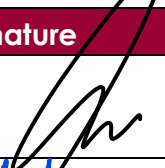

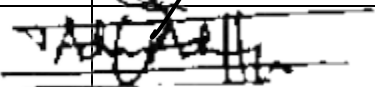


TALENT ACQUISITION POLICY

Reviews & Approvals

This Employee Talent Acquisition Policy document has been reviewed and approved by the undersigned:

Designation	Signature	Date
Chairman, Signal Alliance Technology Holding		17/7/2022
Group Executive Director		14th July 2022
Group Head, Human Resources		13th July 2022

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1. INTRODUCTION

1.1 Policy Statement

Signal Alliance Technology Holding ("SATH" or 'the Company') is committed to the highest standards of Talent Acquisition practice. The Company aims to encourage and support personal career development for both internal and external applicants through the provision of transparent selection processes. The Company promotes equal opportunities and seeks to ensure consistent practices which are documented in this Policy.

1.2 Objective

The objective of this policy therefore is to provide a set of principles to ensure that Talent Acquisition is managed consistently, professionally, fairly and transparently. Also, this Policy will ensure that objective decision making is promoted in the process of Talent Acquisition in order to meet the business needs for the Company and personal development of its employees. Finally, the policy aims to ensure that the integrity of SATH is upheld.

1.3 Scope

This policy covers all aspects of internal and external Talent Acquisition processes within the Company, including all cadres and forms of employment available in the Company and its Subsidiaries. Essentially, this Policy shall govern all Talent Acquisition processes in the Holding Company, as well as all subsidiaries of the Holding Company.

2. Related Documents

- a. Exit Management Policy
- b. Employee Referral Policy
- c. Learning & Development Policy
- d. Confirmation Policy

3. DEFINITIONS

- 3.1. Blue Collar Cadre:** In the context of our policy, this refers to non-graduate employment and all categories of drivers and cleaners (if applicable) in the Company. This cadre of staff may be SATH employees or Contingent staff.
- 3.2. Contract Cadre:** This refers to employees who have a short-term employment with SATH ranging from one (1) month to twelve (12) months.
- 3.3. Professional Cadre:** This refers to full time employees whose work is knowledge intensive, non-routine, with required attainment of academic qualifications/certifications.
- 3.4. Contingent Cadre:** A contingent worker is a temporary worker supplied by a 3rd party where the contract of employment is between the 3rd party and the individual. The worker is paid by the 3rd party agency.
- 3.5. Expatriate Employee:** This refers to an employee who is not on a local / normal employment contract. The period of residency could be short term or long term. A Nigerian could be on an expatriate contract; vice-versa a non-Nigerian could

be on a local contract. The qualifying factor for the term expatriate is based on the type of employment contract.

- 3.6. Hiring Manager:** This is the person the candidates would be reporting to should they be offered a position at SATH.
- 3.7. Talent & Learning Advisor:** This refers to the HR Professional responsible for recruitment or learning or talent management.
- 3.8. Talent Acquisition** is defined as the process of filling in a vacancy and carrying out hiring activities where there is a vacancy in which sourcing and hiring activities are required.

4. GENERAL PRINCIPLES

- 4.1. Talent Acquisition shall be based upon a genuine business need.
- 4.2. The Talent Acquisition process and interview stages relevant to the respective grade level in the Company shall be followed.
- 4.3. All Talent hired must go through the Talent Acquisition process and shall only be hired based on merit.
- 4.4. As much as possible, the company will strive to ensure gender and geographical diversity during recruitment.
- 4.5. In a bid to ensure a disciplined recruitment in the Company, any department or subsidiary that requires a role to be filled (whether new or replacement), must fill an employee requisition form through the ERP and secure approval from the top line of authority within the business before such recruitment can be treated by the HR department.
- 4.6. All cadres of employees in the Company, shall without exception, be recruited through the Human Resources Department after all the necessary approvals have been obtained.
- 4.7. Applicant information must be treated as confidential and details must not be forwarded to external parties without the express permission of the Applicant.
- 4.8. Talent Advisors and Hiring Managers must abide by data protection legislation and treat applicant data with the utmost integrity.
- 4.9. **Where a Hiring Manager fails to respond to additional information required by the HR department in respect of a recruitment and the timeline extends beyond 3 working days after the initial timeline of such request has elapsed, the HR department may cancel the hiring requisition for lack of interest from the requestor. Such additional information includes but not limited to: candidates 'shortlisting; review or feedback on job description, interview schedule time, etc. The Hiring Manager may restart the hiring requisition process.**

- 4.10. All candidates must have completed their National Youth Service (NYSC) or have exception letters from NYSC before they can be employed on a full-time basis at SATH or any of its subsidiaries. Exceptions will be granted to Expatriates or such other persons whose technical skills are required for statutory or partnership compliance reasons.

5 EXECUTIVE TALENT ACQUISITION AND DUAL EMPLOYMENT

5.1 Executive Talent Acquisition

Executive level Talent Acquisition will be handled by the Group Head, Human Resources, in conjunction with the Chairman, SATH and/or Group Executive Director, or GM of any of the Company's subsidiary, through external agencies if applicable. The Company may use preferred executive recruitment partners for this Talent Acquisition process if possible.

5.2 Dual Employment

A full-time employee is expected to devote total concentration to assigned SATH duties. Employees are not permitted to accept employment or compensation for services from a competitor; nor are they expected to run private businesses that are in competition with the organisation while in full-time employment with SATH.

6 RELATIONSHIPS

6.1 Former Employees

There is no restriction on employing former employees, subject to the following:

- The former employee must have spent a minimum duration of 2 (two) years while in the Company;
- A satisfactory previous work record based on performance appraisals, strict adherence to the code of conduct, values and behaviours while working with SATH or any of the subsidiary companies;
- Leaver status which must be voluntary resignation (please refer to the Exit Policy);
- The individual must be the best applicant for the position based on objective criteria and fair selection process. If an employee was in a technical position before exit and such employee intends to return, his/her technical experience outside the Company must be far above his/her previous competency while in the Company.

6.2 Relatives and Partners of Employees

This policy demonstrates our attitude towards nepotism and employing people who are related either by blood or marriage. The Company recognizes that encouraging the employment of relatives may have both positive and negative impacts on productivity. In most cases, the negative impact may result into perceived bias on selection credibility, which in turn can fuel accusations of nepotism and favoritism. For these reasons, SATH will use its best endeavours to consider all eligible applicants for a role without undue preference for any referral from employee relatives. This policy aims to minimize these risks and respond to the key questions below:

What is nepotism in the workplace?

Favouritism or conflict of interest may occur when managers are involved in a process with their relatives or friends.

Examples are when:

- Managers decide which team member to promote.
 - Managers complete performance reviews for their relative.
 - Managers discipline their relative.
 - Managers are part of a hiring committee/interviewers for their relative.
- a. Under this Policy, the term “relatives” refers to any person who has a relation by blood; this however excludes relatives within the fourth degree of consanguinity with an existing employee. Parents, stepparents, grandparents, in-laws, spouses or domestic partners, children, step-children, adopted children, grandchildren, siblings, uncles, aunts, cousins, nieces and nephews are all categorized as “relatives”.
- b. The Company aims to keep its hiring process free of discrimination and **may** hire a person who is related to an employee in the second degree (second cousins by blood or marriage to one of our current employees if it is considered that the candidate is the best fit for the position (This is exclusive of roles in Finance, HR and Marketing)).
- c. **In the event that two existing employees decide to get married and both work in the same department, one of the persons involved shall be required to either transfer to another department or leave the employment of the Company if there’s no vacancy in any department or within the Group.** If the latter is the case, the decision of who remains an employee will be taken by the Management. The intending couple must notify HR at least 3 months before the marriage celebration takes place. Exit from the Company by either of the employees shall take place before the last workday preceding the marriage celebration. This provision shall not apply where the intending couple are in separate departments.
- d. Where any employment transfer will cause any married couple to be in the same department, then the highlighted provisions of **6.2c** with respect to the exit of either of the married couple from the Company shall be applicable.
- e. In the event an employee fraudulently caused the recruitment of a relation to the Company and this is discovered, the employment of both employees shall be terminated on the grounds of gross misconduct. Employees shall declare any relationship with a relative to the HR as soon as this is known. This is applicable for employees that are not involved in recruitment. Where an employee is part of the interviewers and fails to disclose relationship with a candidate to HR, such act shall attract disciplinary action to be determined by Management/the Board.
- f. If two employees who are in a reporting relationship become relatives by marriage (not spouses) in the course of their employment, one of the two must be transferred to another department or subsidiary. The affected employees may be given the opportunity to decide which of them will be transferred. Failure to make a decision within the timeline given by the HR, will cause the Management to make a final decision. The Management is expected to make a decision within one month of being notified. Transfers will be discrimination-free. For example, the person being transferred must not always be the woman or the female employee.

7 ATTRACTION

- a. Sourcing channels must not discriminate applicants, either directly or indirectly. For example, if an advertisement is to be used, it should be open to all regardless of race, religion, nationality, and gender.
- b. Adverts must adhere to legislative requirements (e.g. discrimination legislation). A clearly defined job profile must be created for any role being recruited for. This should include a description of the key responsibilities, as well as the key requirements including experience, relevant qualifications, competencies/behaviours and skills (general and/or professional. The Marketing and Corporate Communications department shall be responsible for all internal and external adverts.
- c. The Company may engage the services of Talent Acquisition agencies for the purpose of meeting certain recruitment timelines. However, such engagement with Talent Acquisition agencies must be for Senior roles (i.e. recruitment of Graduate Trainees, Interns and other junior roles are not to be managed by recruitment agencies). Whenever a vacancy exists, the internal employees must first be considered and where suitable talent cannot be obtained internally, an external selection process will be considered.
- d. Hiring Managers and HODs must not contact or contract with Talent Acquisition suppliers (e.g. Talent Acquisition agencies, head-hunters, mapping firms, job board vendors or assessment suppliers etc.). The Company will only utilise suppliers who are on the preferred supplier list unless exceptional circumstances apply.
- e. Where third parties are engaged to assist with selection, the third party shall be fully briefed by the HR department on SATH's Talent Acquisition policy and is expected to abide by the principles therein.
- f. Where social media is used to attract and engage potential candidates, employees should:
 - o Remember their duty of confidentiality to SATH and not put any information on networking sites such as details of projects they have been/are working on, financial information, advertising plans, details of external partners or disputes with third parties, internal communications or anything that may be considered confidential business information.
 - o Post comments that are honest and accurate.
 - o Refer questions relating to SATH's activities, structure, financial situation, performance, product availability to the Marketing & Corporate Communications department, or the Human Resources department.

8 ADVERTISING INTERNAL VACANCIES

- a. Advertising internal vacancies is based on the principles of fairness and transparency and is complementary to other talent management practices (such as succession planning and performance management processes) in finding the best resource for a job role.
- b. All positions advertised must be posted within one week, regardless of level.

- c. To apply for any internal vacancy, employees must take the following criteria into consideration:
- Time in current job: It is best practice that applicants have been in their current role for a minimum of two years.
 - Skills and competencies required by the position.
 - Individual Development Plan (employee's career wishes, company view, career plan).
 - Applicants must let his/her direct Line Manager know about his/her intention to apply for a position before doing so.
- d. All interviewed internal applicants must receive either verbal or written feedback concerning the outcome of their application from the HR department within one week of the end of the process.

9 SELECTION AND ASSESSMENT PRINCIPLES (GENERAL RECRUITMENT)

- i. All applicants must be treated fairly and assessed objectively.
- ii. Selection decisions should be made based on the experience, qualifications, competencies, behaviours and skills required for successful performance in the role.
- iii. For entry level positions, a minimum of Second Class Lower or Lower Credit is required for eligibility. There will an exception where the candidate has high experience and certifications required for the role.
- iv. Where an entry level applicant's class of degree is not indicated on the certificate, such applicant will be required to produce an academic transcript. In this instance, the Talent & Learning advisor shall verify the grading structure of the institution with respect to the applicant's overall score as shown on the academic transcript. Applicants in this category must obtain an equivalent score which must NOT be less than **55%**.
- v. Applicants for entry level/graduate trainee positions must not be older than **28 years** as at the date of consideration, except in an exemptional case, where such applicant possesses compelling technology skills.
- vi. For experienced positions, the applicant's years of experience shall suffice in place of class of degree. The minimum years of experience for an experienced position must not be lower than three **(3) years** of post NYSC experience in similar role.

9.1 SELECTION AND ASSESSMENT GUIDELINES

9.1.1 Selection Guidelines

- a. Structured interviews should be used to support all hiring decisions.
- b. For all entry level positions, all applicants are required to write the SATH aptitude test and obtain the required pass mark before they are eligible for the next stage – an interview.

- c. Blue Collar/Contract: Selection process will be by a panel interview. The panel should comprise the Hiring Manager, HR representative and 1 or 2 other qualified managers depending on the work level of the role.
- d. All applications received before or on the closing date of an advertised vacancy must be considered. Late applications may be considered at the discretion of the Talent Advisor and hiring manager. However, the acceptance of any late applications must not in any way be a disadvantage to those applicants who have already applied earlier.
- a. Thorough and accurate notes should be taken by the interviewers during the selection process to justify and verify any decisions made. Virtual interviews may also be recorded for accurate play back.
- b. All applicants should be given feedback within 14 (fourteen) days after any interview stage.
- c. Hiring Managers must provide the Talent Advisor with feedback on all interviewed applicants immediately after the interview and a decision must be taken by all interviewers.
- d. Documentation from any selection event should be kept for not more than 6 months and may thereafter be destroyed or unless otherwise required for future engagements.
- e. No verbal offers can be made. All offers shall be made in writing. Such offers shall be deemed to have lapsed if the Company does not receive an acceptance from such prospective employee within two (2) working days of receipt of the offer letter. Management may at its discretion extend the period of the offer.

f. Interview Stages for SATH & Subsidiary Companies:

Grade Level	Placement	Aptitude Test	1 st Stage Interview	2 nd Stage
Junior Exec	Non-graduates; Interns; Graduate trainees (0-2 years experience)	Yes	Line Manager, HOD/Head of Subsidiary Business & HR	Depending on line of reporting, HR advises Chairman, SATH or Group Executive Director on the final selection and obtains concurrence on offer decision.
Senior Exec	Supervisors; Assistant Manager; Deputy Manager	No	Line Manager, HOD/Head of Subsidiary Business & HR	<u>Final Interview + Offer decision will be made by:</u> <ul style="list-style-type: none"> ▪ Chairman, SATH - if role reports into Operating Company ▪ Group Executive Director - if role

				reports into Shared Services
Management	*Senior Manager; Manager	No	Line Manager, HOD/Head of Subsidiary Business & HR	<u>Final Interview + Offer</u> decision will be made by: <ul style="list-style-type: none"> Chairman, SATH - if role reports into Operating Company Group Executive Director - if role reports into Shared Services
Senior Management	GM, DGM, AGM, Head of department	No	Chairman, GED and HR	Board Member(s) - if role has strategic reporting relationship to the Board of Directors

*For Manager/Senior Manager placement, the Chairman and GED may have a joint and final interview session (regardless of where the role reports into), provided the role has a P&L responsibility and/or if the applicant in question is a potential member of the management/leadership team.

10 KPI TABLE

KPI	Metric	Responsible
HOD raises job requisition form on the system with details of job requirements and uploaded job description		HOD
Job requisition is approved by Chairman SATH/GED/or GM of subsidiary - depending on the user department/reporting line.	3 working days	Senior Leadership
HR places adverts to run for specific period	2 weeks	Talent Advisor
Shortlist of suitable candidates	3 working days	Line Manager/Talent Advisor
First stage interviews	5 working days	Line Manager/HOD/Group Head, HR
Second Stage interviews	5 working days	Chairman, SATH, Group Executive Director
Pre-employment medicals	1 week	HR
Offer letters	3 working days after medical	HR
Resumption notice	1 calendar month (Subjective)	Applicant

Barring any unforeseen event, a recruitment process should not be more than **60 calendar days** from when the advert is placed up to when the offer is extended to the new hire.

11 REFERENCES

- a. No new employee may be confirmed until satisfactory reference have been obtained and the internal performance review must be satisfactory. The referees must not be relatives of the employee or current employees of SATH. Please refer to Confirmation Policy.
- b. Prospective new joiners must submit details of 2 suitable guarantors with their valid ID cards prior to joining the Company.
- c. The Company reserves the right to withdraw or terminate the employment of a new hire, if there is valid evidence relating to misrepresentation of facts/or academic records on the part of the new joiner.

12 MEDICAL EXAMINATION

- a. All new appointments shall be offered subject to a satisfactory medical examination arranged by the Company. The Company shall be responsible for the cost of all pre-employment medical tests.

SATH operates a 'no discrimination' policy on HIV /AIDs. Except where otherwise stated, employment discrimination shall not be made on the basis of HIV/AIDs. The employee with such HIV case must be careful in their relationship to avoid transmission. However, where the medical report shows that the potential new joiner has a highly or extreme case of contagious/viral disease that may endanger the health of other employees if hired, the Company shall reserve the right to take a decision on the withdrawer of offer.

- b. All medical information gathered during the Talent Acquisition process will be treated as confidential.

13 INDUCTION AND ORIENTATION

Induction and orientation programmes shall be conducted by the Human Resources Department, in conjunction with the other departments.

13.1 Pre-Boarding

- An initial offer is extended to the successful candidate with two days validity (2 working days); after which it shall be closed.
- Upon acceptance of offer, an onboarding shall be planned for the new employee
- The on-boarding program shall be fully implemented to ensure the new employee experience is memorable.
- All relevant documentation for filing must be done by the prospective new joiner prior to resumption.

13.2 On-Boarding

The objective of the on-boarding exercise is to create a 'wow' factor that will inspire and energize new joiners, create a passion for work and instil a sense of belonging.

Upon resumption, new employees shall go through the compulsory induction sessions involving all departments as well as their departmental onboarding. All induction sessions prescribed by SATH both virtually and face-to-face must be concluded before confirmation. Induction sessions are mandatory and should never be postponed except if there are circumstances beyond the control of the new employee. The Talent Advisor must drive the process and ensure completion. The employee shall be required to do a review of his/her learnings after the induction program.

14 GRADUATE TRAINEE PROGRAM (INTERNSHIP)

SATH has over the past years supported education by offering Internship opportunities to graduates. The Company aims to achieve the following benefits via the internship program:

- a. Create awareness about SATH Operations; raising our image as an Employer of Choice among students, thereby supporting our Graduate Talent Acquisition Drive.
- b. Train and develop young and smart individuals to take up key positions in the Company
- c. Provide a succession for critical roles through investment in key talent.
- d. Have a cost-effective way to recruit and evaluate potential employees.
- e. Boost our attractiveness as an Employer of Choice within the technology space in Nigeria.

14.1 What we want to Achieve (Objectives)

We would like to effectively exploit the opportunity to advance, communicate and successfully leverage on the SATH Employer brand as a key input into our Talent Strategy. To achieve this, we will continuously provide opportunities to young graduates by providing intentional learning platforms that will help accelerate their career development.

The SATH's Graduate Trainee (Internship) program is targeted at fresh graduates with no more than 2 years' work experience from accredited Nigerian and Non-Nigerian Universities with a view to building a talent pool for SATH's future leaders. Master's degree holders are also accepted into the program.

We offer a one-year Graduate Trainees scheme with:

- a. Real responsibilities that will include rotational functional assignments/tasks.
- b. Technology exposure
- c. Mentorship and formal learning
- d. Exposure to formal business etiquette and other soft skill trainings
- e. Leadership & team experience (social skills)
- f. Competitive pay package.

14.2 General Principles

- **The program shall run for a duration of one year and there shall be no extension.**
- **Where an applicant served with the Company during the one year NYSC period, the NYSC period shall be recognized as the internship period and such individual shall be**

confirmed and converted into full time staff after the first year of NYSC, subject to satisfactory performance.

- **If an applicant has completed NYSC before applying for the internship program, such applicant shall be required to undergo a one year internship period with the Company and shall be confirmed and converted into full time staff upon completion of one year internship, subject to satisfactory performance**
- For clauses on termination of contract by the intern before the expiration of one year internship, please refer to **SATH Internship Agreement document**
- The Trainees are bound by the Policies and Processes of the Company, including the execution of a contractual bond.
- A Learning plan must be developed by the department prior to resumption of the Trainees – this is a requirement for internship requisition by Heads of departments
- Successful trainees who performed excellently well during the internship shall be converted and confirmed to full time employees. The conversion allows the trainee to be eligible for all benefits that are available to confirmed staff of their levels.
- Trainees shall not be entitled to pension during the one year internship, but are eligible to be enrolled under the approved HMO plan by the Company.
- At the end of the one year internship, the trainees shall complete a self-review on their performances and achievements. These shall be reviewed and assessed by Line Manager with the concurrence of the HOD.
- Where performance is not satisfactory after the first year or at any review period within the one-year period, the intern's employment shall be terminated.
- The names and details of Trainees eligible for conversion shall be reviewed by Group Head, HR and recommendation shall be made to the management with respect to confirmation or termination.

14.3. Selection Criteria:

- A minimum of a second class lower or its equivalent from a recognized university/polytechnic within or out of Nigeria. Exception is where the candidate has experience and relevant certifications.
- Not more than 28 years old as at the time of application. Exception is where the candidate has experience and relevant certifications.
- Strong academic track record, but not overtly academic.
- Strong communication (speaking and writing) and analytical skills.
- Assessment against SATH's Values and Behaviours and General Skills, as well as Departmental profile.
- Candidates should be commercially and technologically aware, driven and energetic.
- Extracurricular activities and experiences outside the academic world which display the following:
 - ✓ Well-roundedness and varied exposure / maturity.
 - ✓ Connection to desired career path.
 - ✓ Global mindset and external focus.

14.4. Selection Process

- Submission of online application by prospective applicants
- Review and shortlist of qualified applicants by the HR team
- Aptitude testing - online
- Virtual/face to face rounds of interviews, subject to passing the online aptitude test
- Medical test
- Offer
- Complete pre-onboarding documentation process

14.5. The Internship Experience

- Induction program
- Assignment of a 'buddy', who will be responsible for the seamless integration and development of the Trainee.
- Communication of opportunities available during the program
- Completion of certification trainings and exams where applicable
- Monthly/Quarterly performance review and feedback
- Job assignments and varied project experiences
- Yearly performance reviews and assessments.

14.6. Completion

- Self-reviews on performance by the Trainee
- Line Manager's reviews, ratings, and comments
- HR's recommendation to confirm employment to full time or otherwise
- If performance is satisfactory, HR issues an offer to confirm employment
- If performance is unsatisfactory, HR advises the Trainee on termination and exit process.

15. Other Forms of Internship (Short Term/Industrial Attachment)

Short term or Industrial Attachment will only apply in Signal Alliance where the referral is from a Customer of Signal Alliance with considerable business opportunities.

- *Postgraduates*: MBA or Post graduate students in selected Universities or Business Schools.
- *Pre- National Service Corps Graduates*: Recent graduates awaiting the NYSC program. We will review such application and decide on placement.
- *Professional Internships*: Semi to experienced candidates who are required to go through an internship by recognised professional associations.

15.1. Selection Process (Short Term Internship Placement)

- All applications shall be processed through the Talent Acquisition process.
- The placement period should be between 3 – 4 months, with a maximum of 6 months for all categories of short-term placement, with the exception of diploma interns (OND/HND/Technical College) and NYSC who have a mandatory 1-year internship.
- Monthly allowances will be determined by HR and the business depending on competitive market rates and budget affordability.

15.2. Policy Enforcement and Control

The Overall responsibility for the enforcement of compliance with this Talent Acquisition Policy guidelines shall reside with the Human Resources department. The Group Head, Human Resources or any of the assigned HR Business Partner shall drive compliance with the guidelines and will serve as the enforcement secretariat for any deviance to the guidelines.

This policy document will be revised periodically as the need arises or as the business environment dictates. The responsibility for reviewing these guidelines and updating as necessary shall reside with the Human Resources department.

ⁱ The first prohibited degree of consanguinity is a parent-child relationship, while a second degree is a sibling relationship. The third degree is an uncle/aunt with a niece/nephew while fourth degree is between first cousins