply with CBK regulations, corporate governance guidelines and other applicable legal and supervisory requirements.
- d) Oversee Management’s implementation of the Stakeholder Engagement Policy and ensure adequate resources, systems, and controls are in place to support effective engagement.
- e) Ensure that material stakeholder concerns, including those relating to customers, regulators, shareholders, employees and the community are appropriately escalated and addressed.
- f) Promote a culture of transparency, accountability and ethical conduct in all stakeholder interactions across the Bank.
- g) Evaluate the effectiveness of the Stakeholder Engagement Policy and direct Management to implement improvements where necessary.

7.2 Board of Directors Chairperson

The Chairperson to the Board of Directors has responsibility to:

- a) Lead and represent the Board in engagements with shareholders, regulators, investors, and other key external stakeholders as appropriate.
- b) Ensure that communications on governance and strategic matters are accurate, consistent, and aligned with Board-approved positions and regulatory requirements.
- c) Safeguard the independence of the Board by clearly distinguishing Board-level communications from Management-led operational communications.
- d) Support constructive and transparent engagement with regulators and shareholders, particularly on matters affecting governance, performance, and long-term sustainability.
- e) Ensure that media engagements at Board level are conducted in a controlled and responsible manner in line with the Bank’s disclosure and communication policies.

7.3 Senior Management

Family Bank’s Senior Management have a responsibility to:

- a) Implement and operationalize the Stakeholder Engagement Policy, ensuring alignment with the Bank’s strategy and regulatory requirements.
- b) Ensure timely, accurate, and consistent communication with stakeholders, including regulators, customers, employees, community and shareholders, in accordance with CBK requirements and internal disclosure policies.
- c) Monitor, manage, and escalate material stakeholder issues, complaints, and emerging

reputational risks to the Board and relevant Board Committees in a timely manner.

7.4 Managing Director and Chief Executive Officer

The Managing Director has a responsibility to:

- a) Serve as the principal Management-level spokesperson of the Bank on operational and management matters, ensuring all communications are accurate and in line with Board approved positions.
- b) Oversee day-to-day stakeholder communication, including engagements with customers, employees, regulators, investors, and the media, in accordance with the Bank's approved communication protocols.
- c) Ensure that structures and resources are in place to effectively manage stakeholder relationships, address concerns promptly and safeguard the Bank's reputation.
- d) Monitor, escalate and report material stakeholder issues, complaints, regulatory concerns, and emerging risks to the Board and relevant Board Committees and recommended management actions.

7.5 All Staff

In their role as stewards of the Bank, Family Bank staff have a responsibility to:

- a) Ensure that all interactions with stakeholders are conducted professionally and in accordance with the Bank's values, policies and regulatory requirements.
- b) Provide accurate, timely and complete information to stakeholders in line with their role ensuring transparency and consistency with approved Bank communications.
- c) Promptly record, escalate, and respond to stakeholder feedback or concerns through the Bank's approved engagement and complaints handling mechanisms.
- d) Contribute to the identification and understanding of stakeholder needs and expectations as well as providing insights to Management for continuous improvement of products, services and engagement processes.
- e) Maintain confidentiality and safeguard sensitive stakeholder information ensuring compliance with data protection laws and the Bank's information security policies.

7.6 Legal Department

The Legal Department is responsible for:

- a) Ensuring that all stakeholder engagement activities comply with applicable laws, regulations, and internal policies.
- b) Providing legal guidance to Management and staff on stakeholder communications, contracts, and agreements to mitigate legal and reputational risks.
- c) Reviewing and advising on stakeholder-related documents, feedback mechanisms, and engagement processes to safeguard the Bank's interests.

7.7 Enterprise Risk Department

The Enterprise Risk Department is responsible for:

- a) Identifying, assessing, and monitoring risks arising from stakeholder engagement activities, including reputational, operational, and compliance risks.
- b) Providing risk guidance and recommendations to Management and staff to ensure stakeholder interactions remain within the Bank's risk appetite.
- c) Escalating material stakeholder-related risks to Senior Management and the Board, with proposed mitigation strategies.

7.8 Internal Audit Department

The Internal Audit Department is responsible for independently reviewing and assessing the Bank's stakeholder engagement processes and compliance with this Policy. The Department shall evaluate the effectiveness and efficiency of stakeholder interaction systems and procedures and report findings and recommendations to Senior Management and the Board to ensure continuous improvement and adherence to regulatory and internal requirements.

7.9 Government Regulatory Bodies

Government Regulatory Bodies are responsible for:

- a) Ensuring that the Bank complies with all applicable laws, regulations, and supervisory requirements.
- b) Protecting the interests of stakeholders, including depositors, investors and the broader financial system, through effective oversight and enforcement.

7.10 Bank Suppliers

Family Bank's suppliers are responsible for providing the company with high-quality materials and products in a timely and cost-effective manner.

7.11 Media

Media is responsible for accurately reporting on the company and its products, and for raising awareness of any issues related to the company's practices.

8 Stakeholder Identification and Prioritization:

Family Bank is committed to identifying and maintaining an up-to-date record of both internal and external stakeholders, including those who interact with, are impacted by, or have the potential to influence the company's operations, performance, or reputation, to ensure effective and structured engagement.

The Bank's key stakeholders include:

- i. Employees.

- ii. Communities.
- iii. Service Providers.
- iv. Business partners.
- v. Regulatory and government bodies.
- vi. Media Stakeholders are prioritized based on their relevance and profiled into different categories depending upon the specific context of engagement.

9 STEKEHOLDER ENGAGEMENT PROCESS

9.1 Methods of Engagement

Family Bank is committed to continuous engagement with all stakeholders, using appropriate tools such as written communications, meetings, surveys, focus groups, joint projects and information sessions. Engagement shall adhere to the following principles:

- a) Clearly define the purpose, scope, frequency, and method of engagement based on the nature of the stakeholder relationship.
- b) Allocate sufficient resources and assign responsibilities to ensure inclusive, transparent and effective engagement.
- c) Recognize and assume responsibility for the impact of the Bank’s policies, decisions, products and services on stakeholders.
- d) Identify and mitigate potential engagement risks, including conflicts of interest, stakeholder fatigue or unwillingness to engage, through proper planning and preparation.
- e) Assess stakeholder capacity to engage and where necessary, provide support to overcome barriers such as technical capability, language or resource limitations.
- f) Enable stakeholders to provide feedback and participate positively in the Bank’s operations.
- g) Address and resolve stakeholder grievances fairly, equitably, and promptly.
- h) Align Bank actions with stakeholders’ high-priority areas, based on ongoing assessment.
- i) Communicate engagement outcomes to internal and external stakeholders through appropriate channels, including annual reports, meetings, website notices, AGMs, and social media

9.2 Stakeholder Engagement

Family Bank engages stakeholders through multiple channels and communication methods tailored to each stakeholder group, which can be classified into the following broad categories:

9.2.1 Engagement Channels

Stakeholder Group	Engagement Channel
Shareholders	<ul style="list-style-type: none"> ♣ Annual General Meetings (AGMs). ♣ Press releases and newsletters. ♣ Financial results publications and reports. ♣ Share Registrars.

Employees	<ul style="list-style-type: none"> ♣ Employee newsletters. ♣ Intranet Portal. ♣ Team building activities. ♣ Bank wide calls by the Managing Director Branch visits by Senior Management. ♣ Training programs and performance management system. ♣ Functional and cross-functional committees. ♣ Emails and written communication. ♣ Face-to-face meetings.
Board of Directors	<ul style="list-style-type: none"> ♣ Quarterly board engagements with management. ♣ Board meetings. ♣ Site tours. ♣ Board retreats.
Community	<ul style="list-style-type: none"> ♣ Community meetings, surveys, and consultations. ♣ Social investments, interventions, and initiatives. ♣ Awareness campaigns and radio advertisements. ♣ Community development through various events such as trainings.
Customers	<ul style="list-style-type: none"> ♣ Direct consumer calls and surveys. ♣ Complaint handling & feedback mechanisms. ♣ Marketing and Advertising. ♣ Electronic Communication. ♣ Training sessions for customers. ♣ Customer events such as dinners and breakfast
Service Providers	<ul style="list-style-type: none"> ♣ Meetings with service providers ♣ Regular interaction through phone, e-mail and in person. ♣ Service Provider Audits.
Government	<ul style="list-style-type: none"> ♣ Annual reports. ♣ Communications with regulatory bodies. ♣ Formal dialogues. ♣ Face to face meetings.
Media	<ul style="list-style-type: none"> ♣ Press Conferences. ♣ Written Communication audio & visual communication. ♣ Face to face meetings

9.2.2 Media Engagement

All media engagements, press statements, interviews and public commentary regarding the Bank shall be coordinated through the office of the Managing Director or a designated function, with the Chairman involved in matters relating to Board oversight, governance or shareholder interests.

9.2.3 Engagement Through Shares Department

Family Bank's day-to-day management of the members' register is handled by an in-house Shares team, while AGM management is outsourced to a designated registrar.

9.2.4 Shareholder Communications and Query Resolution

The in-house Shares team manages all shareholder interactions. Shareholders may contact the registrar or the Bank via walk-in, email, postal mail, telephone, or approved social media channels.

9.2.5 General Meetings of Shareholders

AGMs serve as the primary channel for shareholders to engage directly with the Board and Management. Communication for AGMs shall be conducted in accordance with the following guidelines:

- a) AGM notices shall be published on the Bank’s website and in major newspapers.
- b) AGM materials and relevant communications shall be sent to shareholders via email, SMS, and voice calls, with support for individual queries.
- c) Shareholders may register for the AGM and participate by voting and asking questions.
- d) An appointed registrar shall support shareholders with registration, participation, questions, and voting.
- e) Voting results and responses to questions will be published on the Bank’s website.

9.2.6 Dividend Payments and Reconciliation:

Dividends payment shall be managed by the bank’s Shares team and communicated to shareholders via electronic notification or physical mail.

9.2.7 Share Register Maintenance and Updates:

Shareholders may update their personal information, including contact details and payment mandates, through the internal Shares registry or at Bank branches.

9.2.8 Stakeholder Feedback:

The Bank systematically collects stakeholder feedback through surveys, focus groups, customer compliments and complaints, and other engagement channels. This feedback is analyzed and leveraged to guide decision-making and enhance the Bank’s products, services, and overall stakeholder experience.

10 Stakeholder Communication

Family Bank Limited will maintain regular, transparent, and multi-channel communication with stakeholders, including newsletters, press releases, social media, webinars, face-to-face meetings, teleconferences and engagement events. The Bank will respond promptly to all stakeholder inquiries and feedback.

10.1 Authorized Spokespersons:

External communications on behalf of the Bank shall be conducted only by duly authorized persons. The Chairman of the Board and the Managing Director serve as the Bank’s primary spokespersons in their

respective capacities. Other employees may engage externally only with prior authorization and in line with approved communication protocols.

10.2 Feedback and Complaints:

Family Bank maintains a structured process for receiving, managing, and resolving stakeholder feedback and complaints. These includes:

- i. Providing clear and accessible feedback channels
- ii. Acknowledging receipt within a reasonable timeframe
- iii. Investigating and addressing concerns raised
- iv. Communicating outcomes clearly to stakeholders
- v. Maintaining records of all feedback, complaints and their resolution

11 POLICY EXCEPTIONS

While FBL is committed to adhering to the principles outlined in this Policy, certain exceptions may be considered under specific circumstances. These exceptions will be subject to careful evaluation and approval processes to ensure that they align with FBL's objectives and values while minimizing potential risks.

12 POLICY REVIEW

This policy will be reviewed every 2 years to ensure its continued application and relevance. The Policy may also be reviewed and improved if necessitated by a significant event or change in circumstances at the Bank.