

Care

Ethical Supplier Relations

Treating Customers Fairly

Service

Employee Volunteering

World Class Customer Service

Responsible Business Practices

Building Vibrant, Sustainable Communities

CSR IN ACCESS BANK PLC

Partnership for Societal Sustainability

Community Investment

Economic Development & Advocacy

Advisory to Emerging Institutions

Equal Opportunity Employer

Responsible Products

Ethical Competition

Sustainable Leadership

Customer Ombudsman

Corporate Governance

Contribution to Public Policy

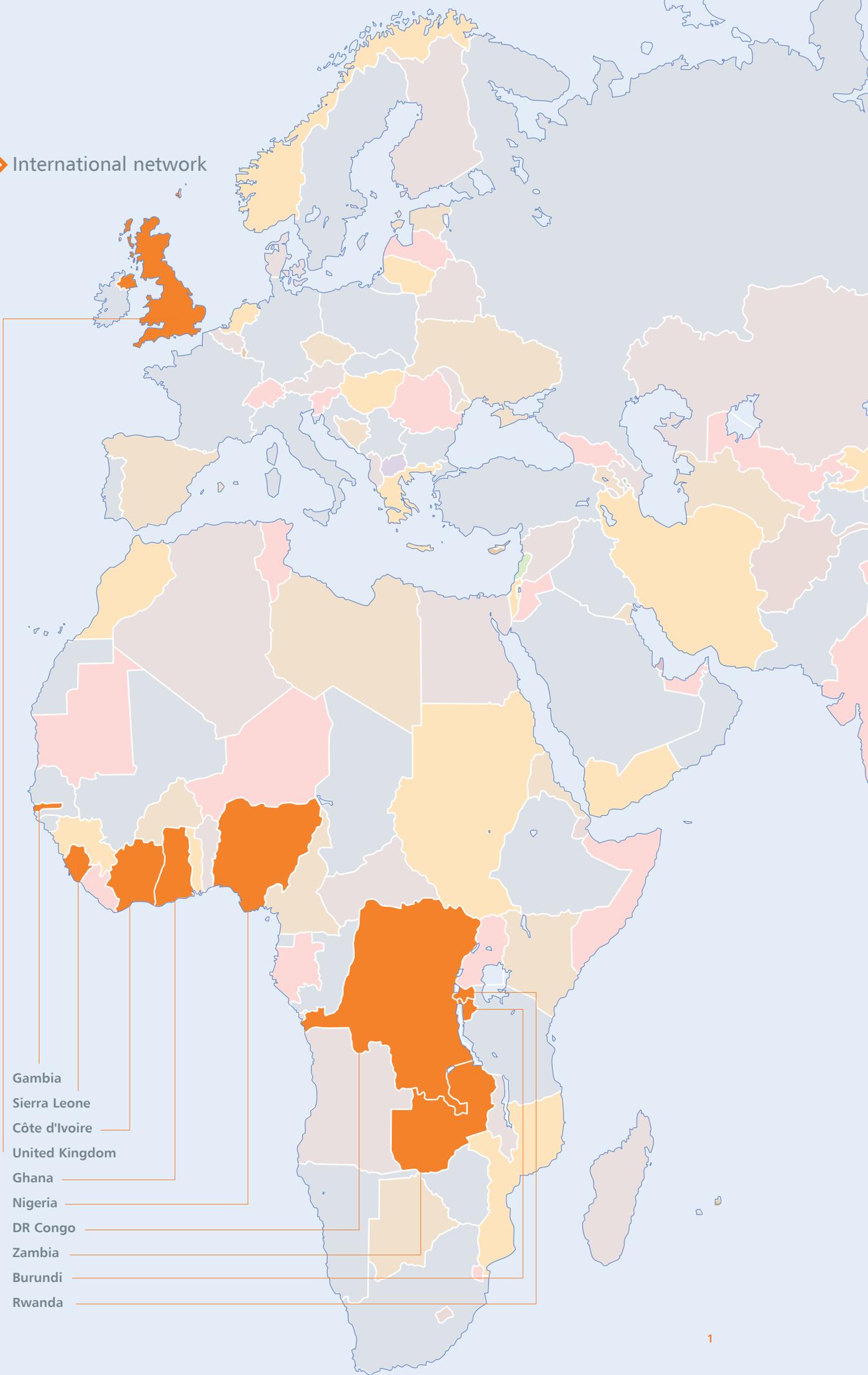
Capacity Building

Environment

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International network





Strategy and Analysis

Corporate Social Responsibility at Access Bank reflects how we advance our business objectives, implement our policies, apply our social investment and exercise our influence to make a productive contribution to society.

Executive Summary

Delivering value through sustainable business practices

Developing and delivering best in class financial services has been crucial to Access Bank's business success. In line with our commitment to ensuring the sustainability of our business, we incorporate environmental, social and governance priorities into our business decisions. Access Bank consistently enhances its ethical standards and balances economic, environmental and social imperatives addressing the concerns and expectations of our range of stakeholders.

We recognise that we are in business to maximise shareholder value while paying due regard to the social and environmental impact of every aspect of our operations. There is therefore high-level management focus on sustainability and the Bank's strategy is to mainstream sustainability into our operations for the long term success of our business.

We have always believed that doing good is good for business: being responsible and being commercially successful go hand in hand. A key goal of our corporate social responsibility strategy is to address the challenge of sustainability—balancing economic growth, social development, and environmental protection, to ensure future generations are not compromised by actions taken today. We address this challenge through a focus on improving the efficiency of our current operations and products.

To ensure an enduring framework for corporate decision making, brand image, employee recruitment and retention, we have addressed the broad corporate social responsibility agenda through core sustainability areas - community investment; human rights and employment standards; customer satisfaction and relations; product and services and ethical supplier relations.

These priorities resonate in our businesses, provide a platform for action, and give us a clear purpose and direction. They help in the process of building a sustainable business that creates sustainable value for our

shareholders. Implementation is driven by actionable goals and a robust performance measurement system which has, amongst other things, resulted in; responsible lending, ethical marketing and advertising to our customers, employee diversity and rewarding career opportunities, consideration of the environmental and social issues that arise in financing projects and positive contribution to the economic development of the countries where we operate.

Access Bank has therefore consistently improved on its corporate social responsibility performance, across key sustainability indicators, including:

Governance and Ethics – Access Bank manages safe, reliable, ethical operations as well as corporate social responsibility issues in all our countries of operation through our globally deployed management systems. We expect our employees to integrate responsibility into their work-related activities and decision-making processes. Our management and control systems are therefore designed to support that goal.

Employee Standards – Access Bank's workplace policies and practices aims at shaping corporate culture and guiding relationships among employees and between the Bank and its workers. We are committed to creating a work environment where people can make a difference both as individuals and as part of a team. The engaging, inclusive work environment of the Bank helps attract, engage and retain talented employees while enabling them to achieve their full potentials.

Health and Safety – Access Bank protects the health and safety of our employees, customers, vendors and the public by implementing policies and initiatives that demonstrate our commitment to a safe, secure, and healthy work environment. Examples include the Access Care Programme; appointment and training of fire wardens and fire searchers; all of which contribute to higher productivity and reduced costs.

»»» Sustainability risks and opportunities

Customer Satisfaction – At Access Bank, we recognise that marketplace perceptions and reactions to business behaviour and practices are critical to corporate success. We engage in responsible customer relations, including marketing and advertising; and ethical competition. We treat our customers fairly, with openness and transparency and ensure that our marketing practices enable us to focus on building and maintaining sustainable, long term relationships with our customers.

Environmental Performance – Access Bank is committed to conducting its business in a manner that protects the environment, wherever we operate. We integrate environmental elements into our business plans and strategies, and address key environmental issues that are specific to the processes and activities of our business.

Responsible Products and Services – Responsible banking is one of the key differentiators of Access Bank with the purpose of developing innovative business solutions to social and environmental challenges. Product responsibility at Access Bank relates to the impact that the Bank's products and services have on the people and society as a whole. Our products and services promote financial growth and also enhance social and environmental causes across a range of clients and stakeholders.

Economic Development – Access Bank seeks to create long-term economic and social benefits from our projects and presence. We employ a variety of economic support and incentive programmes, including employee development and strategic community investments. Our contributions to economic development allow us to reduce barriers to development in the communities where we operate and are consistent with the objectives of the United Nations Millennium Development Goals (MDGs).

Access Bank has taken steps to ensure that risk management systems cover the legal, regulatory and reputational risks associated with direct and indirect environmental and social impacts. These risk reporting systems have been informed by the Environmental, Social, and Governance (ESG) framework and Board level oversight is provided by the Access Bank's Risk Management Committee.

ESG risks are addressed by a policy guideline which addresses environmental and social risk issues in credit and lending. This forms part of a group-wide framework for addressing the Equator Principles (EP), and provides for internal monitoring and management of ESG performance.

Sustainability opportunities

Sustainability opportunities are identified through growth of the business and the implementation of sustainability solutions at business unit level, as well as Access Bank's participation in sustainability and environmental forums. These forums provide a platform to actively pursue sustainability opportunities and, where necessary, incubate new projects until they mature enough to be fully integrated into the operations of the business unit concerned.

Prioritizing risks and opportunities

Risks and opportunities are prioritized taking business performance implications and stakeholder materiality into consideration. Access Bank defines materiality according to the GRI (G3) guidelines definition and with reference to both internal and external factors.

Current sustainability priorities include investing in employee development and retention, maintaining progressive business client relationships, managing our environmental footprint, and implementing ESG risk management processes in line with the Bank's adoption of the Equator Principles.

»»» About this report

This report covers the period January 1, 2009 to December 31, 2009. In developing this report, we have utilized relevant international standards and guidelines such as the AA1000 Assurance Standards and the Global Reporting Initiative (GRI) G3 Sustainability Reporting Guidelines - www.globalreporting.org. A GRI context index is provided on page 110.

Date of last report

April 1, 2008 – March 31, 2009

Report scope and boundaries

The Access Bank reporting methodology aligns with the Global Reporting Initiative's (GRI) G3 guidelines and the London Benchmarking Group (LBG) which enables us to effectively measure our Corporate Community Investment (CCI).

The boundaries, scope and content for the report have been determined in accordance with the principles outlined by the GRI G3 reporting guideline, the GRI finance sector supplement and relevant G3 indicator protocols and technical protocols.

The report aims to provide a balanced and reasonable representation of Access Bank's performance in respect of sustainability issues. Material disclosures including management approaches and performance indicators have been selected through a process using the principles of materiality and stakeholder inclusiveness.

Access Bank defines material topics as those reflecting significant economic, environmental and social impacts, or those that would influence the decisions of our stakeholders. These topics are addressed in order of priority based on their materiality, and relevance to our stakeholders.

The report covers entities over which Access Bank has control, or significant influence and focuses primarily on Nigerian operations as this is where our sustainability impacts are most significant.

Assurance

We engaged the services of Corporate Citizenship to provide independent third party assurance for the 2009 Access Bank Corporate Social Responsibility Report. The assurance statement is on page 107.

The verification of the 2009 CSR Report was done by Corporate Citizenship through on-site visit and interview sessions with several managers and heads of Strategic Business Units around the Group office.

Key performance indicators

Over the reporting period, we progressed in our sustainability agenda through the management of our environmental, social and economic impacts. Our commitments on various corporate responsibility key performance indicators include:

- Environment: actively address and reduce the impacts of our business on the environment.
- Marketplace: take a lead in upholding high standards of corporate conduct and ethical practices in the marketplace.

- Supply chain: work for positive social, environmental and economic impact in the supply chain.
- People and culture: continually attract and retain best-in-class professionals.
- Community: strategic selective and effective response to important societal needs.

The progress we have made on 2009 goals and our future plans are highlighted below:

CORE AREAS	TARGET	2009 PROGRESS	LOOKING AHEAD
Environment	<p>Going Green; Beyond Words, a two-pronged initiative:</p> <ul style="list-style-type: none"> • Mainstream Environmental, Social and Governance (ESG) considerations into our business operations. • School-based tree planting project across Nigeria 	<p>Access Bank commenced the integration of ESG into its business processes and operations. In line with this, the Bank signed on to conventions and principles in line with ESG best practices. We were the first Nigerian bank to:</p> <ul style="list-style-type: none"> - adopt the Equator Principles - sign on to the United Nations Principle for Responsible Investment (UNPRI) - become an organizational stakeholder of the Global Reporting Initiative (GRI). <p>Access Bank Plc in 2009 became a signatory to the United Nations Environment Programme Finance Initiative (UNEPFI).</p> <p>As part of Access Bank's initiative to attain carbon neutrality, the Bank embarked on a national tree planting project where 2800 trees were planted.</p>	<ul style="list-style-type: none"> • Capacity building for employees in E&S risk management. • Application of customized toolkit for E&S integration • Reduction targets for energy, water and carbon emissions. • Further reduction of our energy consumption across the Access Bank Group. • Design and implement environmentally-friendly initiatives for employees. • Further attain carbon neutrality through the school-based tree planting project.

People and Culture	<p>- Develop an engaged and high-performing workforce.</p> <p>- Become the Employer of choice in Africa</p> <p>- Develop a sustainable work culture that is performance driven, progressive, global and underpinned by integrity.</p>	<p>- We conducted employee surveys across all areas of our operations.</p> <p>- The Bank delivers a minimum of 50 hours of training for all employees through various channels allowing employees more flexibility in planning their own development.</p> <p>- Group-wide strategy that aims to improve diversity and inclusion across the Bank. The strategy focuses on gender, ethnicity and age diversity to ensure the long-term sustainability of the organisation.</p> <p>- Initiated Access Care Programme through which 160 employees were trained on first aid administration and emergency response to provide complementary healthcare-services outside of the core hospital setting in a realistic manner that will ensure attainment of good health across Access Bank's workforce. The Access Carers were certified by the International Red Cross.</p>	<ul style="list-style-type: none"> • Continually attain upper percentile in employee survey results. • Work with employees to devise action plans for improvement in response to results from our global employee opinion survey. • Develop plans to help our employees remain engaged and motivated during periods of organisational change.
Employee Volunteering	<p>Increase awareness and participation of staff in the volunteering scheme, thereby adding value to various communities where we operate.</p>	<p>- Approximately 80% of all our employees actively participated in the Bank's volunteering scheme.</p> <p>- Over N17,500,000 (Seventeen Million, Five Hundred Thousand Naira) was expended by various employee volunteering groups on impactful community development initiatives.</p> <p>- School adoption project initiated for employee volunteering groups interested in educational intervention.</p>	<ul style="list-style-type: none"> • Increase employee participation in the Bank's volunteering scheme. • Provision of additional platforms for employees to volunteer in community development initiatives.

Supply Chain	Ensure proactive implementation of sustainability solutions in the supply chain and effective management of associated supplier risk.	Engagement of suppliers through routine site visits and fora. Feedback integrated into future dealings with our suppliers has helped to manage relationships with suppliers, helping to prevent unethical or compromising conduct.	<ul style="list-style-type: none"> • Further integrate sustainability principles into the selection criteria for our suppliers. • Implementation of integrated sustainable supply chain strategy.
Stakeholder Engagement	<p>- To provide platforms for open, honest and constructive dialogue with stakeholder publics.</p> <p>- To obtain feedback to improve our sustainability performance.</p>	<p>Engagement sessions via meetings, forum, teleconferences, amongst others, were held for our various stakeholders and we have designed new initiatives in response to the issues raised by the stakeholders.</p> <p>The stakeholders who participated include employees, investors, non-governmental organisations (NGOs), and representatives from academia, government and the media.</p>	<ul style="list-style-type: none"> • Broaden our dialogue with stakeholders on sustainability issues. • Continuous response to stakeholder concerns for the improvement of our business sustainability performance.

Our sustainability agenda will continue to be driven by our Corporate Social Responsibility (CSR) Committee chaired by our Group Managing Director/CEO.

»»» Our philosophy

The Access Bank philosophy gives an insight into the Bank's direction and the driving force for achieving business objectives. Our philosophy is about the values that we have as a bank - excellence, ethics, trust, teamwork, passion for customers and continuous learning. It encompasses the way we communicate, how we recruit, how we work, our relationships with external stakeholders, our controls, our systems, our rewards and the way we celebrate.

Our corporate philosophy is at the heart of everything we do and forms the bedrock of our business. It includes our:

- 1 **Vision**
- 2 **Mission**
- 3 **Brand Driver**
- 4 **Values**

At all meetings, excluding Monthly Performance Review (MPR), Monthly Service Review (MSR) and budget presentations, all staff irrespective of grade recite the corporate philosophy of the Bank. This is to keep the corporate philosophy alive in the hearts and minds of every employee, resulting in a commitment to work together to achieve Access Bank's common purpose.

VISION AND MISSION

Vision: To transform our bank into a world-class financial services provider.

This vision belongs to everyone who works in Access Bank. It is a guiding light for all of us, a vision of the future – of where we want to be – of where we see ourselves in the months, years and decades to come. It shapes our corporate attributes and values and guides our corporate decisions.

We are a fast-paced, result-driven and innovative organization boldly setting standards of excellence in the Nigerian Banking sector and beyond. In 2002, we embarked on a remarkable but ongoing transformation journey that has seen us emerge as one of Africa's leading

banks from a hitherto obscure position. The Bank's vision requires committed and dedicated people who are willing to make sacrifices to bring the vision to fruition. There are several examples of outstanding commitment by the Bank's employees that have made this remarkable story of transformation possible.

We are therefore consistently setting new and higher benchmarks by which to assess ourselves and we are constantly improving and seeking superior platforms from which to practice our business. Our vision is the DNA that drives us forward. A guide to understanding elements of our vision is:

- **Total Compliance:** We are transparent in all our business practices and voluntarily adhere to all relevant regulations.
- **Best People:** We recruit and develop the industry's most skilled and talented individuals. They define the industry standards at all levels.
- **Market Leader:** We are committed to being the first among peers - first to develop innovative and responsible products and industry leaders in chosen markets and segments.
- **Global Recognition:** We strive to attain worldwide recognition for high performance, service delivery, excellence and innovation.

Mission: To go beyond the ordinary, to deliver the perceived impossible, in the Quest for Excellence.

Expressing our purpose as one entity, our mission is based on what we do for our stakeholders, through the range of our operations – our markets, products and services, relationships, goals and values. In our determination to successfully achieve our mission, we focus on the practical measures that need to be carried through.

Our passion, fierce determination and strength of purpose

spur us on to continually go further than others have gone. Understanding what it means to win in our chosen markets is the next step to understanding the basis for our decisions. To win in the market place means:

- **We will go “Beyond the Ordinary”.** Going beyond the ordinary means, challenging the status quo and extending the possibilities of the products, services and solutions that we offer our customers.
- **We will deliver the “Perceived Impossible”.** We will achieve the impossible by providing solutions to customers’ problems and meeting previously unfulfilled needs with innovative and responsible products and services.
- **“Quest for Excellence”.** We will strive to incorporate the stamp of excellence into all facets of the Bank’s operations and exceed reputable industry standards by devising new, more effective and responsible products and services supported by a dedicated, highly skilled and motivated workforce combined with cutting edge first class, technology enabled systems and processes.

OUR CORE VALUES

At Access Bank, our values represent another important step in our decision making process. Our values represent our core priorities and what we say, we live by. This is what enables us to deliver on our vision and mission. The origin of our values was not an imposition on the bank by the Board or Executive Management; they were evolved by all employees after several engagement sessions. Our values are the six values we have all committed to live up to daily.

Access Bank’s core values are:

Excellence – We strive to attain and exceed the highest possible standards through our passionate and painstaking attention to details.

Ethics – Our operations are transparent and always comply with regulations, while decisions are based on business interests.

Passion for Customers – Customers always come first. We develop a deep understanding of them, approaching them with a positive ‘can do’ attitude and responding creatively to their needs.

Team Work – We hold the interest of the team above those of the individual, while showing mutual respect for all employees and sharing information throughout our organisation.

Trust – We have total confidence in one another. We’ll work tirelessly to earn the faith, loyalty and confidence of our customers. To this end, we will always deliver on contracts, agreements, undertakings and assurance.

Continuous Learning – We are dedicated to continuous growth and career development. This principle is applied at all levels and across all functions.

These core values are key considerations in the design and implementation of our various policies, our practices and our corporate behavior.

BRAND DRIVER

Quest for Excellence

In whatever we do and wherever we go, the brand ‘Access’ is associated with ‘Excellence’. Everything we do and touch must reflect that we are people driven by Excellence.

PRODUCTS AND SERVICES

Access Bank offers a range of comprehensive bouquet of financial and non-financial product and services. The key business segments of the Bank are institutional Banking, Commercial & Consumer Banking, Investment Banking and Private Banking while the key customer segments include Telecommunication, Beverages, Manufacturing, Construction, Oil & Gas, Parastatals, High Net-worth & Middle Income Professionals.

Access Bank has core capabilities in Treasury, Cash Management, Trade Finance, Mass Payment Cards & ATM, Asset Management & Custodial Service and Relationship Management.

At Access Bank Plc, we offer our customers a variety of products and services designed to help better manage their funds. For added banking convenience, we offer additional products and services which help meet personal and business needs.

Our wide range of e-channel services also offer convenience and safety that enables our customers take total control of their accounts. Our products and services include Accesspay, Access Advantage, Access Premier, GEM, Trade Services, Mpower Biz, Payment & Collection, Access Mobile, The Black card, Access Online, Wealth Management amongst others.

COUNTRIES OF OPERATION

Access Bank Plc's geographical coverage cuts across sub-Saharan Africa and the United Kingdom. The Group head office is located in Nigeria while the international offices are located in Cote D'Ivoire, Democratic Republic of Congo, Rwanda, Sierra Leone, The Gambia, Zambia, Burundi, Ghana and the United Kingdom.

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OWNERSHIP AND LEGAL STRUCTURE

Access Bank was incorporated as a Private Limited Liability company on February 8, 1989, and commenced business on May 11, 1989. The Bank converted to a Public limited liability company (Plc) on March 24, 1998 and its shares were listed on the Nigerian Stock Exchange on November 18, 1998.

The Bank has core capabilities in treasury, cash management, trade finance, payment & settlement, E-business, asset management & custodial service and relationship management.

Access Bank has both individual and institutional shareholders. The Bank's shareholders and shareholding for the period under review is analysed below:

The shareholding pattern of the Bank as at 31 December 2009 is as stated below:

Analysis of shareholding:

Range	December 2009			
	Number of Shareholders	% of Shareholders	Number of Holdings	% of Shareholding
Domestic Shareholders				
1-1,000	126,122	28.47	112,919,805	0.69
1,001-5,000	178,665	40.33	469,831,237	2.89
5,001-10,000	60,645	13.69	440,492,804	2.71
10,001-50,000	57,731	13.03	1,295,903,934	7.97
50,001- 100,000	10,526	2.38	735,535,115	4.52
100,001-500,000	7,745	1.75	1,443,516,292	8.88
500,001-1,000,000	749	0.17	525,710,890	3.23
1,000,001-5,000,000	540	0.12	1,073,680,650	6.60
5,000,001-10,000,000	73	0.02	519,892,430	3.20
10,000,001 and above	80	0.03	5,661,775,200	34.82
	442,876	100.00	12,279,258,357	75.51
Foreign Shareholders				
500,001-1,000,000	4	0.00	3,141,508	0.02
1,000,001-5,000,000	21	0.00	64,998,741	0.40
5,000,001-10,000,000	21	0.00	174,831,507	1.08
10,000,001 and above	59	0.01	3,739,816,686	23.00
	105	0.00	3,982,788,442	24.49
Total	442,981	100.00	16,262,046,799	100

SCALE OF OPERATIONS

Number of employees: 5,195

Net Profits: N3. 8 Billion

Total Assets: N610 Billion

Total Capitalization(Shareholders' funds): Equity is N172, 599,668 as at December 31, 2009

Convertible Bonds: Debt securities N2, 604,277 as at December 31, 2009

»»» Group Chairman's Statement



As a driver of economic growth, the financial sector is essential to modern society and development. We impact societies through the jobs we create; the revenues we generate for governments; the impact of our social investments in areas such as arts, education, environment, health, local capacity building; and the way we engage and work with various stakeholders.

We are mindful of the scale and perceived influence of our business, and believe that by operating in a responsible manner, we significantly contribute to economic and social development.

By embedding corporate social responsibility into our business processes, we link our non-financial performance with our business strategy. This enables us to focus our efforts on long-term value drivers that contribute to the success of our Bank and progress for society as a whole.

Our objective is to integrate corporate responsibility into Access Bank's day-to-day operations and to make it the

way we conduct our business as it becomes particularly clear in these difficult times that corporate responsibility and business success belong together. Therefore, at a time when the global economy is undergoing challenges, Access Bank is mainstreaming corporate responsibility to bring about positive and sustainable change.

By nearly any measure, 2009 was a challenging year for both local and international financial institutions. Turmoil in global financial markets shook investor and consumer confidence, and again brought questions of corporate governance, business ethics, free market principles, and the role of government into the public spotlight.

In such turbulent times, successful organisations are those that see business discipline and corporate responsibility as interlinked. We consider Access Bank's philosophy of investing with a long-term perspective—rather than reacting to short-term market fluctuations—as a cornerstone of our successful business model. We believe organisations that retain a systematic focus on corporate governance, ethics, employee relations standards, customer satisfaction, environmental performance, and community engagement in the down cycle will be best placed to succeed in the up-cycle.

We have therefore consistently asserted that our first responsibility as a financial services company is to have a positive economic impact: to make profit, provide shareholders with good returns, pay taxes and provide safe and attractive employment. We do this by operating with integrity and ethics in all our activities.

In view of the crisis response, Access Bank continued to underline the importance of its corporate social responsibility agenda as one of its main principles.

As an indigenous Nigerian bank and particularly, as a corporate citizen, we articulate and pursue our obligations to society at large. Access Bank is irrevocably committed to engaging in sustainable development, that is, development that meets the needs of the present without compromising

the ability of future generations to meet their own needs. Corporate Social Responsibility is therefore Access Bank's contribution to sustainable development.

Sustainable banking engenders business longevity as both risks and opportunities are integrated into business processes and operations. Risk exposure, with respect to the environmental and social performance of customers and business opportunities of sustainable development, that is, products and services offered, results in economic and social value for the Bank.

This report therefore highlights our activities in 2009 regarding a number of important themes, which we have discovered from regular stakeholder consultation, to be of continuing interest to our stakeholders.

Away from the headlines on the banking crisis, we have been making good progress in important areas, where we have a leading position in our sector. We have also made early and purposeful progress on issues such as transparency, risk management and governance, demonstrating that we are addressing the issues faced by our wider industry in a step by step manner.

Through the CSR Committee, we set strategic direction for our approach to sustainability, challenging our businesses to set ambitious targets and reviewing their progress against those targets.

In 2009, the Bank undertook the rigorous task of integrating Environmental, Social and Governance (ESG) considerations into the Bank's processes and procedures, including improved assessment and effective management of environmental and social risks. We engaged in a comprehensive review with input from relevant internal and external stakeholders. This resulted in a plan focused on capacity building, policy review and implementation. In our 2008 CSR Report, we had stated our aspiration to be "the light for others to follow" and this has been demonstrated in 2009. We continued in our ambitious sustainability integration agenda such that Access Bank is

taking the lead in this regard amongst indigenous Nigerian banks. The Bank's sustainability expertise has been deployed to build local capacity in the industry, attract business for the Bank and also negotiate deals.

For instance, Access Bank has been actively involved in sharing its experience in implementing sustainability best practices at various roundtables and workshops across Nigeria. Examples include the IFC Roundtable for Financial Institutions in Africa, held in November 2009 and the Nigerian Conservation Foundation's Workshop on Environmental Best Practices in Project Finance, September 2009.

To ensure stakeholders have greater access to our sustainability activities, we launched our CSR portal in 2009. Our 2008 and 2009 Corporate Social Responsibility Reports are now available online. We also continue to include corporate responsibility information in our Annual Report to Shareholders and enhance our communications with non-governmental organizations (NGOs), providing detailed, direct reporting to analysts and researchers from the socially responsible investment community.

Access Bank's continued strong performance in these areas gives our over 5,000 employees cause for confidence and pride, and has continued to earn us recognition from our stakeholders.

Given the scale of our business and the diversity of cultures in which we operate, we find that the best way to achieve our goals is to embed the many aspects of corporate responsibility directly into our global business processes, so that they are clearly understood wherever we operate.

In all areas of corporate responsibility, we listen to others in order to understand different perspectives, to regularly assess our progress, and to know where we need to improve. While proud of our achievements, we are not complacent. By so doing, we have also endeavoured to encourage business environments which facilitate sustainable investment, meet the needs and aspirations of

stakeholders while maintaining our high standards. A time of crisis is a time of challenges and also an opportunity to show long-term commitment to all stakeholders.

The goal of our 2009 Corporate Social Responsibility Report is to detail our performance and commitment in most significant sustainability areas: corporate governance, customer satisfaction, employee relations, supplier relations, environmental performance, managing climate change risks, economic development, and human rights and security. We hope you find this information helpful in understanding our commitment to corporate social responsibility and our progress to date. We welcome any comments you may have.



Gbenga Oyebo (MFR)
Chairman

Statement from the Group Managing Director / Chief Executive Officer



The economic and financial crisis has proved rather demanding and turbulent for Nigeria as well as other global markets. The worsening business climate, declining markets and consumer confidence are some of the factors that have caused uncertainty and raised the Central Bank of Nigeria concerns about liquidity, risks and other regulatory considerations.

Despite the local and global economic meltdown, Access Bank continues to underline the importance of sustainable business practice as we deliver value. This is due to our recognition that sustainable business practices remain even more important than ever in times of uncertainty as we continue to practice innovative principles throughout our business – from governance and best practice to nurturing talent.

As Access Bank continues to respond to the global economic challenges with a clear vision and a strong sense of purpose continue to point the way forward. There is no doubt that 2009 was another difficult year for the economy

and the financial sector and we continued to work through some complex economic conditions. Through all of this, Access Bank has remained steadfast in our commitment to embed all aspects of corporate responsibility into our culture.

Access Bank remains fully committed and engaged in our core initiatives to ensure the long-term sustainability of the communities we serve and the planet we all share.

This 2009 Corporate Social Responsibility Report highlights some of the ways we deliver on our sustainability commitments daily, through initiatives that focus on supporting homeownership, strengthening our communities, educating customers and addressing the challenge of climate change. We continue to proactively reach out and support community and environmental programs and our employees completed over 1,392 volunteer service hours in 2009.

Our concern for the environment is further reflected by the fact that we are sharing this report electronically rather than printing thousands of paper copies – and the few copies we do print are on environmentally friendly paper stock.

As we continue to work through the current economic conditions, Access Bank remains steadfast in our commitment to creating a sustainable future for our company, our customers and our communities.

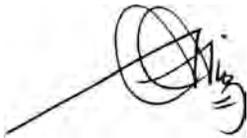
Although local conditions may continue to weaken, our ability to provide solutions to our clients, leveraging our reputation, track record and depth of human talent, ensures that we remain valuable to all our stakeholders.

With the global imperative to reduce humanity's environmental impact, we embarked on a bank-wide integration of Environment, Social and Governance (ESG) considerations. This redefines the way we look at projects, what we want to achieve with our investments and how we define our position with regard to our partners and the general public. While sustainability as a goal is most prominent in

our Environmental and Social Policy, it is a principle which underpins all our activities, procedures and processes.

More than ever, corporate assistance to communities can help bring about a fundamental positive change to society. Access Bank committed over N320 million to community investment projects in 2009. These include the implementation of our flagship community development initiatives – Mirror the Master (Art); Going Green; Beyond Words (Environment); SME Workplace Policy Programme and Access Care Programme (Health).

We believe in the sustainable balance of doing good business and good work, and we continually strive to remain relevant to our shareholders, our clients, our staff, our communities and the broader society.

A handwritten signature in black ink, appearing to read 'Aigboje Aig-Imoukhuede', written over a light grey circular stamp or watermark.

Aigboje Aig-Imoukhuede, FCIB

Group Managing Director/CEO

The Access Way

»»» Governance

Access Bank’s approach to corporate governance is proactive and responsive to the changing regulatory environment. Our governance and ethical behaviour form the baseline of our business practice. This ensures that we tie CSR directly to the Bank’s senior management and Board of Directors who bear responsibility for overall business strategy, practices and policies.

Our governance structure determines the fundamental relationships among the members of the Board of Directors, management and other stakeholders. It defines the framework through which ethical values are established and the context in which corporate strategies and objectives are set.

The strength of our governance starts at the top with a non-Executive Chairman and well-informed Directors that give priority to strategic planning; ensure that standards exist to promote ethical behaviour throughout the organization; and drive continuous improvement in governance practices.

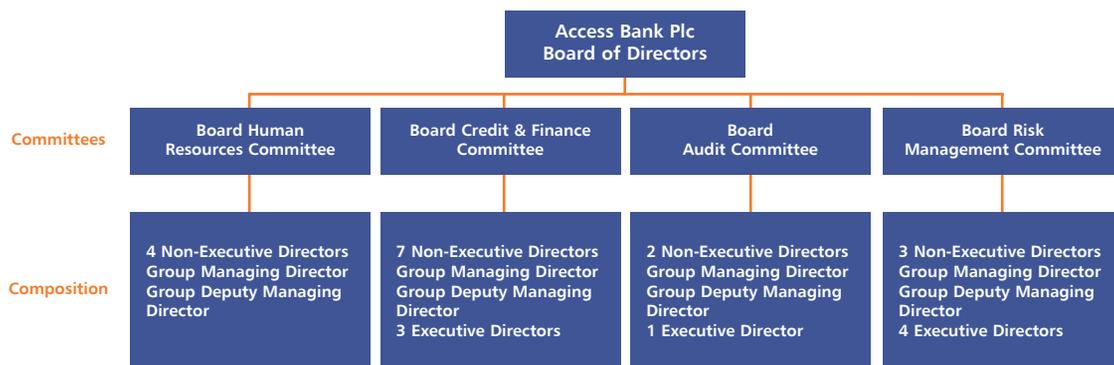
Corporate Governance at Access Bank is the principal responsibility of the Directors led by the Chairman of the Board whilst the management of the Bank is the responsibility of the Executive Directors led by the Group Managing Director/CEO. The Board of Directors at all times complies with the Central Bank of Nigeria Code of Corporate Governance.

Committee: Structures and Procedures

The Board oversees the identification and management of economic, social and environmental issues through various standing committees. These committees include:

- Audit Committee
- Credit & Finance Committee
- Human Resource Committee
- Risk Management Committee

Each Committee has a charter approved by the Committee and by the Board of Directors. As a general rule, Directors serve on committees in addition to the Board. Membership of Committees is rotated to enable all Directors to gain experience on all Committees; however, this principle of rotation does not deprive the Board of expertise that Directors possess. In keeping with good corporate governance practice, the Chairman of the Board is not a member of any of the committees.



Independent and non-Executive Board members

Board Composition, Selection and Tenure of

Directors

- 1 Directors that are currently employed by the Bank are deemed Executive and all others are deemed non-Executive Directors.
- 2 Non-Executive directors will always constitute at least a majority of the Board.
- 3 To closely align Directors to interests with those of shareholders generally, Directors are encouraged to own stock of the company.
- 4 An Executive Director that has substantial stock of the company upon retirement from active employment may elect to serve on the Board of Directors as non-Executive. In all other cases an Executive Director shall submit his or her resignation from the Board upon termination of active service as an employee.
- 5 A Director will retire from the Board at the next annual meeting of the shareholders following the attainment of age 70.
- 6 A Director will also vacate office or cease to be a Director, if the Director directly or indirectly takes a facility from the Bank that remains non-performing for the period of more than 12 months.

Currently our Board of Directors are:

S/N	NAME	STATUS
1	Mr. Gbenga Oyebo	Chairman (Non Executive)
2	Dr. Cosmas Maduka	Non Executive Director
3	Dr. Adewunmi Desalu	Non Executive Director
4	Mr. Tunde Folawiyo	Non Executive Director
5	Mr. Emmanuel Chiejina	Non Executive Director
6	Dr. Mahmoud Isa-Dutse	Non Executive Director
7	Mrs. Mosun Belo-Olusoga	Non Executive Director
8	Mr. Oritsedere Otubu	Non Executive Director
9	Mr. Aigboje Aig-Imoukhuede	Group Managing Director/ CEO
10	Mr. Herbert Wigwe	Group Deputy Managing Director
11	Mr. Taukeme Koroye	Executive Director
12	Mr. Okey Nwuke	Executive Director
13	Mr. Obeahon Ohiwerei	Executive Director
14	Mr. Ebenezer Olufowose	Executive Director

MECHANISM FOR MAKING RECOMMENDATIONS TO HIGHEST GOVERNANCE BODY

Shareholders and other stakeholders communicate with the Board at the Investors Forum and Annual General Meetings which are held yearly. At these fora, stakeholders are free to raise any issue of concern. The Bank also has an Investor Relations Unit which is an accessible channel for shareholders to register their views.

Through the annual employee survey report, the Board is intimated of staff opinions. Also, employees express their views through various avenues including one-on-one discussions, focus group discussions, feedback via emails, amongst others.

CONFLICT OF INTEREST

Access Bank Plc's business requires that special obligations be imposed on all employees to safeguard its integrity, operations and interests.

- a) Employees are expressly prohibited to use their association with the organisation for personal gains

beyond authorized compensation and benefits. Whenever there is any question of whether an activity would violate or appear to violate this principle, guidance must be sought from appropriate management authority. Clarification must be sought on all issues, which border on conflict of interest.

- b) Employees must not, on their own behalf, borrow from or lend to customers of the Bank.
- c) Employees must not use the Bank's name and influence for personal purposes.
- d) Employees must not do anything to undermine another employee, or environment of the Bank.
- e) Employees must adhere to the Bank's principles and policies, to be free absolutely from conflicting interests or activities, which interfere with proper performance of their duties to the Bank and to conduct themselves in manners that reflect credit to the Bank.

The Bank has also instituted policies and standards to eliminate issues relating to conflicts of interest. Policies include:

1 Code of Conduct: Access Bank employees are governed by an Employee Code of Conduct. The code contains extensive provisions on the following areas – compliance with laws, rules and regulations, confidential customer information, confidential bank property, conflict of interest, gifts from customers, loans to or from customers, use of account by third parties, use of Access Bank's name, cooperation with regulatory bodies, public statement, etc.

Contained in this code is the conflict of interest policy. This policy requires all employees to avoid any situation that poses a conflict, or the appearance of a conflict, between their personal interests and the performance of their official duties.

The Code is regularly reviewed and updated as is needed to ensure it covers all aspects of our activities and is clear and easy for our employees to understand and follow. Employees are encouraged to familiarize themselves with the code of conduct and ensure strict adherence to its provisions.

2 Directors' Regulatory Reporting Framework: This guides the reporting of Directors' interests in contracts, Directors' interest in facilities, the reporting of share dealings by Directors, amongst others.

Determining qualifications and expertise of the highest governance body

Members of the Board are appointed taking into account the following criteria:

- Demonstrated outstanding achievement in the prospective Board member's personal career.
- Breadth of experience.
- Soundness of judgment.
- Ability to make independent and analytical inquiries.
- Ability to contribute to a diversity of viewpoints among Board members.
- Willingness and ability to devote the time required to perform adequately, Board activities.

THE CSR COMMITTEE

The Board of Directors, through an established CSR Committee, provides the highest level of governance oversight for sustainability management. The CSR Committee is responsible for overseeing the delivery of the Bank's sustainable business strategy to ensure the Bank's sustainability ambitions on each of our five strategic priorities are achieved.

The Committee meets quarterly and is responsible for setting guidance, direction and overseeing policies and progress on the Company's corporate social responsibility and related activities and offers advice to the Board on these matters.

The CSR Committee is chaired by the Group Managing Director while membership includes top management of relevant units and a senior independent adviser, Dr. Christopher Kolade, who provides leadership support, guidance and an independent opinion on the Bank's sustainability performance, to enable the Bank to benefit from global best practice.

The Bank also has a series of other committees and steering groups that underpin our governance approach to sustainability. They review emerging and current issues, risks as well as opportunities, make recommendations to the Board and are actively involved in the integration and implementation of the Bank's sustainability initiatives.

Members of the CSR Committee are:

- Group Managing Director/Chief Executive Officer, who is also the Chairman of the Committee
- A Senior Independent Adviser
- Deputy Group Managing Director
- Executive Director, Investment Banking
- Group Head, General Resource Management
- Group Head, Wealth Management
- Head, Group Human Resources
- Head, Group Internal Audit
- Group Head, Total Quality Management
- Head, Regulatory Compliance and Reputational Risk
- Group Head, Corporate Communications and Brand Management
- Head, Corporate Social Responsibility, who also serves as the Secretary of the Committee

EVALUATING BOARD PERFORMANCE

Annual Board performance evaluations are conducted internally and externally by consultants. Internally, the collective performance of the Board is evaluated by all Board members using evaluation criteria approved by the Board. This is done at least annually.

The performance of the Chairman and the Group Managing Director/CEO is evaluated by the Board members utilizing evaluation criteria approved by the

Board of Directors. Performance of each Director is also evaluated by the Chairman and two Non-Executive Directors, the Group Managing Director/CEO and the Group Deputy Managing Director when their term is expiring and prior to such Director being invited to stand for re-election to the Board.

The performance of the Group Deputy Managing Director is evaluated annually by the Group Managing Director/CEO utilizing evaluation criteria approved by the Board of Directors, the result of which will be reviewed by the Chairman of the Board.

The performance of the Executive Directors is evaluated by the Group Managing Director /CEO and the Group Deputy Managing Director utilizing criteria approved by the Board of Directors and results of which will be reviewed by the Chairman of the Board of Directors.

Externally, Board performance evaluation is conducted by consultants. For the reporting period the review was done by Accenture, Nigeria.

»»» Commitments to external initiatives

In promoting sustainability practices across its operations, Access Bank Plc has created formidable relationships with international organizations, adopting and integrating international policies and standards into core business functions. These policies have helped influence and align the Bank's practices with international best practice.

To achieve the Bank's long term sustainability plans and also encourage responsible behaviour among its corporate clients, the Bank is a member of sustainable development focused organizations and is also committed to conventions, codes and principles such as:

- Equator Principles (EP)
- Global Reporting Initiative (GRI)
- United Nations Environment Programme Finance Initiative (UNEP FI)
- United Nations Global Compact (UNGC)
- United Nations Principle for Responsible Investment (UNPRI)
- Convention on Business Integrity (CBI)
- London Benchmarking Group (LBG)
- Business in the Community (BITC)
- Global Business Coalition on HIV/AIDS, Tuberculosis and Malaria (GBC)
- Nigeria Business Coalition Against AIDS (NIBUCAAA)
- Nigerian Conservation Foundation (NCF)

EP – Access Bank in 2009 became the first Nigerian Bank to sign on to the Equator Principles, thereby adopting its principles for managing the Bank's environmental and social issues relating to project finance. The Bank upon its adoption, commenced a review of its Environmental and Social Risk Management Policy, integrating elements espoused under the Equator Principles and IFC performance standards into the policy.

In addition, the Bank is working with key stakeholders to develop a corrective action plan and fully integrate ESG across our operations. Progress has been made in this regard in 2009 and capacity building for relevant staff, including Equator Principles training is scheduled to be

held in 2010.

Access Bank has been actively involved in sharing its experiences in implementing the Equator Principles with other financial institutions while also highlighting the challenges faced and our approach in addressing them. Given the peculiarity of the Nigerian environment, the implementation of the Equator Principles comes along with huge challenges including cultural challenges, credibility, low knowledge base and client 'unwillingness to disclose relevant information', amongst others.

www.equator-principles.com

GRI – We became the only Nigerian organizational stakeholders of GRI in 2009. We are also members of the financial sub-group of the GRI and apply the GRI Sustainability Guidelines in the generation of our annual CSR/Sustainability Report.

www.globalreporting.org

UNEP FI – In 2009, we became members of the UNEP Financial Institutions (UNEPFI) and we have been actively involved in its activities, some of which include:

- Signing on to the Global Investor Statement on Climate Change;
- Participation at the UNEPFI Conference held in Cape Town in 2009;
- Membership of the African Task Force;
- Membership of the Banking Commission;
- Membership of the Climate Change Working Group.

www.unepfi.org

UNGC – We make efforts to continuously improve on our integration of the ten UNGC principles. We have also signed the UNGC CEO Statement of Human Rights. This commitment indicates that Access Bank, with other global leaders, calls on governments to implement fully their human rights obligations. It also reiterates our own commitment to respecting and supporting human rights within our sphere of influence.

www.unglobalcompact.org

UNPRI – Access Bank Plc is the only Nigerian signatory to the United Nations Principle for Responsible Investment (UNPRI). The PRI provides us with the relevant framework to engender the integration of ESG considerations into our processes.

www.unpri.org

CBI – As members of the Convention on Business Intergrity (CBI), Access Bank operates a zero tolerance policy with regards to corruption. The Bank continuously engages in various actions to ensure full compliance to regulations on corrupt practices. Fraudulent behaviour within the Bank may result in dismissal and information on current regulations and behavioural expectations are available on the Bank's intranet.

www.theconvention.org

LBG – This provides a framework that enables the Bank to manage our community-focused initiatives by assessing how it fits with our sustainability goals, thereby ensuring that we do not engage in practices that will expose the Bank to social and environmental risks. It enables us to benchmark with other global organizations. Currently Access Bank is the only Nigerian member of the London Benchmarking Group.

In 2009, we participated in a training programme organized by the LBG. The aim was to enable internal stakeholders to have a clearer understanding of the LBG model and how to effectively apply it in our community development efforts.

www.lbg-online.net

BITC – This provides us with a corporate responsibility index which is a strategic management tool that aids the integration and improvement of responsibility throughout our operations. The index enables the application of a systematic approach to identifying, managing, evaluating and reporting on our sustainability programmes. It also provides networking opportunities and access to global best practices in the areas of community, marketplace, workplace and environment performance.

www.bitc.org.uk

GBC – We have been members of the GBC since 2007 and we have actively partnered with the GBC to address global health challenges. Access Bank's Group Managing Director/CEO, was appointed to the Corporate Advisory Board of the Global Business Coalition in 2009.

www.gbcimpact.org

NIBUCAA - We became a member of NIBUCAA in 2007. However, we have continually partnered with the organization to increase the impact of our HIV/AIDS eradication activities. In 2009, the highlights of our partnership activities were:

- NIBUCAA facilitated at the Bank's interactive session and talk-shop with both internal and external stakeholders.
- NIBUCAA participated in the Bank's community outreach programme on World AIDS Day.
- NIBUCAA provided technical support for the Bank's SME Workplace Policy Programme.

www.nibucaa.org

NCF- Access Bank is a gold member of the Nigerian Conservation Foundation. This is to support genuine efforts in the conservation of nature and its resources with the aim of improving quality of human life.

As a way of sharing best practices in environmental management, Access Bank provided both funding and human resource support for the NCF environmental symposium on "*Environmental Financing in Nigeria – the Way Forward*". Executive Director, Investment Banking Group, Ebenezer Olufowose shared the Access Bank experience through a presentation tagged "Environmental Best Practices in Project Finance".

Furthermore, the Bank also participated in developing a multi sectoral 17 point communiqué that summarized deliberations at the NCF symposium on Environmental sustainable practices.

www.ncfnigeria.org

»»» Stakeholder engagement

Our stakeholders are defined as entities and individuals that are affected by our activities and how we implement strategies and achieve objectives.

Access Bank's major stakeholders include regulators, government, shareholders and investors, employees, customers, suppliers, non-governmental organizations (NGOs), communities and the media.

The importance of regularly listening to our stakeholders, responding to their feedback and addressing their issues of concern cannot be over emphasized. The current financial crisis further buttress the need to identify, engage and respond to our key stakeholders, across all our business areas.

This therefore provides a platform to understand and manage our responsibilities as a business; to anticipate and address emerging issues and; where feasible, to closely align the interests of our different stakeholders.

IDENTIFYING AND ENGAGING STAKEHOLDERS

Our key stakeholders are categorised into groups based on their interaction with our business activities. The categories are not mutually exclusive, with some groups potentially having interests across a number of the category areas. Some areas, such as customers and employees, are all-inclusive; others, such as NGOs, require a degree of prioritisation to identify the most relevant groups to engage with.

We have several established mechanisms in place to gather stakeholder views, ranging from opinion surveys to focus group discussions on particular issues. This also includes regular dialogue with representatives from the media and NGOs, as well as consultations with consumer groups and contributions to industry-wide discussions.

We however constantly look to increase the effectiveness of the mechanisms for engagement with each of our key stakeholder groups.

CUSTOMERS

Access Bank encourages customers to give feedback. The information received is evaluated and used to develop product and client strategies.

We obtain client feedback in a number of formal and informal ways to support the development of high-calibre client, marketing and channel strategies. We conduct customer satisfaction and loyalty surveys and render quarterly reports, customer feedback/input from our Contact centre and Customer Ombudsman for process and service improvement and new product development.

We track client satisfaction as a key measure of performance and use feedback to make improvement. We record and use feedback to make improvements. We record problems noted by clients in a central database handled by our Customer Ombudsman Unit and follow-up directly to ensure that systemic problems are corrected.

Customer Service Week: Annually, we join other organizations globally to commemorate Customer Service Week (CSW). In 2009, the CSW was held between October 5-9 under the theme **"A Call to Excellence."**

The activities for the CSW week celebrations provided the Bank a unique and strategic opportunity to strengthen existing customer relationships and establish new ones as well as boost morale, motivation and team work amongst staff.

During the week, customers were given "Thank You" cards personally endorsed by the Group Managing Director/CEO, Aigboje Aig-Imoukhuede; branded gifts were also provided through a "Pick & Win" competition; light refreshment was served to customers at the branches and members of executive management visited branches to celebrate our customers during the week. Service champions were also identified bank wide and celebrated through the Bank's intranet platform.

The following are excerpts of comments from staff and

customers recorded during the Customer Service Week:
A third party (customer name withheld) that came to make a withdrawal was so impressed that she opened an account with us the next day with complete documentation and promised to tell more people about Access Bank Nnewi Branch

"Yesterday you guys gave me a card, today, I have gotten an Access Bank branded pen. It seems I would like to see your time table so that I know what's in stock for me tomorrow. Then, I must come to your place throughout this week. If my office sends me to another bank, I will insist that I bring our cheques to your bank." Allen Avenue Branch

"Even before the customer service week celebration services rendered by staff have been encouraging. They should not relent."

"Friendly workers make me excited, I think this reminds me of how lucky I am banking here."

"The recognition and the sense of being respected as a customer as well as the entertainment make it unique."

"If there is anything like perfect service THIS IS IT!"

"Thank you very much, your services are world class. You pamper me!"

"You guys are just the best and will always be the best continue to fly high and make us customers proud."

"Devise a means of sending Bank balances to customers by phone monthly"

We also deployed a survey with the following objectives:

- To determine the level of awareness of customers on the Customer Service Week celebration
- To establish the relevance/benefit of the CSW celebration by Access Bank to customers and

prospective customers.

- To determine customer satisfaction with service received during the period.
- To determine if there has been marked improvement in the quality of service delivery in the bank over the last one year.

A set of questionnaires was administered and highlights of our finding are stated below:

What do you think about the way we are celebrating the customer service week?

Answer	Count	Percent
It makes me feel important to the bank and should be continued	181	66.79
It creates more customer service awareness	87	32.10
It is not important and should be discontinued	3	1.11
Total	271	100

How would you rate the services of this bank over the last 12 months?

Answer	Count	Percent
The service has become poorer	1	0.40
The service is the same as last year	20	7.94
The service is better than last year	231	91.67
Total	252	100

Project 5*: The Project 5* is a customer-service improvement initiative established to trigger a quantum leap in the quality of service delivery in Access Bank with focus on four identified critical satisfaction factors (TECO) namely:

- Turn around time.
- Error free processing.
- Customer service.
- Office ambience.

To further drive the service culture among staff, a

standard behavioural and Customer Service Guide was drawn up for adoption by all staff. This guide aims to:

- Provide all staff with a clear understanding of management’s expectations with respect to customer service attributes and standards.
- Communicate and clarify customer service expectations at each service touch point and from specific staff members.
- Standardize staff behaviour in order to ensure customers receive a consistent service experience at all touch points.

A rating and assessment system for the project was developed in-house in line with the identified success factors (TECO). Standards were set for all the factors and performance was measured against these standards.

102 branches and 47 Head Office Units (SBUs) were assessed in 2009. Different methodologies were employed in objectively tracking and reporting the performance of Branches and SBUs across the four CSFs for Project 5*.

Some of the methodologies used are listed below:

Customer service – Mystery shopping, telephone etiquette monitoring and a customer satisfaction survey were used to assess the customer service and handling as well as the telephone handling skills of staff. Levels of courtesy and product knowledge were also tracked using these methodologies.

Turn around time - Mystery shoppers and members of the Total Quality Management Group physically visited branches to track the time taken to complete banking hall transactions e.g cash deposit and withdrawal, bank draft issuance and fund transfer. The observed time was compared to the set Standard Turn Around Time for the process.

Error rate: The total number of manual reversals on FCR per branch as well as the total number of transactions carried out within the same period was generated from flexcube. The error rate for each branch was calculated using the six sigma methodology.

Ambience: Physical inspection of branches was carried out in 95 branches.

Trend Analysis (YTD Average Score): 2008 Vs 2009

Comparing regional YTD Project 5* average scores in 2008 and 2009 for Branch Services Group.



- The Bank had an overall rating of 2* in 2008. Note that in 2008, all the regions had a YTD average score of less than 3.0 (3*) with the exception of Abuja Region (3.29).
- The Bank's rating for 2009 is still 2* but apart from the South with an average YTD score of 2.95 (2*), all other regions had scores above 3.0 (3*) which is an improvement from the previous year.
- The YTD score improved in all of the regions. The YTD average improved by an average of 0.796 points between 2008 and 2009. This is close to an improvement of 1* on 2008 performance.

EMPLOYEES

As key stakeholders, employees are actively engaged and managed through several mediums as follows:

Retreats

They are held periodically off site in order to engage employees in reviewing annual strategies and their operational efficacy on the one hand and evolve current business and environmental realities. Examples of business retreats include Institutional Banking Group (IBG), Commercial and Consumer Banking Group (CCBG) and Human Resources (HR) retreats.

Meetings

Meetings are ways by which we further reinforce organizational cultures and values. Meetings are tools in managing communication in Access Bank. To ensure that meetings are structured, a calendar of corporate meetings was developed and hosted on the Bank's intranet. Examples of meetings include managers meetings, MD's of subsidiaries, Asset and Liability Committee (ALCO), Criticized Assets Committee (CAC), Product Profitability Report (PPR), Monthly Performance Review (MPR) and Monthly Service Review (MSR).

Events

These include corporate parties organized to foster better integration within the business. Entertainment, refreshment

and security are provided to promote a relaxing atmosphere for employees to bond and have fun. The treasury function recently hosted selected staff at its corporate party.

TGIF (Thank God It's Friday)

This event is held to celebrate key events in the organization such as end of the financial year.

Recognition and rewards

The Bank recognizes and rewards employees that make significant contributions to the organization at three different levels; contribution to team, division and organization's bottom line. In the same vein, a long service award was instituted to recognize employees that have spent 5 years and 10 years in the employment of the Bank.

Employee satisfaction Survey

Access Bank conducts comprehensive employee satisfaction surveys across all of our offices and this has led to the development of organizational goals and actions. The objective of the satisfaction survey is to measure the level of employee satisfaction and gain insight into the Bank's performance for the year.

The 2009 survey was successful as 83% of employees participated in the survey. The survey was designed to capture questions focused on employee motivation and wellbeing, ethics and diversity, HR function and training opportunities, job security and health and safety, amongst others.

INVESTORS/SHAREHOLDERS

The Investor Relations Unit manages all relationships with the investment community, this includes investors, financial services analysts and rating agencies. The investors consist of all classes (common, preferred and fixed income) and types (institutional and retail). Feedback from analysts and investors is taken into consideration as we formulate our strategy and priorities. We interact with the investment community in a variety of ways including conference calls, investor fora, shareholders association fora, investor road shows, publication of our

»»» "RARE BIRDS FLOCK TOGETHER"

AN OPPORTUNITY TO TAKE YOUR PLACE

The graduates of the Access Bank School of Banking Excellence are selected through stringent criteria designed to separate the very best from the best.

In addition to building and developing their technical knowledge, skills and capacity; they are immersed in our corporate values and positioned to deliver excellent service to our customers.

Graduates of the Access Bank School of Banking Excellence are invited to join its Alumni Association. To register as a member please visit www.accessbankplc.com

A Passion for Excellence.

access »»»

Investor Digest (Bi-annual), annual reports to shareholders, our quarterly non audited financial statements, analyst calls, various external websites and our annual Corporate Social Responsibility Report.

Conference calls: For Investors in the corporate world, meetings are a vital part of communication. One way to conduct meetings in which participants may be in different offices, or even different parts of the world, is by scheduling a conference call.

In line with our value of transparency and openness in the dissemination of accurate and timely information, the Bank pioneered the hosting of quarterly conference calls for local and foreign institutional investors and analysts. The feedback from these conference calls showed that the many investors and analysts were endeared by the quality of information and disclosure contained in the presentations made at these conference calls. This has positioned the Bank in the minds of many investors and analysts as a Bank of best practice especially in terms of transparency and disclosure of information.

Facts behind the figures: We host an annual international investor forum and also host a “fact behind the figures” forum followed by a conference call for international investors. Under this option, financial media engagement would include arranging for the Financial Times or Reuters to interview Executive Management on the results for the full year and 1st quarter and the performance outlook going forward.

Shareholders association forum: The Shareholders Association is the leading independent organization which represents the interests of private shareholders. They campaign to protect the rights of shareholders in public companies and promote improved standards of corporate governance.

Credit ratings: The Bank currently solicits credit ratings from 4 reputable rating agencies namely; Agosto & Co Limited, Global Credit Ratings, Fitch Ratings and

Standards and Poor’s Ratings Limited. The pre-rating meetings with all the rating agencies are conducted to ensure early release of the rating reports.

Electronic communication with shareholders: Over the past few years we have increasingly adopted the internet as the preferred means of communicating with our shareholders. Companies justify this trend by reference to the significant potential savings in administrative costs and environmental resources.

Examples are:

- annual reports,
- notices of meetings,
- proxy forms,
- brief quarterly reviews
- other communications.

Investor Relations Portal: This is designed to provide easy access to investors to resolve issues relating to non-receipt of share certificates, return money and dividend warrants. It addresses general questions asked by investors. We ensure the investor relations portal on the bank’s website is updated periodically with new and relevant information.

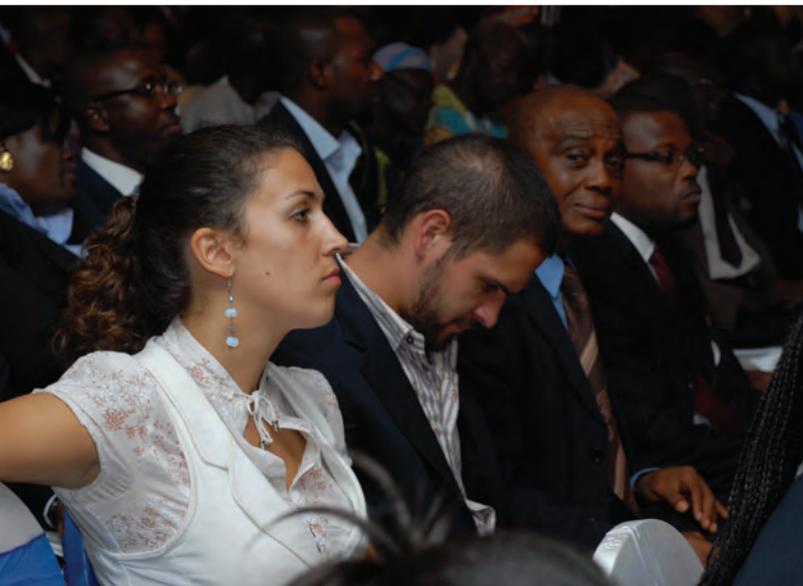
The information on this portal includes:

- CEO’s statement
- Five year strategic objectives
- Financial reports
- Market information (share price)
- Credit rating
- Publications and presentations

“Investors’ Digest” Bulletin: The bulletin is prepared and published bi-annually following approval by the executive management team. Current information about the Bank and its products is also included in this publication as it enhances timely and accurate communication.

SUPPLIERS

Our relations with major suppliers are governed by Service Level Agreements (SLAs). We have also incorporated into our vendor selection criteria yardsticks and requirements





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**INTERNET BANKING
THAT DELIVERS
REAL VALUE
ANYTIME, ANYWHERE**

- Funds transfer
- Balance enquiry
- Generate account statement
- Cheque requisition
- Transaction alerts and more

To find out more about us and what we
can do for you,
visit www.accessbankplc.com

A Passion For Excellence.

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that ensure we only do business with socially responsible organizations that share common goals and values.

Suppliers are also mandated to possess a distributorship/agency license and a good track record. This enables the Bank to deal with organizations that have excellent reputation both technically, financially & ethically thus ensuring a rewarding and sustainable relationship.

We engage our suppliers through platforms such as vendor forums, site visitation and exhibitions. Such meetings have continuously provided us with opportunities for re-iterating our core values on ethics and social responsibility and also to keep abreast of new developments within the various markets/industries in which our vendors operate. This enables us to tap into new knowledge or information on process improvement, removal of waste and redundancies, safety and environmental protection.

GOVERNMENTS AND REGULATORS

Access Bank Plc has ongoing relationships with Local, State and Federal Governments. We have at various points served on government committees and supported government agency initiatives such as the Lagos State Tree Planting Initiative.

We also render reports and hold meetings with relevant financial regulators such as the Central Bank of Nigeria (CBN), Nigeria Deposit Insurance Corporation (NDIC), Securities & Exchange Commission (SEC), Corporate Affairs Commission (CAC), Nigerian Stock Exchange (NSE) and Economic and Financial Crimes Commission (EFCC).

We contribute to consultations and working groups established by regulators to assess key financial sector issues that have been identified for wider policy consultation. We also render reports such as Daily Business Returns (DBN), Parastatals Returns, Monthly Business Returns (MBR), SME Returns, Quarterly Business Returns, Uncollateralized LC Returns, Unconfirmed LCs Returns and Fraud & Forgeries Reports.

NON-GOVERNMENTAL ORGANIZATIONS (NGOs)

We liaise with a number of NGOs with regard to developing a common understanding on key issues of concern such as sector lending and project finance, human rights, environmental impact and climate change, or in response to specific concerns that are raised through campaigns.

We also ensure that we monitor and respond in a timely manner to correspondence and issues raised by these and other groups through other forums and engage in further discussions where appropriate.

MEDIA

We understand that the media has a huge influence on public opinion and can enhance or damage an organization's reputation. It is important that we keep close and open relationships with the media to ensure we are not portrayed incorrectly.

In 2009, we held a media parley with foreign journalists. This forum provided a means for the Bank to personally communicate its philosophy and its activities. In addition to media parleys, we also use press releases and press statements to provide information about our sustainability activities.

Our media relations team responds (on a daily basis) to enquiries and requests for our views on issues highlighted in the media in all of the countries in which we operate.

COMMUNITIES

Engaging with our host communities is an important part of our CSR approach. Engagement with these communities is carried out through our community investment approach, which includes employee volunteering initiatives, charitable giving programmes, partnership with various nonprofit organizations, sponsorship of philanthropic activities, community outreach efforts such as our flagship projects (Mirror the Master Art Initiative, SME Workplace Policy Programme and Going Green; Beyond Words).

STAKEHOLDER ENGAGEMENT KEY TOPICS AND CONCERNS

Stakeholder	Methods and frequency of engagement	Issues raised
Customers	<ul style="list-style-type: none"> • Branches and Customer Care Officers. • Contact Center. • Customer Ombudsman Desk (complaints). • Relationship managers engage directly with corporate customers. • Comprehensive customer opinion surveys. • Industry wide customer survey conducted by organizations such as KPMG. • Approximately 75 000 customers of the Bank are surveyed annually on service delivery through channel-specific surveys including branches, private and business banking suites, call centres and self-service channels such as ATMs, internet and mobile phone banking. 	<ul style="list-style-type: none"> • Financial Crime.
Employees	<p>Surveys: We conduct an annual comprehensive employee satisfaction survey.</p> <p>Internal communication: Key issues are communicated regularly to employees through internal platforms such as HR Weekly, Employee Central Portal, operational updates via email. Employee focus group discussions serve as consultation forums and are held from time to time.</p> <p>Employee Involvement: We encourage and support our employees in their volunteering, community investment and charitable giving through a matching fund of 30%.</p>	<ul style="list-style-type: none"> • Work-life balance.
Investors and Shareholders	<ul style="list-style-type: none"> • Results and dividend announcements. • Conferences and seminars on various aspects of the financial markets, such as foreign exchange and fixed income securities seminars. • Conference calls with analysts and institutional investors. • Annual General Meeting (AGM). • Annual and Sustainability Report. 	<ul style="list-style-type: none"> • Operating performance. • Responsible lending.
Suppliers	<ul style="list-style-type: none"> • Supplier relations management. • Regular visits and meetings. • Performance reviews. • Regular interaction with suppliers. • Supply chain initiative to improve financial strength and sustainability. 	<ul style="list-style-type: none"> • Contractual performance • Development initiatives including financial support such as supplier facility.
Government and regulators	<ul style="list-style-type: none"> • Contributions to consultations and working groups established by governments and regulators. • Frequent regulatory reporting. • Formal meetings and informal communication when required by respective authorities. 	<ul style="list-style-type: none"> • Basel II implementation. • Responsible lending.

Non-Governmental Organisations	<ul style="list-style-type: none"> • Stakeholder meetings. • Consultations. 	<ul style="list-style-type: none"> • Role of business in society. • Contribution to thought leadership
Media and social media	<ul style="list-style-type: none"> • Annual media briefing. • Press releases and statements. • Media parleys. 	<ul style="list-style-type: none"> • Financial stability and strength.
Communities	<ul style="list-style-type: none"> • Workshops and seminars. • Community investment projects. • Meetings. • Correspondence. 	<ul style="list-style-type: none"> • Channeling funds to maximise impact in communities.

RESPONDING TO STAKEHOLDERS

Our engagement with stakeholders is open, transparent and constructive, providing a platform for our various shareholders to share their views, and for us to understand the expectations of our stakeholders groups in a manner that facilitates mutual understanding and benefits.

Issues raised

The changes in operating environment for banks, post the global financial crisis, with significant regulatory changes.

Our response

Through our robust risk management framework we will continue to manage all risks at all levels of operation.

We have also continued to proactively manage regulatory changes including the Central Bank of Nigeria (CBN) circular that mandates a maximum limit of 10 million naira on all cheque transactions with effect from January 1 2010. To make the process easier for our customers to understand and comply, we developed and distributed a brochure which served as a process manual.

Issues raised

Embedding sustainability in our processes and procedures.

Our response

In 2009, we commenced the integration of environmental, social and governance considerations in our business

processes. We established and commenced implementation of a framework for ESG integration in 2009.

Issues raised

Contribution to external thought leadership and global debates.

Our response

We hold conferences and seminars on an annual basis that address critical global issues. We also deploy our expertise in various areas to build local capacity in the industry. For instance, Access Bank has been actively involved in sharing its experience in implementing sustainability best practices at various roundtables and workshops across Nigeria.

Issues raised

Improved learning opportunities and personal development for employees.

Our Response

- Introduction of e-learning to improve learning opportunities.
- Introduction of employee portal to improve communication.
- The buddy system.
- Performance improvement tools (staff personal development plan)

Customer satisfaction and relations

At Access Bank Plc, we have a customer-centered culture which identifies and provides innovative solutions to customer needs, reinforcing service as the primary value in all customer engagements. We understand that marketplace perceptions and reactions to business behaviour and practices are critical to corporate success, we therefore engage in responsible customer relations, including marketing and advertising and ethical competition.

We treat our customers fairly, with openness and transparency and ensure that our marketing practices are such that they enable us to focus on building and maintaining sustainable, long-term relationships with our customers. Our outstanding customer service sets us apart from competitors and has created a culture and reputation which attracts other customers to us. The Bank ensures the highest level of customer satisfaction by developing our services in a way that meet the expectations of our customers across all our areas of operations.

MEASURING CUSTOMER SATISFACTION

The Bank has put in place mechanisms to assess our level of service delivery on a continuous basis, and also provides customers with complaints or compliments access to a number of channels to provide feedback to the Bank.

Customer satisfaction surveys at Access Bank are designed to determine the attitude of customer to the Bank's customer service skills and speed of service delivery, which are major determinants of customer satisfaction, loyalty and retention.

Our customer satisfaction surveys are executed quarterly and utilise both qualitative and quantitative methodology. The results are analysed by a cross-sectional committee comprised of the Total Quality Management (TQM) Group and Access Bank Quality Service Ambassadors (a certified quality service team), charged with the responsibility to handle the exercise with additional expertise obtained from other qualified members of staff in the Bank.

The committee reviews the survey report in totality and makes appropriate recommendations to management. Their report helps to determine the key drivers of customer satisfaction, as well as to identify specific issues requiring urgent intervention. Underperforming business units undergo a service improvement process with the assistance of the Total Quality Management (TQM) team. The resulting continuous improvement plan is overseen by management.

OMBUDSMAN

As a way of enhancing our customer satisfaction performance, Access Bank Plc established the Office of the Ombudsman with responsibility for investigating customers' complaints and also resolving complaints through informal means to ensure sustenance of our customer relationships' during and after the complaint has been resolved amicably. This pioneering initiative by Access Bank Plc in Nigeria has, since inception, facilitated the resolution of customer conflicts which otherwise could result in litigation and customer dissatisfaction.

Customers with complaints have access to a number of channels for reaching the Ombudsman. Customer have access to telephone numbers and complaint forms can also be filed and addressed to the Customer Ombudsman via any of our branches or service outlets. Mails can also be sent to the Ombudsman through complaints ombudsman@accessbankplc.com

The Customer Ombudsman will, within 24hrs of receipt of the complaint, write to acknowledge receipt and assure the complaint is receiving due attention. On average, the Customer Ombudsman resolves the complaint within 3 to 7 days, depending on the complexity of the complaint and reconciliation required to reach a settlement.

The Customer Ombudsman services are free of charge to all our customers, and the Customer Ombudsman abides by the ethics of banking and ensures the complaint is treated confidentially.

TREATING CUSTOMERS FAIRLY

In line with best practice, the Bank adopts the principles of Treating Customers Fairly (TCF) which is a core UK Financial Services Authority (FSA) Principle intended to promote fair treatment of customers by regulated firms throughout the product life cycle from design to post-sales support.

By adopting the principle, Access Bank aims:

- Ensure that clients' understanding and expectation of performance and service in respect of a product are satisfied; and
- Embed TCF Principles within the Bank's culture and procedures so that Access Bank's interests are aligned with those of its clients.

In adopting this principle, the Bank offers products and services suitable for our target customer segments, have competent staff providing customers with quality advice and appropriate recommendations, ensure that customers receive clear, relevant and timely information to make informed decisions and handle customer complaints in an independent, effective and prompt manner.

This also ensures that complaints are handled fairly, effectively and promptly, and resolved at the earliest possible opportunity, minimising the number of unresolved complaints which need to be referred to the sub-Committee on Ethics and Professionalism. This purpose is consistent with the CBN consumer protection regulatory objective and financial institutions are expected to adhere strictly to it.

»» Responsible products and services

At Access Bank, we believe that institutional excellence is a sustainable competitive advantage that enables the Bank to survive against competition.

Access Bank aspires to become "Africa's Bank of Best Practice" and to achieve this, we strive to provide cutting edge innovative business processes and practices. Our value proposition must offer a superior solution to customer needs while providing business solutions to social and environmental problems.

Our responsible products include:

Telecommunications Infrastructure Provider Scheme

(TIPS): Since the Global System of Mobile Communications (GSM) launch in Nigeria in 2001, mobile telephony has rapidly become the most popular method of voice communication in Nigeria. Growth has been so rapid that Nigeria has been rightly described in various fora as "one of the fastest growing GSM markets in the world." These developments have been truly explosive when compared with just 450,000 working lines from the national telecommunications provider in 2001. Currently, the subscription base in Nigeria is over 70 million.

The GSM operators embarked on massive expansion programmes but were limited by the capacity of their contractors to build the required base stations that make the expansion strategy a reality. The telecommunication contractors faced the huge challenge of sourcing funds and high quality materials to build the base stations that would enable the commencement of telecommunications operations in various areas of Nigeria.

To salvage the situation, Access Bank in 2005, developed the **Telecommunications Infrastructure Provider Scheme (TIPS)**, a pioneering product to meet the large infrastructural requirements of telecommunication contractors, thereby enabling telecommunications and mobile banking services to reach the unreached, while also leading to a positive impact on Nigeria's GDP.

Under the TIPS, Access Bank finances the importation and

supply of relevant materials required in building base stations. The Bank also provides financial support to contractors in the acquisition of these materials from suppliers and other sub-contractors. The financing provided is solely by Access Bank, without any external support or funding from other organisations or DFIs.

TIPS has enhanced the roll-out rate for the contractors and subsequently the telecommunications companies, thereby resulting in:

- 1 **Easy access to high quality materials necessary for building effective base stations** – From a figure of 840 GSM base stations in Nigeria at the end of 2004, the nation is estimated to have around 40,000 GSM base stations in 2010.
- 2 **Improved access to telecommunication services in Nigeria, especially the sub-urban and rural areas** – From 10.20 million lines in 2004, Nigeria's mobile subscribers' base had hit 67 million in February 2009. In December 2008, the total number of subscribers in Nigeria's mobile market was 62.99 million an addition of 22.59 million subscribers in 2008, this represents a 56 percent annual growth rate compared to the 2007 figure.
- 3 **Increased job and business opportunities** – mobile pay phones can be found in almost every rural and sub-urban area where GSM coverage is available. Many people invested in handsets and started a business, providing public payphone services. This has changed the lives of micro-business owners and also brought affordable phone services to every area of the country.

In addition, expansion of the market for ring tones is one of the unexpected benefits that has resulted from the rapid spread of mobiles. This has enabled local musicians to profit from, and promote their work. The ring tone business is big worldwide and this is no different in Nigeria.

- 4 **Improved access to banking services** – banking has been brought to the unbanked as a result of the expansion of GSM services into the sub-urban and rural areas. In the effort to improve their services, Nigerian banks have utilized mobile phones to extend their banking services, thereby bringing the safety and security of banks to places located far from the halls and walls of the traditional commercial bank; providing previously unbanked populations the conveniences of modern day banking.

- 5 **Increased investments in the telecommunications sector** – Prior to the licensing of the Digital Mobile Operators, private investment in the telecommunications sector was about US\$50 million. Between 2001 and now, the sector has attracted over US\$10 Billion of investment, a substantial part of which was foreign direct investment. Nigeria has thus become one of the most desired investment destinations for ICT in Africa.

- 6 **Socio-Economic Impact** – The great improvement in access to telecoms in Nigeria has had a positive impact on virtually all facets of life in the country from political and social to economic. Government's interface with citizens is now faster, people now contact their friends and family in most parts of the country from anywhere instantly, whenever they wish and clients now easily reach their various service providers. Ownership of phones now cuts across the various social classes, opening good opportunities for e-health, e-education, e-security, e-commerce and e-banking in the country.

- 7 **National GDP growth** – the mobile sector has been pivotal to the growth of telecommunications in Nigeria. Developing from a 30,000 line subscriber base at the beginning of the Millennium to 67 million connections in 2009, there has been outstanding success and Nigeria is the largest growth market for telecommunications in Africa and the Middle East.

Dealer Credit Plan (DCP): The Dealer Credit Plan (DCP) is an innovative scheme established by Access Bank for the distributors of our large corporate customers as well as other distributors to encourage the development of small and medium sized enterprises in the country through the provision of competitively priced loans.

Access Bank changed the way DCP is operated in Nigeria by pioneering an initiative which addresses sustainability of the businesses. The Bank also organises capacity building programmes to support distributors in developing their businesses.

Furthermore, Access Bank was the first bank in Nigeria to give dedicated lines strictly for telecommunication dealers. This happened at a time in Nigeria when banks established subsidiaries to be involved with various telecommunication firms as dealers. Access Bank therefore created a niche by supporting dealers in the business rather than competing with them.

In addition, Access Bank is the first bank in Nigeria to hold periodic fora for dealers. Currently, 466 SMEs are benefiting from the DCP. Please see a breakdown below:

Sector	Number
Cement	138
Telecommunications	232
Beverages	54
Other commodities	42
Total	466

Gender Empowerment Programme (GEM)

Based on research, we realise that women in Africa face typical Small and Medium Enterprise issues such as limited or non-existent financials on their business, lack of sufficient collateral for loans, weak business management and strategic planning, poorly prepared and presented business plans. Consequently Access Bank partnered with the International Finance Corporation (IFC) to establish the Gender Empowerment Programme (GEM).

GEM programme is aimed at supporting and empowering women owned business and entrepreneurs to become the business leaders of the future. Women entrepreneurs represent an untapped reservoir for job creation, economic growth and social development in any developing economy. Despite the growth of these businesses, many women owned businesses remain stunted by lack of appropriate managerial skills, access to business resources, networking opportunities and access to new markets.

Under the GEM programme, Access Bank provides necessary resources such as finance, capacity building via business training, advisory services, vital networking and new markets opportunities. The following are highlights of the programme:

- **Business development workshops**

We have well designed business development programme that educate and support female entrepreneurs as they seek capital and grow their companies. The aim of the workshops are to equip participants with the fundamentals of entrepreneurship – how to run, manage and grow their businesses effectively. Participants are also taken through a series of growth management issues like strategy and the business environment, industry and environmental analysis and strategic growth imperatives.

The workshops have provided a unique platform for Nigerian female entrepreneurs to come together, share ideas and experiences. It has also provided an avenue for the participants to learn success strategies first hand from successful business owners and professionals. These sessions are interactive with the participants and facilitators sharing practical experiences.

In 2009, workshops were held in Lagos on July 21, 2009 and Abuja, July 28, 2009. The theme of the Advantage Workshop for 2009 was “understanding and managing your business cash flow”. It was implemented in collaboration EDS (Enterprise Development Services) an arm of PAN African University.

Participants have been impressed with the quality of training and have seen it as an avenue for budding entrepreneurial ideas to the next level. So far, over 540 women have been trained under the GEM programme.

- **Provision of Funding**

We provide access to finance needed to meet business obligations. Clients are assigned dedicated account officers that assist every step of the way from application, to disbursement to principal remittance.

We avail businesses our Cash Management products for timely information and easy access to funds, Credit Facilities with flexible repayment options, Trade Services for domestic/international trade and many other products and services tailored to specific requirements.

Through GEM, funding has been deployed to fund women in business through provision of facility for different funding needs of women entrepreneurs which include over head costs, business expansion, working capital requirement and start-up capital. Currently, Access Bank has disbursed loans to a total of 268 businesses at a total sum of \$18,000,000 and over 3000 accounts women business account have been established.

- **Technical Assistance Programme**

GEM Technical assistance programme is a value-adding service being offered to GEM account holders in recognition of the various challenges faced by business owners. The assistance comprises of diagnostic evaluation of a business and the provision of specific intervention aimed at improving processes and/or capacity to effectively run a business.

This programme is being coordinated by Enterprise Development Services (EDS), the entrepreneurial arm of the Pan-African University. We engage the consultant to work one on one with our clients providing professional advice in the areas of management, marketing, Human Resources, Procurement etc.

ACCESS BANK IN THE MARKETPLACE

“Responsible banking is one of the key differentiators of Access Bank with the purpose of developing innovative business solutions to social and environmental problems. Product responsibility at Access Bank relates to the impact that the Bank’s products and services have on the people and the society as a whole.

The Bank’s products and services therefore promote financial growth and enhance social and environmental causes across a range of stakeholders. Access Bank’s Responsible Banking is implemented using 2 approaches; Responsible Banking in Leadership that provides cutting edge thought leadership in the sustainability space and Responsible Banking in Products that develops specific banking products and services in line with its responsible banking strategy.”

Responsible Banking in Products

This comprises the Bank’s full range of products and services that suit individual and corporate situations, identify promote sustainable development and provide easy access to suitable financial products and services to the unbanked/underbanked. We offer products such as:

Personal – Cash management, savings account, loans, wealth management, mpower, Accesspay, Access Advantage.

Business – Gender empowerment, trade services, investment, small business, mpower, BizAccount, Telecommunications Infrastructure Provider Scheme (TIPS), Dealer Credit Plan (DCP).

Online Banking – Point of Sale terminal, VISA credit card, Access online, debit card, WUMT Online, The VISA Black Card.

Our business sectors include:

Asset management – Access Investments and Securities (AIS) was established in 2008 to provide specialized products and services in asset and investment

management and advisory services.

Housing finance – Identifying the key challenges militating against provision of affordable housing in the areas of , gap in home ownership, dearth of long-term funds for mass housing delivery, insufficient capital by primary mortgage institutions, lack of adequate incentives, difficulties in land acquisition, inadequate legal framework and housing infrastructure, as well as high cost of building materials. Access Bank has been continuously involved in various initiatives aimed at addressing the housing challenge in Nigeria.

Recognizing the commitment of the Bank, the President of the Federal Republic of Nigeria, appointed Access Bank’s Group Managing Director/CEO, Aigboje Aig-Imoukhuede to serve on the Presidential Committee on Affordable Housing. The Committee made several recommendations which were all approved by the President.

The Federal Government has taken a further step towards redressing the anomalies in the housing and property sector, by establishing three sub-Committees on implementation of the Report of the Presidential Committee on the Affordable Housing Scheme. The Committees are Finance and Funding, Concession, Incentives, Insurance and Taxes, Committee on Legislation, National Housing and Urban Development Policies and Committee on Land Titling, Housing Infrastructure, Building Regulations and Materials and Skilled Labour.

In line with the Bank’s commitment, Access Homes was established to offer superior housing solutions and services with a focus on savings and loans, mortgages and real estate.

SME – We effectively partner with small and medium sized businesses to engender growth and sustainability. The bank understands that it is essential that SMEs have the backing of a supportive and efficient bank as well as having a good, reliable financial partner. Our SME support

offerings include Dealer Credit Plan (DCP), Telecommunications Infrastructure Provider Scheme (TIPS), Gender Empowerment Programme (GEM) and Mpower Biz.

Syndications and project finance – Equator Principle due diligence is applied to syndications and project finance. The E&S risk management process is applicable to non-project finance transactions and all projects are screened for compliance with E&S requirements. In addition, the Bank appreciates the complexities and challenges involved in syndications and project finance and therefore offer the financial resources and expertise required, such as; innovative ideas, skilled specialist, knowledge of local markets and access to capital. By customizing our services to our customer's unique requirements, we develop and execute financing that will maximize the social and economic value of any given project.

Retail – Access Bank's retail products are supported by the provision of financial literacy training, high-quality advice and a level playing field between products perceived as having similar characteristics. They encourage savings and are tailored to meet the immediate and longer term needs of our customers.

Access to banking

At Access Bank Plc, we offer our customers a variety of products and services designed to help them better manage their funds. For added banking convenience, we offer additional products and services which help meet our customer's personal and business needs. We provide banking access to a host of traditionally underserved groups through customized products, services and channels. This includes low-income and underserved clients, students and youth. An example is the Access Solo Account for students.

In 2009, we opened 3 new offices in Ghana, Congo and Cote d'Ivoire.

RESPONSIBLE BANKING IN LEADERSHIP

Access Bank's Responsible Banking in Leadership involves sharing our sustainability best practices with organizations in Nigeria. This is to encourage other institutions to embed responsible business practices in their operations.

Access Bank seeks out opportunity to serve on the board/committee of organizations that address issues of sustainable development, participate in national and international thought leadership forums, sign on to sustainability initiatives, engage in developing innovative business approaches to development alongside credible non-governmental organizations and international aid/donor agencies and hold industry defining seminars and workshops.

One of such responsible banking in leadership approach is our Thought Leadership Series. This involves the hosting of industry defining seminars. In 2009, we held 3 workshops. Access Bank Seminar on Foreign Exchange Outlook for 2009, National Conference on Bonds and Access Bank International Seminar on Stress Testing In Financial Institutions.

ACCESS BANK SEMINAR ON FOREIGN EXCHANGE OUTLOOK FOR 2009

Access Bank Plc, in continuation of its demonstrated commitment to the growth and economic development of our nation, organized a seminar on foreign exchange outlook for 2009. This seminar follows our International Conference on Debt & Equity Capital Markets held in March 2008. The forum enabled Policy Makers, Regulators, Economists, Investment Analysts and Treasurers of Local Corporates and Multinational Institutions to dissect contemporary issues of global economic importance with bearing on the Nigerian economy.

The effect of the global financial slowdown on the Nigerian economy is manifest through lower commodity prices, reduction in foreign investment portfolio and de-accumulation of foreign exchange reserves; after a period

»»» TREATING CUSTOMERS FAIRLY...



...BECAUSE IT'S THE RIGHT THING TO DO

Treating customers fairly lies at the centre of our customer value proposition. For this reason, in 2009 we pioneered the establishment of our Ombudsman Office to handle and resolve customer complaints in an amicable, fair and timely manner.

Our Ombudsman can be reached on 01-2802241 or by email at complaints.ombudsman@accessbankplc.com
Visit www.accessbankplc.com for more information.

A Passion For Excellence

access »»»

of remarkable write down in asset classes and significant volatility in the Foreign Exchange Markets.

Consequently, this seminar was organized to empower users of foreign exchange with the parameters for adequately assessing their currency exposures and knowledge on how to structure appropriate foreign exchange solutions to mitigate the risks arising from the prevailing global financial crisis. The aim is to help stakeholders to understand the unfolding Nigerian foreign exchange dynamics.

The one - day seminar was structured into three sessions:

1st Session: Macro-developments in the Nigerian Financial Markets: Impact of the last 9 Months on the Next 12 Months.

2nd Session: Nigerian Naira: What Lies Ahead

3rd Session: FX Hedging: Structures and Products

A team of accomplished Nigerian and International facilitators from renowned domestic and global institutions provided lectures on diverse perspectives. Presenting at the seminar were Bismark Rewane (Managing Director, Financial Derivatives Company), Matthew Pearson (Head, EPG & Research, Renaissance Capital, Africa) and Felipe Berliner, (Vice President, Emerging Markets Strategy, Goldman Sachs). The panelists are Ashok Bhundia (Africa Research, Goldman Sachs), David Cowan (Emerging Market Strategist, Citigroup), Andrew Alli (CEO, African Finance

Corporation), Ayo Teriba (CEO, Economic Associates), Batari Musa (Director, Central Bank of Nigeria), Bola Onadele (President, Financial Datanet House Limited), Ebenezer Olufowose (Executive Director, Access Bank Plc), Emmanuel Abolo (Chief Economist, Access Bank Plc) and Dapo Olagunju (Group Treasurer, Access Bank Plc).

NATIONAL CONFERENCE ON BONDS

Debt Management Office, Nigeria in conjunction with Access Bank Plc, as part of initiatives to deepen investors and stakeholders knowledge on the activities of the rapidly developing Bonds Market in Nigeria, organized a one-day seminar captioned '**National Conference on Bonds**'. The conference created a platform for Investment Managers, Pension Fund Administrators and Custodians, Insurance Companies, and other Debt Market Operators to explore the abundant investment opportunities in the Fixed Income Market.

Bonds and Debentures which are instruments for financing long term investment and developmental projects have not been fully exploited. This has been attributed to limited knowledge of the operations and potentials of the Bond market as a driver of socio - economic development.

The one-day seminar was structured into two sessions:

1st Session: The Bonds Market in Nigeria

2nd Session: Investment Opportunities in the Bonds Market



DG of DMO, Dr. Abraham Nwankwo making a presentation at the Seminar



Ebenezer Olufowose, ED, Investment Banking, Access Bank Plc making his presentation at the event.

To give depth and global perspective to the issues slated for discussion, we assembled a team of professionals with both local and international experience to share their perspectives on various topics slated for discussion.

The team included Dr. Abraham Nwankwo (Director-General, Debt Management Office, Nigeria), Patience Oniha (Director, Market Development, Debt Management Office, Nigeria), Ebenezer Olufowose (Executive Director, Investment Banking, Access Bank Plc), Obinna Abajue, (MD, IBTC Pensions Management Limited), George Amoaka-Temeng (Asst. Director, Treasury and Investment, African Re Insurance Corporation) and Michael Ndiomu, (Country Treasurer, Access Bank Plc).

The Conference was held on Thursday, May 21, 2009.

ACCESS BANK INTERNATIONAL SEMINAR ON STRESS TESTING IN FINANCIAL INSTITUTIONS

In October 2009, as part of our international lecture series, we hosted an seminar titled "Access Bank International Seminar on Stress Testing in Financial Institutions". This programme was triggered by need to understand the peculiarities of stress tests run by governments globally to determine the health levels of financial institutions.

Stress testing as a risk management practice alerts the managements of banks to possible adverse outcomes related to a variety of risks and of the level of capital that may be needed to absorb losses should significant external shocks occur.

The aim of the Seminar includes understanding and quantifying the vulnerabilities in the financial system; highlighting the evolving nature of stress testing in financial institutions and learning how to build stress testing mechanisms into an overall risk management architecture. Highlights of the seminar include:

- Stress Testing as a tool for assessing systematic risks
- Stress Testing in Practice: An application to Banks

Lead Presenters were Dr. S. Ventakakaraman, Associate VP Dun & Broadstreet Transunion Analytic & Decision Services; Vijay Kandula, Senior Member, Risk Compliance Practice, Oracle Financial Services Software Consulting, India; Keith Ackerman, PricewaterhouseCoopers, South Africa and Francois Prinstoc, PricewaterhouseCoopers, South Africa.

Discussants were Ina De Vry, Director, Financial Risk Services, PWC; Funmi Ade-Ajayi, Chief Operating Officer, Citibank; Nicholas Nyamali, MD/CEO, GTBank Asset Management Ltd.; Oluseyi Bickersteth, National Senior Partner, KPMG Professional and Emmanuel Abolo, Chief Economist, Access Bank Plc.

»» PARTNERING WITH WOMEN

CREATING LEGACIES

Name: Mrs. Munira Shonibare

Occupation: Furniture Manufacturer and Interior Designer

Company: IO Furniture Limited

Interests: Design, Travel, Wellness

Ambition: To become the leading contemporary furniture manufacturers in Nigeria and West Africa; foster the empowerment of women to influence policies that affect us towards a better society for all.

There are no limits to what you can achieve with a strong will and a passion to succeed. From humble beginnings, IO Furniture Limited has become a world class organization. With the support of Access Bank GEM, the company has built a legacy that will sustain it through time.

GEM is a programme specially designed to support female entrepreneurs. The programme features include the provision of finance, capacity building, networking and advisory services. GEM is yet another initiative that demonstrates Access Bank's commitment towards ensuring the growth and development of the Nigerian economy.

For more information visit www.accessbankplc.com

GEM Knowledge. Ideas. Wealth

A Passion For Excellence.

access »»

➤➤➤ Economic performance

The Access Bank 2010 Annual Report provides information on our financial performance. The society section of this Sustainability Report provides data on Access Bank's Community Investment.

Statement of Value Added For the period ended 31 December 2009

	Group Dec-09 9 months		Group Mar-09 12 months		Bank Dec-09 9 months		Bank Mar-09 12 months	
	N'000	%	N'000	%	N'000	%	N'000	%
Gross earnings	66,076,468		109,341,056		56,943,666		104,494,981	
Interest expense								
- Local	(7,150,292)		(32,359,725)		(7,146,296)		(32,359,725)	
- Foreign	(3,581,241)		(3,040,102)		(2,067,083)		(1,926,302)	
Fees and commission expense	-		-		-		-	
Group's share of associate's loss	55,344,935 (775,431)		73,941,229 505,547		47,730,287		70,208,954	
Loan loss expense:	(16,650,665)		(7,972,887)		(16,171,832)		(7,350,557)	
Allowance on other assets	(4,880,816)		(469,241)		(4,658,203)		(450,683)	
Allowance no longer required								
Bought-in-materials and services								
- Local	(21,831,693)		(22,183,843)		(16,332,621)		(19,210,840)	
- Foreign			(606,419)				(606,419)	
Value added	11,206,330		43,214,386		10,567,631		42,590,455	
Distribution of Value Added		%		%		%		%
To Employees:								
Employess costs	10,165,567	91	10,936,463	25	6,899,092	65	9,086,778	21
To government								
Government as taxes	920,601	8	5,371,213	12	922,475	9	5,220,021	12
To providers of finance								
Interest on borrowings	605,526	5	2,134,341	5	605,526	6	2,134,341	5
Retained in business:								
- Depreciation on fixed assets	3,492,324	31	3,465,540	8	2,596,811	25	2,770,908	7
- Depreciation on equipment on lease	424,479	4	492,613	1	424,479	4	492,613	1
- To pay proposed dividend	-	0	11,349,981	26	-	0	11,349,981	27
- To augment reserve	(4,402,166)	(39)	9,464,235	22	(880,752)	(8)	11,535,813	27
	11,206,331	100	43,214,386	100	10,567,631	100	42,590,455	100

Pension Plan

For all employees hired by the Access Bank Group, the pension policies of the applicable jurisdiction is adhered to. However, all employees of Access Bank Plc, Nigeria have a standard pension plan as mandated in the Pension Reform Act 2004.

Under this plan, each employee contributes 7.5% of his/her monthly emoluments (defined as Basic Salary, Housing and Transport Allowance) and Access Bank contributes an equivalent amount. Thus a minimum of 15% of the monthly emoluments is credited into the RSA of the employee.

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➤➤ Social performance

EMPLOYMENT

Number of Employees: This refers to the total number of staff strength of the Bank i.e. Access Bank and subsidiaries.

Staff strength by Division- Access Bank, Nigeria

Professional staff by Division	Number	Support staff as @ March 31st, 2010 by categories	Number
Commercial and Consumer Banking Group (CCBG)	533	Trainees	0
Institutional Banking Group (IBG)	74	NYSC	175
Investment Banking	30	IT	4
Risk Management	161	Platform Assistants, Tellers, Admin Staff, Secretaries	1296
Enterprise Resources Group	187	Call Center Agents	33
Retail Banking	31	Drivers	450
Operations	384	Security Men	739
		Tea Girls	33
Total	1400	Total	2730

Staff Strength – Grade Levels and Executive Management

GMD	1	AGM	23	SBO	110
GDMD	1	SM	40	BO	114
ED	4	MGR	54	ABO	172
GM	13	DM	58	ET	697
DGM	16	AM	88	NBN	7

Staff strength – Subsidiaries

Subsidiaries	Professional	Support	Total
Ghana	57	28	85
Sierra Leone	41	31	72
Gambia	45	107	152
Zambia	58	65	123
Cote D'Ivoire	105	64	169
UK	55	0	55
Rwanda	67	76	143
Congo	39	34	73
Burundi	44	70	114
United Securities	20	19	39
Access Homes	10	11	21
Access Inv. & Sec	12	7	19
	553	512	1065

Rate of turnover by age, group, gender and region:

This part is broken into 3 sub-sections as follows: Total attrition, voluntary attrition and involuntary attrition.

Total staff attrition

This part analyses the total staff resignation, both voluntary and involuntary, showing the trend over a 2-year period.

Table 4

Year	2008	2009
No of Resigned Staff	279	172
Staff Strength as at 31st of December	1355	1393
Attrition Rate	21%	12%

EMPLOYEES**Diversity and equal opportunity in our workplace****Composition of staff by Division & Gender**

	MALE	FEMALE
CCBG	297	240
INVESTMENT BANKING	15	12
RETAIL BANKING	19	11
ENTERPRISE	131	53
INSTITUTIONAL BANKING	42	29
OPS & IT	224	159
RISK MANAGEMENT	107	51
EXC MANAGEMENT	6	0
TOTAL	841	555

BENEFITS TO FULL-TIME EMPLOYEES

The Bank's practises on benefits to its employees are as follows:

Social Engagement: through club subscription for all employees at the level of Assistant General Manager and above, the banks creates a platform for the senior professional to balance work-life while delivering on set targets.

Extended Welfare Package: Besides the timely and competitive remuneration package, employees benefit

from Salary Advance when there is an urgent need to be met. Vehicle loans also exist for employees from the cadre of Executive Trainee to Managers while Mortgage Loans are extended to all employees from Senior Managers upwards.

Group Insurance: To ensure adequate cover during and after official hours, the Bank have in place a Group Life Insurance Scheme.

Breakdown of employees per category according to gender and age group

25 YRS AND BELOW	101
25-30 YRS	746
31-35 YRS	278
36-40 YRS	168
41-45 YRS	64
46 YRS AND ABOVE	34

LEADERSHIP

At Access Bank, we ensure that employees take leadership roles in driving the Bank's CSR agenda in the bank and outside the workplace.

Through the Bank's Volunteering scheme, employees implement impactful community projects within predetermined focus areas.

This is also implemented at Subsidiaries level where CSR Champions are identified and trained. The Champions play strategic roles capable of impacting positively in identified regions. Champions connect divisions and regions while propagating best practises and ideas.

Out leaders are active within and outside the workplace. This is defined by the exemplary leadership of the Group Managing Director, Aigboje Aig-Imoukhuede who gives his personal time to serve as the Chairman of the Global Fund Africa. He has also been invited to serve on the Corporate Advisory Board of the Global Business Coalition on HIV/AIDS, Tuberculosis and Malaria(GBC).

TRAINING AND MENTORING

Learning at Access Bank is structured to develop and support a diverse workforce. Employees diversity training initiatives comprises the following;

Classroom training: this creates an opportunity for the employees of the group to meet, share experiences and learn about the Access Way.

On-the job training: this is implemented by the bank and can be in form of policies processes, meetings, in-house team training etc. Other forms are secondments to other locations, redeployments, and project assignments.

Self study: this are self directed training targeted at improving employees. The Bank's library is a platform for this initiative while the bank pays for professional subscription for some category of staff.

e-learning is a web based training which focuses on developing employees by providing contents that are computer based. The virtual class room is a learning innovation that enables employees to access training contents from their home, work or any where irrespective of location.

Programmes to support diversity

Many of our internal policies and programmes promote diversity at all levels of the company by providing the flexibility and support that many employees need to manage work and life responsibilities. For instance, maternity leave and the flexibility of annual leave.

PEOPLE MANAGEMENT

Employee participation survey

The Bank also engages its employees through satisfaction surveys.

2009 Satisfaction Survey

In line with results presented by the Culture & Internal Communication team, the 2009 survey was regarded as a total success in that 1,551 employees representing 83% of all staff took part in the survey.

A few examples of the responses from staffs are as follows:

"Access Bank is a great bank to work"

"Compared to my previous organization, one person has so much responsibilities here but I take them as self development and multi tasking"

"the bank has built in me confidence to face life challenging situations"

"working in Access Bank gives me the opportunity to do 10 peoples job together at the same time, while delivering high quality within a short time"

"this organization is the best"

1 Objectives

The objectives of the 2009 employee satisfaction survey were:

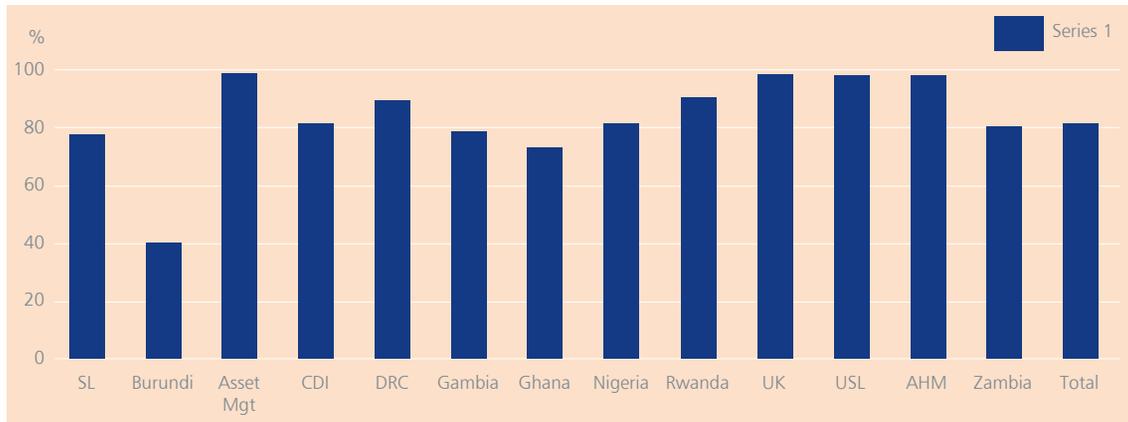
- To measure level of employee satisfaction between 2008 and 2009
- To obtain insight into how well the bank has performed in a year
- To obtain insight into what motivates employees

2 Participation

A total of 1,551 employees participated in the survey representing 83% participation rate:

- 1 There was a 7% increase over 2008 participation rate
- 2 9% (137) of those who participated did not complete the survey – the section on the part of demographics
- 3 Burundi was the only country that the participation rate was below 50%
- 4 The total number of members of executive management that completed the survey was 116% due to the UK's nomenclature

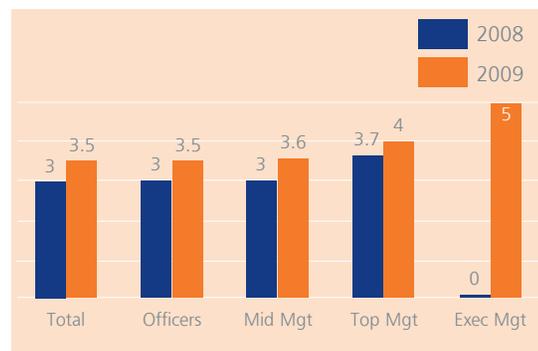
Participation Rate by Country



Participation Rate by Grade



Satisfaction Index by Grade



3 Employee Satisfaction

The overall employee satisfaction and engagement index for the group was 3.5 compared to 3.0 in 2008 and this is reflective of all grade bands in the organization.

As at June 30, 2009, there were 67 international organizations that had completed the AlphaMeasure satisfaction survey and Access Bank is at the 71th percentile.

Participation Rate by Country



Recommendations designed to address the findings from the survey were approved by management. See table 11 below:

Table 11: 2009 Recommendations and actions taken

Recommendations	Action
Culture	
Repackaging of on-boarding with formal launch of mentoring and buddy system.	<ul style="list-style-type: none"> • Mentoring and buddy framework has been approved. • Implementation has commenced.
Training	
Implementation of blended learning- e-learning	<ul style="list-style-type: none"> • Credit Risk Management Training. • Entry Level Training Programme (ETLP) • Leadership development programme. • In-house training. • Self study training. • On the job training. • E-learning – 95%.
Quality of supervision	Implementation of Personal Development Plan
Compensation & benefits	
<ul style="list-style-type: none"> • Development of an employee value proposition • Development of a reward manual by August 2009. • Relocation of the Bank’s guest house in Nigeria to Lekki. 	<p>Employees and employers were engaged, midpoint yet to be agreed on.</p> <p>This has been done and presently undergoing modification. Relocation has been done.</p>
HR function	
Bi-annual HR day in all areas.	The Bank holds HR Day across its countries of operation

OCCUPATIONAL HEALTH AND SAFETY

Access Care Programme: The Access Care Programme is an health initiative designed to help in building and maintaining a healthy workforce. The programme provides emergency care for injured or sick persons with the intention of preserving life, promoting recovery, preventing workplace injury or injuries from becoming worse and protecting against unintended casualty.

The Access Care Programme provides satisfactory and complementary healthcare-service portfolios outside of the

core hospital setting and in a manner that synergises the attainment of good health. The programme comprises the provision of first aid kit across the Bank, appointment and training of employees as first aiders (Access Carers) and the provision of personal compact kits to all employees.

- Provision of first aid kits: In 2009, Access Bank branch and office in Nigeria was provided with 1 first aid box containing first aid items. The first aid kits are under the supervision of an Access Carer with the relevant first aid training and certification. The Access Carer is

responsible for recommending actions regarding use, contents, modifications and maintenance of kits; checking and replenishing contents; and ensuring equipment and contents are within the use-by dates.

The contents of first aid kits are reviewed regularly by the responsible Access Carer and are replenished bi-annually. However, Access Carers that require additional items are permitted to make extra-ordinary requisitions.

- Appointment and training of Access Carers:

Currently, there are 95 Access Carers bank wide. They have been provided with the necessary training on Basic Life Support including the CPR (Cardio-Pulmonary Resuscitation) and have been certified by the International Red Cross. This is to ensure that Carers understand the necessary procedures for administering first aid and ensure that workplace injury or injuries do not deteriorate thus providing emergency care for injured or sick people.

The Access Carer's maintain a first aid kit appropriate to the level of training undertaken and to the requirements for the particular workplace; ensure first aid skills are maintained at an acceptable level, including attending annual cardiopulmonary resuscitation refresher courses and provide emergency treatment for injury or illness within their competencies in the workplace.

- Provision of compact kits: To ensure that employees can also cater for emergency services outside the workplace, all employees were provided with compact personal first aid kits.

The Access Care first aid wallet is a personalized healthcare response kit which is designed to cater for sudden healthcare exigencies prior to a hospital or clinic visit.

The kits were packaged in Access Bank branded pouches that can be easily stored in handbags, briefcases and can be easily carried around. The kits contain 11 different first aid accessories and non-prescriptive drugs.

A users guide was also circulated to all staff. The materials contained a list of contents and use of the items listed. This guideline provides a reference material for employees.

Training and Education

Learning and Development (L&D)

The Bank believes it can best achieve its objectives through retaining and empowering the best hands through implementing L&D programmes. In achieving this, medleys of learning interventions were deployed to enhance knowledge retention and build the desired capacities. Some of the L&D interventions include the following:

- Leadership development programme: Module - *Managing in Global Organization* delivered by a team of professionals from the London Business School targeted at senior management. 32 employees were in attendance ranging from AGM's to GM's.
- In-house training: *Quest for Excellence*. 3,416 employees were in attendance ranging from ET's to GM's.
- Exchange programme: *Goldman Sach's Dealing Room (Ghana, Cote'd'Ivoire, Congo, Burundi, Zambia, Rwanda, Sierra Leone, and Gambia) on Currency Trading*. 18 employees were in attendance and benefited from this programme.
- Macro and micro-economics: 64 employees were in attendance raging from AGM's to GM's.
- BASEL 11: 291 employees ranging from ET's to BO's were in attendance and benefited from the learning programme.
- Anti-money Laundering Training: 1,406 were in attendance ranging from ET's to GM's.

2010 Learning Programmes

In line with the Learning & Development Plan 2010, key objectives are focused on implementing a Learning Management framework, Knowledge Management framework and the Group training curriculum; with the purpose of ensuring enhanced skills of the Bank's workforce (both professional and non-professional). The training curriculum is presented in Table 3 as follows:

Table 3

Learning hours	150,000 training hours across the group
Employee satisfaction index	3.5
Leadership development:	<ul style="list-style-type: none"> • Articulation and development of a leadership programme which includes quarterly guest lecture series, subscription to leading articles of world-class organizations and overseas training. • Launch of supervisory training across the group and the attendance of at least 50% of the eligible employees. • Mentoring & coaching programmes.
Core banking skills:	<ul style="list-style-type: none"> • 50% of eligible employees attend the relationship management school and the operational school. • Development of courses specified in the group training curriculum. • Development of tool kits for managers to support on the job training and self-study.
Organizational culture and values	<ul style="list-style-type: none"> • 50% of eligible employees attend the service school. • All groups must have at least a team building activity. • Repackaging of the orientation and induction processes including the launch of web-based orientation. • Release of the following CBT – Access Way, staff handbook, Enterprise Risk Management (ERM), Anti Money Laundering (AML).
Learning & knowledge Infrastructure	<ul style="list-style-type: none"> • Sign-off by the EDs on competencies for their division. • Development of employee learning journey. • Launch & tracking of knowledge management. • L&D portal with the requisite library. • Release 2011 training plan by Nov 2010. • Conversion of other manuals to entrench the Access Way – CPG manual. • Ensure 80% adoption of the knowledge management portal & eLearning solution. • Creating a learning culture - this will involve every employee committing to the use of SPDP and actively managing their learning processes and the line managers. While line managers will be committed to the development of their direct reports.

Adapted from 2010 Learning & Development Plan

»»» Human rights performance

Access Bank is committed to respecting human rights in all its business activities through compliance with prevailing National laws in the constitution and in labour legislation. The Bank gives adequate consideration to human rights through its corporate social responsibility strategy document, which sets the tone for integrating sustainability into core business functions.

Our workplace policies and practices are aimed at shaping corporate culture and guiding relationships between the Bank and its stakeholder groups. Our policies support the rights of the individual as expressed in the International Bill for Human Rights (comprising the 1948 United Nations Universal Declaration of Human Rights – UNDHR and the two International Covenants on Human Rights of 1966).

The UNDHR contains internationally accepted standards for human rights and applies to governments and businesses. The general principles related to business practices are:

- Safe and healthy working conditions.
- Non-discrimination in personnel and hiring practices.
- No forced or child labour.
- Rights to basic health, education and housing (if operations are located in areas where these are not provided).
- Respect for existing international guidelines and standards for the use of force.
- Protecting the economic livelihood of local communities.
- Contributing to the public debate about matters that affect our operations, employees, customers and communities where we operate.

The Bank has a responsibility to ensure that human rights are upheld in all its lending decisions, all its interactions with staff and those of suppliers and contractors through procurement and supply chain management.

Access Bank as a member of the United Nations Global Compact (UNGC) is committed to upholding the 10 principles of the UN Global Compact in respect of human rights, labour rights, environmental protection and anticorruption. The Global Compact seeks to promote responsible corporate citizenship, so that business can form part of the solution to the challenges of globalisation.

NON-DISCRIMINATION, CHILD LABOUR, FORCED AND COMPULSORY LABOUR

Access Bank has measures to eliminate discrimination and encourage cross-cultural interaction, as well as diversity tolerance. The non-discriminatory practices extend to the Bank's hiring and requirement activities, employees are recruited with no regard to gender disposition of applicants.

Access Bank is committed to upholding ethical practices across its operations and will not engage in forced or compulsory labour.

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»»» Corruption - zero tolerance

- **Anti money laundering/Countering Financial Terrorism (AML/CFT)**

Access Bank Plc is required by various regulators to apply appropriate scrutiny and monitoring measures to clients in order to monitor for possible money laundering, especially for clients whose business activities are known to be susceptible to criminal activity or have been designated as high risk for money laundering.

Our Anti-Money Laundering (AML) Compliance Group is dedicated to the continuous development and maintenance of policies, guidelines, training and risk assessment tools and models to help our employees deal with ever-evolving money laundering and terrorism financing risks.

To enhance our anti-money laundering /countering finance of terrorism, Access Bank promotes employee awareness and compliance with anti-money laundering and anti-terrorist financing controls through web-based training, presentations, employee communications vehicles (newsletters, websites, meetings). Annual anti-money laundering training is mandatory for all employees including senior executives. Furthermore, we have instituted a Security Portal and Compliance and Internal Control Portal.

- **Training**

Training of staff is very important in the Bank's effort to fight money laundering and terrorism financing. Therefore, as policy in the Bank, all staff are expected to be trained at least once in every financial year on AML policies, procedures and regulations.

Continuous and qualitative training are a mix of both web-based (e-learning) training and in-person compliance training, and these are available to both fresh hires and experienced employees.

Attention is also focused on the training of staff and their continuous education as part of the Bank's strategy to facilitate the recognition and reporting of money

laundering in accordance with the Money Laundering (Prohibition) Act 2004.

In 2009, 93% of staff members of Access Bank Plc were trained on AML policies and procedures.

- **Reporting suspected activities**

Access Bank employees have the duty to report suspected breaches of our Anti-Money Laundering Policy, other irregularities and dishonesty. Specific to financial reporting practices, the Access Bank Whistle Blower Hotline was established so employees and third parties around the world can report suspected irregularities or wrongdoing relating to accounting, auditing or internal accounting controls directly to the Chief Compliance Officer Unit, anonymously, confidentially and without fear of retaliation.

Furthermore, the Bank has made available a Cheque Kitting Manual to aid employees detect and distinguish Cheque Kiting from legitimate transactions.

- **Whistle blowing**

Employees are constantly made aware of the reporting requirement of suspected internal violations, including violations of Access Bank Plc's Ethical Standards / Conflicts of Interest Policy, the Staff Policy, Confidential Information Policy, laws and regulations, as well as the appropriate mechanisms to do so.

All non-financial wrongdoings and any suspected non-financial wrongdoings perpetrated by an employee are reported to the compliance and internal control units. This includes the investigation of all whistleblower situations and monthly reporting to the CBN accordingly.

- **Know your customer**

Access Bank businesses are based on Know Your Customer (KYC) policies, procedures and internal control which are specifically broadened. To this end, we have developed KYC policies and standards. This principle of "Customer Identification" ensures that KYC safeguards go beyond simple account opening and record keeping.

Furthermore, the Bank has formulated a customer acceptance policy and a customer identification programme that involves more extensive due diligence for higher risk accounts, and includes proactive account monitoring for suspicious activities.

ANTI-COMPETITIVE BEHAVIOUR

We ensure that we engage in healthy competition which will be in compliance with the laws and regulations. Therefore, while engaging in all our activities within the free market economy, the Bank avoids statements and behaviours that may cause unfair competition

In 2009, the Bank did not have any legal action taken against it due to anticompetitive behaviour, anti-trust and monopoly practices and outcomes

COMPLIANCE

Access Bank Plc is committed to conforming to the highest standards of ethical behaviour. Therefore, some of the standards that we have adopted are ahead of local legislation and we are irrevocably committed to working with relevant stakeholders to proffer solutions to ethical challenges.

Amongst other things, Access Bank combats corruption in all our countries of operation; refrains from aggressive tax avoidance procedures and pay our taxes in line with the intent of the relevant tax regulators.

Access Bank is also committed to fighting money laundering and terrorist financing and complying with anti-money laundering laws in the countries and jurisdictions in which the Bank operates. As an international financial services provider, Access Bank recognizes that it has important responsibilities to help fight the global battle against money laundering. No customer relationship is worth compromising our commitment to combating money laundering and terrorist financing.

Accordingly, it is the policy of Access Bank Plc to take all reasonable and appropriate steps to prevent persons

engaged in money laundering, fraud, or other financial crimes, including the financing of terrorists or terrorist operations, (hereinafter collectively referred to as "money laundering") from utilizing Access Bank products and services.

The Bank's relationship with international correspondent banks has also enabled us to comply significantly with the requirements of the US Patriot Act and other international AML/CFT regulations and recommendations such as:

- Financial Action Task Force (FATF).
- Wolfsberg Group.
- BASEL Committee.
- EU Directive.
- Office of Foreign Assets Control (OFAC).
- Sarbanes-Oxley Act.
- BSA/AML.
- Patriot Act.

Furthermore, Access Bank championed, organized and hosted the 1st meeting of the Chief Compliance Officers of Banks in Nigeria (CCCOBIN) and currently serves as the Committee's Secretariat.

Access Bank was one of the major banks in Nigeria that championed the electronic system of reporting introduced by the Nigeria Financial Intelligence Unit in January 2006. Our Bank was part of the project steering committee.

Our Bank was among the first banks in Nigeria to implement the XML (Extensible Mark-up Language) reporting format for reportable transactions.

The Bank also acquired a name checking and transaction filtering solution (Side Safewatch) to screen international funds transfer transactions against some watch lists (EU, BOE, UN and OFAC lists).

In addition, Access Bank is one of the three banks in Nigeria to be invited to make presentations on the AML/CFT situation in Nigeria to the prestigious Egmont

Group during the evaluation process of admission of the NFIU into the Egmont Group.

In addition:

- It is the policy of Access Bank Plc to comply with all applicable laws, regulations and corporate ethical standards and policies in the conduct of our businesses.
 - The protection of our franchise and the sustainable growth of our business as well as delivering on our business goals are dependent on conducting our operations within the letters and spirit of all laws, regulations and policies that apply to and govern our activities.
 - It is imperative that every one of our staff focuses on compliance as an integral part of our business responsibilities.
 - Access Bank management will continue to maintain the trust and confidence of its customers, and all stakeholders through its AML/CTF policy.
 - The Chief Compliance Officer of our bank is a senior management staff.
 - The Bank goes the extra mile in ensuring that only credible customers are maintained as clients in the bank's books.
 - Access Bank will not establish any relationship with any customer until the identity of the potential customer is fully known. The forms of identity can be an international passport, national driver's license, national identity card or third party proxy.
 - Once identified, fraudulent customers will be reported to the appropriate authorities.
 - There is constant review of customers profile and mandate files in order to update our customers' records.
 - Continuous review of customers accounts transactions to identify cheque offenders and reporting them to the appropriate authority.
 - Special caution is taken when Politically Exposed Person(s) (PEP) approach the bank to open account(s). Such account(s) are placed on surveillance and approvals restricted to executive management.
 - In response to the recent focus on terrorist financing, NGO accounts are flagged as high risk and placed on special surveillance.
 - Regular, high quality and timely rendition of returns are done to the Nigerian Financial Intelligence Unit (NFIU) which is the only central national agency responsible for receiving, analyzing and disseminating to the competent authorities, disclosures of financial information.
- A weekly review of reportable transactions is done in order to identify suspicious ones. If found, they are reported to the NFIU through Suspicious Transaction Reports (STRs) .
- Staff are constantly trained bank wide on issues relating to KYC, anti-money laundering activities, terrorist financing and identifying suspicious transactions. Compliance Unit staff are encouraged to belong to professional bodies like the Association of Certified Anti-Money Laundering Specialists (ACAMS).
 - Training is facilitated by professionals in money laundering monitoring including very senior staff of the regulatory bodies.
 - Internal and external audits of the compliance unit are carried out regularly, at least once every quarter by an internal audit unit, external auditors and competent regulators including the NFIU.
 - The Bank has installed the world renowned ACI Worldwide Proactive Risk Manager (PRM, a rule-based anti-money laundering/counter terrorist financing

solution) for tracking, analyzing and reporting suspicious activities and other AML/CTF alerts.

- In terms of monitoring of transactions, any transaction that is within the reporting threshold (\$10,000 and above) has to be approved by a senior management staff after proper scrutiny.
- Customers are required to fill a KYC "Customer Profile" form which gives details of the type of business and transactions that will be seen on their accounts. New accounts documentation is reviewed by designated officers for compliance with AML/CTF requirements before they are opened.
- Accounts with outstanding documentations are placed on "No debit" restrictions.
- An officer of the Bank must visit the premises of the prospective customer and provide a clean visitation report before the account is opened.
- The Bank takes extra effort to know and identify the shareholders of the business in addition to the directors as enhanced due diligence for high risk accounts.
- We do not hesitate to make a report of suspicious accounts to NFIU and the Economic and Financial Crimes Commission (EFCC) as they arise.
- All transactions within the reportable threshold amounts in all currencies are flagged by the system for reporting to the NFIU on a periodic basis and as requested.
- Details of special transactions e.g. Letters of Credit cannot be amended on the system except by authorization.
- All transactions are reviewed against a blacklist like the OFAC, EU, UN lists of SDN's and the PEP list to ensure that transactions are not done for known terrorists and money launderers.
- We have also developed an in-house name checking system for checking names of customers against the OFAC, UN, BOE and EU lists before on-boarding customers.
- We carry out enhanced due diligence on all deposit taking financial institutions i.e. micro-finance banks, who maintain accounts with us through periodic AML/CTF compliance questionnaires and checks. We also assist them with their AML/CTF training needs.
- Access Bank was one of the major banks in Nigeria that championed the electronic system of reporting introduced by the Nigeria Financial Intelligence Unit in January 2006. Our Bank was part of the project steering committee.
- Our Bank was among the first banks in Nigeria to implement the XML (Extensible Mark-up Language) reporting format for reportable transactions.
- UNODC (United Nations Office on Drugs and Crime) commended Access Bank Plc as one of the best reporting entities in Nigeria in terms of quality rendition of data for analysis in the XML project.
- Our Bank actively collaborates with AML/CFT compliance stakeholders and has consistently received commendation from regulators for our support and collaborative efforts.
- We are proud to be associated with the Nigeria Financial Intelligence Unit's (NFIU) achievements in the following areas:
 - Delisting from the Non-Cooperative Countries and Territories.
 - Removal of the US directive on Nigeria.
 - Admission of the NFIU to the Egmont Group of Financial Intelligence Units.
 - Pass mark by the (Financial Action Task Force) FATF on the mutual evaluation on Nigeria.

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Marketing communications

Stakeholders buy-in is critical to the success of Access Bank's sustainability agenda, therefore, our sustainability communication strategy provides an overall framework for managing and coordinating the wide variety of activities that directly or indirectly inform and engage stakeholders. It addresses communicators, stakeholders, messages, communication channels, feedback mechanisms, message timing, and creates a map between all. This strategy ensures that the Bank provides relevant, accurate and consistent information on its activities at all times. Without this it would be very difficult to achieve the required level of internal and external support.

One of the platforms we explore for communicating Access Bank's brand, values and product offerings to clients and other stakeholders, is through sponsorships of key sporting, cultural and social events and interaction with the media on an ongoing basis.

At Access Bank, we recognise that marketplace perceptions and reaction to business behaviour and practices is critical to corporate success. We therefore engage in responsible marketing and advertising; utilizing the media as a communication tool to reach all stakeholders and position Access Bank as a bank of choice for all our stakeholders.

We ensure that our marketing practices are such that they enable us to focus on building and maintaining sustainable, long term relationships with our customers and our relevant stakeholders, while avoiding misleading marketing and advertising.

Our marketing communication strategy provides an overall framework for managing and coordinating a wide variety of activities that directly or indirectly inform and engage stakeholders. It addresses communicators, stakeholders, messages, channels, feedback mechanisms, message timing, and creates a mapping between all. This strategy ensures that the Bank provides relevant, accurate and consistent information on its activities.

Our approach to responsible marketing communications is to adhere to prevailing national laws, standards and voluntary codes related to marketing communications, including advertising, promotion, and sponsorship. Access Bank therefore adheres strictly to the laws and provisions of the Advertising Practitioners Council of Nigeria – APCON, established by Act in Nigeria and charged with the responsibility to regulate and control advertising practices in Nigeria.

In 2009, we launched a corporate advertising campaign showcasing our people. The Advert "Graduate Advert" was centered on the Access Bank person as professional, disciplined, intelligent and customer centric.

Supply chain

SUPPLY CHAIN

With an increased presence in sub-Saharan Africa and in Europe, we have a significant global supply chain that impacts, and is impacted by, a wide variety of different stakeholder groups.

We recognise that our business interests are best served by working to make a positive impact within our supply chain and by ensuring that we create mutually beneficial relationships with our suppliers. By working closely with our suppliers and other stakeholders, we have developed creative solutions to help minimize the social and environmental impacts in our supply chain and maximize the economic benefit.

At Access Bank we promote responsible procurement standards and encourage our suppliers to act ethically and responsibly. Our procurement philosophy is expressed through our operating standards for purchasing and selection of suppliers premised on: effective supply chain management; growing business value for the Bank and our supplier network and transformation of the supplier environment, in line with our commitment to the financial sector charter.

The Bank's commitment to ethical supplier relations is reflected in our operating standards for selection of suppliers. The Bank prior to engaging its suppliers scrutinizes aspects of the suppliers operations to ensure compliance with ethical standards. Access Bank Plc also has a procurement and expenditure policy. The policy states acceptable behaviour for relating with vendors, registering them and also standard operating procedures for procurement.

SUPPLIER ENGAGEMENT

We strengthen our relationships with vendors and suppliers through constant dialogue and meetings across our supply chain to ensure that our value of high ethical standards is not compromised. We therefore hold, on a quarterly basis, a forum for suppliers to align business objectives with uncompromising ethical value. Through

such fora, our suppliers highlight possible areas for improvement in our supplier engagement endeavors.

SUPPLIER SATISFACTION

Although Access Bank does not have a formal procedure to measure supplier satisfaction, feedback from suppliers is obtained through ongoing engagement and site visits with our suppliers/vendors.

Feedback received from such engagements is documented and integrated into future dealings with our suppliers. Such feedback has helped to manage our relationships with our suppliers, helping to prevent intent and appearance of unethical or compromising conduct, actions and communications with our suppliers.

PAYMENT FACILITY

Access Bank has implemented a 5 day payment process for our vendors and suppliers upon completing assigned task. This has helped ensure improved cash flow in our suppliers' businesses.

INVESTMENT AND PROCUREMENT PRACTICES

Our procurement network spans our countries of operation and is designed to meet both local and business needs. Through our corporate procurement policy we make reference to ethical, labour rights and environmental standards in the choice of suppliers, and it applies to all Group suppliers. Access Bank shall ensure that its partners respect the Bank's code of ethics.

We engage in ongoing consultation with our suppliers regarding the management of social and environmental issues, helping and encouraging them to adopt best practices in managing their business functions.

The Bank recognises that our dealings with suppliers often take place in cultures with different norms and values. The Bank therefore expects its suppliers to have a natural respect for ethical standards in the context of their own particular culture.

The Bank's procurement activities pay due attention to:

- Social impacts and human rights.
- Environmental impacts.
- Combating bribery and corruption.

Our procurement procedures involve:

- Selecting vendors based on value, performance and price.
- Providing justifiable and transparent selection decisions.
- Maintaining an "arm's length" relationship with suppliers.

FUTURE TARGETS

KPI	RELEVANCE
<p>Develop a standard procurement framework that addresses the following areas:</p> <ul style="list-style-type: none"> - Equality/discrimination. - Forced labour. - Child labour. - Worker representation 	<p>To help track sourcing and procurement processes to identify bottlenecks and ensure continuous improvement in our stakeholder engagements.</p>
<p>Develop spend tracking system</p>	<p>To analyze past spend by supplier and commodity type; to identify future sourcing opportunities, leverage spend in negotiations and track compliance issues.</p>
<p>Develop performance monitoring processes</p>	<p>To track: qualitative and quantitative performance indicators, suppliers compliance within our established policy framework as well as contracts; and also inform decisions on contract termination or renewal.</p>
<p>Web access process</p>	<p>To provide a central source of information for all Access Bank suppliers.</p>

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The Environment

Climate change

Climate change presents environmental, social and financial challenges to the global economy, human health and to our own businesses and operations. The impacts of climate change can already be seen and there is no question that climate change will continue to impact our stakeholders and our own operations, which is why the issue is central to our strategy.

We believe it is vitally important that we all contribute to efforts to reduce GHG emissions and effectively adapt to the impacts of climate change. We advocate a proactive response as tackling climate change will require a concerted effort between government, business and individuals.

Access Bank has embarked on environmentally-friendly initiatives and we are irrevocably committed to reducing our carbon footprint. Activities in line with these new initiatives are continuous to enable the Bank to achieve its set environmental targets.



NIGERIAN CONSERVATION FOUNDATION (NCF) SYMPOSIUM

Access Bank has been actively involved in sharing its experience in implementing Sustainability best practices at various roundtables and workshops across Nigeria. In September 2009, the Bank supported the Nigerian Conservation Foundation's environmental symposium on "Environmental Financing in Nigeria – the Way Forward". Access Bank provided funding support; our Executive Director, Investment Banking, Ebenezer Olufowose, shared the Access Bank experience through a presentation tagged "Environmental Best Practices in Project Finance".

The symposium is part of a concerted effort by NCF and Corporate organizations like Access Bank to address global environmental and ecological problems in an era of inadequate funding for environmental issues in Nigeria.

The symposium provided a forum for both private and public institutions to examine problem of environment financing; assess the limitations of the current funding mechanism in Nigeria; and review the role of various sectors in environmental financing in Nigeria.

As part of our contribution to the development of environmental polices in Nigeria, the Bank also participated in developing a multi sectoral 17 point communiqué that underpin deliberations of Sustainability practices with focus on the Environment. This communiqué is designed to influence policy thrust and Nigeria's participation in major global climate change negotiations.

This page

'Beyond Words' 2009 NCF Symposium sponsored by Access Bank

Pictures opposite

"Going Green"



»»» Environmental Priorities

Reduce the intensity of our environmental footprint

Access Bank is committed to reducing our energy use, GHG emissions, paper consumption and water use. We are also committed to reducing the negative environmental impacts associated with the waste we generate and our procurement activities. We are aware that improving our operational efficiency, reducing our consumption of resources, and decreasing emissions associated with our business activities can lead to positive environmental and economic results.

- **Reduce GHG emissions and energy use**

As a result of inadequate power supply in Nigeria over the reporting period, we expended an estimated 1,770,000 gallons of diesel for the period, equivalent to 71,932,800 Joules of energy, to complement the 6,500,000kwh power supply from the National Power Holding Company.

As part of our commitment to managing our direct environmental impacts and direct energy consumption through our operations, the Bank has been piloting some energy consumption reduction initiatives across the Head Office and its branch network, with a view to consolidating this process across the Group.

We have been able to save energy significantly through our policy of shutting down generators at 5pm for branches and 8pm for the Head Office. This has resulted in a total saving of 354,000 gallons in the period which is equivalent to 14,386,560 Joules of energy saved for the reporting period.

We are currently exploring opportunities for using solar energy to power our ATMs and also use LED bulbs as we will continue to set targets for reducing consumption over the coming years.

- **Responsible Water Use**

Over the reporting period, the Bank consumed 2,290,000 gallons of water. The percentage of reused/recycled water to total volume of water consumed over the period is 10%. Going forward we will develop a database to track water

consumption and costs. This will enable us to implement standards for installing monitoring systems and equipment to reduce water consumption, as well as to develop water conservation strategies.

- **Responsible Transportation**

The Access Bank car fleet is managed by the General Resources Management (GRM) Group with a broader responsibility of effecting maintenance, repairs and disposal of aged cars.

We understand that anthropogenic climate change poses major risks not only to our environment and human health, but also to our economic systems. We are therefore conscious of the potential hazards of poor management of our fleet system and have taken some steps to reduce our impact on the environment through our transport system.

- In order to reduce the total number of car users across its employee base Access Bank provides buses to transport its employees within different regions to its service outlet. This initiative has helped reduce daily use of personal cars amongst staff members and indirectly reducing potential emission of toxic waste into the environment.
- In dealing with these challenges, we constantly maintain and assess our cars to ensure they meet the minimum requirement of road worthiness and use. The cars under our fleet management are serviced on a regular basis to ensure they are in good shape and contribute minimum environmental pollution.
- Access Bank disposes of cars that have been in use for over a certain number of years and have depreciated significantly, especially to the extent that their use may impact negatively on the environment.

Going forward, we shall work towards identifying other areas through which we can enhance our fleet management system and reduce potential environmental

hazards resulting from poorly managing our fleet system.

- **Reduce Paper Use**

In the last report the Bank embarked on a series of initiatives to reduce cumbersome paperwork involved in various Bank processes and to also reduce the use of paper. This led to the purchase of a 'workstation' software that automates basic bank operations and processes.

The Bank communicated to all its members of staff on the new paper usage policy, which mandates printing on both sides of a piece of paper. Sanctions were attached for defaulting on this mandate and this project has helped reduce paper usage and wastage across the Bank.

We ensure that papers used in printing internal memos are reused where possible. This has significantly reduced our paper purchase and paper consumption over the reporting period.

To reduce cumbersome paperwork involved in various internal processes, we have invested in a 'workstation' software that automates basic bank operations and processes.

To produce the 2008 Corporate Social Report, we purchased 14,700 pounds of FSC-certified paper. By using this 100% post-consumer recycled paper, Access Bank and its supplier:

- Saved over 163 million BTUs of energy;
- Eliminated over 29,913 lbs CO2 equiv;
- Saved 72,591 gallons of water; and
- Prevented over 12,372 pounds of solid waste.

Environmental Product and Services

Sustainable Finance: We manage the potential social and environmental risks associated with our lending and investment by following international standards of good practice, such as the Equator Principles which apply to project finance.

We are also in the process of developing policies for

lending to socially and environmentally sensitive sectors and a tool kit to capture transaction impacts/risks, recommend outcomes for the risk management approaches, and define monitoring and reporting requirements.

Project Finance

- **Sustainable risk management – ESRM Policy**

Our Environmental and Social Risk Policy requires all lending decisions to include consideration of risks such as climate change, including the physical risks it brings from extreme weather and other changes. It also covers the impacts of clients' activities on biodiversity, deforestation, air and water pollution. This holistic approach to sustainability risk means we are steering our lending towards higher-quality assets.

Our environmental and social due diligence process requires all high-impact transactions to be reviewed by our Credit Risk Committee.

- **Equator Principles**

Access Bank Plc has adopted an Environmental and Social Risk Management Policy which includes implementation of the Equator Principles for its transactions and which, through the International Finance Corporation's environmental and social performance standards, addresses issues such as labor and working conditions, community health and safety, land acquisitions and resettlement, and the treatment of indigenous peoples.

- **Equator Principles categories**

Project prospects in Access Bank Plc are now screened for inherent social and environment risks associated with the project and classified under the following based on the outcome of the risk assessment.

- **Category A: High Risk**

Projects with potential significant adverse social or environmental impact that are diverse, irreversible or unprecedented.

- **Category B: Medium Risk**

Projects with potential limited adverse social and environmental impacts that are few in number, generally site specific, largely reversible and readily addressed through mitigation measures.

- **Category C: Low Risk**

Projects with minimal or no social or environmental impacts .

Prospective projects are either embarked upon or declined based on the category it falls into.

Electronic statements: In 2009, Access Bank stopped issuing paper copy and commenced offering electronic account statements to customers. Together with our customers, we have made great improvements in reducing the amount of paper we use.

»»» Environmental responsibility

Global investors statement

An investor statement on a Global Agreement on Climate Change, has been produced by an international collaboration of four investor and finance sector associations namely the United Nations Environment Programme Finance Initiative (UNEP FI); the investor Network on Climate Risk (INCR); the Institutional Investors Group on Climate Change (IIGCC); and the Investor Group on Climate Change/Australia and New Zealand (IGCC Australia/New Zealand). The statement called on world leaders to reach a strong post-2012 climate change agreement in Copenhagen in December, 2009.

Access Bank Plc as a committed member of the United Nations Environment Programme Finance Initiative (UNEP FI) signed on to the statement to demonstrate the importance that the Bank attaches to a strong, credible and effective global agreement on climate change.

This statement outlines in details what investors are looking for from policymakers in order to allocate capital in a way that supports both the transformation to a low carbon economy and the development of adaptation measures.

This includes:

- A binding global target for reducing greenhouse gas emissions. The reductions are informed by the latest available scientific evidence for avoiding dangerous climate change (which suggests that global greenhouse gas emissions must decline by 50-85% by 2050 against year of 2000).
- Long and medium term emission reduction targets for developed countries which will be backed up by effective national action plans.
- Contributions from developing countries, initially in the form of national action plans focused on energy efficiency commitments, but with the ultimate aim of absolute emissions reductions.
- Continuity in the legally binding framework underpinning the carbon market and provisions for an expanded and more liquid global carbon market.
- A review, reform, and expansion of the Clean Development Mechanism.
- Clear measures to reverse deforestation and value forests as carbon sinks.
- A commitment to adaptation in order to prepare for, and respond to the physical impacts of climate change.



Moscow Road Roundabout - a Going Green Initiative



Access Bank in the Community

»»» Access Bank in the community

Access Bank believes in adding value to the communities in which we operate. The Bank aims to build vibrant, sustainable communities by developing interdependent relationships, based on our common pursuits.

As a Group with operations in nine countries and still expanding, the Bank recognizes that it has a role in investing in economic, social and cultural development in the communities where we operate. As a responsible organisation, we work with our stakeholders to develop, implement or contribute to health, educational, environmental and cultural programmes focused on their local communities' needs and aspirations.

The process of investing in the community involves continuous stakeholder engagement. In view of feedback received from these engagements, we evaluate and address issues with particular value to social development.

Data

The Bank's community investment from January – December 2009 is shown below. As members of the London Benchmarking Group (LBG), we have used the LBG model, a comprehensive and consistent set of guidelines to classify, measure and benchmark our community contribution, including cash, employee time, fundraising and in-kind donations, as well as management costs.

Measure	2009
Cash contributions	N343.1m
Employee volunteering time	N4.2m
Gifts-in-kind	0
Management costs	N23m
Leverage (funds raised)	N1.9m
Total	N372.2m

Pictures:

- Top:** Participant at the Mirror the Master Workshop
- Second:** Tree Planting during the Bank's Going Green; Beyond Words Project.
- Third:** Peer Educator talking to security personnel during the Bank's Community Outreach Programme on HIV/AIDS.
- Bottom:** SME Workplace Policy Programme Workshop



Community development projects

Investing in our operating communities is an integral part of Access Bank's Corporate Social Responsibility strategy. During 2009, we maintained our levels of investment in communities despite the challenging economic conditions. We launched flagship projects with a focus on health, arts and the environment.

SME WORKPLACE POLICY PROGRAMME:

The SME Workplace Policy Programme is a project aimed at enhancing the capacity of Small and Medium Scale Enterprises to scale up on health programmes through a 2-day workplace policy developmental workshop on HIV/AIDS, Tuberculosis and Malaria. This programme is implemented by Friends of the Global Fund Africa.

However, the National Agency for the Control of AIDS (NACA), Nigerian Business Coalition Against AIDS (NIBUCAA) and Global Business Coalition on HIV/AIDS, Tuberculosis and Malaria (GBC) also provided technical partnership.

The programme provides a forum for participating organizations to acquire necessary skills to develop and implement world-class workplace policy on HIV/AIDS, Tuberculosis and Malaria which impacts positively on the health and lives of people that are affected directly and indirectly with HIV/AIDS, TB and Malaria.

The workshops were held in three regions (Lagos, Enugu and Minna) in Nigeria. These strategic locations were selected to ensure that participants are drawn from all parts of the country for higher impact. On Tuesday, January 26, 2010 the programme with the theme

"Empowering SMEs to Strengthen and Develop Workplace Policy" was formally launched in Lagos State, Nigeria.

Each workshop commenced with a brief opening ceremony was conducted. At the Lagos Workshop, the programme was officially launched by Her Excellency Mrs. Abimbola T. Fashola, the First Lady of Lagos State. While Enugu and Minna were declared open by Dr. Uche Okenwa, representing Dr. Uche Uzochukwu (Enugu Commissioner of Health) and Hon. Ibrahim Musa Ibeto (Santurakin Kotangora), Deputy Governor Niger State respectively.

At the start, participants discussed their expectations from the workshop. Key to most organisations were implementation and applying knowledge gained to the different classes of employees in their organisation. Thereafter, participants were taken through a series of topics which included HIV/AIDS Prevalence in Nigeria, Personal Risk Assessment for HIV/AIDS; TB and Malaria and Values Clarifications; The impact of the 3 Pandemics in Nigeria; ATM - Impact on Business; the Elements of a Comprehensive Workplace Programme and Overview of the Nigerian National Workplace Policy 2005 and the Rationale for a Workplace Policy which rounded up activities of the 1st day.

The 2nd day opens up with a re-cap of the previous day activities. Then participants are divided into groups with facilitators overseeing its activities. Each group was tasked to develop workplace policies on various aspects such as



Dr Akudo CEO Friends Africa, Abimbola Enmanuela Fashola (wife of the Lagos State Governor and Ebenezer Olufowose (ED, Access Bank)



Olusina Olulana, Executive Secretary, Nigerian Business Coalition Against AIDS (NIBUCAA) and a participant.



protection, prevention/awareness, voluntary counselling & testing and privacy & confidentiality. At the end of the session each group made a presentation on developed policies to other participants. After each presentation, participants were allowed to ask questions and make relevant suggestions that will enhance the policy that was presented.

Thereafter, a workplan developed by NIBUCAA was shared with all participants. It included activities that will guide the organisations in developing and implementing policies and programmes. In collaboration with participants, appropriate timelines were included in the plan. This session usually brought each workshop to an end. However, in concluding the programme, evaluation sheets are distributed to all participants in order to assess the programme and a certificate of participation is presented to participants. Overall, over 226 SMEs participated in the programme, 60 from Lagos, 106 from Enugu and 60 from Minna.

The expected impacts of the programme include increased number of SMEs with workplace health policies, increased number of organisations that are able to implement the policies in their various organizations and increased

knowledge of AIDS, TB and Malaria in the workplace.

The programme is monitored primarily by Friends of the Global Fund Africa. Indicators to be used include number of workplace programmes established after the workshop, private sector firms that have developed a policy document and implemented health programmes and number of employees that feel the policy has a positive impact on their quality of life.



INTERNAL WORKPLACE POLICY PROGRAMME ON HIV/AIDS, TB AND MALARIA

Through our internal workplace programme, Access Bank is championing the global effort aimed curbing the triple pandemic of HIV/AIDS, Tuberculosis and Malaria. As a responsible organisation, our workplace policy has been designed to draw attention to the associated issues of the triple pandemics.

In 2009, in order to stimulate involvement at all levels- from individuals to groups, institutions and governments, Access Bank embarked on various innovative programmes. Highlights include:

Community Outreach Programme: The essence of the programme is to sensitize people in the immediate community and encourage them to stop the spread of HIV/AIDS through preventing new infections, up-take of voluntary counselling and testing and championing the fight against stigma and discrimination.

The outreach was done by various groups of the over 171 Peer Educators in different locations across Nigeria. Programmes were conducted at Victoria Island, Ikeja and Port-Harcourt in collaboration with Nigeria Business Coalition Against AIDS (NIBUCAA) and Friends of the Global Fund Africa (Friends Africa).

The community outreach comprised of highly literate members of the society as well as the not so literate, such as artisans, Street Hawkers, Motorbike Riders and Motorists. During the outreach, Information Education and Communication (IEC) (Handbills, Booklets, leaflets and t-shirts) were given to people as Access Bank Peer Educators spoke to them on the need to prevent themselves from the diseases while also educating them on how to manage and care for people living with HIV/AIDS.

The highly sophisticated and educated members of the various communities were given the more detailed information, education and communication (IEC) materials focused on the pandemic and how to prevent and

manage it, while the remaining IEC materials were handed out to other members of the community.

Interactive Talk-shop: The session had in attendance, converts from the community outreach, peer educators, NGO community and members of staff. It commenced with selected peer educators from various locations, sharing their experiences on the outreach programme. Below are some highlights of their experiences:

- The Team met an HIV positive lady, named Esther, who shared her experience with stigma and discrimination at her former place of work. Esther had to resign her appointment and seek a new one. She was very pleased to see a corporate entity championing the fight against stigma and discrimination.

Thereafter, was an interactive session led by a representation of Nigeria Business Coalition Against AIDS (NIBUCAA) that encouraged participants to become advocates of change by preventing and mitigating the impact of the pandemic. Peer Educators and guests at the talk-shop were urged to take collective responsibility to ensure universal access in prevention, treatment and support for people living with HIV/AIDS and to preserve their fundamental human rights.

With respect to stigmatization and discrimination, the participants were encouraged to support the government efforts regarding a bill to discourage discrimination in the work place. In conclusion, everyone was urged to support efforts at ensuring access to information, become advocates and champions of gender equality as well as fight harsh laws encouraging discrimination against HIV-positive people.

Advocacy and External Communication: Access Bank has embarked on an aggressive advocacy and external communications campaign on HIV/AIDS, TB and Malaria. Some of the mechanism used are:

- **ATM messages:** Using the Bank's ATM network,

HIV/AIDS awareness messages were deployed from Monday, November 30, 2009 to Friday, December 4, 2009. The ATM broadcast message included a voice over while a page was being displayed on the screen. The Access Bank website is accessed by 1065 people daily.

- **Flash Messages on Group Website:** The messages focused on HIV/AIDS prevention, Voluntary Testing and Counselling (VCT) and stigma and discrimination. This was run for a 5-day period (Monday, November 30 – Friday, December 4, 2009) on the Bank's Group website. The messages were further re-enforced by sending the messages to all employees via e-mail.
- **Brochures:** We have developed brochures on HIV/AIDS with the theme: Take Responsibility Stop AIDS. The brochures highlight HIV prevention, voluntary Counselling and Testing. It also has the list of free VCT centers in Nigeria.
- **T-shirts:** The T-shirt is an awareness tool that encourages the fight against HIV/AIDS. The back of shirt has a list of VCT centers.



This page Community Outreach Programme and Talkshop during the 2009 World AIDS Day





MIRROR THE MASTER:

The appreciation of the Arts expresses values, attitudes and invokes change that transcends boundaries and preconceptions to achieve the human goal of unity and understanding.

Access Bank has actively demonstrated its commitment to the development of the Arts by supporting and creating platforms for the identification, exposure and projection of artistic talents. Consequently, to take the Bank's creative aspiration to greater heights, an art initiative titled **Mirror the Master** was developed.

Mirror the Master is a creative initiative that is aimed at art development by celebrating the works of established Art Masters. The initiative is carried out through a workshop and exhibition based approach. Workshops





facilitate the introduction of the masters and their works to young participants with a view to increasing their appreciation for the arts and stimulating their artistic skills.

For the 2009/2010 edition, the selected Master is **Benedict Enwonwu**. The initiative was held in Osogbo, Benin, Zaria and Enugu with the final exhibition in Lagos, Nigeria.

At the workshops, background information on Ben Enwonwu and his works were presented to participants.

Thereafter, participants were shown how to use various art materials such as a canvas, frames and types of brushes. Participants were also taught how to mix colours i.e. mixing primary colours to get secondary colours, to achieve different paint styles and the control of brushes while painting.

Students were then instructed to create their own art work by making sketches on the canvas and then painting them with colours that appealed to them. At the end of



Above and opposite: Participants at Benin MTM contest locations painting during the contest.

each workshop, zonal exhibitions were held and winners were selected.

450 secondary and primary school students from 39 schools participated in the 1st phase which was held in 4 zones across Nigeria.

Zone 1- Osogbo, Osun State

The 1st phase of the initiative was held in Osogbo, Osun State from October 14 - 16, 2009. Over 120 students from 9 schools participated in the Osogbo Workshop. The workshop commenced with an artistic tour to landmark places such as the Nike Art Workshop and Gallery, the Oba of Osogbo (Ataoja of Osogbo Palace), Chief Jimoh Buraimoh Art Gallery and the Osun Sacred Groove.

At the end of the workshop, art works produced by participants were assessed by the panel of judges which comprised Jimoh Buraimoh, renowned artist, Chief Mrs. Adedoyin Talabi Faniyi (Susan Wenger’s Daughter), Osogbo Sacred Artist and Mr. Oluremi Adedayo, Curator, National Commission for Museums and Monuments.

The 3rd place prize won by Akinrinola Tola, from Gray International School was presented by Chief Mrs. Adedoyin Talabi Faniyi. While 2nd place was given to Folasayo Babatunde from Osogbo Grammar School by Mr. Oluremi Adedayo and 1st place was presented to Oladigbo Oladiran from El-Shaddai Comprehensive School by Jimoh Buraimoh.



Zone 2 – Benin, Edo State

The second phase of the initiative held in Benin City, Edo State. The Workshop had in attendance over 120 students from 8 schools across Benin. The workshop held from October 26 - 28, 2009.

Participants paid a courtesy visit to the Oba of Benin, National Museum Benin and the “Guild of Benin Bronze Casters Heritage Site” while the workshop was held at the Oba Akenzua cultural centre.

The resulting art works were assessed by a panel comprising of Mr. Yakubu Federick, Uniben Artist, Mr El-dragg Okwoju – Artist/Lecturer (University of Benin) and Mr. Mark Ihama – Bronze master crafts man.

Certificates of Excellence were awarded to the following participants for coming first, second and third at the workshop:

	NAME	SCHOOL
THIRD	Deinma imabibo	Negbenebor International School
SECOND	Augustina Obi	Greater Tomorrow School
FIRST	Aiwekhoe Osamagbe	Edo College

Zone 3 - Nsukka, Enugu State

The third phase of the Bank’s art initiative held at Nsukka, Enugu State from January 19 – 21, 2010. The venue for the Enugu arts workshop was relocated from University of Nigeria Nsukka Children Centre to the Central School,









Nsukka due to student unrest, causing a temporary closure of the university. A total of 110 students from 11 schools actively participated in the workshop.

The artworks produced by the participants were assessed and judged by a “3 - man” panel of judges based on such qualities as: beauty, skill, inherent meaning, uniqueness and fulfilled intent. The panel of judges comprised of Professor Mrs G.O. Dike – A senior lecturer at the Department of Library Science UNN and proprietor of the Children’s Centre, Dr Emeka Okpara – an artist and art historian and Ms.Ngozi Omeje – a sculptor and a lecturer at the Arts Department, UNN.

The winners at the Nsukka art workshop were:

	NAME	SCHOOL
THIRD	Ifeanyi Agbo	Township Primary School
SECOND	Oluchukwu Okorie	University Primary School
FIRST	Omeke John Cross	Model Primary School

To reinforce the influence of art and artists on education a

tour was taken around the Ben Enwonwu building in Nsukka. The tour round the building provided a forum for discussion on specific themes, social and cultural issues associated with Enwonwu’s works. Participants also had the opportunity to learn in details the various aspects of ceramic and textile material production.

Zone 4- Zaria, Kaduna State

The fourth edition of Mirror the Masters Art workshop held in Zaria from 27th – 29th January, 2010. The workshop had in attendance a total of 102 students from various schools in Kaduna.

The participants took a tour around Kaduna’s historical and cultural centres including Arewa House and the National Musuem, Kaduna. The art workshop was held at the Drama Village, ABU University.

The works were assessed and judged by Mr. Jerry Buhari, the associate professor of painting, Department of Fine Arts, ABU Zaria, Mr. Mark Ogbe – lecturer in art education, Department of Fine Arts, ABU Zaria and Mr. Lasisi Lamidi – lecturer in sculpture, Department of Fine Arts, ABU Zaria.



The winners of the Zaria edition of Mirror the Masters Art workshop were:

	NAME	SCHOOL
THIRD	Abdulhamid Aminu	Demonstration Secondary School
SECOND	Abdullakim Alkassim	Jama'a Model Primary School
FIRST	Ibrahim Isa	Barewa College

Certificates of excellence and cash prizes were awarded to the above listed winners of Mirror the Masters, Zaria.

Outcome exhibition, Lagos

The Lagos outcome exhibition represents the final phase of the 2009/2010 Mirror the Master arts initiative, bringing together the best art works created by participants across the four zones for viewing at a private gallery in Lagos State. The participants together with their guardians embarked on an art tour to Omenka gallery, which houses arts works created by Ben Enwonwu. The tour was facilitated by Oliver Enwonwu – the director of the Omenka Gallery. The essence of the tour was to acquaint participants with the works of the legendary artist and also learn about his

works, inspiration and achievements.

“Mirror the Master” Outcome Exhibition held at Nike Arts Gallery and textile museum located at Lekki Epe-Expressway Peninsula. The over 120 attendees cut across the art community, Lagos State Ministry of Arts and Culture, representatives of arts centres, Society of Nigerian Artists, NGO's, media, customers, art lovers and collectors. Prominent artists in attendance included Rasheed Gbadamosi, Jimoh Buraimoh, Jerry Buhari, Emeka Okpara, Ken Okoli, Samuel Olagbagi.

The final 12 art works selected from the zones were assessed and judged by a panel of judges comprising of Rasheed Gbadamosi, Ken Okoli, Nike Davis, Oliver Enwonwu and Jimoh Buraimoh.

The overall winner for the 2009 Mirror the Master arts initiative is 13 year old Omeke Johncross, from Model Primary School, Nsukka. He painted the famous Idia Mask, also representing the icon for the arts initiative.

Incidentally, the artwork used as the cover design for the catalogue is Omeke's painting.



GOING GREEN; BEYOND WORDS:

Going Green; Beyond Words is an Access Bank intervention initiative in the focus area of the environment with both an external and internal aspect. The Access Bank tree planting initiative is aimed at fighting climate change by effectively reducing greenhouse gas emissions through planting trees while engendering environmental sustainability.

The tree planting initiative was implemented through an education based approach whereby over 500 students from 16 secondary schools located in Abuja, Abia State and Lagos State were educated on critical environmental issues including; greenhouse gas emissions; the impact of human activities on the environment; and the consequent effects of environmental elements on various communities.

Participants were provided with opportunities and practical ways of promoting a safe and sustainable environment by directly undertaking planting and





nurturing of trees across schools, communities, local governments and society at large. Project toolkits were donated to the various participating schools across the states. The toolkits will be used by participating schools in nurturing the planted trees to ensure their survival.

The Bank has been able to raise awareness on climate change causes, effects, & solutions; inspired students to effectively reduce CO2 emissions personally, within schools, and in their local communities. In this phase, a total of 2800 trees were planted across the three states for the project launch.

The Access Bank tree planting initiative was implemented in partnership with Idea Builders, an NGO engaged in the promotion of environmental friendly activities including but not limited to tree planting activities in various communities within Nigeria.

Access Bank was also able to leverage on the initiative to encourage participation of Lynx Nigeria – an NGO that

works towards national youth empowerment. Lynx Nigeria participated in the tree planting campaign, involving participation of youths across Lagos State.

The Access Bank tree planting campaign also witnessed external participation from critical stakeholders across: Ministry of Environment; Lagos State Ministry of Education; local and international NGOs; Schools Education Boards; State Governments; and School District Offices.







Employee involvement

Employees are at the very heart of our business and help us connect with our stakeholders. Employees are a valuable source of ideas and innovation. With this in mind, we ensure that employees take leadership roles in driving our CSR agenda. By so doing, through the Bank's volunteering scheme, employees implement impactful community projects in line with the Bank's pre-determined focus areas. Project coordinators take full responsibility and ensure that programmes align with the business objectives.

Groups	Project	Partner	Beneficiary(s)	Details	Total Amount Donated (N)
Group Compliance and Internal Control	Adopt -A - School	n/a	Ladipo Primary School	This is a School adoption project that commenced in 2009 and will be implemented over a period of 3 years. The focus is on the upgrade of infrastructural facilities, provision of educational tools and mentoring. So far, the team has renovated the administrative building, provided 5 personal computers and 12 chairs and tables for the kindergarten school and renovated the restrooms.	850,000
Branch Services Group	Mind The Gap Mentoring Project	e-Green	National Youth Service Corps	This is sustainable development project whereby staff mentor fresh graduates (protégés) participating in the National Youth Service Corps to adequately position them for leadership in the community. The protégés in turn become mentors to Junior Secondary School students. A total of 60 hours is to be expended by each mentor over an 8 month period. Currently, each staff has mentored 5 NYSC members and over 360 protégés have participated in the programme.	1,000,000
Global Trade	Support for Orphan and Vulnerable Children (OVC)	Hope Worldwide	Orphan and Vulnerable Children affected by HIV/AIDS	The initiative provides support for orphan and vulnerable children (OVC) and youth at risk given that their caregivers are dead or infected with HIV/AIDS. The programme includes mentoring and educational/health support for children and youth between the ages of 10 – 21. On 21st	1,400,000

November, 2009, the Group participated in a 10km Great Hope Walk (from Maryland to Stadium) for enlightenment and awareness on HIV/AIDS.

Central Processing Centre Group	The Future Of Our Youth; Our Passion	n/a	Herbert Macaulay Senior Girls Grammar School	The programme is for a 3 year period starting from 2009. The project includes establishment of an Endowment Fund; infrastructure upgrade and career & counselling sessions for the students. CPC Group has committed to expend N7.4 million for the successful implementation of the project, over 3 years.	2,105,000
Human Resources Group, Wealth Management, Retail and CCBG Mainland	Combating HIV/AIDS	Positive Action for Treatment Access (PATA)	Children affected by HIV/AIDS	This volunteering initiative displays teamwork across the Bank as 4 various groups are implementing the project in conjunction with relevant stakeholders such as non-governmental organizations, government agencies and the media. The initiative is aimed at supporting global efforts at curbing the spread of HIV/AIDS. These activities include a stage play performed by Theatre@Terraculture to educate a range of stakeholders on HIV/AIDS, launch of e-forum discussion groups for all Access Bank employees on the intranet, support for children living with HIV/AIDS through the sponsorship of a christmas party for them in conjunction with the Nigerian Institute of Medical Research (NIMR) and provision of e-brochure on HIV/AIDS to all Access Bank employees.	2,500,000
Internal Audit	Support the Physically Challenged	None	Atunda-Olu School	The programme includes the provision of physiotherapy equipment such as finger exercisers, pro-nature equipment, re-education boards,	300,000

infrared lamps, hand grips and tables and chairs (for the nursery class) for the physically challenged.

Operational Risk	The Path to Career Success	Change-A-Life Foundation	Army Children Senior & Junior High School	This involves delivering career talks to students of Army Children Senior & Junior High School on the topic <i>"The Path to Career Success"</i> , Donation of motivational books (25 copies) to outstanding students and cash donation of N150,000:00 (One Hundred and Fifty Thousand Naira Only) to Change a Life Foundation in support of their <i>"Keep a Child In School"</i> programme.	209,500
Credit Risk Management	Provision of Borehole	None	Ibeju-Lekki Local Government Area	The initiative seeks to provide potable water for the Ibeju-Lekki Community and reduce the risk of health related issues associated with poor un-hygienic water supply which they currently experience. The community has a population of about 1000 people that are predominantly fishermen.	416,000
Legal and Company Secretariat	Reality Vision	n/a	Pacelli School for the Blind	This initiative is an infrastructure intervention programme that seeks ways of boosting the educational facilities available to blind students between the ages of 11 and 16. This initiative is a unique programme given the fact that the physically challenged, particularly the blind, do not often have the benefit of sufficient education facilities by virtue of the high cost of teaching materials and the scarce nature of these materials. The Group provided a braille machine and other consumables for teaching purposes and also intends to sustain the initiative for 3 years, identifying and tending the needs of the school for the period.	145,000

TQM	A-Word-A-Day	Center for Societal Transformation	Olomu Primary School	This a mentorship programme that combines 3 aspects of community intervention: mentoring, teaching and infrastructure intervention (supply of books and construction of shelves to serve as an ad hoc library).	300,000
Group Treasury	Teachers Reward	n/a	Ebute-Elefun School	This is a 3-year adoption project. Phase 1, 2009 was renovation of the staff room and providing other relevant office equipment such as tables and chairs.	200,000
Northern Branch Services	Adopt -A - School	n/a	Garki Model School	Staff members of Northern Branch Services North undertook this project to improve the standard of education by providing a conducive learning environment for both the pupils and teachers of Garki Model Primary School, Abuja. The school caters for a diverse group of students, including the physically challenged. In order to address this, the Northern Branch Services provided 400 desks for 20 classrooms and 20 teacher's tables and chairs. The Bank will also maintain the furniture for a period of 3 years (2009 – 2011).	2,500,000
CCBG West	Rehabilitation of the Nutrition Clinic at Oni Memorial Hospital	n/a	Oni Memorial Children's Hospital	The team rehabilitated the Oni Memorial Children's hospital. The project involved the re-painting of the walls and ceiling as well as fixing of tiles on the floor of the clinic.	220,000
CCBG Apapa	Project Recovery	n/a	Apapa General Hospital	This is a unique project to help retain and sustain life in people who cannot of their own accord breathe in oxygen, without aid. This will be done through an Oxygen Concentrator Machine donated by the Group.	300,000

Economic Intelligence/Group Market Risk	Preparing Leaders & Grooming Talents	Foundation for Skills Development	Undergraduates & unemployed graduates	The programme tagged "Preparing Leaders & Grooming Talents" is a unique mentoring project to be implemented by staff. This project entails 14 members of staff coordinating and mentoring 50 unemployed graduates & final year students between the ages of 17 and 25 over a period of 2 days.	100,000
CCBG Lagos Central, VI & Ikoyi	Renovation of a School	Sunbo Onitiri & Co, Obodex Nigeria Ltd, Capital Field Investments & Trust Limited, Metalum Ltd and Mr. Mohit Melwani	Herbert Macaulay Junior High School, Ebute-Metta	The team renovated toilets and provided a borehole for the school in order to foster a conducive learning environment.	925,000
Telecoms Group	Adoption of Girls Senior Secondary Grammar School Obalende (a long term project)	n/a	Students and staff of Girls Senior Secondary Grammar School Obalende	The project includes refurbishing of the classrooms, laboratories, staff room, library and rest room. The Group has installed furniture and fittings in the laboratory, fitted 13 chalk boards in the classrooms and supplied 75 2 seater desks and chairs that can seat 150 pupils.	4,100,000
Global Financial Market (GFM)	Schools Project	n/a	* Government College, Maroko Lagos *Akande Dahunsi Memorial High School *Lafiaji High School, Hawley, Lagos	This 3 year project includes career counseling and donation of educational materials to selected secondary schools in Lagos State. The primary purpose is to provide the beneficiaries with adequate reference materials for further studies, and also to engender a reading culture among secondary school pupils in Lagos State. The Group will also sustain the initiative for a period of 3 years.	100,000

▶▶▶ WE ARE PAINTING A BRIGHTER PICTURE ACROSS AFRICA

...AND BEYOND

At Access Bank, we believe acting responsibly is essential for business and societal sustainability. Our Corporate Social Responsibility endeavours continually provide innovative and proactive solutions to economic, social and environmental challenges.

We create sustainable value for our shareholders; promote diversity while ensuring rewarding career opportunities for our employees; consider environmental and social issues in our lending activities.

Through this responsible business approach, Access Bank is touching lives across countries where we operate and helping our host communities paint a bright picture of a sustainable future...for everyone.

A Passion For Excellence

access ▶▶▶

»»» CSR fact sheet

PROJECT TITLE	DESCRIPTION	COST IMPLICATION
EDUCATION AND ENTERPRISE		
1 Fate Foundation Business Plan Competition	In response to the prevailing socio-economic challenge of un-employment and poverty prevalent in the society, Access Bank Plc supported implementation of the FATE Foundation Business Plan Competition. The competition promotes entrepreneurship and also presents a platform for young business owners to showcase their business potential to investors for possible investment opportunities. Winners also receive funding support to kick start their business initiative.	2,100,000.00
2 Ovie Brume Youth Centre Programme	In fulfilling the Bank's strategic objective of providing opportunities for youths to develop their leadership skills, thereby preparing them as agents that will drive positive and sustainable socio-economic growth, Access Bank provided financial support to Ovie Brume Foundation. Ovie Brume Foundation is a non-governmental organization that works with youth, providing them with motivational, developmental and intellectual program activities and resources. This includes computer literacy, mentoring, and counselling amongst others.	4,000,000.00
3 Support for The International Centre for Leadership and Entrepreneur Development (ICLED)	Access Bank Plc provided financial support for training 200 members of the Nigeria Police Force in Lagos and Ogun State. The training was facilitated by International Centre for Leadership and Entrepreneur Development (ICLED) and was aimed at enhancing performance of the Police workforce, by providing participants with skills in solving compelling problems; and learning critical steps in making sound decisions.	500,000.00
4 Donation of IT Equipment to Schools and Vocational Centres	To help improve national computer literacy amongst public secondary school students, Access Bank Plc donated IT equipment to selected public secondary schools and vocational centres across Lagos State. This include: Ajeromi Ifelodun High School; Apapa; Ajimosho Grammar School amongst others.	1,028,600.00
5 Financial support for "Convention on Business Integrity"	Access Bank Plc provided financial support for the Convention On Business Integrity, the funds were utilized to finance its projects and for administration of the organization.	2,500,000.00
6 St. Michael's Catholic Church and Primary School	Access Bank Plc provided funding support for St. Michael's Catholic Church & Primary School.	5,000,000.00

7	Renovation of Hope International School Abakaliki	Access Bank Plc provided funding support for the renovation of Hope International School, Abakaliki.	2,000,000.00
8	Funding support for Mokin School Project	Access Bank Plc made a monetary donation towards the improvement of education delivery system at Ilara-Mokin primary school Ondo State.	2,000,000.00
9	Support for Olaniwun Ajayi and Adunola Ajayi Foundation	Access Bank Plc provided funding support for intellectual research that contributes to knowledge development. The Olaniwun Ajayi and Adunola Ajayi Foundation was the recipient of this.	5,000,000.00

SOCIAL WELFARE

10	Support for Arrow of God Orphanage	<p>Arrows of God is an orphanage centre that caters for the needy, orphans and abandoned children in society. The charity organization has impacted over 150 children since inception and is being run by Rev. D.C. Ogo (retired Lt. Col).</p> <p>Based on identified needs of the home such as locating a permanent site, construction of a school, daily upkeep of the orphanage, providing proper facilities (toilets, kitchen, dining rooms, vehicle, computers, books clothing), and improving the standards of living of the home.</p>	5,000,000.00
11	Support for National Christian Centre, Abuja	Access Bank Plc, provided funding support to facilitate the construction of the National Christian Centre, the primary Christian place of worship located in Abuja.	25,000,000.00

HEALTH

12	Support for Sickle Cell Advocacy and Management Initiative (SAMI) projects	<p>The "Touch a Cell" benefit concert was organized by the Sickle cell Advocacy and Management (SAMI) Initiative. a non-governmental organization with a mission to eliminate the effects of Sickle Cell anaemia Disorder (SCD), and cause a behavioural change in societal reaction to people living with SCD.</p> <p>The Bank provided funding support for SAMI to enable it to meet its objectives of helping people living with SCD.</p>	400,000.00
13	Sponsorship of Ministry of Health Roll Back Malaria, HIV/AIDS Project	Access Bank Plc in its effort to support global efforts towards achieving broad UN goals, provided funding support for the Ministry of Health on its initiative to help combat the double pandemic of Malaria and HIV/AIDS.	3,500,000.00
14	Support for health projects, including International Cancer Centre Abuja	Access Bank Plc provided funding support for the development of the Abuja, international cancer treatment centre (ICCA), committed to providing whole-person cancer treatment in a compassionate and nurturing environment.	150,000,000.00

15 Support for the Nigerian Red Cross Society Health Care Centres.	Access Bank Plc provided funding support for the Nigerian Red Cross Society. The funds are for building health care centres across the country and as such increasing nationwide access to health care.	11,000,000.00
16 HIV/ AIDS - World AIDS Day	In fulfilling the Bank's strategic commitment to strengthen the global effort in the fight against Malaria, HIV and AIDS, Access Bank Plc implemented an awareness/advocacy program to commemorate World AIDS day. Program activities included a interactive talk-shop, community outreach programme and advocacy through our website and ATMs	500,000
ENVIRONMENT		
17 Support for IMO State Environment transformation Programme	Access Bank Plc in its effort to help transform Imo State from waste dump status to a clean and green state donated waste disposal amenities to the state.	2,000,000.00
18 Maintenance of Moscow Road Roundabout Port Harcourt	Access Bank Plc in contributing to global environmental sustainability supported the development of green-spaces along Moscow traffic junction. The initiative is aimed at beautifying and enhancing the appearance of the area. The green-space will contribute significantly to the aesthetic appeal of the area, helping to maintain the psychological health of individuals in the area and also reduce the adverse effect of anthropogenic greenhouse gas emissions.	6,532,000.00
19 Support for Nigerian Conservation Foundation (NCF) environmental symposium	Access Bank Plc provided funding support for the Nigerian Conservation Foundation (NCF) symposium on "Environmental Financing in Nigeria". This is in support of global efforts to address environmental and ecological problems in an era of inadequate funding in Nigeria. Issues deliberated upon at the symposium included: <ul style="list-style-type: none"> • the roles of bank's and financial markets in protecting the environment • Taxation and Corporate Social Responsibility. • Best practice in environmental financing. • Legal aspects of financing environmental projects. 	2,000,000.00
20 Support for Lagos State Tree Planting Initiative	Access Bank Plc supported efforts by Lagos State Government to promote environmental sustainability, through its annual tree planting campaign. The extent of the Bank's participation involves provision of branded shirts and face caps for the initiative.	2,030,000.00

21 Support for Agriculture Census	Access Bank Plc made a monetary contribution to the Ministry of Agriculture and Water Resources for executing its agricultural census. The census was to provide agricultural data. It also examined land use and ownership, production practices, income and expenditures amongst other things.	10,000,000.00
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SPORT

22 Renovation of Minna Squash Court	Access Bank Plc provided funding support for the renovation of Minna Squash court located in Niger state. The Bank facilitated renovation of the building; installation of a glass back wall; fitting of a floating floor and coating of the floor, thereby upgrading it to an acceptable standard.	2,625,000.00
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MEMBERSHIPS

23 Nigerian Business Coalition Against AIDS (NIBUCCA)	Access Bank Plc is a corporate member of the Nigerian Business Coalition Against AIDS, an NGO that helps strengthen organizations effort at combating HIV/AIDS.	700,000.00
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24 London Benchmarking Group (LBG)	Access Bank Plc became a member of the London Benchmarking Group (LBG) an institution that helps other organizations manage, measure and report on their community investment activities in the community.	790,000.00
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25 United Nations Environment Programme Finance Initiative (UNEP FI)	Access Bank joined the UNEP FI, an environmental organization that promotes international cooperation in the field of the environment. They also provide appropriate policies that facilitate integration of environmental sustainability into core business operations.	490,710.00
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26 United Nations Principles for Responsible Investment (UNPRI)	The Bank became the first Nigerian member of the United Nations Principles for Responsible Investment (UN PRI). The PRI provides opportunities for organizations to closely align investment practices with the goals of the United Nations and to work together with other investors to address basic Environmental, Social and Corporate Governance issues, thereby contributing to a more stable and inclusive global economy.	1,490,000.00
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27 Global Reporting Initiative (GRI)	Access Bank became an organisational stakeholder of the GRI. The GRI guidelines are adopted for the Bank's CSR report.	1,201,900.00
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28 Equator Principles (EP)	Access Bank became an Equator Principles Financial Institution. The principles were adopted for the effective management of environmental and social issues in project finance. This is part of the Bank's effort to engender environmental sustainability.	339,806.24
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29 United Nations Global Compact (UNGC)	Access Bank joined the United Nations Global Compact.	745,110.00
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30 Business in The Community (BiTC) ARTS	Business in The Community is a unique movement of member companies committed to mobilising business for good through their Corporate Social Responsibility (CSR).	1,432,600.00
ARTS		
31 Support for Bonhams Arts Exhibition	The Bank sponsored the Bonhams Art exhibition, an inaugural auction of African contemporary art, held in London.	5,305,255.00
32 Art House Contemporary Art Exhibition and Auction	Access Bank funded the exhibition and auction where the works of contemporary masters of African arts were showcased. 93 works by Nigerian artists and 4 Ghanians were up for sale during the auction.	5,000,000.00
TOTAL		262,210,981.24
FLAGSHIP TOTAL		60,705,657.00
GRAND TOTAL		322,916,638.24

»» Assurance statement

Access Bank has commissioned Corporate Citizenship to provide external assurance and a commentary solely on its Corporate Social Responsibility Report 2009.

The scope of our assurance

The assurance provides the reader with an independent, external assessment of the report and, in particular, with how it corresponds with the AA1000 standard. It is intended for the general reader and for more specialist audiences who have a professional interest in Access Bank's responsibility and sustainability performance.

Access Bank has chosen to use the new iteration of the AA1000 assurance standard AA1000AS (2008). Our assurance is a Type 1 assurance as defined by the standard, in that it evaluates the nature and extent of adherence to the AA1000AS principles of inclusivity, materiality and responsiveness and assures the behaviour of the organisation as reported here. Our assurance used disclosed information as its starting point and then investigated the underlying systems, processes and sustainability performance information to arrive at its conclusions.

The level of assurance offered is moderate as defined by AA1000AS (2008). That is to say, our work obtained sufficient evidence to support the statement that the risk of our conclusion being in error is reduced.

Access Bank is entirely and solely responsible for the contents of the report, Corporate Citizenship for its assurance.

A detailed note of our assurance methodology appears at the end of this statement.

Opinion and conclusions

In our opinion the Access Bank CSR Report reflects the principles of AA1000 (2008): inclusivity, materiality and responsiveness.

In our commentary we review the report against each of

these principles separately. We also provide feedback that can help the company and its stakeholders identify where Access Bank's reporting can be strengthened in future.

Commentary

This is Access Bank's second full CSR Report. The company has made significant progress in its approach to CSR over the last two years. There is clear evidence of support, a defined structure in place to manage CSR and a commitment to build a sustainable business by embedding responsible behaviours across its core operations.

The report gives an account of Access Bank's strengths and successes, such as its community investment programme and steps taken to improve the levels of compliance across the organisation in the last year. It also touches on other more difficult issues, such as the effect that the global economic situation has had on the bank. Going forward, as Access Bank increases the focus of its reporting towards performance, we believe it important that reporting provides a balanced picture of highlights and challenges in an open and transparent way.

It is evident that Access Bank wants to keep improving its CSR performance. The company's decision to adhere to external initiatives and best practice standards, such as the Equator Principles and United Nations Global Compact, will help drive further progress.

Specific comments in relation to the three principles of AA1000 are as follows:

Inclusivity: *Does the organisation accept a responsibility to those on whom it has an impact? Does it involve stakeholders in developing a strategic approach to corporate responsibility and sustainability?*

Access Bank identifies and defines its key stakeholders in the report. The Bank accepts its responsibility to these groups, outlining how it engages with them and the issues that have been raised. Access Bank demonstrates

how the interests of stakeholders have played a role in the development of its CSR strategy. These activities indicate that the Bank is acting in line with the AA1000 principle of inclusivity.

However we believe there is scope for Access Bank to further improve the reporting and management of its stakeholder engagement activities. Disclosure of feedback gathered specifically on Access Bank's CSR programme and performance can help shape its strategy going forward and drive on-going improvement. At present stakeholder voices, both from external and internal audiences, should be given more prominence in future reports.

Materiality: *What are the issues that really matter to the organisation's sustainability performance ("material issues")? How does the organisation identify these issues?*

Access Bank uses the Global Reporting Initiative (GRI) guidelines to determine its material issues, prioritising different risks and opportunities. This year's report includes more information, for example on responsible products and services, as a result. However the explicit link between stakeholder dialogue and the materiality assessment process could be made clearer in future reports.

Environmental performance is a fundamental aspect of any business' responsibilities, especially with climate change top of the global agenda. Access Bank has increased its disclosure, addressing operational issues such as energy use, fuel consumption from generators, water, waste and transport. This could be enhanced by also reporting on recycling and renewable energy, as well as the environmental implications of products and services.

As a financial services company, the main contribution that Access Bank makes to society is its economic impact. The inclusion of a cash value added statement helpfully shows the distribution of value amongst the bank's stakeholders. In addition to these direct impacts, we

believe Access Bank could usefully report on its indirect economic impacts; for example, where and to whom funds are lent and invested, and the impact that has on job creation and wealth generation.

Responsiveness: *Does the organisation respond to stakeholder issues that affect performance through its actions and communications?*

The report contains evidence that Access Bank uses feedback to shape its approach. For example, the actions taken in response to the employee survey findings are detailed. This shows that Access Bank acts in line with the AA1000 principle of responsiveness.

Going forward, the Bank plans to respond further to stakeholder expectations, for example around sustainable finance. Future reports should highlight how policies and practices are developed in response.

Looking forward

Access Bank gives a good account of its approach to CSR, with a retrospective account of past CSR performance. We believe it important that reports are also used to articulate where the company is heading on responsible practices and long term sustainability. Setting specific targets, for example, allows businesses to show future direction and priorities. Quantified key performance indicators with specific targets across the full range of issues allow stakeholders to track progress. We believe Access Bank should build on and extend the commitments published here, as this will help it drive performance in the years ahead.

Corporate Citizenship

London

26 July 2010

Methodological notes

The assurance work was commissioned in February 2010 and was completed on 26 July 2010. Detailed records were kept of meetings, assurance visits and

correspondence relating to the inclusivity, materiality and responsiveness of the report, as well as to technical matters relating to the accuracy and presentation of data. A team of three, led by a director, undertook the assurance and commentary process. An associate director acted as adviser to the group. The team has a variety of professional and technical competencies and experience. For further information please refer to our website www.corporate-citizenship.com.

Our external assurance and commentary process for Access Bank's CSR report has involved, but not been limited to, the following elements:

- Understanding Access Bank and its value chain, its own culture and the broader social contexts in which it operates; its approach to and understanding of corporate responsibility; how it identifies issues material to its operations.
- Benchmarking against peers, competitors, best practice and internationally recognised standards to identify the basis on which to judge Access Bank's performance.
- Analysis of Access Bank's stakeholder engagement activity, including findings from the employee survey.
- Review of national and international published sources of information about the views and opinions of external stakeholders.
- Examination of the report at set stages in its development and testing of the assertions throughout, drawing from evidence and supporting documentation, reporting mechanisms, frameworks and processes.
- Examination of management and reporting systems, notably for community investment.
- Site visit to Access Bank's head office in Lagos.
- Interviews with twelve senior managers including the Group Managing Director/Chief Executive Officer, Customer Ombudsman, Group Head of General Resource Management and Head of Corporate Social Responsibility.

Our work did not extend to a complete audit of the

report's contents. We have not been responsible for the preparation of Access Bank's CSR Report nor in devising the internal management and reporting systems that yielded the data contained therein.

The opinions expressed in this external assurance statement and commentary are intended to extend understanding of Access Bank's non-financial performance and should not be used or relied upon to form any judgments, or take any decisions, of a financial nature.

Corporate Citizenship is a leading assesor of corporate responsibility reports. The company is a member of AccountAbility (Institute for Social and Ethical AccountAbility).

We have provided report assurance for Access Bank in 2009 and 2010. In addition to our work on assurance, Access Bank is a member of the LBG (www.lbg-online.net), an evaluation framework for corporate community involvement which we manage on behalf of its members and adherents.



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Economic Performance Indicators

Aspect: Economic Performance

EC1	Direct economic value generated and distributed, including revenues, operating costs, employee compensation, donations and other community investments, retained earnings, and payments to capital providers and governments.	Statement of Value Added	50
EC2	Financial implications and other risks and opportunities for the organization's activities due to climate change.	Climate change; CSR Fact Sheet	72-77; 104-108
EC3	Coverage of the organization's defined benefit plan obligations.	Pension plan	51
EC4	Significant financial assistance received from government.	Not applicable	

Aspect: Market Presence

EC5	Range of ratios of standard entry level wage compared to local minimum wage at significant locations of operation		
EC6	Policy, practices, and proportion of spending on locally-based suppliers at significant locations of operation.	Supply Chain	67-68
EC7	Procedures for local hiring and proportion of senior management hired from the local		

community at significant locations of operation.

Environmental

Environmental: Disclosure on Management Approach

EN	DISCLOSURE ON MANAGEMENT APPROACH	Environmental Priorities, Responsible products and service, corruption	74-76; 41-46; 61-64
	Environmental Aspects:		
	• Energy;		61-64
	• Water;		
	• Emissions, Effluents, and Waste;		

Environmental Performance Indicator

Aspect: Energy

EN3	Direct energy consumption by primary energy source.	Environmental Priorities	74-76
EN4	Indirect energy consumption by primary source.	Environmental Priorities	74-76
EN5	Energy saved due to conservation and efficiency improvements.	Environmental Priorities	74-76
EN6	Initiatives to provide energy-efficient or renewable energy-based products and services, and reductions in energy requirements as a result of these initiatives.	Environmental Priorities	74-76
EN7	Initiatives to reduce indirect energy consumption and reductions achieved.	Environmental Priorities	74-76

Aspect: Water

EN8	Total water withdrawal by source.	Environmental Priorities	74-76
EN9	Water sources significantly affected by withdrawal of water.	Environmental Priorities	74-76
EN10	Percentage and total volume of water recycled and reused.	Environmental Priorities	74-76

Aspect: Emissions, Effluents, and Waste

EN16	Total direct and indirect greenhouse gas emissions by weight.	Environmental Priorities	74-76
EN17	Other relevant indirect greenhouse gas emissions by weight.	Environmental Priorities	74-76
EN18	Initiatives to reduce greenhouse gas emissions and reductions achieved.	Environmental Priorities	74-76
EN19	Emissions of ozone-depleting substances by weight.	Environmental Priorities	74-76

Social

Labor Practices and Decent Work

Labor Practices and Decent Work: Disclosure on Management Approach

LA	DISCLOSURE ON MANAGEMENT APPROACH	Social Performance	52-58
	Provide a concise disclosure on the following Management Approach items with reference to		

the Labor Aspects listed below. Employment;

- Labor/Management Relations;
- Occupational Health and Safety;
- Training and Education; and
- Diversity and Equal Opportunity.

Labor Practices and Decent Work Performance Indicators

Aspect: Employment

LA1	Total workforce by employment type, employment contract, and region.	Employment	52-53
LA2	Total number and rate of employee turnover by age group, gender, and region.	Total Staff Attrition	53
LA3	Benefits provided to full-time employees that are not provided to temporary or part-time employees, by major operations.	Benefits to full time employees	53

Aspect: Occupational Health and Safety

Information Links

LA6	Percentage of total workforce represented in formal joint management-worker health and safety committees that help monitor and advise on occupational health and safety programs.	Occupational Health and Safety	56-57
LA8	Education, training, counseling, prevention, and risk-control programs in place to assist workforce members, their families, or community members regarding serious diseases.	Occupational Health and Safety	56-57

Aspect: Training and Education

Information Links

LA10	Average hours of training per year per employee by employee category.	Employment	52-53
LA11	Programs for skills management and lifelong learning that support the continued employability of employees and assist them in managing career endings.	Employment	52-53

Aspect: Diversity and Equal Opportunity

Information Links

LA13	Composition of governance bodies and breakdown of employees per category according to gender, age group, minority group membership, and other indicators of diversity.	Employment	52-53
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Human Rights

Human Rights: Disclosure on Management Approach Information Links

HR	DISCLOSURE ON MANAGEMENT APPROACH Provide a concise disclosure on the following Management Approach items with reference to the Human Rights Aspects listed below. • Abolition of Child Labor;	Human Rights Performance	59
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- Prevention of Forced and Compulsory Labor;
- Complaints and Grievance Practices;

Human Rights Performance Indicators

Aspect: Investment and Procurement Practices

HR1	Percentage and total number of significant investment agreements that include human rights clauses or that have undergone human rights screening.	Supply Chain	67-68
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Aspect: Child Labor

HR6	Operations identified as having significant risk for incidents of child labor, and measures taken to contribute to the elimination of child labor.	Supply Chain	67-68
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Aspect: Forced and Compulsory Labor

HR7	Operations identified as having significant risk for incidents of forced or compulsory labor, and measures taken to contribute to the elimination of forced or compulsory labor.	Supply Chain	67-68
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Society

Society: Disclosure on Management Approach

SO	DISCLOSURE ON MANAGEMENT APPROACH Provide a concise disclosure on the following Management Approach items with reference to the Society Aspects:	Community Development Projects, Corruption	81-108; 61-64
	<ul style="list-style-type: none"> • Community; • Corruption; • Anti-Competitive Behavior; and • Compliance. 		

Society Performance Indicators

Aspect: Community

SO1	Nature, scope, and effectiveness of any programs and practices that assess and manage the impacts of operations on communities, including entering, operating, and exiting.	Community Development Projects	81-108
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Aspect: Corruption

Information Links

SO2	Percentage and total number of business units analyzed for risks related to corruption.		
SO3	Percentage of employees trained in organization's anti-corruption policies and procedures.	Training, Learning and Development	61;57
SO4	Actions taken in response to incidents of corruption.		

Aspect: Public Policy

S05 Public policy positions and participation in public policy development and lobbying.

Aspect: Anti-Competitive Behavior

S07 Total number of legal actions for anti-competitive behavior, anti-trust, and monopoly practices and their outcomes. Anti-competitive Behaviour 62

Aspect: Compliance

S08 Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with laws and regulations (e.g. human rights). Compliance

Product Responsibility**Product Responsibility: Disclosure on Management Approach**

PR DISCLOSURE ON MANAGEMENT APPROACH 39-40;
Provide a concise disclosure on the following 66
Management Approach items with reference
to the Product Responsibility Aspects:
• Product and Service Labeling;
• Marketing Communications;
• Customer Privacy; and
• Compliance.

Product Responsibility Performance Indicators**Aspect: Product and Service Labeling**

PR5 Practices related to customer satisfaction, including results of surveys measuring customer satisfaction. Customer Satisfaction and Relations 39-40

Aspect: Marketing Communications

PR6 Programs for adherence to laws, standards, and voluntary codes related to marketing communications, including advertising, promotion, and sponsorship. Marketing Communications 66

»»» Contact Information

This Report has been prepared in line with the Global Reporting Initiative (GRI) Sustainability Guidelines to the GRI Application level B+.

As a way of adding value to our CSR Report and the reporting process, while disclosing and being accountable to our internal and external stakeholders on an on-going basis, Access Bank Plc welcomes feedback from all our stakeholders in respect of the content of this report and additional information of interest to the stakeholders assumed to be material.

The information received would be functional in mapping out other areas for disclosure hence providing a balanced and reasonable representation of the sustainability performance of Access Bank Plc.

We are interested in hearing what our stakeholders think about our sustainability performance and reporting efforts – and how we can improve both. Please email your thoughts and suggestions to:

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The Access Bank Corporate Social Responsibility Report is published annually. Our last Report was published in June 2009. A PDF version of this report is available at www.accessbankplc.com

»»» ACHIEVING FINANCIAL STRENGTH BY ADHERING TO SOCIALLY RESPONSIBLE GOALS



“Access Bank is demonstrating that Africans can take responsibility and contribute significantly towards making Africa a better place for all.”

As financial institutions emerge from the effects of the global financial crisis, Access Bank Plc stands out as a model of financial stability and social responsibility. The Bank's financial safety indicators are of high quality with capital adequacy ratio of 25.6% as at 30th June 2010. The Bank also recorded a June 30, 2010 half year audited Profit Before Tax of N9.81 billion and recently distributed an interim dividend of 20 kobo per share to its shareholders.

Access Bank is headquartered in Nigeria and has banking subsidiaries in 9 African countries and the United Kingdom. Across all these countries, the Bank operates a knowledge and purpose driven business philosophy with a strong commitment to the economic and social wellbeing of the countries that host its operations.

The Bank takes pride in its ability to add value to clients, leveraging its unique value proposition to provide innovative and proactive solutions across entire economic value chains. In deploying products and services, Access Bank adheres to responsible business practices and readily commits resources to social investments in fulfillment of the Bank's corporate social responsibility mandate.

In the past 2 years, the global financial crisis has curtailed lending in several countries around the world. This year, Access Bank stands out as one financial institution that is driving the origination of sustainable lending

activities in the real sector. The Bank continues to pioneer the introduction of new products and technologies to enable companies and entrepreneurs access the finance required to make their aspirations a reality. Access Bank is demonstrating that Africans can take responsibility and contribute significantly towards making Africa a better place for all.

With an ongoing commitment to appropriate 1% of annual profits in support of charitable investments, the Bank actively seeks to improve the affairs of host communities. It is noteworthy that despite the difficult operating environment in 2009, Access Bank did not curtail its commitments to social investments.

This year, Access Bank has taken a significant partnership step with the Global Fund by contributing the sum of US\$1 million to fund Global Fund's programmes in Africa.

The understanding and commitment of the Bank's 4500 employees, over 500,000 shareholders, millions of customers and several partners across the world, have been critical to Access Bank's progress and success. But for the larger community, there is still much to do and a long way to go. Together, we must do what is required to make Africa a better place for all.

For more information about our sustainable business practices, visit www.accessbankplc.com.

»»» RESPONSIBLE BUSINESS PRACTICES

Access Bank's responsible banking philosophy promotes economic development and sustainable social and environmental causes across a range of stakeholders.



EMPLOYEE RELATIONS

Access Bank creates an engaging and inclusive work environment whilst promoting diversity and ensuring rewarding career opportunities for all employees. We institute policies and initiatives aimed at engaging and retaining our employees, ranging from health and safety programmes to market competitive salaries and world-class training.

The Access Bank School of Banking Excellence is reputed as the industry standard for employee capacity building. We also pioneered the HIV/AIDS Workplace Policy Programme across all our subsidiaries. This Policy is implemented through a robust peer educator scheme.



GENDER FINANCE

Access Bank in partnership with the International Finance Corporation (IFC) pioneered the introduction of specialised gender empowerment programme (GEM) to provide specialised products to empower female entrepreneurs. Access Bank's GEM has recorded over 3000 women beneficiaries. GEM was developed in recognition of the need to provide support for women development as an economic tool necessary for gender transformation. The Bank therefore created a platform that allows enterprising women grow and develop their economic and entrepreneurial skills.

GEM offers technical and financial support to female entrepreneurs through advisory services, access to skilled consultants, trainings / seminars / workshops, tailor-made financial services and credit facilities. Currently, Access Bank has thus far disbursed loans to women owned businesses.



TREATING CUSTOMERS FAIRLY

Access Bank is customer-centric and this is demonstrated through the implementation of its standards and policies for treating customers fairly. This enables us build and maintain sustainable, long-term relationships with customers. The Bank led the Nigerian financial sector in instituting the Ombudsman and has in place various mechanisms for ensuring world-class customer service.



ENVIRONMENT

Motivated by the current global environmental challenges and developments, Access Bank supports global sustainability efforts at making the environment more conducive for individuals and business operations. The Bank launched its green campaign "Going Green; Beyond Words" to fight climate change by effectively reducing Greenhouse Gas Emissions through various initiatives including tree planting. We are planting 200,000 trees, which will overtime, offset 192,000 tonnes of carbon emissions.

Access Bank is the first Nigerian signatory to the Equator Principles and we leverage our role as a financier to promote responsible environmental stewardship and socially responsible development.



ECONOMIC DEVELOPMENT & ADVOCACY

Access Bank establishes linkages with local and international governmental, non-governmental and private organisations of repute to develop innovative business approaches to societal development.

The Bank adds long term value to society by providing cutting-edge thought leadership. Through this platform, we have influenced and shaped the adoption of International Financial Reporting Standards (IFRS); pushed for the introduction of sophisticated products in financial management; helped the entire sub-Saharan region establish best practices in Compliance in line with the Financial Action Task Force (FATF) expectations and our Economic Intelligence Reports has 150,000 subscribers globally. Access Bank serves on several public and private Boards, Bodies and Think-Tanks.

»»» COMMUNITY INVESTMENT

At Access Bank, we are changing lives and impacting communities, through our social investments. The Bank focuses on the Arts, Education, Environment, Health and Sports. In so doing, we engage with relevant stakeholders to address community issues while also empowering our employees to contribute ideas, skills and resources for societal development, through our Employee Volunteering scheme.



PARTNERSHIPS

At Access Bank, we appreciate that in a globalised, interconnected world, there is an opportunity for all sectors - profit-making, non-profits and governments to partner and tackle the world's greatest challenges. The Bank's partnerships with local and international organisations and governments is maximised for sustainable development, that is, development that meets the needs of the present without compromising the ability of future generations to meet their own needs.



SPONSORSHIPS AND DONATIONS

At Access Bank, we are changing lives and impacting communities through our investments in our communities of operation by way of sponsorship and donations to worthy initiatives. The Bank focuses on societal development in the areas of Arts, Education, Environment, Health and Sports.



EMPLOYEE VOLUNTEERING

At Access Bank, our employees are empowered to contribute ideas, skills and resources to address social issues. Currently, about 90% of our 4,500 employees are actively engaged in various high impact and sustainable community development initiatives across Africa. So far, over 25,000 beneficiaries have been impacted through our employee volunteers including about 15,000 students in educational institutions; 100 orphans and vulnerable children affected by HIV/AIDS; 1,500 Secondary School students educated on HIV/AIDS; 4,000 hospital patients; 2,000 Community members gaining access to portable water and about 3,500 orphans, old people, prison inmates and motherless children.

Through our Adopt-a-School project, our employees have renovated various educational institutions such as Ladipo Primary School and Herbert Macaulay Senior Girls Grammar School; our Mentorship and Skills Sharing initiative has enhanced the National Youth Service Corp scheme while also benefiting Secondary School students and teachers. Our employees have developed stage plays to educate stakeholders on HIV/AIDS and also provided communities such as Ibeju Lekki with borehole facilities to provide them with portable water. Oni Memorial Hospital and Apapa General Hospital are beneficiaries of our Hospital intervention projects.

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