

R.T. BRISCOE (NIGERIA) PLC

Ethics Policy for Staff

1.0 Introduction

The Management and Board of R.T. Briscoe (Nigeria) PLC are committed to the highest standards of ethics and integrity. In line with this commitment and in furtherance to the on-going CHANGE effort, the company encourages employees to demonstrate ethical conduct and compliance as personal responsibility. Every staff member will be accountable for his or her conduct. All employees, temporary staff and other relevant stakeholders are expected to conduct themselves in accordance with the Code of Ethics.

Ethics are the basic concepts and fundamental principles of right human conduct. This principles and concepts are universal and they all rest on the principles of the five pillars of character.

The Code of ethics is designed to promote common values and define the behavior and performance expected of all members of staff.

2.0 The policy

This policy is to communicate to all members of staff an expectation and requirement of ethical conduct and compliance with all applicable policies, rules and regulations.

R.T. Briscoe (Nigeria) PLC operates according to the following Code of Ethics:

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| Official Duties | We will carry out our official duties for the benefit of the company and our customers and shareholders. We will not use our office and title for unofficial purposes. We will adhere to the rules, regulations and policies that apply to us. |
| Conflict of Interest | We will avoid conflict of interest between our official obligations and our personal interests. We will not allow our official duties to be compromised by personal interests, and we will not use the company's resources for personal, gain nor will we exploit our employees for private benefits. Specific guidelines regarding conflict of interest are as follow: |

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| | <ol style="list-style-type: none"> 1. As a general rule, RTB prohibits employees and their families from transacting business with the company (e.g. a staff' spouse may not serve as a contractor for RTB); 2. Accepting additional employment may create a conflict if the other employer is a competitor or a contractor to RTB; 3. Paid service should only be undertaken if it does not create a conflict of interest and if the necessary approval has been obtained. |
| Disclosure | We will disclose improper conduct within the organization to those in authority. |
| Gifts and Favours | We will not accept gifts and favours that may influence how we carry out our official duties. Gifts and favours will not be received by our family members. Gifts from suppliers, contractors, staff and other parties must not exceed ₦50,000.00 in market value. |
| Confidentiality | We will maintain confidentiality of all sensitive information. In the course of our duties, we may have access to information concerning employees, and other sensitive data. We will not disclose such sensitive information unless our official duties require it. |
| Values | We will treat everyone with respect and dignity. RTB will not tolerate harassment and discrimination. We will be honest at all times. All our statements must be truthful and honest. We will strive in all actions to demonstrate the company's values of innovation, proactive, professionalism, resilience, trust and teamwork |
| Impartiality | We will respect the personal views of our fellow employees and not convict members of staff publicly on controversial matters. |
| Working Relations | We will ensure a harmonious working relation based on mutual respect. Managers and supervisors are responsible for guiding and motivating their staff and promoting their development. |
| Communication | It is naturally incumbent on managers and supervisors to communicate effectively with their staff and share information with them. Staff members have reciprocal responsibility to provide all pertinent facts and information to their supervisors and abide by and defend any decisions taken, even when these do not agree with their personal views. The official language remains English. |
| Staff Identity | We will ensure staffs are properly identified by ensuring that the company's identity card is worn by staff while in the office premises. |

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| Loitering | We will not allow loitering of staff and unauthorized visitors with premises. Hawking and selling of wares are totally prohibited. We will attend to private visitors only at lunch hour. |
| Decorum | We will maintain etiquette in all transactions, avoid bickering and noise making. |
| Attendance | We will be punctual to work, attending to our official duties with promptness and urgency. |
| Company facilities | We will not use the staff clinic as relaxation spot. Abuse of the internet facility and company assets are disallowed. Eating food, excluding snacks in the office is prohibited. Lunch hour will be strictly adhered to and all eating to be done in the staff canteen or kitchenettes provided on each floor |
| Safety and Security | We will ensure adequate and safe working conditions as well as security of lives and properties of staff |
| Personal conduct | We will not intrude upon private life of staff. Moreover, staff must bear in mind that their conduct and activities outside the workplace, even if unrelated to official duties, can compromise the image and the interest of the company. This can also result from the conduct of members of the staff's household and it is the responsibility of the staff to make sure that their households are aware of this. |
| Process Procedures / | Human Resources will introduce the Ethics Policy to employees as part of Induction for new staff. As a condition of employment, each employee must sign the <i>Ethics Policy Acknowledgement Form</i> that states awareness of, and agreement to work in accordance with, the expectation and policy requirement. |

3.0 Responsibilities

The responsibilities each party has in connection with the *Ethics Policy* are:

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| All General Managers & the HR team | Responsible for oversight of all matters related to the implementation and adherence to the Ethics Policy. |
| Human Resource Manager | Responsible for ensuring employees awareness of the expectations and policy requirements through the introduction of <i>Ethics Policy Acknowledgement Form</i> at the time of recruitment. |
| Internal Auditor | Responsible for the company's internal audit function and compliance of implementation and adherence to the Ethics Policy. |
| All Employees | Responsible for adhering to the Administrative policies of R.T. Briscoe (Nigeria) PLC. |

