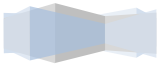


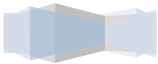


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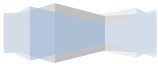
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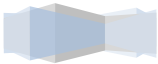
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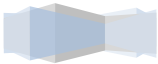
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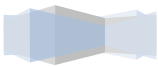
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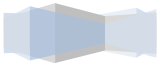
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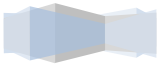
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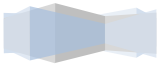
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DISCIPLINARY POLICY



1. POLICY OVERVIEW

This policy aims to guide Heckerbella Limited Employees on the standards of conduct, rules & regulations as well as the roles, responsibilities & procedures for dealing with breaches and non-compliance. Heckerbella Limited employees are expected to abide by all company's policies as well as the laws of the country.

2. SCOPE

This policy applies to all employees of Heckerbella Limited. The policy covers aspects required by labour legislations within Nigeria and is also based on principles derived from best practices.

3. PURPOSE

This policy aims to ensure the following:

- 3.1 Protection of the Company's Core Values and culture.
- 3.2 Consistent, objective and equitable handling of disciplinary cases.
- 3.3 Compliance with the principles of fairness, equity, and natural justice.
- 3.4 Provision of a system for disciplinary action consistent with the principles of employee relations practices.
- 3.5 Strengthening the company's internal control mechanism; and
- 3.6 Prompt investigation and timely resolution of disciplinary cases against employees.

4. POLICY STATEMENTS

- 4.1 Heckerbella Limited expects all employees to provide its customers with professional, customer-driven and quality assured service.
- 4.2 Compliance with policies, systems & procedures is intended to support the delivery of excellent service to customers and all other stakeholders.
- 4.3 Violation of any work rule, policy and procedure may result in disciplinary action, up to and including dismissal from employment.
- 4.4 Disciplinary sanctions will be lawful, fair and uniformly applied to all employees.



4.5 Heckerbella Limited is highly committed to the practice of progressive and corrective discipline; the company reserves the right to take whatever disciplinary action it deems appropriate under critical circumstances within the confines of the law.

4.6 Heckerbella Limited may only resort to disciplinary sanctions against an employee after the alleged misconduct has been investigated and the employee found to have committed the infractions alleged against him or her.

5. POLICY GUIDELINES

5.1 Principles

At all stages in Heckerbella Limited disciplinary procedure, employees will be:

- 5.1.1** Informed of the nature of the issue(s) of concern or case against them.
- 5.1.2** Given a chance to explain before any decision is taken.
- 5.1.3** Given reasonable notice of any formal meeting or hearing.
- 5.1.4** Notified of the outcome of any formal meeting or hearing in writing.
- 5.1.5** Given a right to appeal against any formal disciplinary action.
- 5.1.6** Would be protected under the circumstances from abuse of sanctions and miscarriage of justice.
- 5.1.7** Are required to be familiar with the contents of this policy document as ignorance of any of its provisions will not be accepted as a justifiable excuse in cases of violation.

5.2 Standards of Conduct

All employees have a contractual responsibility to be aware of and conform to Heckerbella Limited's values, rules, policies, and procedures. Employees are expected to maintain high standards of conduct both at work and outside of work. The following examples of misconduct are intended to help employees understand the standards required by Heckerbella Limited. These lists of examples are illustrative and not exhaustive.

- 5.2.1** The deliberate provision of false or misleading information.
- 5.2.2** Unauthorized absence from work.



- 5.2.3 Failure to comply with sickness absence procedures and Absence Management.
- 5.2.4 Falsification of official accounts or documents e.g. travel sheets, expense claims.
- 5.2.5 Incapacity at work, because of alcohol or non-prescribed drugs.
- 5.2.6 Physical violence, indecent behaviour, action, or language that is likely to offend.
- 5.2.7 Harassment, bullying or victimization of others, including racial, religious, or sexual intimidation or prejudice of other employees or members of the public.
- 5.2.8 Disruption of others by unruly or disorderly behaviour.
- 5.2.9 Discourteous or improper treatment of others, e.g. the public, colleagues, customers or business partners.
- 5.2.10 Acceptance of bribes or involvement in similar corrupt practices.
- 5.2.11 Lack of integrity may damage public confidence in the Company.
- 5.2.12 Unauthorized employment; e.g. engaging in unauthorized employment during hours when contracted to work for Heckerbella Limited or engaging during off-duty hours in employment considered detrimental to the interests of the Company.
- 5.2.13 Use of Company time/property/equipment for personal reasons without permission.
- 5.2.14 Theft of, misuse of, damage to or neglect of property or equipment.
- 5.2.15 Disregard for the health and safety of others, including reckless driving or operation of vehicles, equipment, and smoking in prohibited areas.
- 5.2.16 Engaging in activities or conduct that places an individual, e.g. a service user, at risk.
- 5.2.17 Disclosure of confidential information.
- 5.2.18 Depending upon the circumstances and seriousness of the case, the above examples of misconduct may be regarded as gross misconduct.

5.3 *Gross Misconduct*

Gross misconduct is regarded as a fundamental breach of contract that makes it impossible for Heckerbella Limited to continue with the contract of employment with the employee. Where an employee is dismissed for gross misconduct, the dismissal is normally summary, i.e. without

notice. An allegation of gross misconduct is extremely serious and is not made lightly. Examples of acts that may constitute gross misconduct include but not all exhaustive.

- 5.3.1 Negligence that causes unacceptable loss, damage or injury.
- 5.3.2 Serious violation of company health and safety rules.
- 5.3.3 Unauthorized absence from work.
- 5.3.4 Physical violence or intimidation.
- 5.3.5 Deliberate and serious damage to the company's property.
- 5.3.6 Theft, fraud, corruption and deliberate falsification of records.
- 5.3.7 Submission of false medical certificate(s) or any other falsified documentation.
- 5.3.8 Breach of the compliance & Ethics Code.
- 5.3.9 Fighting or illegal possession of dangerous weapons within the company premises.
- 5.3.10 Suppression of financial documents/ records.
- 5.3.11 Integrity Issues.
- 5.3.12 Assaults and harassment of a Sexual nature or intimidation of a subordinate or sexual relationship with another Employee under circumstances where the independence or freedom of the other party cannot be guaranteed.

5.4 *Procedures*

5.4.1 Informal Procedure

5.4.1.1 It is part of the normal supervisory process that managers bring to the attention of the Employees the standards required and the consequences for any failure to meet those standards.

5.4.1.2 Cases of minor misconduct, (e.g. recurrent lateness) should be dealt with by the Employee's Line Manager or Head of Department informally and without delay. The manager must speak to the employees in private and should encourage them to conduct themselves following the required standards.



5.4.1.3 The purpose of this discussion is to ensure that the Employee understands the nature of the concerns, expectations of improvements in conduct within a specified time frame and the nature of any support available.

5.4.1.4 It is advisable to confirm the outcomes of any discussions in writing to the Employee. The Line Manager should retain any note of these informal discussions or meetings.

5.4.1.5 Following a satisfactory outcome to the use of the informal procedure, the matter will be considered resolved.

5.4.1.6 However, where an issue has been discussed with an employee informally without resolution and the problem persists, with no improvements in conduct and further information becomes available during discussions that make the matter sufficiently serious, the formal procedure should be initiated.

5.4.2 Formal Procedure

5.4.2.1 Where the informal process has not led to improved conduct, or where the alleged misconduct is of such seriousness that the Line Manager considers informal action to be inappropriate, formal action will be initiated.

5.4.2.2 An investigation of the facts will be conducted to determine whether there is a disciplinary case to answer.

5.4.2.3 This investigation will be conducted by a constituted Investigation Committee.

5.4.2.4 Where an investigation indicates that there may have been an act of misconduct, the employee will be required to provide a response in writing to the allegations, which will be considered by the Investigation Committee that must include the Line Manager.

5.4.2.5 If the Committee finds the answer satisfactory, then it may either discharge the employee of the allegations or throw the complaint out, thereby closing the issue, but where the committee considers that the answers provided are not satisfactory, it shall invite the employee to attend a formal disciplinary hearing at which he/she shall be allowed to respond and state his/her case.

6

5.4.3 Investigation

5.4.3.1 Before a disciplinary hearing is convened there will be an investigation into the circumstances of the alleged misconduct. The purpose of the investigation is to establish

the nature of the allegations, gather evidence to enable a decision to be taken on whether there is a disciplinary case to answer and consider if the matter should proceed to a formal hearing.

5.4.3.2 The employee will be informed promptly of any allegation and that an investigation to establish the facts will be undertaken. The investigation must be concluded as soon as reasonably possible whilst allowing enough time to interview relevant parties. Employees must be kept informed if there is any unexpected delay in the process.

5.4.3.3 The employee's Line Manager may appoint a third party not immediately involved in the case to investigate the facts of the situation. A member of the HR team will assist in ensuring that the matters are handled fairly, reasonably and in compliance with this policy.

5.4.3.4 If there is no disagreement concerning the facts of the case because the employee admits misconduct, an investigation may not be necessary before a disciplinary hearing is arranged. However, in cases where misconduct is not admitted or if there are conflicting views or evidence, further investigation will usually be appropriate before a decision is taken to proceed to a formal hearing.

5.4.3.5 The outcomes of an investigation may be:

5.4.3.5.1 There is no case to answer and therefore no disciplinary action is taken.

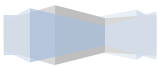
5.4.3.5.2 The matter is dealt with informally, if appropriate with support and or training to resolve the matter.

5.4.3.5.3 The recommendation that there is a disciplinary case to answer and a disciplinary hearing should be arranged.

6. DISCIPLINARY SANCTIONS

6.1 Verbal Warning

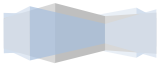
6.1.1 A verbal warning is a piece of verbal advice by the employee's Line Manager that his/her behaviour is unacceptable and that a repeat of such misconduct within the next three (3) months will lead to further disciplinary action, probably a written warning. Verbal warning issued must be documented and filed for three (3) months in the employees' personnel record folder.



- 6.1.2 It creates an opportunity for the immediate Line Manager to schedule a meeting with an employee to bring his/her attention to the existing performance, conduct or attendance issue.
- 6.1.3 The Line Manager should discuss with the employee the nature of the violation of company policies and procedures.
- 6.1.4 The Line Manager is expected to clearly describe expectations and steps the employee must take to improve performance or resolve the problem.
- 6.1.5 The Line Manager will prepare written documentation of the discussion and the corrective measures. The employee will be asked to sign this document to demonstrate his or her understanding of the issues and the corrective action.

6.2 *Written Warning*

- 6.2.1 A written warning is given by the employee's Line Manager when a verbal warning has already been given and similar misconduct occurs again within six (6) months; or where the misconduct is more serious and justifies more than a verbal warning, even though it occurs for the first time.
- 6.2.2 The written warning involves more formal documentation of the performance, conducts or issues, and consequences.
- 6.2.3 The Line Manager and Departmental Head will meet with the employee to review any additional incidents or information about the performance, conducts, or issues as well as any prior relevant corrective action plans and consequences for the employee of his or her continued failure to meet performance or conduct expectations.
- 6.2.4 A formal performance improvement plan (PIP) requiring the employee's immediate and sustained corrective action will be issued.
- 6.2.5 A warning outlining that the employee may be subject to additional discipline up to and including termination if immediate and sustained corrective action is not taken.
- 6.2.6 A written warning remains valid for six (6) months where after it should be removed from the employee's personnel record folder. If similar misconduct occurs again within that period, a final written warning may be given.



6.3 ***Final Written Warning***

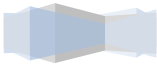
- 6.3.1 A final written warning is issued to an employee when a written warning has already been given and related misconduct occurs again within nine (9) months of the written warning or where the misconduct is of a serious nature that justifies more than a written warning, even though it occurs for the first time.
- 6.3.2 A final written warning remains valid for nine (9) months where it shall be removed from the employee's personnel record folder. If related misconduct occurs within the nine (9) months period, it could result in the dismissal of the employee.

6.4 ***Impact of Written or Final Written Warning on an Employee***

- 6.4.1 **Internal Transfers:** (applying for another position within the Organization) – the employee with a written or final written warning will not be eligible to apply for vacancies during the period of his/her sanction.
- 6.4.2 **Annual Increase:** Employees on a final warning are not eligible for an annual increase. Employees on a written warning are not automatically eligible for an annual increase but at the Management discretion and in consultation with HR, an increase for an employee who has been on a Disciplinary Warning may be considered provided they have significantly met and sustained performance expectations within a reasonable period of three (3) months or more.
- 6.4.3 **Promotion:** Discipline issues related to a current warning (a written or final written warning within the last nine (9) months may affect employee promotion for the year under review.

6.5 ***Suspension***

- 6.5.1 The length of a suspension typically depends on the time needed to investigate.
- 6.5.2 Where applicable, employees are prohibited from the work site to prevent tampering of evidence, witness intimidation and future harm to co-workers.
- 6.5.3 At the discretion of Heckerbella Limited Management and Disciplinary Hearing Committee, depending on the seriousness of the infraction, an employee may be suspended without pay as a form of sanction.



6.6 *Dismissal*

- 6.6.1 The last and most serious step in the disciplinary procedure is a recommendation for Dismissal.
- 6.6.2 Dismissal from Heckerbella Limited may result where an employee commits misconduct within twelve (12) months of receiving a final written warning or in the case of gross misconduct.
- 6.6.3 If an investigation indicates that an act of further or gross misconduct may have occurred, the employee will be required to attend a formal disciplinary hearing. Employees' acts of misconduct may lead to termination of the contract.
- 6.6.4 Dismissal does not require notice to the employee and only wages for the days worked up to the time of dismissal are paid. The reason for the dismissal is often stated clearly on the letter of dismissal.

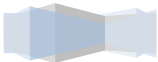
6.7 *Termination*

- 6.7.1 An employee's contract may be terminated without prior notice or through a disciplinary hearing process. DC's recommendation to terminate employment must be approved by the HR Manager and Departmental Head of the employee.
- 6.7.2 Final approval may be required from the Managing Director.

7. *DISCIPLINARY HEARING*

Guideline

- A Disciplinary Committee may be convened where the outcome of an investigation recommends disciplinary hearing to HR necessitating initiation of a disciplinary proceeding or if a Line Manager becomes aware of misconduct and refers such to the HR for appropriate action.
 - Where an employee notifies HR of suspected misconduct, HR may be required to set up a committee to investigate or request for a detailed report of the incident from the employee.
 - Upon receipt of the investigation report, HR would accordingly refer the matter to the Disciplinary Hearing Committee for considerations where the report shows sample evidence against the Employee involved.
-



- HR may also institute a disciplinary proceeding based on the policy breach it has investigated and which the HR Manager considers appropriate for considerations by the Disciplinary Committee.
- HR may place the affected employee on suspension where the employee's continued stay could obstruct the proper investigation, or the business could be at risk due to the continued stay of the employee.
- An employee who is to appear before a disciplinary committee shall be given a minimum of forty-eight (48) hours' notice of such disciplinary hearing. If the employee fails and/or refuses to appear (without justification) at the hearing on two (2) consecutive occasions, after confirmation that he/she received the notices of the hearing, the disciplinary hearing shall proceed to deliberate on the matter without the employee and take a decision based on the facts before it.

Composition of Investigation Committee

- The investigation committee shall consist of representatives selected from the different departments of the Company based on the nature of the issue.
- Members of the Investigation Committee must be from the level of Manager and above.
- Composition of Disciplinary Committee
- The Disciplinary Committee shall consist of four (4) members and must not be below Manager Grade, one of whom shall chair the proceeding, members will be;

HR Manager

- Legal Services representative (when necessary)
- Head of the department other than the department of the employee involved.
- Senior Manager
- Managing Director (where a senior management employee is involved)
- Any other co-opted member whose contribution or expertise will be helpful to the proceedings e.g. Finance in the case of a financial infraction which it has investigated.



APPEAL

Appeals against warnings, sanctions, or action less than dismissal

- The employee has the right to appeal against a decision to issue a warning or sanction, less than dismissal, under this procedure. Any appeal should be sent to the HR Manager within five (5) working days of the employee receiving the written decision. The appeal must state the grounds for appeal.
- The appeal will be heard by a manager that is senior to the employee's Line Manager who has made the decision to issue a sanction and who has had no prior involvement in the case. HR will facilitate the process.
- The appeal hearing will be a review of the decision to issue a sanction under the disciplinary procedure. The person conducting and hearing the appeal may substitute a different sanction from that appealed against, or confirm the sanction appealed against; however, it is not intended that any substituted sanction would be more severe than the original sanction appealed against.
- The decision may be given verbally at the appeal hearing and will in any event be conveyed or confirmed in writing within five (5) working days of the hearing.
- The decision following the appeal shall be final and there will be no further internal right of appeal.

Appeals against Dismissal / Termination of Employment

- The employee has the right to appeal against a decision to terminate his/her employment under this policy. Any appeal should be sent to the HR Manager within five (5) working days of the employee receiving the written decision to dismiss. The appeal must state the grounds for appeal.
 - The HR Manager on review of the appeal if considered justified following the terms of reference stated hereunder may constitute and convene the Appeal Hearing.
 - The HR Department may advise the employee of the date, time and venue of the appeal hearing where oral evidence is deemed necessary by the Appeal Committee.
 - The Notice of appeal shall state fully the grounds upon which the disciplinary action is being challenged.
-



- The appeal will be heard by an appeal committee, the appeal committee will have had no prior involvement with the case and the appeal hearing will be a review of the decision to dismiss.
- The decision may be given verbally at the appeal hearing and will be conveyed or confirmed in writing within five (5) working days of the hearing.
- The decision following the appeal shall be final and there will be no further internal right of appeal.

Terms of Reference of Appeal Committee

- An Appeal will be considered only under the following circumstances:

7.1 New Evidence/fact

7.1.1 Alleged Procedural Irregularities

- The Appeal Hearing is by way of our hearing and the case would be considered based on documentary evidence and facts before the Committee. Oral evidence may however be allowed when deemed necessary by the Appeal Committee. The Appeal Committee is not obligated to hear the parties.
- If the Appeal Committee is satisfied that the appeal should succeed, it shall overturn or substitute the disciplinary sanction imposed at the initial proceedings or overturn or substitute the finding of the Committee of the initial proceedings as to the culpability of the Employee.
- The Decision of the Appeal Committee shall be final and binding. No Further right of appeal or review is permissible.

Composition of Appeal Committee

The Appeal Committee shall consist of the following members:

- Two (2) Members of the management team.
- HR Manager
- One (1) other member appointed by the Managing Director (which can be external individuals).



8. CRIMINAL CONVICTIONS OUTSIDE EMPLOYMENT

- 8.1 If an employee is charged with, or convicted of a criminal offence, this will not necessarily in itself be the reason for disciplinary action. However, consideration will be given as to what effect the charge or conviction has on the employee's suitability to do their job, their relationship with Heckerbella Limited, work colleagues, other parties, and whether there is damage to Heckerbella Limited's reputation.
- 8.2 Heckerbella Limited may also consider if the employee has breached any of the Company's policies or ethics concerning the criminal conviction by ensuring a detailed investigation process is carried out.
- 8.3 There is no automatic application of the Disciplinary Policy if an employee becomes the subject of police enquiries or charges relating to a criminal offence outside employment or if they are absent from work because they have been remanded in custody. This applies regardless of whether the offence has any direct relevance to the employee's duties.
- 8.4 In determining whether or not it is appropriate to apply the Disciplinary Procedure in this context, Line Managers must discuss the matter with the HR Manager, General Manager and the Managing Director.
- 8.5 If on conviction for any offence, an employee is sentenced to a period of imprisonment, this will not automatically be treated as a reason for dismissal. However, the HR Director will need to consider the effect of the employee's enforced absence, and if any further action is required before making a decision.
- 8.6 The Heckerbella Limited Management Team may have to determine the next line of action on a case-by-case basis.

9. DEFINITION OF TERMS

Abbreviation	Meaning
HR	Human Resources Department
DC	Disciplinary Committee
Company	Heckerbella Limited



10 ROLES & RESPONSIBILITY

10.1 Investigation committee

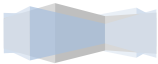
- 10.1.1 Investigation of cases brought to its notice.
- 10.1.2 Presentation of the report of findings to the Disciplinary Committee.
- 10.1.3 Proffer suggestions on ways to prevent or reduce disciplinary incidences.

10.2 Finance

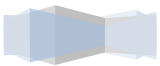
- 10.2.1 Investigation of financial cases brought to its notice.
- 10.2.2 Presentation of audit report of findings before the Disciplinary Committee.
- 10.2.3 Advice on ways to prevent or reduce disciplinary incidents.

10.3 Human Resources

- 10.3.1 Custodian of the disciplinary policy.
 - 10.3.2 Periodic Review of disciplinary policy, procedure and process in line with current development.
 - 10.3.3 Receive a report of findings on infractions from investigating authority and initiate the sitting of the DC.
 - 10.3.4 Provide necessary support for the Disciplinary Committees.
 - 10.3.5 Implementation of the Recommendations of the Disciplinary and Appeal Committees.
 - 10.3.6 Articulate learning points from cases emanating from Disciplinary Committees and disseminate same to all Employees (where necessary).
 - 10.3.7 Review notices of appeal and examine conformity with established grounds of appeal and term of reference under this policy.
 - 10.3.8 Initiate the sitting of the Appeal Disciplinary hearing.
 - 10.3.9 Provide support for and the necessary documentation to legal services in the handling of litigation that may arise from disciplinary matters.
-



DRESS CODE POLICY



1. POLICY OVERVIEW

This policy is designed to provide guidelines for acceptable employee work attire and professional appearance to work. Heckerbella Limited's goal is to provide a workplace environment that is comfortable and inclusive for all Employees. Heckerbella Limited expects that business attires even when on corporate casual will exhibit common sense and professionalism.

2. SCOPE

This applies to all Full-Time Employees, Contract Employees, and those on special assignment at Heckerbella Limited.

3. PURPOSE

The purpose of this policy is to:

3.1 Ensure employees understand the required official dress code of Heckerbella Limited.

3.2 Avoid indecent dressing in the workplace.

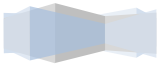
3.3 Provide general guidance for dealing with instances of unacceptable dress code.

4. POLICY STATEMENTS

It is always important for all Heckerbella Limited Employees to project a professional image of the company. A professional appearance is essential for a favorable impression with Customers, Regulators, Company stakeholders and the public at large. Employees' work attire should complement an environment that reflects efficiency, orderliness, and professionalism. It is important to always maintain a professional appearance, avoiding excesses in attire both in the office as well as while representing Heckerbella Limited. The dress code for Heckerbella Limited is Business or Corporate casual.

5. POLICY GUIDELINES

Employees are expected to be well-groomed (which includes ensuring they adhere to high standards of personal hygiene) and to dress appropriately for their position and the type of business carried out by Heckerbella Limited. Since not all casual clothing is suitable for the office, these guidelines will help to determine what is appropriate to wear to work.



- 5.1 Clothing that works well for the beach, housework, night clubs, exercise sessions, and sporting activities are not appropriate for a professional appearance at work.
- 5.2 Clothing that reveals the cleavage, back, chest, stomach or underwear is not appropriate for a place of business.
- 5.3 Clothing should never be wrinkled. Torn, dirty, or tattered clothing is unacceptable.
- 5.4 Clothing that has words, terms, or a picture that may be offensive to other employees is unacceptable.
- 5.5 Uniforms may be required in some areas which require specific attire standards for an event or business activities.
- 5.6 The dress code for employees that go out for field work is to be agreed upon between the employees and their Line Manager with approval from the Management.
- 5.7 Identity cards should be worn while on all Heckerbella Limited premises.
- 5.8 This dress code policy is not able to cover every single illustration, so employees must exert a certain amount of discretion in their choice of clothing to wear to work.

6. DRESS CODE GUIDELINES

Business or Corporate Casual Dressing:

This provides a general overview of appropriate business or corporate casual outfits. Some modes of dressing that are not appropriate for the office are also listed and are open to change or additions. The guidelines tell you what is generally accepted as a business casual attire and what is generally not acceptable as a business or corporate casual outfit.

Appropriate Business Attire

Appropriate business attire for Employees includes the following:

Men:

- Shirts, polo shirts with buttons and collars.
 - Blazers, suits, or sport coats.
 - Ties.
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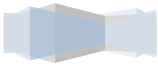
- Slacks or trousers.
- Decent traditional attire
- Sweaters and pullovers.
- Sandals are allowed only Fridays on traditional attire.

Women:

- Dresses and skirts that are split at or below the knee
- Dress and skirt length should not be more than 3 inches above the knee.
- Dress or shirts with buttons and collars.
- Dress slacks or tailored trousers or denim trousers (jeans).
- Blouses, polo shirts, sweaters, and pullovers.
- Decent traditional attire
- Sandals are allowed only Fridays on traditional attire.

Unacceptable Attire

- Pair of shorts, tight skirts that ride halfway up the thigh are inappropriate for work. Mini-skirts, sun dresses, beach dresses, and spaghetti-strap dresses are inappropriate for the office.
- Inappropriate slacks or pants include low-rise jeans or trousers, sweatpants, exercise pants, shorts, leggings, and any spandex or other form-fitting pants that may be worn as exercise attire.
- Backless shirts, tops, blouses, or dresses; or any other forms of clothing that do not cover the upper body appropriately are not acceptable.
- See-through/lace attires (except with adequate lining or camisoles)
- Cut-off or distressed jeans.
- Tennis shoes, workout, or gym clothes.



- Tank tops, tube tops, halter tops with spaghetti straps.
- Underwear as outerwear, beachwear, or evening wear.
- Provocative attire (outfits that leave very little to the imagination).
- Hats are not appropriate in the office.
- Slippers are not acceptable in the office (not allowed even while wearing traditional attires).

Jewelry, Makeup, Perfume, and Cologne

These should be in good taste and moderation. While offensive body odours are unacceptable, some employees are allergic to the chemicals in perfumes and make-up, so wear these substances with restraint.

7. BREACH AND CONSEQUENCES

All employees are required to comply with the principles of this policy. Failure to adhere to the standards set out herein may constitute misconduct and may result in formal disciplinary proceedings.

8. ROLES & RESPONSIBILITY

8.1 Human Resources

It is the responsibility of Human Resources to:

- 8.1.1 Frequent review to ensure the policy is in line with organizational goals and objectives.
- 8.1.2 Guides employees on the right mode of dressing.
- 8.1.3 Apply disciplinary actions when necessary.

8.2 Line Managers

It is the responsibility of the Line Manager to:

- 8.2.1 Read and fully understand this policy.



8.2.2 Monitor and enforce the policy.

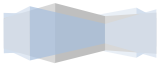
8.2.3 Advise and guide employees when appropriate.

8.3 Employee

It is the responsibility of the employee to:

8.3.1 Read and fully understand this policy.

8.3.2 Must abide by the guidelines of this policy.



DRUG & ALCOHOL POLICY



1. POLICY OVERVIEW

Heckerbella Limited recognizes that the effects of alcohol and other drugs may spill over from individual private life into the workplace resulting in inefficiency, accidents, and absenteeism. Alcohol, drugs, and substance abuse affect concentration, coordination, and work performance; therefore, being under the influence of alcohol or drugs can impair one's judgment and reactions, leading to associated risks to the individual, other employees, and the company.

2. SCOPE

This policy is to promote the health, safety, and welfare of all employees (Full Time or Contract), Customers, Visitors, Contractors, Vendors of Heckerbella Limited and the rules are equally applicable to everyone.

3. PURPOSE

The purpose of this policy is to ensure a safe and healthy working environment for all Employees, Customers, Visitors, Contractors and Vendors, to protect our property and those of our neighbors and visitors, by having clear rules and guidelines regarding the use and possession of alcohol and drugs, and to support those who have reported a problem with alcohol or drug dependence. This policy is aimed to:

- 3.1 Raise awareness of the risks of alcohol and other drug-related problems.
- 3.2 Encourage a healthy lifestyle by preventing the development of alcohol and drug-related problems.
- 3.3 Promote the health and wellbeing of employees.
- 3.4 Minimize problems at work arising from the effects of alcohol and other drugs
- 3.5 Identify employees with possible alcohol and drug-related problems at an early stage.
- 3.6 Help employees with alcohol and other drug-related problems to overcome the problem.
- 3.7 To safeguard Heckerbella Limited's properties and reputation.



4. POLICY STATEMENT

- 4.1 Heckerbella Limited strictly prohibits the use, making, sale, purchase, transfer, distribution, consumption, or possession of drugs or alcohol on company premises or that of its customers or partners.
- 4.2 All employees will be treated consistently and fairly in line with this policy.
- 4.3 The rules on alcohol and drugs will be strictly enforced.
- 4.4 Employees with an illness related to alcohol or drugs are encouraged to disclose this at the earliest opportunity to ensure support and help with treatment.
- 4.5 All matters concerning alcohol and drugs shall be treated as confidential, and any employee who seeks the assistance of the company in finding treatment for drugs or alcohol problems has the Company's complete assurance of confidentiality.
- 4.6 Heckerbella Limited shall support an employee with drug issues to undertake counselling, treatment and rehabilitation alternatives before consideration is given to the imposition of disciplinary measures.
- 4.7 This policy is designed to comply with International best practices on Health and Safety, at work on alcohol and drug use in the workplace.

5. POLICY GUIDELINES

Heckerbella Limited Employees must be free from the influence of alcohol or drugs, during work hours and always while on company premises or the field. This will help to ensure the health and safety of employees and others with whom they come in contact, maintain the efficient and effective operation of the business, and ensure customers receive the service they require. Employees shall be guided as follows:

No Employee, worker or contractor shall –

- 5.1 Report to work while under the influence of alcohol or drugs.
- 5.2 Have alcohol or illegal drug in the workplace.
- 5.3 Supply others with alcohol or illegal drugs in the workplace.
- 5.4 Consume alcohol or illegal drugs or abuse any substance while at work.



5.5 Whether an Employee is fit for work is at management discretion.

5.6 Misconduct concerning alcohol and drugs will be dealt with concerning the disciplinary policy and problems with attendance or long-term alcohol or drugs related illness will be managed in line with the Leave policy.

5.7 An employee who is reasonably believed to be under the influence of alcohol or drugs at work will be removed from the company premises.

5.8 The company reserves the right to search its offices including furniture, plants and machinery thereon, for alcohol, drugs and illegal substances.

5.9 The possession of or dealing in illegal drugs on Company premises will, without exception, be reported to the appropriate Law enforcement Agency.

6. HELP AND SUPPORT

6.1 The Company will endeavor to ensure that advice and help are made available to any employee who feels they have a problem with alcohol or drug misuse. In the first instance, employees will be encouraged to seek help from their General Practitioner.

6.2 It may occasionally be necessary to request that the Employee refrains from work temporarily or undertakes restricted duties to ensure their safety and that of others.

6.3 The Company may also allow additional time off (normally unpaid) for Employees to obtain treatment or attend support groups.

7. ROLES AND RESPONSIBILITIES

7.1 The successful implementation of this policy is the responsibility of all employees of Heckerbella Limited. It is the responsibility of all staff to identify concerns about an individual's immediate ability to perform their job and take appropriate steps.

7.2 Heckerbella Limited shall provide education and training opportunities to employees:

7.2.1 To increase awareness of responsible drinking.

7.2.2 Increase knowledge of the risks associated with alcohol and drug misuse

7.2.3 To increase awareness of early signs of alcohol and drug dependency.



- 7.2.4 Employees and Contractors must ensure they are aware of the side effects of any drugs prescription and advise their line manager or a member of the management team immediately of any side effects of the prescription, which may affect work performance or the health and safety of themselves and that of others, for example, drowsiness.

8. BREACH AND CONSEQUENCE

Contravention of these rules is gross misconduct and the Company will take disciplinary action for any breach of these rules, which may include summary dismissal. In the case of contractors, services may be terminated immediately upon a breach of these rules.

9. DEFINITION OF TERMS

9.1 Employee

- Except otherwise stated, the term “Employee” refers to all permanent and contract staff of Heckerbella Limited.

9.2 Company

- The Term “Company” refers to Heckerbella Limited.

9.3 Company Premises

- This includes all locations at which work is performed by the Company and locations that are assigned to the Company for its use by a client or contractor, including parking lots, warehouses, shops and storage areas. It also includes automobiles, trucks and all other vehicles used by the company, whether company-owned or leased by the Company.

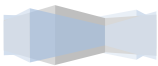
9.4 Customer

- Organizations that Heckerbella Limited is rendering services to.

9.5 Contractor or Vendor

- OEMs or Partners implementing a project or services on behalf of Heckerbella Limited.

9.6 Alcohol Dependence



The habitual drinking of intoxicating liquor by an Employee, whereby the Employee's ability to perform his or her duties is impaired or attendance at work is interfered with or endangers the safety of others.

9.7 Drug Dependence

The habitual taking of drugs by an employee other than drugs prescribed as medication, whereby the employee's ability to perform his or her duties is impaired, or attendance at work is interfered with or endangers the safety of others.

9.8 Illegal drugs

Include but are not limited to heroin, cannabis/marijuana, cocaine, ecstasy and amphetamines, codeine.

9.9 Prescription Drugs

Drugs prescribed by a physician for treatment of illness or disease, subject to the following:

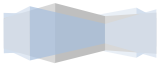
- The use of drugs/medicine prescribed by a licensed physician to the individual Employee holding the prescription is permitted provided the Employee advises the Company if he or she is using prescribed drugs that may impact the Employee's ability to work.
- The Company always reserves the right to have a licensed physician through the approved HMO Company to determine if the use of a prescription drug or medication by an Employee produces effects that may increase the risk of injury to the Employee or others while working.
- If it is concluded that a prescribed drug will affect performance, the Company reserves the right to limit or suspend the work activity of an employee during the period that the physician advises that the Employee's ability to perform his or her job safely may be adversely affected by the consumption of such medication.
- Employees who have been informed that medication could cause adverse side effects while working or where medication indicates such warning, must inform their supervisor before working while under the influence of such substances.
- Use of medications prescribed by a physician for someone other than the employee in question or use of prescription medication in a manner that does not conform to the physician's prescription or instructions is strictly prohibited.



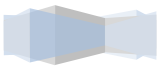
Abbreviations

HMO = Health Management Insurance Company

HSE = Health, Safety & Environment



ETHICS & CODE OF CONDUCT



1. INTRODUCTION

At Heckerbella Limited, we are committed to conducting our business with trust and integrity, in accordance with high ethical and legal standards, and with respect for each other and those with whom we do business. Our code of conduct sets out the basic rules, standards, and behaviors necessary to achieve our business objectives. All Employees are expected to display ethical behaviour, to follow consistently the meaning and intent of this Code and to act with integrity in all of our business dealings. Line Managers and Functional Heads are expected to take such actions as are necessary and appropriate to ensure that Heckerbella Limited policies, business processes and practices are in full compliance with the Code.

2. WHO WE ARE

2.1 Heckerbella Limited Vision Statement

- **To use unique individuality and cutting-edge technologies as tools to create efficiency and overall revenue for every organization.**

2.2 Heckerbella Limited Mission Statement

- **We are committed to making balanced decisions to ensure the long-term success of Heckerbella and our customers. We measure our success by the business value Heckerbella solutions deliver to our customers.**

2.3 Heckerbella Limited Core Values

- **At Heckerbella Limited, our values are the pillars on which all our activities are anchored. Excellence, Expertise, Precision, Poise, Professionalism and Proactive**

3. PURPOSE

3.1 This code provides an exhaustive list of general ethical principles, procedures and governance guidelines that employees must apply in the day-to-day conduct of their affairs, whether business-wise or personal.

3.2 This code does not seek to modify or deprive employees of their fundamental rights but mainly provides a guide to safeguard the integrity and reputation of the company and its employees. It also strives to ensure that all dealings and transactions are carried out within the confines of the law.



3.3 Heckerbella Limited recognizes that the guidelines and principles contained in this code are by no means exhaustive nor do they provide for every possible scenario of employees' conduct. The company, therefore, relies on its policies, the exercise of basic honesty, integrity, and good judgment on the part of employees in all dealings. Failure to follow the guidelines and principles may result in disciplinary action or even dismissal.

4. SCOPE

This code shall apply to all Full-Time Employees (FTE) and Contract Employees of Heckerbella Limited and all consultants and contractors. The code applies to persons working in or providing services to Heckerbella Limited.

5. RESPONSIBILITIES

5.1 Employee

As an employee of Heckerbella Limited, it is your responsibility to:

- 5.1.1 Learn and understand the elements of the Code.
- 5.1.2 Comply with the Code and associated policies and processes.
- 5.1.3 Seek clarifications and assistance when in doubt.
- 5.1.4 Promptly report known or suspected violations.
- 5.1.5 Co-operate in investigations about Code violations.

5.2 *Management*

As management, our responsibilities go beyond those we have as an employee and include:

- 5.2.1 Preventing and detecting problems and issues of compliance.
- 5.2.2 Building and maintaining a culture of compliance.
- 5.2.3 Responding expeditiously to issues as they emerge (investigate/resolve).
- 5.2.4 Following communication and reporting guidelines.

5.3 *Business Associates or Partners*

This includes Suppliers, Contractors and Service Providers.



- 5.3.1 We expect our Business Associates or Partners and their employees to conduct business legally and ethically with high integrity, in line with the Code.
- 5.3.2 We will train employees of Business Associates who represent the face of Heckerbella Limited, on the relevant aspects of the Code.

6 WORKPLACE CONDUCT

6.1 *Personal Conduct*

- 6.1.1 To imbibe and practice the Code in character through personal conduct.
- 6.1.2 To be a good corporate citizen.
- 6.1.3 To embody and model ethical behaviour.
- 6.1.4 To lead by example.
- 6.1.5 To be aware of the laws, regulations, policies, and procedures required in the performance of your duties.
- 6.1.6 To seek clarification from HR on Compliance related issues when required.
- 6.1.7 Not to compromise on the Code no matter how high the business stakes.
- 6.1.8 Not to penalize or retaliate against those who report a violation of the Code.

6.2 *Employee Relations*

- 6.2.1 Provide a work environment and atmosphere that promotes harmony, teamwork, productivity and the achievement of all Company objectives.
- 6.2.2 Communicate openly with all honesty.
- 6.2.3 Always Maintain, the highest standards of dignity, decency, fairness and integrity.
- 6.2.4 Listen to the opinion or viewpoint of your subordinates and peers and encourage creative and innovative thinking.
- 6.2.5 Maintain an exemplary relationship with subordinates and peers.
- 6.2.6 Provide timely suggestions for performance improvement.



6.2.7 Maintain a relationship of mutual respect and trust with Line Managers.

6.3 *Fair Employment Practices*

6.3.1 Ensure diversity in the workplace.

6.3.2 Embrace the strengths of our differences.

6.3.3 Provide equal opportunity and fair treatment to all employees.

6.3.4 Treat each other with respect and dignity.

7 *WORK HOURS AND OVERTIME*

The objective of this section is to ensure a common understanding by all employees of the expected working hours and provide clear guidelines on the eligibility and management of overtime.

7.1 *Normal Working Hours*

7.1.1 The normal working hours for all employees per week is 40 hours (8 hours a day) from Monday to Friday, between 8 am and 5 pm, and one (1) hour break in between.

7.1.2 Employees are expected however to work whatever hours are needed to achieve company objectives.

7.1.3 The daily working hours for all employees including shifts shall be determined by Management subject to operational requirements.

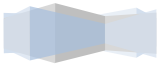
7.2 *Overtime*

This section applies to:

7.2.1 Permanent employees excluding management staff (Managers, Directors and CEOs)

7.2.2 Employees with Contracts and/or Letters of Appointment which clearly state the requirements and terms of carrying out overtime work.

7.2.3 Employees working on specific roles eligible to claim overtime as agreed and approved by the Functional Head /Director and/or MD/CEO.



8 DRESS CODE

This section provides guidelines for acceptable employee work attire & appearance in Heckerbella Limited.

- 8.1 Employees are expected to be well-groomed (which includes ensuring they adhere to high standards of personal hygiene) and to dress appropriately for their position and the type of business carried out by Heckerbella Limited.
- 8.2 All Heckerbella Limited employees must always project a professional image of the company. A professional appearance is essential for a favourable impression with Customers, Regulators, Company stakeholders and the public at large.
- 8.3 Employees' work attires should complement an environment that reflects efficiency, orderliness, and professionalism.
- 8.4 More details on Dress Code can be viewed under the Dress Code Policy.

9 SAFETY AND SECURITY

- 9.1 All employees of Heckerbella Limited must obey the safety regulations issued by the organization.
- 9.2 The HR Unit will work with all employees throughout the organization to communicate and address security issues and to facilitate compliance.
- 9.3 All employees will be trained appropriately on security issues relating to their work and regular lectures on safety will be organized.
- 9.4 Employees are expected to ensure they are always conversant with the organization's safety procedures.
- 9.5 Employees who for any reason willfully disregard the organization's policy on safety will be sanctioned appropriately.

9.6 Firearms

- 9.6.1 No firearms or dangerous weapons are permitted on the premises.
- 9.6.2 This policy excludes security operatives such as members of the Nigeria police force or members of the armed forces on official posting or duty within the premises, engaged for the protection of lives and property.



- 9.6.3 No police or army officers as clients or guests on visitation to the company will be allowed access onto the premises of the organization with firearms.

9.7 *Health, Safety and Environment*

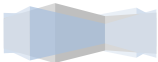
- 9.7.1 While the organization's goal is to provide a safe environment in which employees can work, it is also expected that employees will maintain the highest levels of safety and health consciousness, and always adopt safety precautions to prevent injuries, occupational diseases and damage to property.
- 9.7.2 The consequences of accidents are enormous and therefore, prevention is vital. When despite precautions, an accident occurs in the course of work, the organization will ensure that adequate medical care is available and will make compensatory payments when necessary.

9.8 *Fire Drills*

- 9.8.1 There will be three (3) fire drills annually in all Heckerbella Limited locations.
- 9.8.2 The employees in charge of Health& Safety at the various Heckerbella Limited locations will have the responsibility of ensuring that all employees can identify and locate all designated muster points.
- 9.8.3 Non-compliance during these drills will attract disciplinary action.
- 9.8.4 There shall be regular fire alarm tests and monthly examination of fire extinguishers to ensure the functionality of equipment, in line with manufacturers' specifications, and International standards for such equipment.
- 9.8.5 Employees shall identify and report to the Health & Safety Champions any unsafe or unhealthy working conditions around the premises.
- 9.8.6 Incident reporting is mandatory, and staff is requested to show a sense of responsibility in reporting any case of an unsafe or unhealthy working environment.

9.9 *Smoking*

- 9.9.1 Smoking is not permitted in any of the office premises of the company. This is always to be strictly adhered to.
- 9.9.2 Prohibition of smoking in office premises includes the following areas:
-



- 9.9.2.1 All offices
- 9.9.2.2 Meeting rooms
- 9.9.2.3 Lifts and lifts foyers
- 9.9.2.4 Toilets
- 9.9.2.5 Canteens
- 9.9.2.6 Official cars
- 9.9.2.7 Kitchens
- 9.9.2.8 Entrance to the buildings

9.9.3 Employees are expected to observe practical guidelines to minimize the risk of fire, discomfort to others and health risks through passive smoking.

9.9.4 No smoking signs will be displayed randomly in the above-mentioned prohibited areas, and employees are requested to respect and advise their visitors of the policy. Smoking will only be permitted outside the buildings at designated points.

9.9.5 Non-compliance shall attract disciplinary action.

9.10 *Drugs and Alcohol*

9.10.1 Heckerbella Limited seeks to promote alcohol and drug-free workplace.

9.10.2 The unlawful distribution, dispensing, possession, use or sale within the organization of any hard-drug or controlled substance by employees or visitors, as defined by State or Federal Laws is prohibited.

9.10.3 Any employee that is found to be under the influence of alcohol, or in possession of or under the influence of any hard drug such as marijuana, heroin or other illegal or controlled substance while working on any job site, including property or equipment under the control of Heckerbella Limited, shall have his or her appointment terminated.

9.10.4 If such illegal or unauthorized items are found in the possession of an employee, such items and/or materials will be confiscated, reported and released to the appropriate Law Enforcement Agencies.



9.10.5 Alcohol is also prohibited from internal events during work hours.

9.10.6 Employees are enjoined to read and understand the Company's policy on Alcohol & Drugs.

10 EATING IN THE OFFICE

Eating of food is prohibited in the company's offices and premises except in designated areas as approved by management. i.e., canteen and kitchen. However, light refreshment may be allowed where the eating is conducted with much discretion especially as regards visibility or proximity to the public and colleagues. Light refreshment includes beverages, soft drinks, biscuits, and pastries. Cooked meals are strictly prohibited.

11 TRADING ON COMPANY PREMISES

Heckerbella Limited prohibits any form of trading and merchandising activities by employees on company premises for personal gain.

12 FACILITATION AT THIRD PARTY TRAINING PROGRAMMES AND PUBLIC SPEAKING

- Engaging in any form of training facilitation or public speaking whether in an official or personal capacity is prohibited. However, in exceptional circumstances where business needs demand, MD on the recommendation of the HR Department may approve participation in such an engagement. Any financial reward or fee arising from there shall be declared and handed over to the Compliance Team or HR Department to be deposited in the gift bank.
- If such an engagement is approved exceptionally, the employee is required to make a disclaimer at the onset of the engagement, that the views/opinions expressed are personal and not that of Heckerbella Limited.

13 DISCLOSURE OF INTERESTS

- Employees must disclose all personal business interests to the Human Resources Department and obtain approval in writing from the irrespective Departmental Heads.
- Where there is a perceived conflict of interest, the employee may be requested to either terminate his involvement with the external business interest or resign from the company.

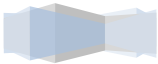


- A part-time job is prohibited. However, where the job involves a non-executive board position in a non-competing company, NGO or social club, the disclosure will be required in writing to Human Resources. Non-compliance shall attract disciplinary action.

14 OPEN AND HONEST COMMUNICATION

It is the responsibility of every employee to report incidents, behaviour or conduct at work that they suspect to be a breach of the code, illegal, corrupt, dishonest, unlawful, criminal, improper or unethical or that may be damaging to the reputation and image of Heckerbella Limited. Employees are to report any:

- Bribery, fraud, financial malpractice, dishonesty, money laundering and corruption.
- Failure to comply with a legal obligation that may result in individual or Heckerbella Limited liability or damage to Heckerbella Limited reputation.
- Criminal activity.
- A breach or potential breach of data privacy or unlawful disclosure of sensitive and confidential information.
- Abuse of the company's systems, processes or policies.
- Other suspected criminal activity or serious conflict of interest.
- Danger to the health and safety of employees or the public, potential abuses of Human Rights or serious environmental issues.
- Attempt to conceal any of the above.
- Employees are encouraged to, when possible and feasible raise questions and discuss issues relating to the code with their line managers or functional heads.
- Employees may also raise issues with more senior management team members and other appropriate people within Heckerbella Limited such as the MD/CEO or COO.
- Concerns raised and information shared by employees shall be treated as confidential.
- It is prohibited for any employee to retaliate against another employee who makes a report, regardless of seniority. An employee, who has been retaliated against, should contact the HR Department.



- Any employee who retaliates against another for reporting a legal, compliance ethical concern or violation will be subject to disciplinary action, up to and including termination of employment.

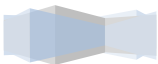
15 COMPLIANCE WITH LAWS AND REGULATIONS

- Employees of Heckerbella Limited must always comply with all applicable laws, statutes, by-laws, edicts, policies and regulations enforced in Nigeria and all its States including the Federal Capital Territory, where applicable, or any other laws and regulations of other countries that may apply to or that may impact Heckerbella Limited's business.
- Where in doubt as to the exact provisions of any law or regulation or where the provisions of any law or regulation are unclear to an employee, such employee should seek legal advice from the HR Department before proceeding any further, particularly in the conduct of the company's business or in the conduct of personal affairs which outcome could impact on the integrity and public perception of the company.
- The following list of laws, regulations and principles must be complied with, it is hereby advised that the list below is not exhaustive, and every employee must personally keep abreast with relevant laws passed by the National Assembly or the House of Assembly of every state in which the company carries on its business.
- The whole body of the Laws of the Federation of Nigeria, 2004 and even subsequent amendments thereto, particularly the Corrupt Practices and other Related Offences Act and the Economic and Financial Crimes Commission (Establishment) Act.
- Every law enacted and currently in force in the 36 states of the federation including the Federal Capital Territory Abuja and every subsequent amendment thereto.
- The bye-laws of the different Local governments of the federation etc.

16 PROFESSIONAL COMMITMENT

16.1 Professionalism in Service Delivery

- Employees, contractors and third parties shall carry out their duties with honesty, integrity, skill and care. Employees, contractors and third parties must observe high standards of professional conduct while performing their duties and providing services to the company.



- Employees shall work in a spirit of respectful collaboration and co-operation with those with whom they interact without compromising their personal or professional integrity.
- Employees shall not discriminate against contractors and third parties based on age, gender, race, ethnicity, culture, nationality, religion, disability, socioeconomic status, or on any basis proscribed by law.
- Employees shall always, act honestly and in such a manner that contractors and third parties are not caused to be misled. Employees shall not while discharging their professional duties knowingly or recklessly disseminate false or misleading information to contractors or third parties.
- Employees shall not engage in any conduct involving dishonesty, fraud, deceit, or misrepresentation or commit any act that would negatively impact the Company.
- The integrity of information received from or disseminated to contractors, third parties or the company must not be compromised by Employees or vice-versa.

16.2 Professionalism in Reporting

- Employees shall ensure the validity of the reports and statements issued by them. Stakeholders and shareholders depend on the information reported by employees and the company's reputation is tied to the credibility of such reporting.
- Honest and accurate recording and reporting of information are extremely important. Transactions with contractors and third parties must be recorded promptly and accurately to permit the preparation of accurate financial and other records. Records shall not be falsified in any manner.
- No entry shall be made that intentionally hides or disguises the true nature of any transaction. Employees are to be alert to any indication that reports may not accurately reflect the situation.
- Financial data books and records must comply with applicable international and Nigerian Financial Reporting Standards, other applicable laws and regulations and the Company's business and financial policies and procedures.



- Transactions and balances must be classified appropriately and consistently. routines and controls must be in place to protect assets and to ensure that information is recorded consistently.
- Employees are to be aware of and comply with the limits and authorities granted in the relevant delegation of power that applies to their work. Acting outside one's authorization may lead to disciplinary action.
- Employees are to report any indications or suspicions of financial misconduct.

17 CONFLICTS OF INTEREST

- Employees must act in the best interest of the company and avoid actions or situations that might affect their independent judgment concerning any business transaction between the company, themselves and third parties.
- Conflicts of interest may also arise when employees, or members of their families, receive improper personal benefits because of their position with the company, whether received from a company or a third party.
- Employees should put in their best efforts to ensure their impartiality and independence and avoid all situations that could result in a conflict of interest or be perceived as such. They should not use their position for the private gain of their spouse or children, or the private gain of any other person.
- Employees should therefore avoid all situations in which their private interests, whether pecuniary or otherwise, conflict or have the potential to conflict with their duty, nor should they place themselves in a position where they are obliged to accord preferential treatment or special consideration to any person or entity.

Employees are strictly prohibited from:

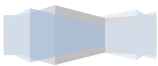
- Establishing or maintaining any business or financial interest whether directly or indirectly that would conflict with the interest or compete with the business of the company.
- Performing any service as a consultant, employee, officer or Director, advisor or acting in any other capacity for a competing company whether for profit or not



- Owning or having a financial interest in a competitor company, other than an investment representing less than 1% of the outstanding shares of a publicly held company.
- Disclosing any Company proprietary or Confidential Information or records to any person or organization except when mandated by the Company or by law or court order to do so.
- Profiting directly or indirectly from confidential information obtained or gained because of their employment or involvement with the Company.
- Any employee who becomes aware of a transaction that could conflict with the interest of the Company involving either themselves or another employee is obligated to report such a conflict to the HR Department or be deemed to have colluded in the commitment of that transaction and will be dealt with as if he were conflicted.
- Any report made to the HR Department, in line with 17.6 above shall be in the prescribed form and must be dealt with confidentially in a manner that will protect the identity of the reporting employee.
- No employee shall suffer from any acts of retaliation or be prejudiced, discriminated against, or unfairly treated in any way as a result of his compliance with 17.6 above.
- Conflicts of interest may not always be clear-cut, so if employees have questions, they are encouraged to consult the HR Department.

18 RELATED PARTY TRANSACTIONS

- Employees must disclose to the Company, the existence or likely occurrence of any transaction by the Company with a Related Party.
- Disclosure shall be made by the employee, immediately such Related Party transaction occurs, and the employee shall complete the Declaration of Interest Form and submit same to the HR Department.
- It is prohibited for any employee to be involved in negotiations on behalf of the Company with a contractor with whom he has a 'Related Party' relationship, neither shall any employee approve terms of payment under a contract with his related parties, unless the CEO's prior approval is obtained, and copies of such approval must be forwarded to the HR Department.



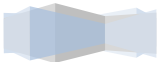
- Every employee is required to complete the Declaration of Interest Form at least once every year at a time to be specified by the HR Department whether a Related Party Transaction has occurred.
- An employee who becomes aware of a Related Party Transaction that could conflict with the interest of the Company involving another employee is obligated to report such a transaction to the HR Department.
- Once a Related Party Transaction has been reported or discovered, any existing or potential conflicts shall be reviewed by the HR Department who shall recommend a line of action to the CEO. The CEO shall make a final decision as to the propriety of the transaction and whether the Company should proceed with or terminate the transaction.

19 ETHICS AND COMPETITION

- Knowledge and understanding of Competitors and Contractors is an important aspect of any business; however competitive information must be gathered and used following applicable laws and good business practices.
- Employees when in doubt as to what constitutes competitive information or whether competitive information can be used are encouraged to seek guidance from their line manager and or the HR Department.

20 GIFTS AND HOSPITALITY

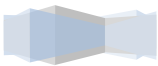
- Employees are hereby prohibited from accepting gifts and hospitality from Contractors or third parties that might conflict with the proper performance of their duties, hinder, or interfere with their independent professional judgment or construed as an attempt to induce them to grant an unfair competitive advantage or to motivate them to do anything unethical, illegal or prohibited by Heckerbella Limited.
 - Cash or cash equivalent gifts of any amount are prohibited.
 - Any gift, entertainment or hospitality offered must be reasonable and consistent with ethical, cultural, and professional practice and following the Heckerbella Limited gift and hospitality policy.
 - Employees must complete a Gift Declaration form once a gift is received notwithstanding the value of the gift and forward the form together with the gift to the HR Department, who would determine whether the employee should keep the gift, following the Policy.
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- The acceptance of any expense paid travel, meals or entertainment without prior approval is prohibited.
- Heckerbella Limited Employees should discourage Contractors, Vendors and other third parties from offering such gifts and hospitality to employees. Employees should bring to the attention of such persons the Company's policy on gifts and hospitality.
- The value of a gift shall be determined by open market price valuation. That is, the price the gift would be purchased for in the open market on the date the gift is received or is to be given. It shall be the responsibility of any employee declaring a gift, to ascertain the value of the gift and state it in the appropriate column of the Gift Declaration Form.
- Provided that nothing in this Code shall prevent the Company in the normal course of its business, from distributing approved promotional materials of whatever value, on which the Company's logo or trade name is imprinted or embossed.

21 BRIBERY AND CORRUPTION

- Heckerbella Limited has zero-tolerance for bribery and corruption. All forms of bribery and corruption are therefore prohibited. Any breach of this policy or local or international law could result in disciplinary action being taken and ultimately could result in dismissal.
- A bribe does not have to take place, just promising to give a bribe or agreeing to receive one is prohibited.
- Heckerbella Limited and its employees and Contractors will not directly or indirectly, offer, promise, give, or demand a bribe or other undue advantage to obtain or retain business or other improper advantages, nor would it be solicited or expected to give or render a bribe or other undue advantage.
- Bribery is prohibited when dealing with any person whether they are in the public or private sector.
- Facilitation payments of any kind are prohibited.
- Contractors and Suppliers are to be selected fairly and on merit with a contractual requirement that they act ethically and comply with all applicable laws and regulations.



- Third parties representing Heckerbella Limited must be subject to due diligence, commit to following Heckerbella Limited Compliance and Ethics Code and may not offer or accept bribes, on behalf of the Company.
- No Employee or Contractor shall in their capacity or on behalf of the Company:
- Directly or indirectly, offer or accept a bribe whether on behalf of the Company or in their capacity and any demands for such a bribe must be rejected.
- Demand or accept kickbacks, grease payments, or offer of any facilitation payment of any portion of a contract payment from employees of a third-party contracting with the company, or the outsourcing of bribes through other techniques to channel payments to Government Officials, to employees of business partners or Contractors or third parties of any form, their relatives or business associates.
- Make payments in any manner or form on behalf of the Company, save remuneration for legitimate services rendered or goods delivered subject to approval and due process.

22 POLITICAL ACTIVITIES AND ENDORSEMENT

- Employees acting in their official capacity are prohibited from engaging in partisan politics and may not openly support any political party in any state or country where Heckerbella Limited carries on its operation or contribute any money or its resources to any political cause or mandate or encourage other employees to be favourably disposed towards any political party or organization.
- The Company while recognizing and respecting its employees' fundamental right of freedom of political association, prohibits the use of Company resources which includes but not limited to money, assets, facilities, goodwill, influence, man-hours, for the furtherance of any particular political cause or support for a particular political party or organization.
- Employees must always make a clear distinction between their politically biased utterances and the Company's official position on such matters and they must not give the impression that they are acting on behalf of the Company when involved with or supporting a particular political party or cause or commenting on such activities.
- Any political activity must be carried on outside an Employee's normal hours of work and must not under any circumstances be carried on within the Company's premises.

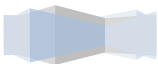


23 CONDUCT

- Heckerbella Limited has zero-tolerance for discrimination or harassment in the workplace in any form and seeks to promote a positive work environment.

The Company prohibits the following conduct by employees in the workplace or while carrying out the Company's business:

- Discrimination and harassment based on race, colour, religion, gender, sexual orientation, age, nationality, disability, political inclination, or any other factor unrelated to the Company's legitimate interests.
- Sexual advances or comments, or any other conduct that creates, in the opinion of the Company, an intimidating or otherwise offensive environment.
- The use of racial, tribal, or ethnically based remarks or any other remarks, jokes or conduct that encourages or permits an offensive environment.
- Threats of violent behaviour or possession of a weapon or the use, distribution, sale or possession of illegal drugs or any controlled substance or being under the influence of controlled substances, illegal drugs, or alcohol except such use is as prescribed by a certified medical doctor.
- Smoking of cigarettes within any of the premises wherein the Company carries on its business, save for designated smoking areas.
- Any employee who has been subjected to any of the conducts listed above or becomes aware of the improper conduct of others should immediately file a complaint with the Human Resources Department who shall deal with such complaint following the laid down Disciplinary Policy of the Company.
- Employees wishing to make complaints directly or anonymously may also do so by using any of the Company approved means for such communication.
- Heckerbella Limited subscribes to a decent dress code and enjoins all employees to adhere to the Dress Code Policy.



24 CONFIDENTIALITY

- The Company's continued success depends on the use of its Confidential Information and its non-disclosure to third parties. Unless required by law or authorized by the Board and Management, Employees shall not disclose Confidential Information about the Company or its customers or allow such disclosures. This obligation continues beyond the termination of employment.
- Maintaining the confidentiality and security of company information protects the Company from business risk.

25 CUSTOMER PRIVACY

- Heckerbella Limited recognizes that building a long-term business relationship with its Customers depends a great deal on trust. This trust begins with the Company's commitment to respect as well as protect their privacy.
- Employees are therefore expected to place enormous value on this trust and safeguard all customer information they encounter, in the normal course of their duties.
- Privacy means several different things to the Customer and this includes ensuring that the details of their phone calls, discussions, emails, text messages and other correspondences remain private, not being disturbed by inappropriate or unwanted communications or spam and ensuring that their personal information is handled securely.
- Personal Information is any information that can identify a person, or from which a person's identity can be reasonably ascertained (. e.g., a person's name, address and financial information).
- Access to a customer's personal information is a privilege and access is only given to those who specifically need it for their role at Heckerbella Limited.

Employees are prohibited from:

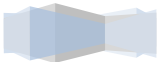
- Collecting personal information of Customers except if it is needed for a legitimate Heckerbella Limited business purpose.
- From accessing or providing customer information to anyone, including the customer, without proper authorization.



- Employees are expected to:
- Take precautions – including administrative, technical, and physical measures – to safeguard the personal information of Customers against unauthorized access, disclosure, alteration, and destruction.
- Ensure the destruction of personal information of Customers which is no longer needed.
- Speak with their Line Managers, or contact the HR Department, if they are unsure or would like to better understand the privacy obligations relating to their duties.
- Respect customer privacy in everything they do.
- Make it clear and simple when communicating with customers about privacy.
- Ascertain the reliability of third parties that handle the Company's customers' information and ensure that there are safeguards in place.
- Remember that privacy is about more than just keeping personal information secure.
- We must respect our customers' privacy and retain their trust.

26 HEALTH, SAFETY AND ENVIRONMENT (HSE)

- Employees must adhere to the health, safety environment (HSE) and security policies and regulations in making our workplace safe. Without competent and safety-conscious people, the equipment and facilities provided will not serve their desired purpose.
- Safety is the responsibility of every employee. However, the Company is committed to ensuring a safe workplace. Employees will be given the requisite information, instruction and training needed for safety. The HR Department shall ensure compliance with the HSE policy.
- Due to the nature of the Company's business, certain materials and tools may be handled daily by some employees. It is therefore imperative to ensure these are handled, stored, and maintained properly and any faults or potential problems are reported immediately to the supervising Manager to avoid potential hazards or accidents.



27 PROTECTING THE ENVIRONMENT

- Heckerbella Limited has a strong commitment to the principles of sustainable development. In delivering on its promise to provide the best services to customers, Heckerbella Limited will carry out its business in a manner that minimizes the impact on the environment.
- Heckerbella Limited aims to achieve these targets through a series of environmental strategies and standards which are designed to ensure that the company adopts best practices for the environment.
- Heckerbella Limited will foster a culture that values care and consideration for the environment.

Employees must be committed to always:

- Support and comply with applicable laws, regulations and codes which relate to Heckerbella Limited operations.
- Prevent pollution and protect the Company's operational environment
- Identify and mitigate key environmental risks
- Demonstrate respect for communities and work in harmony with all stakeholders.

28 INTERNATIONAL TRADE AND OPERATIONS

Heckerbella Limited requires all Employees and Agents of the Company to comply in all respects with applicable laws covering the transmission of goods, services, and technical information across international borders and to conduct the Company's business in the highest ethical standard at all its locations.

The laws that apply to international transactions and activities include those of the countries where the transaction or activity occurs, including restrictions that apply in the jurisdictions where we conduct business or procure goods and services. The applicable laws may also include certain Nigerian or international laws which govern international operations of companies and citizens of certain countries. Accordingly, while conducting the Company's international operations, employees of the Company and its Nigerian and overseas affiliates should consult with the HR Department, to ensure they are aware of and are complying with, applicable laws. Particular attention should be given to the specific requirement of laws in the following areas;



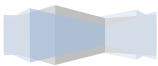
- Trade sanctions and embargoes
- Controlled items or technologies
- Export controls
- Foreign corrupt practices.

29 USE AND DISCLOSURE OF INSIDER INFORMATION / INSIDER TRADING

- Information about any listed company which includes Heckerbella Limited's direct or indirect shareholders, and not generally available to the public and which could affect the market price of the securities of that company or influence an investor's decision is insider information.
- Insider trading includes the buying or selling of any security personally or through family members or others while you have inside information.
- Heckerbella Limited prohibits employees from the disclosure of material inside information obtained in the course of their duties to anyone other than persons within the Company whose positions require them to know such information. It is unethical as well as illegal to use non-public information for personal financial benefit or to share that information with others who may use it as the basis for making trades.
- Employees are prohibited from engaging in market misconduct such as insider trading, stock tipping, disclosing false information and stock market manipulation in the stock of Heckerbella Limited's direct or indirect shareholders, affiliates and competitors.

30 MONEY LAUNDERING

- Money laundering is the criminal practice of concealing money that has come from illegal activities through a series of transactions to give it the appearance of being from legitimate sources.
- The Company shall take steps to know its vendors, partners, and suppliers to determine the identity and legitimate operations of customers. The Company shall also maintain procedures to prevent the acceptance of suspicious payments. Knowing your customer is a continual process and as a minimum, customer data shall be reviewed once a year.



- Employees should be alert to any changes in customer details, circumstances and profiles and notify the finance team.

31 COMMUNICATING EXTERNALLY/PUBLIC DISCLOSURES

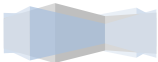
- Effective communication to our stakeholders and the public is an important aspect of the Company's business. However, employees must ensure that the communications are accurate, reliable, timely, fully coordinated and appropriately authorized before release.
- Heckerbella Limited prohibits unauthorized 'leaks' or disclosures of corporate information to the press or financial community.
- Whenever an employee is asked to prepare or contribute to any public disclosure, he or she must be certain that all information is accurate, reliable, and complete.
- Employees should never knowingly provide or allow others to provide misleading or false information.
- All communication with the press and financial community must be authorized by the appropriate authorities within the business.
- Employees are to direct any queries received for information from external sources such as the media, regulators, or other stakeholders to the HR Department.

32 COMMUNICATING ON SOCIAL MEDIA

Heckerbella Limited encourages communication among employees, customers, partners, and others and Weblogs (blogs). Social networks, discussion forums, wikis, videos, and other social media can be a great way to stimulate conversations and discussions. However, when using social networking or similar sites in a personal capacity, employees are expected to make a clear distinction between their personal opinions and the Company's views and they must not give an impression that they are acting on behalf of the Company when commenting on social media.

Employees are prohibited from:

- Making any statement that could harm Heckerbella Limited's reputation or its brand whether in a business capacity or personal capacity.
- Making unauthorized reference to their employment or connection with Heckerbella Limited in communication on social media or social networking sites in a way that could be interpreted as a comment or endorsement by Heckerbella Limited.



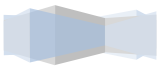
- Releasing any information about new, existing, or future products or services, without appropriate approval.
- Making objectionable or inflammatory statements/posts.

33 USE OF COMPANY PROPERTY AND PERSONNEL

- We should be responsible guardians of our Company's resources by protecting its assets and utilizing our time, equipment, and information judiciously.
- It is the responsibility of all employees to ensure that any Company property in their care or assigned for their use, is used and maintained with responsible diligence and kept safe appropriately.
- Any unauthorized use of Company property or personnel is hereby prohibited.
- Where the misuse of any Company asset is evident, the Company reserves the right to withdraw such property (where possible) and/or mete out appropriate remedial sanctions.

34 INFORMATION SERVICE AND MANAGEMENT

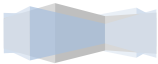
- Depending on specific job roles, employees may be provided with work tools (computers, laptops, software etc...) that are to be used for official purposes. Electronic records (e-mail messages, computer files, etc...) are company property and may have the same legal effect as traditional hard copy documents.
- In the event of an employee leaving the services of the Company, such employee is expected to hand over all relevant documents, physical and soft copies (backed up on a storage device). The Line Manager should ensure this is done as part of the exit process.
- The Company shall have the right to demand all job-related documents at the exit of an Employee and enforce such rights through a judicial process, which shall include claims for damages and restitution if applicable and appropriate.
- Personal use of official computers, and services e.g. e-mail is permitted provided it does not interfere with work but should be kept to the minimum and the Company reserves the right to investigate such where it believes this facility is being abused.
- The use of the internet for pornography, trading, playing of games or illegal and illicit activity is strictly prohibited.



35 ENFORCEMENT OF CODE

It shall be the responsibility of the HR Department to ensure that:

- This policy is effectively disseminated and properly enforced.
- All employees of the Company are periodically and properly trained to understand the provisions of this Code and all other policies issued according to it.
- Establish and enforce measures that will ensure compliance with this policy by all employees.
- This Code is regularly reviewed and updated to retain its relevance.
- A whistleblowing policy is put in place and implemented by the Company to facilitate the reporting of actual or suspected violations or genuine concerns by employees, subscribers, Contractors, Vendors, and the public in general.
- The whistleblowing policy must be widely published.
- Enquires or reports made or submitted according to this Code are dealt with promptly and confidentially.
- Investigation of possible illegal, improper, or unethical conduct by the Company or its employees are pursued to its logical conclusion and that where appropriate, reports of the results of such investigation are presented to the CEO.
- No employee is victimized, prejudiced, or dealt with maliciously as a result of any report made or information volunteered under this Code.
- A periodic review of proposed contracts and agreements between the Company and Contractors are carried out to ensure that they comply with this Code.
- Each Contractor retained by the Company has adopted and implemented a compliance programme, acceptable to Heckerbella Limited and undertakes to educate its employees about the requirements of that compliance programme; otherwise, such contractor shall be provided with a copy of Heckerbella Limited's Ethics & Code of Conduct for adherence.



- Recommendations are made to the Company regarding disciplinary measures or other sanctions for non-compliance with this Code and that such recommendations are appropriately addressed.
- Each employee executes a Certification at least once in every two (2) years as required by this Code.

36 CONTRAVENTION OF THE CODE

- All employees must familiarize themselves with the provisions of this Code and all other company policies and ensure they fully understand the contents, as ignorance of their provisions or a claim of ambiguity with regards to any of their clauses would not be entertained as an excuse for a violation of any of the provisions of this Code or other company policies.
- A claim that a contravention of any of the provisions of this Code was occasioned while complying with a directive issued by Heckerbella Limited or a member of its Management or in keeping with a custom peculiar to the industry in which Heckerbella Limited does' business would not be an acceptable excuse, nor would it exempt the contravening party from adhering strictly to this Code.
- All violations or contravention of this Code will result in appropriate corrective action at the discretion of the Board of Directors where the violation involves the CEO; where the violation involves an employee, it will be at the discretion of the Human Resources Department and such corrective action might be up to and may include dismissal or demotion or termination as the case may be.
- Where the violation involves potentially, the commission of a crime, the individual or individuals in question may be reported, as warranted, to the appropriate authorities.
- Where an employee is in doubt as to whether his action(s) would contravene or violate any of the provisions of this Code or could amount to the commission of a crime or is unclear about any of the provisions of this Code or his or their obligations under this Code, then the advice of the Executive Director, Legal Affairs should be sought before any further action is taken.



37 CERTIFICATION

Every employee shall upon his initial employment, appointment or association with the Company execute a Certification and thereafter at least once in every two (2) years execute Certification that, at a minimum, represents that he or she:

- Has read, understands, and has received training and education regarding the requirements of this Code.
- Will not violate any of the provisions of this Code.
- Has not violated this Code during his employment or tenure or association with the Company.
- Understands his duty and obligation to report promptly any known or suspected violation of this Code.
- Understands that he will be held accountable for any violation which may result in disciplinary action, up to and including among other things, termination from employment, retirement or termination of contract or other appropriate sanctions.
- A copy of the executed Certificate by an employee shall be maintained in the personnel file of that individual with the Human Resources Department and shall be retained for the period of his/her employment. A copy of the executed Certificate by other than staff members, i.e., seconders, contractors and consultants, shall also be maintained.

38 DEFINITION OF TERMS

Employee

Any staff of Heckerbella Limited, whether on a permanent or contract and includes consultants rendering professional services to the company under a consultancy or management agreement.

Company

The term “Company” refers to Heckerbella Limited.

Competitor or Competition

Refers to any Company that carries on the business of providing services or any business the Heckerbella Limited carries on in Nigeria.



Confidential Information

Includes the following information relating to Heckerbella Limited:

- Commercial information including but not limited to details of services, pricing, business strategy and unpublicized business information, offers, key performance indicator and results.
- Technical information including but not limited to network architecture, business equipment, location or value, performance and capacity of the equipment, IT strategy and architecture.
- Business plans, expansion or acquisition plans, financial results.
- The legal strategy, risk management strategies, internal policies, processes and procedures, intellectual property.
- Customer, Employee, contractor or shareholder information that is classified or marked confidential.
- Any information concerning or relating to Heckerbella Limited, its Customers, Employees, Directors, Contractors or Shareholders or Business Partners which is now or hereafter available to the public and in the public domain are however excluded from being confidential information.

Contractor(s)

- Refers to any third party with whom the company agrees to the supply of goods and or provision of services, whether they are registered with the company as business partners or not.

Director

- Refers to a sitting member of the Board of Directors of Heckerbella Limited.

Government Official(s):

- Any officer or Employee or political appointee of a government (whether Federal, State or Local Government Council), government department (whether executive, legislative,



judicial or administrative), or agency, including a regional governmental body or government-owned or government-controlled business.

- Any person acting in an official capacity for or on behalf of such government, government department or agency. Provided that the definition of Government Official herein shall not include any Shareholder or Director of Heckerbella Limited or any designated representative of a Shareholder acting in the course of any dealings with Heckerbella Limited.

Related Party includes:

- A spouse, child, sibling, parent, extended family members up to cousins, nieces, nephews, uncles and aunties, legal partner, present or former close business associates or friends of any Employee of the company.
- An organization or company for which any Employee of the company serves as an officer, director, trustee or partner, or for which he or she has served in such capacity during the preceding 12 months.
- A company or business in which an employee of the company has a financial interest, other than an investment representing less than 1% of the outstanding shares of a publicly held company.
- Any individual, company or organization with whom any employee of the company is negotiating, or with whom he or she has an arrangement, concerning prospective employment.

A Related Party Transaction includes:

The transfer of assets or liabilities or the performance of services by, to or for a related party irrespective of whether consideration is paid, or profit is gained. Examples include but are not restricted to the following:

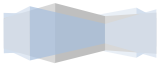
- The purchase, sale, lease, rental or hire of assets between a related party and the company.
- The provision of a guarantee to a third party concerning the liability or obligation of a related party.
- A transaction with the related party will be guided by Heckerbella Limited's Conflict of Interest Policy.



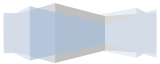
38.1 Abbreviations

CEO = Chief Executive Officer

HRD = Human Resources Department



GRIEVANCE POLICY



1. POLICY OVERVIEW

It is in the best interest of Heckerbella Limited and its Employees that grievances are addressed fairly and as quickly as possible. This policy defines how grievance will be treated in Heckerbella Limited. This will ensure that grievances are brought to the attention of the relevant level of supervision or management for speedy resolution.

A grievance is defined as any complaint or concern interpretation of any written contract in which the worker is involved. Grievance includes any feeling of victimization, injustice, concerns, problems and other forms of dissatisfaction. Informal discussion and resolution are the preferred way of addressing grievances. Therefore, Employees should take up their feelings of dissatisfaction verbally with their immediate superior.

2. SCOPE

This policy applies to all Full-Time Employees and Contract Employees of Heckerbella Limited. The policy covers aspects required by labour legislations within Nigeria and is based on principles derived from best practices.

3. PURPOSE

This document deals with the way Employees' grievances are handled and resolved to foster a good working relationship among the employees and with Heckerbella Limited Management. The purpose of this policy is to ensure the following:

- 3.1 Protection of the company's core values and culture.
- 3.2 Prompt response to Employees' grievances to keep a motivated team.
- 3.3 Compliance with the principles of fairness, equity and natural justice
- 3.4 Provision of a system for disciplinary action consistent with the principles of Employee relations practices.
- 3.5 Strengthening the company's internal control mechanism; and
- 3.6 Prompt investigation and timely resolution of grievance cases



4. POLICY STATEMENT

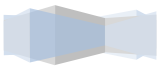
Employees are free to lodge grievances in terms of this procedure. No one will be victimised or prejudiced as a result of using the procedure. Where a grievance has been lodged and the grievance procedure is being followed, the person(s) dealing with the grievance will be given a fair opportunity to try and resolve the grievance. The Employee(s) who raised the grievance shall not take other steps (for example, industrial action such as go-slows or refusal to work overtime) while the procedure is in progress.

5. POLICY GUIDELINES

- 5.1 Employees who handle grievances procedures must attempt to find solutions to the grievances. Their role is not in the first place to decide who is right or wrong, but rather to get the parties involved in the grievance to see and understand each other's position and where justified, to move to mutually acceptable solutions. If this proves to be impossible, the person handling the grievance will state his or her view and return the grievance form to the Employee.
- 5.2 Employees are to focus on the grievance and the possible ways of resolving it. Any unrelated issues that may come up in the process are to be dealt with afterwards if required.
- 5.3 Employees are required to be familiar with the contents of this policy document as ignorance of any of its provisions will not be accepted as a justifiable excuse in cases of violation.
- 5.4 The grievance procedure should not be used in response to disciplinary action taken against an Employee. The disciplinary procedure allows for appeals against or reviews of disciplinary action.
- 5.5 The lodging of a grievance shall also not prevent or delay disciplinary action being taken against an Employee.

6. STAGES OF GRIEVANCE PROCEDURE

6.1 Reporting levels



No reporting level must be skipped during the procedure, unless the grievance is against the person at that level, in which case the person must be advised that the grievance is being referred to his or her superior.

6.2 Informal grievance discussion

An Employee, who feels aggrieved, must discuss the matter with his or her immediate superior, to try to resolve it. This is not part of the formal grievance procedure but is an important opportunity to find a mutually acceptable resolution and to avoid the formal grievance process.

The immediate superior should attempt to resolve the Employee's dissatisfaction without delay but should be given a reasonable period to do so. After five (5) working days without a satisfactory resolution by the immediate superior, the Employee will proceed to the formal grievance procedure.

Voluntary conciliation is useful in dealing with complaints involving interpersonal relationships, including allegations of harassment. The process involves the voluntary participation of the involved parties to reconcile the grievance.

6.3 Grievance form

The grievance form belongs to the Employee who initiates the grievance. The Employee should ensure that it is completed as required at each stage. If it is referred to the next stage, it is the Employee's responsibility to see that it reaches the right person. A photocopy may be made and kept by the Employee at each stage. If more space be required in any section of the form, additional notes should be attached. Copies of documents that relate to or clarify the grievance may be attached to the grievance form.

7. GRIEVANCE HANDLING PROCEDURES

7.1 Stage One (1)

7.1.1 Immediate Superior

If the informal stage has failed to resolve the dissatisfaction, the Employee may formally, and within ten (10) working days, lodge a grievance by:

- completing the grievance form
- recording the relevant facts and describing why it causes dissatisfaction



- describing a logical, reasonable and practical way of resolving the grievance
- attaching relevant documents
- signing the grievance form
- Submitting the grievance form to his or her immediate superior.

On receipt of the grievance form, the immediate superior should again investigate the circumstances giving rise to the grievance and arrange a grievance meeting with the Employee. The grievance meeting may include other persons who are implicated or who may assist in resolving the grievance.

The meeting, under the guidance of the superior handling the grievance, should actively explore ways of resolving the grievance. If it is not practical or acceptable to do what the Employee has proposed as a resolution, other alternatives must be considered and discussed.

If an acceptable way of resolving the grievance is found at the meeting, the immediate superior should record the details thereof and indicate who is responsible for the implementation of the resolution as well as dates for completion, if applicable. The parties concerned must ensure that the solution is implemented as stated.

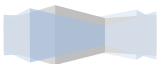
Should the grievance meeting fail to find an acceptable solution, the Employee may agree to allow a further period for the immediate superior to attempt to resolve the grievance, which period will be agreed between the Employee and the immediate superior. If no solution is found, the superior will record the outcome of Stage One (1) on the grievance form, state the reasons why the grievance remains unresolved.

7.2 Stage Two (2)

7.2.1 Next organisational level

If the grievance remains unresolved after stage one (1), the Employee may proceed to stage two (2) of the procedure. The grievance form and any relevant supporting documentation should be forwarded by the Employee within five (5) working days to the next superior supervisor or manager, that is, the direct superior of the person who dealt with the grievance at stage one (1). On receipt, the person responsible for dealing with the grievance at stage two (2) must:

- review the attempts made to resolve the grievance at stage one (1);



- consider whether he or she may be able to resolve the grievance at a further grievance meeting. If so, a further grievance meeting is to be held.
- the purpose and format of such a meeting will be the same as that of the meeting held at stage one (1).
- If a further grievance meeting is not required or if the grievance meeting failed to resolve the grievance, the person considering the grievance shall state why the grievance could not be resolved, record his or her views on the grievance form and return the form to the Employee.

7.3 Stage Three (3)

If the grievance remains unresolved after stage two (2) and provided that stage two (2) was not dealt with at a more senior manager or director level, the Employee may within ten (10) working days refer the grievance to the next organizational level, that is, the direct superior of the person who dealt with the grievance at stage two (2). (If stage two (2) had been handled at the director level, which would be the final stage of the internal grievance procedure then the Employee may proceed to the external stage of the procedure.) On receipt of the grievance, the person responsible for dealing with the grievance at stage three (3):

- must review the attempts made at earlier stages to resolve the grievance and the comments made
- shall consider whether a further grievance meeting may resolve the grievance.
- if a further grievance meeting is held, the purpose and conduct thereof will be the same as that of the meeting held at stage one (1).
- if a grievance meeting is not required or the grievance meeting failed to resolve the grievance, the person considering the grievance shall state why the grievance could not be resolved, record his or her views on the grievance form and return the form to the Employee.

7.4 Further Stages

If the grievance remains unresolved after stage three (3) and provided that stage three (3) was not dealt with at the director level, the Employee may, within ten (10) working days, refer the grievance to the next organizational level(s) until the grievance reaches director level. The procedure followed at stage four (4) and subsequent internal stages, will be the same as stages



two (2) and three (3). If the dispute is not resolved at this stage, management discretion shall apply.

7.5 Ex-Employee and Company Disputes

Where an ex-Employee has a grievance against the Company, he or she shall inform HR for resolution of the dispute. HR will investigate the matter and strive to arrive at an amicable settlement of the dispute within thirty (30) calendar days of receipt of the complaint.

If the dispute is not resolved through negotiation with HR, the ex-Employee shall refer the matter for mediation in a Court Connected Multidoor Centre closest to him or her. At present, a Court Connected Multidoor Centre exists in Lagos, Abuja, Kano, and Uyo. Where a Multidoor Centre does not exist or is not close to the ex-Employee, the dispute may be referred to any Alternative Dispute Resolution closest to him or her.

8. RESPONSIBILITY

8.1 Human Resources

- Must ensure all guidelines of this policy are duly followed by all employees in Heckerbella Limited.
- Provide support to Employees when necessary on Grievance related issues.
- Identify and implement better ways to resolve employee grievance issues internally.

8.2 Employee

- All Employees are expected to adhere to the guidelines of this policy.
- To maintain peace and harmony among colleagues.
- To support the issue resolution process to ensure grievance matters are resolved promptly.

8.3 Line Managers and Superiors

- To adhere to and support the implementation of this policy.
- To provide leadership support in resolving Grievance issues
- To promote a culture that embraces fairness, respect, and harmony.



- To guide and suggest ways to resolve Grievance issues.

9. WHISTLEBLOWING POLICY

9.1 Summary: Staff, clients, stakeholders of Heckerbella Limited should report concerns about actual or potential wrongdoing at work or related to the business of Heckerbella Limited.

9.2 Scope: This policy applies to staff members of Heckerbella Limited.

9.3 What Should Be Reported?

Reports should be made in respect of violations at work of this policy, any laws and regulation, or any threat to life, national security, or public interest. Acts of impropriety that should be reported includes but not limited to any of the following:

- All forms of financial malpractice or impropriety or fraud.
- Failure to comply with a legal obligation or statutes.
- Actions detrimental to health and safety or the environment.
- Any form of criminal activity.
- Improper conduct or unethical behaviour.
- Failure to comply with regulatory directives.
- Other forms of corporate governance breaches.
- Connected transactions.
- Insider trading abuses.
- Non-disclosure of interest; or
- Attempts to conceal any of these.

Disclosure is deemed to have been made following the Central Bank of Nigeria's Guidelines for Whistleblowing for banks and other financial institutions in Nigeria if it is disclosed to Heckerbella Limited, another financial institution, the CBN, and/or any other appropriate agency, provided that such disclosure is true and there is a reasonable belief of wrongdoing.

9.4 Who to Report to?

Heckerbella Limited encourages staff members to raise and expose any kind of information or activity at work that is illegal or unethical internally, however, you have the right to raise these concerns externally. Concerns can be made by the following channels:

Telephone: 09024811947, 08031571366

Email: support@heckerbella.com

9.5 Anonymity and Confidentiality: Heckerbella Limited must confidentially treat all disclosures. The identity of the person making a disclosure must be kept confidential.

Generally, stakeholders are encouraged to disclose their names when making reports, however, anonymous disclosures may be considered on a discretionary basis considering the following factors:

- The seriousness of the issues
- The significance and credibility of the concerns
- The possibility of confirming the allegation

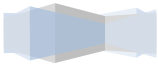
9.6 Prohibition of Retaliation: Heckerbella Limited strictly prohibits intimidation, victimization or retaliation against any staff member who reports concerns to any actual or potential wrongdoing as well as anyone who assists with any inquiry or investigation arising from a reported concern. This is the case even if, because of an investigation based upon your report, we determine that there was no wrongdoing. However, if you made a false and malicious disclosure or intentionally provided false information (be it to Heckerbella Nigeria, any regulators or third parties), Heckerbella Nigeria may take disciplinary action against you, up to and including dismissal.

9.7 Questions and Clarifications: If you are unsure as to the appropriate course of action, you are encouraged to seek guidance. Talk to your manager/supervisor, the HR Manager or the Strategy Manager.

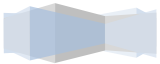
10. DEFINITION OF TERMS

Abbreviation	Meaning
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HRD	Human Resource Department
Multidoor Court Centre	is an Alternative Dispute Resolution Centre which is founded on the principle of mediation as an alternative to the rigorous court processes.



HEALTH, SAFETY & ENVIRONMENT (HSE) POLICY



1. POLICY OVERVIEW

Heckerbella Limited considers the Health and Safety of its employees, customers, others involved in its operation and the protection of its facilities and the environment where the company operates to be of high importance. Heckerbella Limited will operate efficiently and safely, in ways that minimize risk and hazards to its employees, equipment, facilities, and impact positively on the environment.

2. SCOPE

This policy shall apply to all employees, business partners, visitors, and stakeholders of Heckerbella Limited and all persons representing Heckerbella Limited outside of Heckerbella Limited Offices.

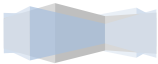
3. PURPOSE

The purpose of this document is to define and establish guidelines for Health and Safety management at Heckerbella Limited. At Heckerbella Limited, we are committed to:

- 3.1 Ensuring compliance with regulatory requirements and continuous improvement on HSE management.
- 3.2 Eliminating and reducing risk to as low as reasonably practicable through the deployment of an effective risk management strategy and best practices.
- 3.3 Being proactive and prepared to respond to potential emergencies.
- 3.4 Educating our employees, contractors, and customers on how their actions influence Health and Safety performance through regular training and awareness programs.
- 3.5 Recognizing and rewarding outstanding Health and Safety performance.
- 3.6 These commitments are in addition to our basic obligation to comply with all local and national health and safety laws and regulations.

4. POLICY STATEMENT

- 4.1 Heckerbella Limited will operate efficiently and safely, in ways that minimize risk and hazards to its employees, equipment, facilities, and impact positively on the environment. “Safe Operations” means that Health & Safety are equal in importance to our business objectives. Safety shall not be compromised for the sake of business expediency.

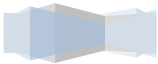


- 4.2 Heckerbella Limited shall ensure that Health and Safety risks associated with its operations are identified, evaluated, and effectively controlled.
- 4.3 Health & Safety performance is an integral part of our business and achieving cost-effective Health & Safety solutions is essential to our long-term business success.
- 4.4 Heckerbella Limited shall provide all necessary support to ensure Health & Safety performance is improved, monitored, and sustained.
- 4.5 Heckerbella Limited emphasizes individual responsibility and accountability. It, therefore, requires everyone throughout the organization including all employees, business partners, and others involved in its operations to adhere to Health & Safety standards and procedures on the job and encourage good Health & Safety practice of the job.
- 4.6 It is equally the duty of everyone engaged in company activities to exercise responsibility and care in the prevention of injury and ill- health to themselves and to others who may be affected by acts and omissions at work.
- 4.7 Heckerbella Limited shall work in partnership with industry associates, government, regulatory agencies, and others for the provision of professional, technical, and expert advice to Heckerbella Limited.

5. *POLICY GUIDELINES*

5.1 *Key Expectations - Health, Safety & Environment*

- Heckerbella Limited shall continuously measure and improve its HSE program and ensure communication of safety standards and procedures to all persons, using available awareness tools.
 - No person shall intentionally interfere with, or misuse assets provided by the company for safety, health, or welfare.
 - All employees and business partners must comply with all established Health & Safety Rules and guidelines as contained in this document and any other HSE requirement or guidance document as may be provided by the Company.
 - All Heckerbella Limited Business Partners and Employees must obtain necessary permits and wear appropriate and approved PPE (Personal Protective Equipment) necessary to control the specific risk for the assigned task.
-



- All employees, contractors, or business partners are responsible, obligated, and empowered to protect themselves, others, and the environment by taking every precaution to prevent death, accidents, and/or injuries by observing established safe working rules and to make the safety of co-workers the foremost consideration.
- Each employee shall have the authority to stop or prohibit any work that they can reasonably foresee is likely to cause property damage, injury, or ill-health to persons.
- Adequate resources and other communication & monitoring tools shall be provided for effective health and safety management and emergency response

5.2 *Smoking*

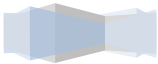
- All Heckerbella Limited facilities are non-smoking areas; Smoking is PROHIBITED within the premises and facilities
- Smoking shall only be permitted in designated smoking areas well away from nearby buildings such that smoke does not drift into them. Violation of the policy shall be subject to disciplinary action.

5.3 *Physically Challenged Persons*

- The company shall make provision for the health and safety of any physically challenged person within its employ.
- Employees with any form of a physical challenge that may affect the safe performance of work tasks in the workplace or their safety during an emergency should expressly notify HR.
- Precautionary measures relevant to each situation shall be discussed and implemented as required. These measures shall also apply to visitors, contractors, etc.

5.4 *Visitors & Business Partners*

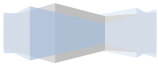
- All visitors to the company shall go through security checks and are not allowed into the premises where adequate security and safety protocol is not followed. The checks aid to minimize the admittance of dangerous items into the premises.
- It is the responsibility of employees to ensure that their visitors follow established Health & Safety guidelines and emergency procedures while within the Heckerbella Limited work environment or operations.



- Business Partners performing work on behalf of the company shall accept full responsibility for complying with the company's HSE policy, and requirements of Heckerbella Limited and any other relevant statutory provisions in respect of work being carried out.

5.5 *Drugs and Alcohol*

- Heckerbella Limited recognizes that the use of legal or illegal drugs and/or alcohol may hinder performance at work and can be a serious threat to health and safety resulting in harm to our people, the community, environment, and physical assets.
- The manufacture, sale, possession, cultivation, distribution, or consumption of illegal drugs, alcohol, or any intoxicating beverage within company premises or during work hours is prohibited.
- All prescription or non-prescription medication should be taken in strict accordance with the doctor's or manufacturer's instructions, and it is the responsibility of everyone to notify their manager or a host of any medication they are taking which could impact their safety or performance at work.
- Outside working hours, alcohol may be consumed at company-sponsored functions, provided the function is authorized by the Management and conducted in an area not requiring performance of a safety-sensitive function or for the participants to operate an automobile or machinery or enter Heckerbella Limited operational premises.
- Where alcohol is to be consumed at a company-sponsored function, the most senior manager present is responsible for the conduct of the function. He or she shall ensure that alcoholic beverages are not made available or offered in a manner that encourages excessive consumption and that the ability of attendees to travel home safely is considered.
- Heckerbella Limited recognizes the benefits of counselling and rehabilitation. All persons requiring such shall be managed in an effective, fair, and constructive manner.
- Heckerbella Limited shall comply with Federal and State Drugs laws and regulations. Necessary disciplinary actions shall be used to enforce this policy and any other policy relating to drugs and alcohol.



5.6 Incident Reporting and Monitoring

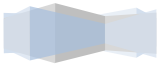
- It is the responsibility of all employees to report any work-related incidents to the HR department (whether the incident resulted in injury or harm). HR Manager shall ensure that investigations on reported incidents are carried out, root causes identified, and corrective measures implemented to prevent future recurrence.
- A record of incident statistics shall be kept by the HR department to track work-related accidents and ill-health and identify trends.
- The HR department shall be responsible for investigating any work-related incidents and ill-health occurring within his/her zone.

5.7 Journey Management

- The Heckerbella Limited journey management system places due consideration on the safety of personnel, material, and equipment. All travel shall be done in line with the Company's Travel Policy.
- Employees embarking on a journey in the interest of the company by land, air or water must have specific travel plans and the integrity and safety of the mode of transportation shall be the first consideration.
- Heckerbella Limited encourages restrictions on night journeys or when environmental conditions are unsafe.
- Only trained and competent persons shall be authorized to operate vehicles or machinery used to transport persons, materials, or lift equipment on behalf of Heckerbella Limited.

5.8 Seat Belt

- Heckerbella Limited values the lives and safety of employees and recognizes seat belt use as a measure towards reducing the impact of Traffic Accidents on drivers and passengers following Nigerian traffic laws.
 - All employees and their passengers are required to wear a seat belt, regardless of seating position, when travelling in any vehicle while conducting a company or personal business.
 - This requirement applies to business travel in a vehicle owned by the company, in a rental vehicle, and a vehicle owned by an individual employee, regardless of whether the employee is compensated for the use of his or her vehicle.
-



- Where an employee is provided with a company-owned vehicle that is used during his or her employment and is also available for that employee's personal use, that employee, together with all passengers who occupy the vehicle at any time and for any purpose, whether business-related or personal, are required to use seat belts at all times the vehicle is in motion.
- Where a vehicle is driven by a company-designated driver, the driver shall not commence a journey until all occupants of the vehicle, both front, and rear-seat passengers have fastened their seat belts.
- The Company shall comply with all Federal and State road traffic laws and shall use where necessary, disciplinary actions to enforce this policy.

5.9 First Aid and Medical

- The company ensures there is an "Appointed Person" (HSE personnel or Safety Champion) to take charge and administer first aid in the event where a person becomes ill or injured and to implement emergency procedures where necessary. Safety Champions shall be appointed in all locations and communicated to all employees. Line managers are encouraged to let their team members act as Safety Champions and consequently facilitate the effective management of Health & Safety within the company.
- First aid boxes shall be provided at all Heckerbella Limited locations and managed by the respective appointed person.
- In the event of an emergency, the Safety Champion of that office location must be notified.
- Arrangements shall be made by the HR department and support of the appointed person to evacuate any employee negatively affected during an incident to the nearest HMO-approved hospital.

5.10 Emergency Procedure

- The HR manager shall be responsible for developing and implementing training programs for employees on emergency evacuation procedures.
- Emergency procedures shall be properly communicated, and appropriate signs shall be displayed. Employees are expected to familiarize themselves with the escape or exit



routes within their immediate environment and guide their visitors through these routes during an emergency evacuation.

- It is the responsibility of respective Safety Champions to coordinate emergency procedures at the various locations, direct evacuees to the assigned muster point, and ensure everyone is accounted for.
- Adequate Fire extinguishers and exit routes shall be placed and identified at all Heckerbella Limited facilities. Access to them must always be unobstructed. Fire extinguishers shall be regularly checked by the Safety Champions to ensure that they are fit for use
- Exit access and Muster points shall be marked, kept clear always, and their location communicated to employees by their respective Safety Champion.
- Evacuation plans must be tested at least every 6 months to educate employees on fire safety and emergency procedures
- All employees are expected to follow established emergency procedures and report any related Health and Safety issues to designated teams for prompt correction.

5.11 Access Control

- Heckerbella Limited encourages Community or Public Relations but such interactions must not give room to uncontrolled entrance into offices and premises. Entrance into Heckerbella Limited premises by an unauthorized person or persons is highly prohibited.
- All employees, contractors, and visitors must respectively display their identity cards or visitors tag within the Company's premises. Unauthorized access into assets areas and equipment rooms is prohibited.

5.12 Training

- All new employees shall receive basic HSE orientation as part of the induction or onboarding process.
- Refresher training and drills are performed for all employees at least twice a year and specific training and drills shall be conducted where there is a significant change to the risk profile within the work environment to the affected persons.



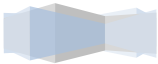
- Training of Safety champions to facilitate safety in the workplace shall be performed at least twice a year.
- A review of Safety Champions is done bi-annually to ensure that HSE lists are updated and training is scheduled for all new (and untrained) representatives.

5.13 Facility Inspection

- Heckerbella Limited is committed to the identification, assessment, and control of risks to people, the environment, and assets.
- HSE inspection shall be carried out on any facility intended to be used or occupied by Heckerbella Limited.
- Upon inspection of the intended facility, Safety Champions or company shall make appropriate recommendations to the project owner, necessary to ensure that all identified risks and hazards to life, asset, or environment are adequately eliminated or reduced to as low as reasonably practicable.
- Requirements of this policy shall apply to both new and existing facilities requiring renovation or modifications.
- The Safety Champions as part of its proactive monitoring of safety performance shall carry out quarterly scheduled safety inspections and risk assessment of facilities. Facilities with a high-risk assessment rating shall have more frequent inspections while facilities with low-risk assessment ratings shall be inspected quarterly.
- The Safety Champions shall track to closure, implementation of corrective actions identified during inspections/risk assessment.

5.14 Contractor Management

- Heckerbella Limited shall prequalify and evaluate every potential contractor for HSE suitability and competence as part of the tender or bid process. Part of the evaluation process may require a review of some relevant documents and a visit to the contractor's site.
- The contractor shall ensure adequate consideration is given to health and safety provisions for maintenance or construction projects when tendering for jobs.



- The contractor before the start of any work on the Heckerbella Limited site or on behalf of Heckerbella Limited shall ensure that all foreseeable hazards associated with the work have been identified and the risk from those hazards properly assessed.
- The contractor shall provide on-demand such documents as HSE plans, method statements, etc. outlining how the job will be carried out safely.
- Heckerbella Limited shall inspect and evaluate all items to be purchased for the company which may otherwise have health and safety risks associated with its use or operation.
- This policy and all other guidelines as may be provided shall apply also to sub-contractors or persons working on behalf of the contractor.
- Agreements with contractors shall contain clauses that require the contractor's compliance with this policy and any related guidelines.
- The HR and Safety Champions shall regularly review contractors' HSE performance and advise management on the continued engagement of the contractor.

6. ENVIRONMENTAL MANAGEMENT

- Heckerbella Limited is committed to the protection and sustainability of the environment where it operates. Subsequently, it shall ensure as far as reasonably practicable that only energy-efficient and environmentally friendly resources are utilized in its operations and shall employ the principles of 'Reduce, Reuse, and Recycle' for waste management.
- Handling, storage, transportation, and disposal of hazardous materials shall be carried out only by competent and authorized persons.
- It is the responsibility of employees or any person involved in Heckerbella Limited's operation to ensure efficient use of energy by switching off electrical appliances when not in use, optimize water usage, follow approved waste management process, and to as far as reasonably practicable go paperless.
- Heckerbella Limited shall in addition to these commitments, comply with the relevant local and national environmental laws and regulations.



7. RESPONSIBILITY

7.1 Human Resources

- Must ensure all guidelines and policies are duly followed by all departments in Heckerbella Limited.
- Provide support to Employees when necessary about HSE.
- Identify and coordinate selection and training of safety champions.
- Provide adequate support for Safety Champions.

7.2 Employee

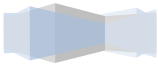
- All Employees are expected to adhere to the HSE policy.
- To report all HSE issues to Safety Champions at a time.
- To watch out for their safety and that of others.
- To provide the necessary support to the Safety Champions.

7.3 Safety Champions

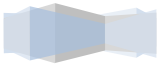
- To adhere to and support the implementation of the HSE policy.
- To investigate all HSE issues or incidents and provide adequate reports.
- To ensure the periodic inspection is carried out on all Heckerbella Limited's facilities and HSE requirements.
- To guide and provide support to employees on HSE matters.

8. DEFINITION OF TERMS

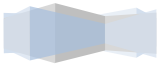
Acronyms	Meaning
HSE	Health, Safety & Environment
HR	Human Resources Department
Appointed Person	A person who is nominated to take care of First Aid



Safety Champion	A person who is nominated to coordinate evacuation within their work area. This person shall also act as the Appointed Person
First Aid	Immediate help is given to an injured person before professional medical care is available
HMO	Health Management Insurance Company for Heckerbella Limited Employees
Company	Heckerbella Limited.



LEARNING & DEVELOPMENT POLICY



1. POLICY OVERVIEW

Our Learning & Development policy provides guidelines that ensure the learning, upskilling, growth, and development of our employees within a framework that ultimately focuses on building the capability required to achieve Heckerbella Limited's business objectives. We ensure that learning and development interventions equip employees with the right knowledge, skills, abilities, and attitude to enable them to perform their job.

2. SCOPE

This policy applies to all Heckerbella Limited Full Time and Contract Employees.

3. PURPOSE

Our Learning and Development strategy is also an integral part of the performance management cycle and will focus on bridging employee knowledge and skill gaps that will ensure optimal performance on the job. Ultimately, this policy is to ensure we create a Learning Organisation. This policy seeks to provide:

- 3.1 Learning & Development opportunities within the objectives of each department or unit through learning events required for the functional, leadership & technical competencies for specific roles.
- 3.2 Mandatory organizational and cross-functional training and other developmental interventions.
- 3.3 Development for identified high potential employees.
- 3.4 Guidance for individuals and line managers regarding access to learning and development opportunities.
- 3.5 Statutory and other industry-regulated training requirements – as required by the Industrial Training Fund (ITF).
- 3.6 Knowledge Management Framework to manage the availability, sharing, and warehousing of information to all employees in real-time.



4. POLICY STATEMENT

All employees shall receive training appropriate to their role and career aspirations, subject to personal development plans, business needs, operational and budgetary considerations. The developmental intervention will begin when an employee joins the company and will continue throughout his/her career in Heckerbella Limited, responding to the job changes and evolving strategies of the organization. We are therefore committed to supporting each employee in achieving the following:

- 4.1 High standards of work performance
- 4.2 Greater understanding and appreciation of factors affecting work performance
- 4.3 Sharing ideas and dissemination of good practice
- 4.4 Building strong and effective teams.
- 4.5 Increased motivation and job satisfaction for individuals
- 4.6 Professional development

5. EQUAL OPPORTUNITIES

Heckerbella Limited is committed to ensuring equality of learning opportunity, hence no employee will be excluded from learning. Contract Employees will also have equal access to learning and development opportunities appropriate to their role when required.

6. POLICY GUIDELINES

- 6.1 Employees' Personal Development Plans (PDPs) are an integral part of the Performance Management process. Employees' personal development needs must be considered at the beginning, during, and at the end of a performance review period.
- 6.2 Employees and Line Managers in creating PDPs will determine the most appropriate method to address the identified L&D need.
- 6.3 Specific developmental interventions must be identified and documented to enable monitoring as well as a measure that the development required has been achieved. Developmental interventions activities in Heckerbella Limited include:
 - 6.3.1 **Classroom Training:** Any kind of formal learning session facilitated within a classroom environment.



- 6.3.2 **E-Learning:** The use of technology to enable employees to learn anytime and anywhere. E-Learning can include training, the delivery of just-in-time information, and guidance from experts.
- 6.3.3 **Job Rotation:** A career development strategy where an individual temporarily moves laterally into an established or “shadow” position. An employee may complete a Job Rotation within a financial year.
- 6.3.4 **Job Enrichment:** An attempt to motivate employees by allowing them to use the range of their abilities by increasing their key accountabilities on the current role to ensure growth and fulfilment.
- 6.3.5 **Secondment:** A temporary transfer to another job or post within or outside Heckerbella Limited for developmental purposes.
- 6.3.6 **Mentoring:** Process of supporting an individual, with the result of achieving a specific personal or professional goal; also, a process of teaching and providing focused guidance to an employee in preparation for the next level of responsibility.
- 6.3.7 **Coaching:** Usually a formal or informal relationship between two (2) people within or outside the organization – a senior employee (usually outside the individual’s chain of supervision) and a junior employee.
- 6.3.8 **Developing Others:** a process by which an individual (a people builder), provides challenging and stretching tasks and assignments, constructs compelling development plans and executes them, and pushes direct reports to accept developmental moves.
- 6.3.9 **Special Assignment/Project:** This is a learning strategy in which the individual performs temporary duties on a full-time or part-time basis. These temporary duties may be performed within the individual’s current organization/department or outside the individual’s department or the organizational structure. An example is a collaborative effort of individuals from a different department, frequently involving research or design that is carefully planned to achieve a particular business strategic goal.



- 6.3.10 **Team Building Event:** Is a wide range of indoor and outdoor activities designed for improving team performance, enhancing work relationship, stimulating Employee engagement and teamwork of Employee.
- 6.3.11 **Industry Seminars:** Educational events that feature one or more subject matter experts delivering information primarily via lecture /discussion/workshops that are relevant to Heckerbella Limited business strategy and Employee professional development.
- 6.3.12 **Certifications:** The management may provide training and further education in pursuit of qualifications for employees where a clear link can be made to meet service objectives.
- 6.3.13 **Induction Programs:** The process used to welcome new employees to Heckerbella Limited and prepare them for their new roles.
- 6.3.14 **Health and Safety:** In Heckerbella Limited, management and individual employees all have a role in ensuring a healthy and safe working environment. Training is provided as part of an employee's induction and courses are arranged according to the requirement of the role.
- 6.3.15 **Accredited Professional Conferences and Workshop:** Heckerbella Limited employees can attend conferences and workshops bound to their work role or the business.
- 6.4 Employee nomination for training is based on identified training needs within IDPs in line with approved training plans.
- 6.5 All employee IDPs and subsequent training & development interventions should be linkable to Heckerbella Limited strategic business goals and training budget.
- 6.6 Approved training plans can be modified anytime within the financial year to address emerging business needs or changes in roles subject to approval from the respective line managers or business heads.
- 6.7 Each employee may mandatorily be exposed to any of the following training and development programs during the financial year. This includes Mandatory, Functional, Cross-Functional, and Developmental training programs.
-



- 6.8 Employees may opt to attend advertised training and development programs; such programs will be attended on the approval of the line manager.
- 6.9 Heckerbella Limited Employees can attend a specific professional certification program that has a direct link to the employees' organizational performance or individual development program.
- 6.10 To ensure efficient planning and business continuity, training will be structured such that no more than two (2) of a departmental headcount will be scheduled for training in a day.
- 6.11 The HR Team prepares a yearly schedule of employees nominated for training and the details of training.
- 6.12 Training will only be deployed on the approval of the training schedule by the CEO.
- 6.13 Line Managers will pre-approve training attendance schedule one (1) week before commencement of training for local training but if a local training requires travelling, approval should be obtained three (3) weeks before the training. Where training is internationally based, approvals shall be obtained three (3) months before the training to allow employees to obtain a visa where applicable.
- 6.14 HR Team will only send training invites to employees released by Line Managers where applicable.
- 6.15 All travel-related training will be in line with the Journey Management Policy.
- 6.16 An employee who might not attend a scheduled training for valid reasons must notify the HR Team four (4) days before the training for local training and one (1) month if it is an international training.
- 6.17 Employees who fail to attend scheduled training sessions without prior notification to the HR Team will receive a penalty in line with HR Disciplinary policy.
- 6.18 A Pre-assessment evaluation questionnaire form will be sent to participants. The form must be completed within three (3) working days before the commencement of any training program.



6.19 A Post assessment evaluation form will be sent to participants after every training program. The form must be completed within three (3) working days of the end of a training program.

6.20 Employees may be required to sign a bond for high-level professional training in line with applicable HR policies.

7. *LEARNING & DEVELOPMENT METHODS*

7.1 *Organizational Learning Needs Identification*

Heckerbella Limited learning needs will be derived from the following processes:

- Identification of needs from organizational and functional objectives or strategic goals.
- Learning gaps identified during 'performance review processes.
- Statutory learning and development requirement.
- Project driven training requirement.
- Training or Developmental gaps captured in IDPs and validated by the line managers within a required time frame.
- Relevant training for Field Employees where necessary.

7.2 *Attendance of International Trainings*

- All international training requests must be in line with employee's training needs.
- International training attendance is pre-approved by the COO and CEO during the functional training plan validation meetings.
- The option of finding a suitable vendor to offer training or invite an international trainer to Nigeria is considered before international training/trip is considered.
- All international training will be approved subject to the availability of the training budget to facilitate such training.
- Emerging business requirements such as the deployment of new equipment, work tools, spares, engines, and international certifications may require international training.



- Final approval for all international training lies with the CEO.
- All international travel must be in line with the Journey Management policy.

7.3 *Project Driven Training*

Where due to emerging business needs there is a need for the deployment of new equipment, systems, services, or software, employees will be trained and developed to manage the equipment or systems deployed. Where training of employees on the newly deployed equipment or system is not part of the service provider's agreement, the logistic costs towards facilitating the training and employee attendance of the training (if applicable) will be pre-approved by the CEO.

7.4 *Leadership Development Programs (LDP)*

A comprehensive set of programs that enable leaders to expand and reinforce their leadership competencies, skills, and strategies. Eligibility for attendance of LDPs is targeted at identified high potential employees from the Talent Management Process or Performance Review Process. This program will help Heckerbella Limited to achieve its long-term business goal and help with the HR succession program.

7.5 *Employee Self Development*

Employees can develop themselves to gain skills required in their job role and might be reimbursed by the company. Such a program must go through line manager, HR, and CEO approval.

7.6 *Information Dissemination*

It is essential to ensure that information flow to all employees is processed and disseminated through the right channel. Information confirmation and dissemination are key in driving business objectives and customer experience.

- The HR team gets information from the approved unit and cascades it to all employees.
- If the information is a large change from existing information, a training session will be scheduled.

8. *TRAINING BOND*

All Employees who attend courses in Nigeria or Abroad, where certain predetermined costs are involved, shall be required to sign a bond when required.

9. INDUSTRIAL TRAINING FUND GUIDELINE

The Industrial Training Fund is established to utilize contributions to the fund to "promote and encourage the acquisition of skills in industry and commerce to generate a pool of indigenously trained manpower sufficient to meet the needs of the private and public sectors of the economy." The Industrial Training Fund (ITF) Act governs general modalities for training & development within organizations in Nigeria.

10. EMPLOYERS OBLIGATION UNDER THE ACT

- An employer with five (5) or more employees or with an annual turnover of N50 million and above, contributes one per cent (1%) of its total annual payroll to the Industrial Training Fund as the employer's contribution to the training of employees in Nigeria.
- The mandatory one per cent (1%) ITF contribution must be made not later than the 1st day of April of the following year.
- The Industrial Training Fund Governing Council may make a refund of up to fifty per cent (50%) of the employer's contribution to the ITF where the training programme of the employer is deemed satisfactory based on ITF guidelines.
- Employers are required to provide adequate training for their employees to improve on the skills related to their job, evidence of such training is to be forwarded to the ITF to obtain refunds. Evidence of the mandatory training of employees must be communicated to the ITF Council before any application for refunds can be entertained.
- Employers must notify ITF Council two (2) weeks in advance of the training.
- The ITF Act provides that not less than 15% of the total workforce in an organization must be trained annually before it is qualified for a full reimbursement grant.

11. ROLES & RESPONSIBILITY

11.1 Management Team Role

The Management Team has a key role to play in Learning & Development by:

- Demonstrating a commitment to train and develop employees concerning the organization's objectives.



- Ensuring that training and development plans are focused on the organisation's needs at corporate and service levels.
- Providing adequate resources and support
- Ensuring training and development actions are evaluated concerning organisational objectives and the benefits are identified.
- Ensuring that training plans are approved as provided in the policy.

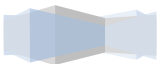
11.2 *Line Managers*

It is the responsibility of the Line Manager to:

- Ensure consistent delivery of Individual Development Plans (IDP) in line with the Heckerbella Limited Competency framework.
- Set / support training objectives and agree to individual training objectives where appropriate.
- Create, support, and prioritize development opportunities.
- Coordinate teams to ensure employees are released for learning and development programs.
- Ensure priority is given to training needs relevant to the functional competencies outlined for individual roles.
- Create career development opportunities where possible.
- Ensure Direct Reports' awareness and understanding of the Learning & Development Policy.
- Ensure in collaboration with the HR Team that employees who fail to attend scheduled training sessions without prior notification receive appropriate penalties.

11.3 *Employee*

It is the responsibility of the Employee to:



- Identify along with Line Manager, Individual Learning and Development needs in line with role competence framework and take personal responsibility for executing agreed development.
- Demonstrate commitment to learning and development, completing necessary documentation before and post attendance of learning and development programs.
- Take responsibility for personal development as required.
- Understand the Learning and Development Policy and process for application or initiation of learning.
- Understand the business expectation from output and result of learning activities.
- Notify the HR Team within four (4) days to the training of inability to attend a program so that the slot can be offered to another employee in the case of local training.

11.4 Human Resources Department

It is the responsibility of the HR Team to:

- Develop the training calendar based on input/training needs from functional heads & Line Managers.
- Circulate the training calendar to all Departmental Heads and Line Managers.
- Send training attendance schedules to Line Managers.
- Support and deliver a range of development opportunities.
- Ensure deployment of quality programs.
- Access appropriate resources and funding to support L&D Agenda.
- Link each Function's Training plans with L & D budget and Group guidelines for functional and technical training.
- Maintain effective communication with Departments or Units on L & D related matters.
- Facilitate the effective evaluation of training activity in liaison with the appropriate line managers at individual, departmental and organisational levels.



12. DEFINITION OF TERMS

12.1 Employee

Except otherwise stated, the term “Employee” refers to all permanent and contract staff of Heckerbella Limited.

12.2 Company

The term “Company” refers to Heckerbella Limited.

12.3 Line Manager

The term “Line Manager” refers to an employee’s immediate superior who oversees the employee’s work and has responsibilities for employee performance, discipline, and career management.

12.4 Departmental Head

The term “Departmental Head” refers to one who oversees, plans, directs and coordinates the day-to-day activities of a major functional department or unit in Heckerbella Limited.

12.5 Performance Gaps

Identified developmental needs which could be knowledge, Skills, or Attitude, required for high performance in a role that is currently lacking in an individual. These are usually identified during performance review meetings between a line manager and an Employee. A personal development plan is then agreed upon by both parties.

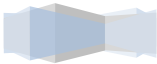
12.6 Mandatory

All training that is deemed essential to the safe and efficient functioning of the organisation and/or the safety and wellbeing of employees. This will include “Statutory” Training.

12.7 Cross-Functional

Learning and/or Development that an employee is expected to achieve while on assignment in another function different from his/hers. Also known as business-enhancing training focused on improving required support for interdependent roles may be a classroom, e-learning, or on-the-job.

12.8 Functional



Learning and Development plan that will improve knowledge, skills, and attitude required for an employee's function. Maybe a classroom, e-learning, or on-the-job training (OTJ).

12.9 Developmental

The Knowledge, Skills, or Abilities required to perform specific tasks. Developmental interventions will include advertised programs, Performance & OTJ coaching sessions, Leadership Development Programs & role-specific requirements.

12.10 Mentoring

Process of supporting an individual, with the result of achieving a specific personal or professional goal; also, a process of teaching and providing focused guidance to an Employee in preparation for the next level of responsibility.

12.11 Coaching

Usually, a formal or informal relationship between two (2) people within or outside an organization, a senior employee (usually outside the individual's chain of supervision) and a junior Employee

12.12 *Abbreviations*

HR - Human Resource Department

COO - Chief Operating Officer

CEO - Chief Executive Officer

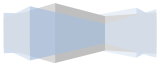
ITF - Industrial Training Fund

IDP - Individual Development Plan

L&D - Learning & Development



LEAVE POLICY



1. POLICY OVERVIEW

Heckerbella Limited promotes a positive and healthy work-life balance and recognizes the importance of leave management in achieving this goal. This leave policy allows flexibility for employees to meet personal, family and work commitments without compromising the achievement of business objectives in ensuring that individual needs are balanced with operational requirements.

2. SCOPE

This policy applies to all Heckerbella Limited full time and contract employees who are entitled to annual leave in their contract of employment.

3. PURPOSE

The purpose of this policy is to:

- 3.1 Ensure employees understand their responsibilities concerning Leave Management.
- 3.2 Ensure that line managers understand their responsibilities in managing leave within their teams and helping their employees achieve a positive work-life balance.
- 3.3 Provide general guidance for dealing with instances where specific requests for leave cannot be accommodated or covered.
- 3.4 Provide information and guidance on all types of leave available to employees.

4. POLICY STATEMENT

Heckerbella Limited employees shall be entitled to the following types of leave:

- Annual leave
 - Public and Statutory holidays
 - Study and Examination Leave
 - Parental Leave
 - Compassionate Leave
-



- Sick Leave
- Unpaid Leave/ Leave of Absence

4.1 It is important and compulsory that employees take regular breaks from their duties through annual leave.

4.2 The annual leave calendar operates from 1 January to 31 December.

4.3 Employees are expected to take their annual leave entitlement within the leave year period.

4.4 Entitlements to leave are pro-rated for full-time employees who join or leave part-way through the leave year.

5. POLICY GUIDELINES

5.1 Annual Leave

5.1.1 Annual leave shall be taken annually.

5.1.2 Annual Leave days' entitlement for full-time employees and contract employees shall be as stated in the table below.

Categories	Number of Leave Days
Senior Managers and Above	25
Managers to Supervisor	22
Others	20
Contract Employees	15

5.1.3 During the probationary period, you will be entitled to five (5) days casual leave, and in certain emergency cases as recommended by the line manager, to be reviewed and approved by the Human Resources Department.

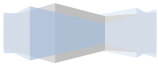
5.1.4 Employees can carry over a maximum of ten (10) leave days into a new calendar year and utilize them between the 1st of January and 31st of March.



- 5.1.5 Employees who fail to use their carry over annual leave before 31st of March of the following year will forfeit it.
- 5.1.6 Unutilized leave will not be commuted to cash.
- 5.1.7 Any unauthorized absence from work will be treated as unpaid leave. If an employee overstays his/her leave, the leave shall be treated as unauthorized leave and shall be treated as unpaid leave. The employee will be deemed as having abandoned his/her duty post if he/she stays away for three (3) days or more and disciplinary proceedings shall commence against the employee.
- 5.1.8 Leave slots taken by an employee should be agreed upon in consultation with the line manager. No payment will be made in lieu of leave not taken except in respect of the year of termination of employment.

5.2 *Public and Statutory Holidays*

- 5.2.1 All employees shall be allowed to observe public holidays declared by the Federal Government.
- 5.2.2 All public holidays will be formally communicated to all employees by the Human Resources Department.
- 5.2.3 If an employee's leave falls within a public and statutory holiday, such days will not be counted as part of the employee annual leave, but the employee shall return to work on the expected date of resumption after the public holiday and contact Human Resources Department for adjustments or seek permission to extend leave by the requisite number of days.
- 5.2.4 Permission for extension of leave days due to public holidays must be sought before the completion of the leave period. Otherwise, the employee will be required to resume and liaise with Human Resources subsequently for the adjustment.
- 5.2.5 Days lost through strikes and other civil unrest will not be recognized as an employee's un-utilized leave days.



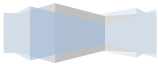
5.3 Study and Examination Leave

- 5.3.1 As part of the Heckerbella Limited to support employees' continuous career development and growth, employees shall be entitled to a paid exam leave up to a maximum of five (5) days in a year to pursue any course of study intended to reskill or upskill in areas related to their current job, future roles and /or professional development.
- 5.3.2 Exam leave does not form part of the annual leave. However, where annual leave has been fully exhausted and there is a need for additional periods of absence to study, such leave of absence shall be deducted from the annual leave balance if available. Where the annual leave has also been fully exhausted unpaid leave of absence may be approved.
- 5.3.3 This policy does not apply to private seminars, workshops, training programs and /or full-time courses/programs.
- 5.3.4 Approval of exam leave by the line manager with the endorsement of the Human Resources Department shall be on a case-by-case basis. Exam leave requests will be declined if the Company may be adversely affected by such absence.

5.4 Parental Leave

5.4.1 Maternity Leave

- 5.4.1.1 Employees should notify the company, via the presentation of a doctor's advice as soon as she is aware of her pregnancy.
- 5.4.1.2 Employees are entitled to three (3) months/90 days of maternity leave (weekends inclusive) with full salary (all allowances inclusive) or a maximum of four (4) months where the fourth month (optional) will be considered unpaid leave.
- 5.4.1.3 In the unfortunate event that an employee has a stillbirth or miscarriage during the third trimester, the employee shall be entitled to four (4) weeks special leave whether the employee has commenced maternity leave or not, to assist her in recuperating.
- 5.4.1.4 Any other illness arising out of and during pregnancy shall not be considered as maternity leave but will be considered as normal sick leave.



5.4.1.5 The Human Resources Department shall upon receipt of the pregnancy notification, confirm receipt as well as notify the employee of all relevant information on the period requested.

5.4.1.6 Upon resumption from maternity leave, the nursing mother will, for three (3) months, be allowed to work from 8 am to 3 pm daily.

5.4.1.7 An employee who took maternity leave within the leaving Year will not be entitled to go on annual leave within the next six (6) months upon resumption from their maternity leave.

5.4.1.8 Employees whose maternity leave coincides with the annual salary increase of the company and/or performance bonus shall be entitled (if they meet the basic requirement for eligibility).

5.4.1.9 Maternity Leave before Confirmation

5.4.1.9.1 Employees on confirmation probation are entitled to Maternity Leave.

5.4.1.9.2 The employee will be entitled to her full monthly salary, (allowances inclusive) for the 3 months of maternity leave.

5.4.1.9.3 The employee shall be eligible for the nursing mother working hours of 8 am to 3 pm for three (3) months starting from the first day of resumption from maternity leave.

5.4.1.9.4 The confirmation process for the employee will continue upon resumption from maternity leave, considering the period the employee worked full time before the maternity leave. For the avoidance of doubt, the three (3) months period of maternity leave does not count towards the probation period.

5.4.2 Adoption Leave

5.4.2.1 Adoption leave is available to enable employees (whether full time or contract) who wish to adopt a child aged up to 18years, to take a period of leave to help the child settle into the family and adjust to new circumstances.

5.4.2.2 An employee adopting a baby shall be entitled to maternity leave (see table below) an application for such leave must be made at least one month before the leave period.



AGES	LEAVE DAYS
Zero (0) to six (6) Years	Three (3) Months (weekend inclusive)
Six (6) Years and Above	Two (2) Months (weekend inclusive)

5.4.3 Paternity Leave

5.4.3.1 Three (3) weeks of paid leave will be granted to employees who are biological or adoptive fathers, to allow them to attend (where relevant) the birth of a child and to provide support during the period immediately during or after the birth.

5.4.3.2 Paternity leave cannot be commuted to cash.

5.4.3.3 Utilization of paternity leave shall be within three (3) months of delivery or adoption.

5.5 *Compassionate and Emergency Leave*

5.5.1 Compassionate leave is time away from the office to deal with the arrangements and/or matters relating to death, life-threatening illness or injury of a member of your immediate family, or a close family or relation.

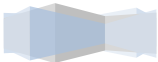
5.5.2 A “close relative” may (but not exclusively) include:

- The spouse, partner, child, parent, sibling, grandparent, uncle or aunt of an Heckerbella Limited employee, or
- The parent, sibling, child, grandparent, uncle or aunt of the spouse/partner of an employee.

5.5.3 Emergency leave is granted for unexpected circumstances that are beyond the control of the employee and which necessitate absence from work without prior notice.

5.5.4 Employees will be allowed to take two (2) days of paid leave for Compassionate or emergency leave with necessary approval and documentation on a case-by-case basis.

5.5.5 Absence reporting should be done on or before 9 am on the same day or the following day; otherwise, it will be considered absence without permission, which would result in disciplinary action. This leave will be deducted from the employee's annual leave



balance. If the employee has exhausted the annual leave entitlement, this leave shall be deducted via payroll from the employee's salary.

5.6 Sick Leave

- 5.6.1 Any employee who will be absent because of sickness must report such absence to the line manager on or before 9 am of the same day or the following day; otherwise, it will be considered absence without permission, which would result in disciplinary action.
- 5.6.2 Medical certificates for sick leave must be presented to the Human Resources Department on or before the day of resumption of duty.
- 5.6.3 In the event of serious illness, the employee will be eligible for approved prolonged sick leave as follows:

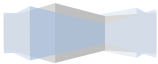
Length of Sickness	Payment Entitlement	
	Full Pay	Half Pay
One (1) day to three (3) months	Yes	Not applicable
More than three (3) months to twelve (12) months	First three months	Half pay for subsequent months till the 12 th month.

- 5.6.4 For any sickness prolonged for over twelve (12) months, the employee shall be given leave of absence for up to eighteen (18) months with no pay, however, re-absorption will be dependent on the availability of a suitable role.
- 5.6.5 In all cases of protracted illness, following the completion of the approved sick leave period, any decision to be taken regarding further assistance and retention of the employee's service will be at management's discretion.
- 5.6.6 Employees will not be entitled to an additional day off if sick on a public holiday except required through a doctor's report and recommendation.



5.7 Unpaid Leave or Leave of Absence

- 5.7.1 This applies to unpaid personal leave of absence, excluding emergency leave, maternity leave and paternity leave.
- 5.7.2 Employees that have served for more than three (3) continuous service years may apply for voluntary unpaid leave for a maximum period of two (2) months, which may be renewed at Management's discretion.
- 5.7.3 The approval right for voluntary unpaid leave rests with the Managing Director or Chief Operating Officer based on the recommendation by the Human Resources Department.
- 5.7.4 The employee, before the commencement of an unpaid leave of absence, shall utilize any accrued leave.
- 5.7.5 Before proceeding on the leave, the employee shall submit all work tools and identity cards in their possession.
- 5.7.6 The applicant shall be required to hand over his/her current role and responsibility.
- 5.7.7 A request for a leave of absence for alternate employment will not be considered.
- 5.7.8 The period of unpaid leave shall be counted as part of years spent in service.
- 5.7.9 All benefits and perquisites like a bonus, medical scheme, life insurance, leave, pension contributions etc. shall cease during the leave period.
- 5.7.10 The leave of absence request must be made three (3) months in advance.
- 5.7.11 Requests for unpaid leave will be considered based on the following criteria:
- Operational requirements
 - Length of service of the employee
 - The period of leave requested.
 - Reason for the leave
 - The need and availability of a replacement



- Cost-benefit to the company and benefit to the employee
- The value of a professional development opportunity, if any.

5.7.12 Heckerbella Limited cannot guarantee that the applicant will return to their previous job, but Heckerbella Limited may at its discretion place the applicant in any available position equivalent to the position he/she left and for which he/she is qualified.

5.7.13 The period granted for leave of absence terminates on the applicant's return to work at Heckerbella Limited at the end of the leave or upon assumption of duty at any other employment.

5.7.14 Failure and or neglect to report to work at Heckerbella Limited two (2) weeks after the end of leave period without requisite approval will be regarded as abandonment of duty and the employee shall be deemed terminated from the date he/she was due to resume.

5.7.15 Where an applicant intends to disengage after the leave period is granted, he/she will be required to tender his/her letter of resignation as well as payment of one (1) month in lieu of notice.

6. *LEAVE APPLICATION*

6.1 Employees are required to request leave using the appropriate document or available portal.

6.2 Where an employee is unable to proceed on a pre-scheduled leave at the instance of the company, the employee is required to inform HR and reschedule within 2 days of the cancellation, where this is not done such leave would be deemed to have been utilized.

6.3 Line Managers must ensure that all employees' annual leave requests, using the appropriate document or available portal must be approved (or rejected).

6.4 Where an annual leave request is turned down, the reason must be documented and emailed back to the employee.

6.5 Line Managers should communicate to the employee as soon as possible, those periods during which due to operational requirements, it may not be appropriate to take annually.



6.6 Employees are expected to provide two (2) weeks due notice when requesting a period of annual leave. However, some flexibility may be required depending on the circumstances surrounding the request.

6.7 Annual Leave Entitlements on Termination of Employment

6.7.1 In the leave year in which employment is terminated, annual leave entitlement will be accrued on a pro-rata basis for service from the start of the annual leave year until the end of the year; this includes part months worked.

6.7.2 Employees are entitled to take any remaining leave entitlement before their departure. If there are valid reasons why this is not possible, he/she will be entitled to receive payment, in lieu of the untaken leave.

6.7.3 If any employee has taken leave in the year beyond that which is required, a deduction for the excess leave taken will be made from the terminal benefits.

6.7.4 The Human Resources Department will notify the employee about any payment required in lieu of annual leave or any deduction from salary required due to more annual leave being taken than had accrued during the annual leave year to date.

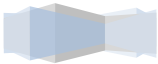
7. **RESPONSIBILITY**

7.1 **Human Resources**

- Must ensure all leave guidelines and policies are duly followed by all departments in Heckerbella Limited.
- Provide support to employees when necessary about leave.
- Confirmation of approved or rejected leave application with adequate notification to the employee and line manager within the required time frame.

7.2 **Line Managers**

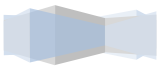
- Inform Employees about the activities for the year to enable them to make informed decisions on when they can take their leave.
- Schedule and agree with employees on leave slots for the year.
- Approve leave application within the required timeline.



- Inform HR in case of any employee misconduct or leave issues.

7.3 *Employee*

- All employees are expected to adhere to the leave policy.
- Schedule and agree on leave days with their line managers.
- Ensure necessary leave documents are signed and approved by their line managers.
- To provide relevant documents when necessary.



APPENDIX ONE

LEAVE APPLICATION FORM

Employee Name		Employee ID	
Job Title		Department	
Line Manager		Date	

LEAVE DETAILS

1. Type of Leave Applied for (Tick appropriately)

Annual Leave ☐ Sick Leave ☐ Maternity/Paternity leave ☐
Study Leave ☐ Others ☐

2. Requested leave dates: From..... To.....

3. The number of leave days requested..... Resumption Date.....

4. Name of Acting / Back-up Colleague.....

(Please ensure handover document is given to acting/back-up colleague)

5. Contact Number(s).....

I understand that my leave may be cancelled if not found convenient for the company to release me and could be recalled from leave to the office where this becomes needful and unavoidable.

Signature..... Date.....

LINE MANAGER APPROVAL

Your application for leave is hereby: (*Tick appropriately*) Approved ☐ Declined ☐

Signature & Date

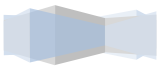
HR USE ONLY

Your application for leave is hereby: (*Tick appropriately*) Approved ☐ Declined ☐

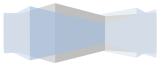
Name & Designation.....

Signature.....

Date.....



PERFORMANCE MANAGEMENT POLICY



1. POLICY OVERVIEW

The objective of this policy is to create an effective performance management system where employees have a clear understanding of the work expected from them, receive ongoing feedback regarding how they are performing relative to expectations, distribute rewards accordingly, identify development opportunities, and address performance that does not meet expectations.

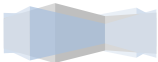
2. SCOPE

This policy applies to all Heckerbella Limited Employees.

3. PURPOSE

The performance management policy has been designed to ensure the standard and consistent management of employee performance across the organization. The purpose of the performance management policy is to:

- 3.1 Provide a criterion and formal framework by which employees' performance will be evaluated.
- 3.2 Align individual performance with business goals, from the setting of objectives according to respective/relevant approved business plans, to performance monitoring and review against goals.
- 3.3 Engage employees in an objective set to ensure that they have a clear understanding of what is expected of them and how they contribute to the overall success of the organization.
- 3.4 Encourage an open dialogue between Line Managers and subordinates through collaborative objectives/target setting.
- 3.5 Identify the necessary resources, training, development and support that employees need to carry out their role and achieve their objectives.
- 3.6 Evaluate contribution in respect of how well objectives have been met and in respect of other skills which maximize effectiveness.
- 3.7 Provide a basis for linking exceptional contribution to reward.



4. POLICY STATEMENT

Performance management is a critical factor in achieving our strategic objectives. Each employee's performance makes a difference to the company's results. Line managers are responsible for managing and optimizing the performance of employees reporting to him/them.

The Heckerbella Limited performance system has been designed to not only reward consistent and exceptional performance but also create an enabling environment with the appropriate level of the target to ensure employees perform at their optimal and full potential.

5. POLICY GUIDELINES

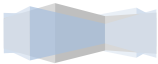
5.1 Objective/Target Settings:

- The Performance Management cycle will run from January through December of each year.
- Objectives/ targets shall be set at the beginning (January) of each year for each employee and shall form the basis for assessing the employee's performance for the period.
- Individual objectives shall be derived from the relevant departmental objectives; aligned with established organization-wide objectives. All completed and approved objectives shall be submitted to the Human Resources Department on or before the 31st of January each year.
- The Human Resources Department shall be responsible for coordinating all objective setting activities across the organization.
- Organizational targets shall be cascaded down from top management and reflected in the individual performance targets of all employees.
- To ensure objectives are clear, employee objectives/ targets shall be written using the 'SMART' methodology.

5.1.1 **Specific** - Define the results to be achieved.

5.1.2 **Measurable** - Discrete unit of measure can be used to determine the extent of achievement of the targets.

5.1.3 **Achievable** - Challenging yet achievable; targets or objectives that are realistic and achievable.



5.1.4 **Relevant** - Objective's support' business goals with practical targets that can be achieved; and

5.1.5 **Time-bound** - Delivered within a specified timeframe.

- When a new employee joins the organization, he/she is expected to have a signed-off performance objective form indicating the objectives and KPIs for the year. This must be done within the first month of assumption of duty by the employee and Line Manager.
- Performance objectives shall be reviewed on an ongoing basis as part of an interim performance appraisal exercise to ensure continued relevance and appropriateness of defined objectives towards the achievement of the organization or department objectives and targets.

5.2 *Performance Appraisal and Feedback*

5.2.1 **Balanced Feedback** - Feedback shall be provided regularly with essential information that will help employees improve their performance. It must be specific and describe the action the employee took and the impact it had.

5.2.2 The annual performance appraisal cycle shall consist of the following:

5.2.2.1 **Interim Appraisal:** Monthly performance discussions and quarterly reviews.

5.2.2.2 **Formal Appraisal:** Mid-year appraisal conducted in June and a year-end appraisal in December.

5.2.3 All employees shall be required to undergo regular performance appraisal to assess their achievement of agreed objectives and identify areas for improvement or development.

5.2.4 Performance shall be divided into 3 parts:

5.2.4.1 Individual Performance;

- Feedback (positive and developmental)
- Adjustment of objectives in line with changes in the business priorities



- Review of the development plan
- Support required moving forward

5.2.4.2 Departmental Performance

5.2.4.3 Organization/Corporate Performance.

- 5.2.5 Performance shall be benchmarked against the target set for the respective areas (individual, departmental and corporate).

5.3 ***Performance Monitoring:***

- In addition to the formal appraisal sessions at mid-year and year-end, Line Managers shall on monthly basis conduct informal performance discussions with their employees to provide ongoing feedback on performance, review learning points and generate or share ideas to foster improved performance.
- Quarterly reviews shall be conducted, documented, and retained in the respective department for future reference.

5.4 ***Documentation of Performance Outcomes:***

- All evaluated performance documents must be duly signed and submitted to the Human Resources Department by the 30th of June and 15th of December every year to cover both evaluation periods.
- Duplicate copies of all appraisals must be retained in the Employee's Performance File to be managed by the line manager.
- The Human Resources Department shall carry out a quarterly audit exercise to ensure the performance process is implemented and documented accordingly.

5.5 ***Communication of Performance Outcomes:***

- Performance appraisal results shall be communicated to individual employees through evaluation feedback sessions upon finalization
- It shall be the dominant factor for reward, the definition of training and competency development requirements as well as career advancement in the organization.



5.6 *Performance Evaluation:*

- Only immediate Line Manager or Head of the unit with whom contact has been established over the last three (3) months before the performance review period shall appraise the employee.
- Where an employee has been in more than one unit or department within the review period, the line manager in the function in which the employee has spent the most time shall perform the appraisal, incorporating inputs from the other relevant line managers.
- Responsibility for appraisal shall not be delegated except in instances where the immediate Line Manager is unavailable due to resignation, incapacitation, termination or death.
- The completed performance appraisal form must be endorsed by the employee, line manager and where applicable, Head of Department.
- All approved appraisal forms must be forwarded to the HR Department.

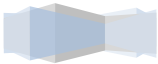
5.7 *Performance Rating*

- Performance shall be evaluated using a five (5) point rating scale. The table below gives a summary of the scale and description.

RATE	DESCRIPTION
1	Below Expectation (BE)
2	Meets Some Expectations (MSE)
3	Meets Expectation (ME)
4	Exceeds Expectation (EE)
5	Significantly Exceeds Expectation (SEE)



- The above rating scale will be used to rate each performance objective, as well as overall performance. Each performance objective shall also be assigned an appropriate weighting.
- Where no performance agreement was approved, and no performance appraisal has been completed, the employee will not qualify for a performance-based annual salary increase or performance bonus payout.
- If an employee will be away during the performance review period, it is the responsibility of both the employee and the line manager to ensure that the performance review is completed before the employee goes away.
- When an employee transfers from one department to another within Heckerbella Limited, the current manager must conduct a formal performance review before the employee transfers. The score should be kept on record and will be incorporated into the final score at the end of the performance management cycle.
- When a line manager or supervisor resigns or will be away for an extended leave period (three (3) months or more), he or she must appraise all his or her direct reports before leaving. This should be discussed with the new manager or supervisor and should be incorporated into the final score at the end of the performance cycle. However, discretion should be exercised by the HR Department; it may not be in Heckerbella Limited best interest for the resigning line manager to do appraisals depending on the circumstances.
- The appraisal must be reviewed and signed-off by the Departmental Head to be valid for submission to the HR Department.
- If an employee joins Heckerbella Limited after the 30th of September, he or she does not qualify for a performance-based annual salary increase.
- Performance agreement must be in place and approved at the beginning of each year or within one month of an employee joining the organization for an employee to qualify for a performance-based annual salary increase.
- The performance-based annual salary increase will be implemented at the discretion of the management and with the approval of the Company's Board of Directors.
- To promote consistency in ratings across the Company, a moderating committee shall be set up to moderate all employees' appraisal scores.



5.8 *Performance Moderation*

This section explains the concept of moderation and clarifies the categories of employees whose scores will be moderated at the different moderation levels.

The purpose of moderation is to ensure that appraisal outcomes of individuals are aligned with the broader performance context of their specific team or department and accurately reflects the overall performance of the Organization.

Moderation committees shall be set up for each department to carry out performance moderation. Each department pre-moderates scores before organization-wide moderation. This is to ensure that individual performance ratings reflect the actual performance of the department.

The Moderation Process, therefore, takes place at the following management levels:

5.8.1 Departmental Moderation Level

This consists of the following:

- Head of Department or Member of the Management Team
- Line Managers
- HR Manager

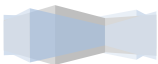
5.8.1.1 At this level, the performance scores of all employees within the department are discussed. Line managers shall present and defend the ratings of their direct reports, with supporting documentation for good or poor performance.

5.8.2 Organizational Moderation level

This consists of the following:

- Managing Director
- Head of Departments
- HR Manager

5.8.2.1 At this level, the organization-wide performance score will be discussed. In addition, the committee will review departmental performance bands across the organization.



5.8.2.2 At all Moderation levels, line managers will be required to review their scores if the desired rating or score is not achieved.

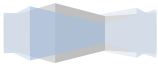
5.8.2.3 The final post moderated scores as approved by the Managing Director shall be communicated to the employees via line manager feedback discussion and email notification.

5.9 *Appeal Process*

- The Appeal Process shall take place after the Moderation Process.
- Where there is a disagreement between an employee and a line manager regarding the final appraisal scores, the following process shall be followed:
- Employees will prepare a written appeal to the next level of management in the department or organization within five (5) working days of receiving the final performance score and inform the HR Department in writing.
- The next level of management shall resolve the disagreement within 2 working days.
- If unresolved, the matter will be escalated to HR within two (2) working days of receipt of a response from the next level of management. The HR Department will make the final decision within 2 working days of receipt of the appeal.
- Performance evidence of parties and the aggrieved employee's Performance Agreement as well as the response letter from the 1st level of appeal will be reviewed and investigated during the process.

6. *PERFORMANCE EVALUATION FOR EMPLOYEES WITH SHORT TERM CONTRACT*

- The performance evaluation shall be conducted for employees with three (3) months of contract and above.
- The Employee and Line Manager shall identify and agree to KPIs at the beginning of the Employees' contract with Heckerbella Limited.
- Employees will be evaluated based on the agreed KPIs at the end of every three (3) months.



- Employee performance will be rated based on agreed Heckerbella Limited performance rating parameters.
- Extension of Employee's contract will be determined by the performance evaluation result.
- Employees with less than three (3) months Contract shall agree to a set of work expectations to be signed and documented with the Contractor and their assigned line manager.
- At the end of their Contract, their job outcome will be evaluated against the agreed work expectations.

7. MANAGEMENT OF UNACCEPTABLE PERFORMANCE

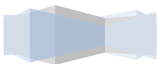
7.1 Where an employee's work performance does not meet a satisfactory standard an appropriate process of investigation and corrective action shall be taken.

7.2 An employee's performance is unacceptable if his/her performance is rated below expectation within an evaluation/appraisal period or at any time during the financial year. Such Occurrence if not properly managed may ultimately lead to;

- A decrease in productivity and quality
- The unbalanced workload that could lead to dissatisfaction amongst employee and ultimately result in high turnover; and
- Reduced Organizational Profitability – Employee Underutilization.

7.3 An employee's performance will be deemed unacceptable if the following occurrences are proven;

- Incompetence- Consistently achieving unacceptable levels of performance due to lack of capacity.
- Unprofessional Attitude.
- Lazy attitude to work consistently performing below the expected performance level.



- Absenteeism-frequent and unexplained absences from work.

7.4 An Employee is responsible for:

Ensuring they are aware of their role and responsibilities.

- Performing their duties to a satisfactory level.
- Engaging in any relevant training and development that will enable them to achieve the required performance levels for the job.
- Proactively and consistently seeking feedback on work performance.
- Informing their line manager of any issue affecting their work performance.

7.5 The role of the Line Manager's in managing unacceptable performance issues include:

- Agreeing and communicating performance standards to employees.
- Identifying and addressing unacceptable performance as it becomes apparent to avoid detrimental impact on the business.
- Providing appropriate training, or access to training for all employees for whom they are responsible to enable them to acquire the knowledge and skills needed to perform assigned tasks.
- Providing prompt and regular feedback on work performance to employees.
- Ensuring that matters relating to work performance are dealt with fairly and promptly.

7.6 The Human Resources department is responsible for:

- Providing necessary guidance to Line Managers on handling cases of unacceptable performance.
- Ensuring consistent and equitable interpretation and application of the policy on unacceptable performance.

8. Procedure for conducting Performance improvement

The performance improvement process shall be instituted for Employees whose performance is deemed to be unacceptable (. i.e. below expectation) in an appraisal period. Appraisal score

rating from 2.5 below at the end of an appraisal year will be categorised as unacceptable performance. In deciding on whether to commence the Performance improvement procedures the following steps shall be taken.

8.1.1 Formal Meeting/discussion:

- The line manager shall conduct a formal meeting or discussion with the Employee to determine where the Employee is falling short, what standard is not being met, and discuss the matter fully to see if the reason for the poor performance can be established.
- The line manager is required to establish the cause and in collaboration with the Employee agree on a mutually acceptable way of dealing with it.
- The line manager must be specific and document what improvement is required, what standard is required to be met, in what area and by when.
- The line manager shall agree to interim targets and review timelines with the affected Employee to monitor subsequent performance.
- Subsequent reviews to assess improvement in the Employee's performance should be done within four (4) weeks following the initial discussion.
- The Line manager must warn the employee of the consequences of failure to improve where such warning is appropriate.
- Where the employee's performance remains below par; the line manager shall involve the Human Resources Department via a memo stating the issues and actions taken so far.
- The written memo initiates the next step of the process.

9. The Performance Meeting

- The HR department will organize a performance meeting between the Line Manager, Employee and HR giving attendees at least two (2) days' notice.
- HR shall facilitate the agreement of new performance targets to be reviewed after 90 days as well as the steps to be taken to achieve the required performance standard.
- The Line Manager shall also identify additional support or training that may be required to improve the employee's standard of work and arrange for this to be provided at the



earliest opportunity. The Line Manager is expected to encourage and support the employee during this period.

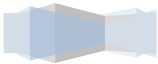
- The performance targets and intervention must be documented and signed off by both the Employee and the Line Manager.
- After the completion of the meeting, the Line Manager will confirm to the Employee and HR Department in writing, the date, time and venue of the final performance review meeting which will take place at the expiration of 90 days.

10.The Final Performance Review Meeting

- This meeting will take place between the Line Manager, the Employee and HR Department.
- The final review meeting will be held to review performance progress and to determine whether an acceptable standard of work has been reached based on the set targets.
- If performance is acceptable, the Line Manager encourages the member of the Employee to sustain this level of performance and continue to monitor progress.
- If there has been some improvement but the employee has still not reached the required level of performance, the Line Manager may consider extending the review period and agree on new review date.
- In the event where after the 90day plan, there is no improvement in the employee's attitude or performance, the line manager will work with the HR department to agree to an appropriate next step which may include termination of appointment or redeployment to an appropriate department or job level.

11.Exception

- The above procedure can be shortened if the Line Manager considers that the impact on the business, customer or other employees is sufficiently severe that the normal procedure cannot be followed.
- This abridged process can only be approved if an agreement is obtained from the Human Resources Department, Departmental Head, and the Managing Director.



12. PROBATIONARY PERFORMANCE EVALUATION – EMPLOYMENT CONFIRMATION

- The probationary period is required to review performance during the initial phase of employment.
- The probationary period is six (6) months for all initial and promotional appointments.
- A six (6) month probationary period is also served upon a lateral transfer to a different department.
- If the employee's performance is found to be unsatisfactory during the initial probationary period, the employee shall be given an extension for another three (3) months.
- If the employee's performance is still found to be unsatisfactory during the extension period, the employee's employment shall be terminated.
- If the employee's performance is found to be unsatisfactory following a promotion, the employee may be demoted to the same or similar position the employee held before the promotion.
- If a transfer to the former position cannot be made, the current employing department will retain the employee until a transfer can be arranged.
- Written notice of removal or demotion due to failure of probation must be issued from Human Resources by the Line Manager or Head of Department before the end of the probationary period.
- Time spent on an approved leave of absence (paid or unpaid) shall not be counted as part of the probationary period. The probationary period shall be extended by an equal number of days the Employee spent on the approved leave of absence.

Procedure

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- The Line Manager must conduct a monthly evaluation during the employee's probationary period.
 - A performance evaluation shall be completed before the end of the employee's probationary period.
-



- Human Resources must notify the Line manager at the end of the probationary period on the evaluation.
- If the probationary Employee's performance is unsatisfactory, the Line Manager shall inform Human Resources and Human Resources will communicate to the employee and the Line Manager details of the extension of the probationary period.

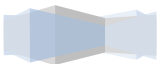
13. ROLES & RESPONSIBILITIES

13.1 Head of Department

- Ensuring Compliance with the organization's defined performance Management Policy.
- Ensuring alignment of individual employee objectives and targets with approved departmental or team targets and measures.
- Ensuring continuous monitoring of employees' performance vis-à-vis set objectives by immediate Line Manager; and
- Reviewing and challenging where required, employee performance appraisal ratings vis-à-vis set targets and achievements to ensure objectivity, transparency and consistency of performance ratings.

13.2 Line Manager

- Providing direction and support to job holders in setting SMART performance objectives and targets in line with the departmental or team objectives.
- Agreeing and signing off on jobholder targets and objectives.
- Ensuring the appraisee is equipped with the resources required to achieve set targets;
- Monitoring the performance of the job holder and providing feedback on an ongoing basis.
- Ensuring timely and objective assessment of the performance of the appraisee during the appraisal exercise



- Ensuring developmental plans for appraisers, addressing identified gaps and areas for development.

13.3 Employee

- Obtaining a clear understanding of the departmental or team objectives.
- Understanding the job responsibilities and expectations as specified in the job description.
- Setting and agreeing to SMART objectives, align with business objectives and address personal development's needs.
- Seeking ongoing performance feedback from Line Manager and
- Approaching the informal performance monitoring and annual formal appraisal sessions with a positive attitude and an open mind.

13.4 The Human Resource

Providing ongoing process guidelines and support (including training of all Employees or managers on effective performance management) across the organization in the execution of the performance management process.

Proactively Identify and Address Employee Appraisal Issues and/or conflicts.

Assisting in monitoring the implementation of appraisal review recommendations, especially regarding career and training issues.

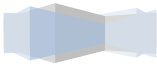
Ensuring the maintenance of accurate performance appraisal records and timely update of the employee performance management database.

14.DEFINITION OF TERMS

Acronyms	Meaning
HR	Human Resources Department
Company	Heckerbella Limited.
KPI	Key Performance Indicator



RECRUITMENT POLICY



1. POLICY OVERVIEW

The objective of this policy is to provide guidelines for the efficient selection and employment of employees with the appropriate qualifications, experience and other necessary values required to perform optimally in their role at Heckerbella Limited. This policy also provides guidelines for employee employment confirmation and exit process.

2. SCOPE

This applies to all Full Time and Contract Employees of Heckerbella Limited.

3. PURPOSE

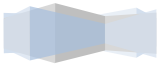
The Human Resources Department is responsible for facilitating the recruitment, employment confirmation and exit process of employees. Heckerbella Limited is committed to;

- 3.1 Recruiting and retaining highly skilled individuals from either external sourcing or within the organisation for available positions.
- 3.2 Building a high-performance culture shaped by ensuring we hire individuals with the required competence for each role.
- 3.3 To develop and implement a structured confirmation process to evaluate the performance of full-time employees and other confirmation requirements to determine their suitability for confirmation of their employment within the required time frame.
- 3.4 To ensure standardised procedures for processing employee exit, resulting from voluntary resignation, retirement, termination, dismissal, disability or redundancy.

4. POLICY STATEMENT

Heckerbella Limited believes that its Employees are critical to the success of the company. The company strongly believes that highly skilled and motivated employees working in a conducive work environment constitute a major factor in the attainment of business goals.

This policy aims to ensure that all recruitment, employment confirmation and exit activities are undertaken professionally, systematically, consistently, and efficiently in line with the company's values as well as relevant labour laws. Heckerbella Limited is committed to ensuring equal opportunity to all applicants to ensure that no unlawful discrimination occurs throughout the employee's life cycle in the organization.



5. POLICY GUIDELINES

5.1 Recruitment

5.1.1 Equal Opportunity and Discrimination

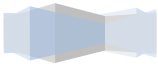
- We are committed to promoting equal opportunity for all employees and external job applicants. We aim to create a working environment in which all individuals can make the best use of their skills, free from discrimination or harassment, and all our recruitment decisions are based on merit, qualifications, and abilities.
- We do not discriminate against any applicant based on age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion, or belief, nor political affiliation.

5.1.2 Job Advertisements

- All vacant positions will be advertised internally or externally through any platform approved by Heckerbella Limited Management to enable potential applicants to view advertisements placed and submit their applications.
- Vacant roles that can be filled within the organisation will not be advertised to external applicants but will be advertised internally, to enable any qualified employee to apply.
- The HR Department is responsible for determining whether a position should be limited to current Heckerbella Limited Employees or should be open to external candidates.

5.1.3 Advertising Timelines: the minimum closing date on an internal advertisement is five (5) working days. The minimum closing date on an external advertisement is ten (10) working days.

5.1.4 Re-advertising of Positions: if a position has been advertised internally and externally resulting in no appointment due to the lack of suitable applicants, the position may require re-advertisement or filling by other means. It might also be appropriate to engage a recruitment agency to assist.



5.2 *Selection Process*

- All recruitment will be based on business objectives, aligned with the organisational structures, job descriptions and person specifications.
- It is the responsibility of the recruiting manager, with input from the head of the concerned department, to develop the job descriptions and personal specifications.
- Recruitment and selection must be conducted as an evidence-based process and will be assessed against agreed selection criteria as outlined in the person specification. All decisions must be documented.

5.2.4 Recruitment Request Form: This should be completed by the recruiting manager after a full evaluation of the need for the role against the department's strategic plans and budget is completed. The request form on completion will be sent to the head of the concerned department for approval. After approval, the recruiting manager will draw up an appropriate advertisement where relevant, for the position.

5.2.5 Approval must be obtained from management for new roles that are not included in the currently approved organogram by the human resource manager.

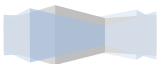
5.2.6 In choosing the most suitable candidate(s), the interview and test processes, where relevant, will be used in testing the professional skills of the candidate. Successful candidates at the interview stage shall be recommended to the Hiring Manager and his or her input would be sought before making a final decision.

5.2.7 Competency-Based Interviews: All interviews must focus on determining relevant competencies (concerning the inherent requirements of the job) and consider prior learning.

5.2.8 Role level will be considered determining the interview or assessment panel. All assessment forms should be duly completed by members of the panel.

5.2.9 A minimum of 3 strong candidates should be shortlisted and interviewed for all job positions.

5.2.10 Job Placement Form: Once the suitable candidate is identified by the Hiring Manager, a Job Placement Form is duly completed and signed off. Thereafter, an offer of employment will be initiated.



5.2.11 Where applicable, successful candidates will be required to take a health assessment to certify them fit for the job.

5.2.12 Once the recruitment and selection process is closed and the applicant has accepted the offer of appointment, notification will be sent to unsuccessful applicants. All documentation relating to the recruitment process will be retained for a minimum period of six (6) months.

5.3 *Child Labour*

The term “child labour” according to The International Labour Organization is defined as work that deprives children of their childhood, their potential, and their dignity, and that is harmful to physical and mental development. It also refers to work that is mentally, physically, socially, or morally dangerous and harmful to children. The minimum age for employment according to the International Labour Organization is 15 years old.

Heckerbella Limited does not condone or employ child labour. Bonded or involuntary labour is completely unacceptable, as is the requirement to surrender identity papers or pay deposits as a condition of employment. We also do not condone exploitation or the unlawful use of immigrant labour.

5.4 *Recruitment of Contract or Temporary Employees*

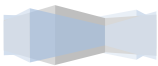
A contract or temporary employee is any person whose engagement is meant for a definite period within which the contracted work should be completed. On the request by the concerned department and after due approval, a contract or temporary employee may be recruited to provide support to complete excessive workload or fill in a vacancy until a suitable candidate is recruited. Recruitment of temporary employees must comply with the local labour laws of the Federal Republic of Nigeria and this policy’s selection process. Employment of NYSC corps members and Interns falls under the category.

5.4.1 *Internship*

Heckerbella Limited Internship Program is classified into Undergraduate, Pre-NYSC and NYSC.

- **Undergraduate Internship**

The Undergraduate Internship program is for candidates currently pursuing a university degree. The prospective candidate must have completed at least the second year of university. We invite candidates from all disciplines and programs with an outstanding interim academic record and an interest in our organization. Monthly stipends would be paid to interns till their duration is over.



The undergraduate internship would run for a minimum of one month to a maximum of six months.

- **Pre-NYSC**

This program is aimed at graduate-level students, seeking an interim job, while waiting for NYSC deployment. We invite candidates from all disciplines. This program would run for a minimum of one month to a maximum of three months. Monthly stipends would be paid till their duration is over.

- **NYSC**

This program is aimed at Corps Members willing to serve at Heckerbella Limited. The duration of this program is one year. Monthly stipends would be paid.

5.5 Recruitment of Ex-Employees

- Re-employment is a privilege granted to former Heckerbella Limited Employees who voluntarily resigned or separated in good standing from the company.
- Prior Employee records of such a person must be reviewed before an offer of employment is made.
- In all cases, the person (s) must meet the selection requirements for the position at the time of re-employment.

5.6 Employment of Relatives

- To minimize business risk, individuals related by blood, marriage, or close relations, maybe declined employment if:
- There is a reporting/supervisory relationship between an Employee and the applicant.
- The applicant will be recruited to work together in the same function or department as the relative.
- The related Employees will be in close cross-departmental collaboration.



5.7 *Offer Letters*

- Each candidate for employment will be issued an offer letter. The letter must be signed and dated by the candidate to show acceptance and returned to the HR department before such a candidate can truly be regarded and accorded Employee status.
- A new hire may undergo a medical and security screening after acceptance of the offer.
- Under no circumstances are managers or Employees permitted to offer employment or suggest that an offer will be made to a prospective Employee.

5.8 *Pre-Employment Medical & Background Screening*

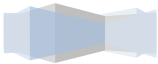
Heckerbella Limited reserves the right to screen and conduct background as well as health checks on all successful applicants.

Heckerbella Limited reserves the right to specify that its corporate physician will conduct the examination. The examination will be at the expense of Heckerbella Limited.

Heckerbella Limited has no discrimination against any employee with HIV/AIDS.

5.9 *Induction and Onboarding*

- Induction for new Employees involves introducing them to the rest of the Company. The induction is aimed at enabling the Employee to imbibe the prevalent culture and ways of doing business within Heckerbella Limited.
 - New Employees will also be briefed on the Company's policies, procedures, rules, and regulations.
 - The Employee Policy Manual will be made available to them.
 - An Employee file shall be opened and maintained for each of the new Employee, which will contain all particulars of the Employee and thereafter documents relating to their relationship and correspondences within and outside the Company.
 - An on-boarding plan shall be shared with new employees on the first day.
 - HR will ensure that initial meetings with key contacts according to the onboarding plan are arranged.
 - The facilitators shall be given information about the new Employee and orientation dates.
-



- All new employees will be assigned a ‘buddy’ for five (5) days who will help them get acquainted with Heckerbella Limited.

6 CONFIRMATION OF EMPLOYMENT

The confirmation process involves the assessment of employee(s) performance to determine their suitability for confirmation of their employment as a full-time employee of Heckerbella Limited. The confirmation process will include performance appraisal, verification of credentials and background check of the employee.

6.1 Probation

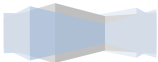
- All new Employees shall be placed on probation for a minimum period of six (6) months.
- During the probationary period, the Line Manager shall evaluate the employee’s performance on the job to ensure that the employee can perform at the required level and demonstrates appropriate competency, professional behavior, and good character traits.
- During the probationary period, the line manager shall monthly, informally, and formally (one on one discussions) evaluate the employee’s performance on the job (technical and behavioral traits) and ensure documentation of the discussion.

At the end of the six (6) months period; employee probation will be eligible for confirmation subject to the satisfaction of the following requirements:

- Receipt of favorable responses from referees
- Receipt of favorable responses from the previous employer
- Satisfactory performance results
- Satisfactory credentials verification

6.2 Extension of Probationary Period

- Where an employee fails to satisfy the conditions for confirmation stated above, the probationary period may be extended by three (3) months within which the employee is expected to have shown some improvement in performance and for all references to having been received.



- If the employee fails to satisfy the conditions for confirmation stated above after the extensions, his or her employment will be terminated and if not terminated, the employee shall be deemed confirmed.

6.3 Exceptions to Confirmation

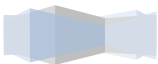
An employee who had previously been employed in the company and was subsequently rehired shall be exempted from the confirmation process provided the employee was rehired at the same level of responsibilities (grade) or role similar to the previous job before initial disengagement. However, such employees still need to display an appropriate performance level to be considered for subsequent salary upgrades or promotions.

6.4 Maternity Leave during Probation

- Employees on Probation are entitled to maternity leave based on the following conditions:
- The employee will be entitled to her full monthly salary, (allowances inclusive) for the 3 months of maternity leave.
- The Confirmation process for the employee will continue upon resumption from maternity leave, considering the period the employee worked full time before the maternity leave. For the avoidance of doubt, the three (3) months period of maternity leave does not count towards the probation period.

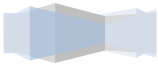
6.5 Verification of Credentials and References

- HR shall endeavour to obtain the last employer reference from the previous employer of an experienced hire within (where applicable) six (6) months after the assumption of duty.
- HR shall ensure that all credentials of new hires are verified and certified by relevant institutions and references obtained from referees within six (6) months of resumption.
- Where references received are not satisfactory (or is adverse), Heckerbella Limited shall be fully entitled to withdraw any offer that may have been made before the references being available.
- In the event after employment, an employee is found to have claimed qualifications or employments which are false, he/she shall be summarily dismissed.
- Heckerbella Limited might engage a verification company to carry out necessary procedures that may be required.



6.6 Employee Confirmation Process

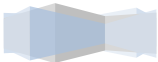
- The HR records are updated with details of new employee.
- HR notifies new employees within two (2) weeks of joining to agree and document job objectives with their line managers.
- Line manager and new employee agree and document job objectives and return to HR.
- HR reviews and approves job objectives.
- HR notifies respective line managers towards the end of the sixth (6th) month to complete pre-confirmation appraisals for employees using approved job objectives.
- The line manager completes the appraisal form and submits it to HR for processing.
- HR reviews employee's appraisal. If the appraisal is incorrectly completed, it is returned to the line manager.
- If the appraisal is correctly completed, HR checks that the appraisal meets minimum requirements for confirmation.
- HR confirms if verification has been completed.
- If verification has been completed, HR prepares a Confirmation Letter for sign-off.
- Where an employee has a disciplinary issue, HR and the employee's line manager shall coordinate the disciplinary process.
- Where confirmation appraisal is completed but does not meet the minimum requirements for confirmation, the employee probationary period may be extended, line manager and HR shall give the employee feedback as well as discuss the expectation from the extension. If an employee fails to meet the pre-confirmation requirement after extension, management decisions will be made on his or her continued employment with Heckerbella Limited.
- HR notifies employees to pick-up confirmation; employee collects confirmation letter, signs acknowledgement copies and returns to HR.
- HR team files off acknowledgement copy of confirmation letter in Employee's file.



7. EMPLOYEE EXIT

This Policy is designed to ensure standardized procedures for processing employee exits resulting from voluntary resignation, retirement, termination, dismissal, disability, or redundancy. At Heckerbella Limited, we ensure that employee exit is managed with the provisions of relevant legislation and workplace agreements. Employee exit shall be managed through the following process.

- 7.1 Where an employee's service is terminated, whether voluntarily or otherwise, Heckerbella Limited will pay the employee net of all balances owed by the employee to the company.
- 7.2 Employees whose services have been terminated with the company whether voluntarily or involuntarily (except dismissal) will receive pay in lieu of earned unused annual leave.
- 7.3 Employees will no longer be covered by the Health Management cover as well as all other employee benefits from the date of exit or disengagement.
- 7.4 All final payments shall be made via bank transfer or cheque issued in favour of the employee unless otherwise requested by the employee (unless in the case of death in which case, the amounts shall be paid to the employee's current legal representative or next of kin).
- 7.5 In all cases, employees who have disengaged from the company shall return all the company's property in their possession (except where the properties have been given to the employees as a form of ex-gratia).
- 7.6 Terminal Benefits (except for involuntary termination) shall not be processed unless all disengagement procedures have been completed and an exit interview held for the exiting employee.
- 7.7 Exit procedures involve the exit notification, completion of the exit clearance process (clearance from any agreement or other obligation), exit interviews with the HR department, handover of all company's assets including but not limited to computer, laptop, hospital card, staff identity card, security access card, and company car (where applicable).
- 7.8 All Terminal Payments shall be net of all outstanding obligations/indebtedness to Heckerbella Limited.
- 7.9 Requests for references from companies regarding terminated employees shall be handled by HR and will contain information relating to the employee's tenure and level at the point of termination.



Voluntary Exits

Resignation

- Resignation is the termination of employment at the instance of the Employee.

Designation	Employment	Notice Period
All Employees	During probation	Two (2) weeks' notice or two (2) weeks salary in lieu of notice.
	After probation or Confirmation	One (1) month notice, or one (1) month salary in lieu of notice.

- An Employee resigning his or her employment with the company must do so in writing, providing the appropriate notice as specified above.
- All resignation letters must be acknowledged and signed by the employee's line manager before being forwarded to HR.
- An exit interview shall be conducted by the HR department with the employee to establish the reason(s) for resignation.
- Approved resignation letter and completed exit interview form are passed to the Finance or Payroll Team. The Payroll Team will advise the employee of any obligation to Heckerbella Limited.
- If the employee is not indebted to Heckerbella Limited, a formal acceptance of resignation is issued to the employee via email.
- The Line Manager must follow up with the employee in retrieving all Heckerbella Limited's assets in his or her possession.
- From the effective date of an employee's resignation, he or she is removed from the payroll.
- All stakeholders are advised on employee exit via email on the effective date of resignation.



- HR Manager will update the Management monthly on all Employee exit reports.

Retirement

- The retirement age for Full-Time Employees of Heckerbella Limited is sixty (60) years.
- The Head of Department can request an extension of the retirement age of an employee beyond sixty (60) years. This will require the approval of the HR Head, Managing Director as well as Heckerbella Limited's board.
- Retirement is a form of employment termination with eligibility to receive an annuity under the Pensions Act Scheme 2004.

Involuntary Exits

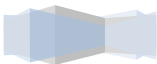
An employee's employment with the company may be discharged or disengage in the following circumstances:

Expiration of Employment Contract

- Where an Employee's engagement is based on a fixed-term contract/employment, the employment shall automatically terminate by effusion of time.

Termination

- Heckerbella Limited may at its discretion terminate the appointment of an employee by giving one month's notice or payment of one (1) month's salary in lieu of notice, in the case of a confirmed employee. For an employee on probation, the required notice is two (2) weeks or payment of two weeks' salary in lieu of notice. The reasons and procedure for termination shall be as stated in Heckerbella Limited's disciplinary policy.
- HR shall inform the employee via a written letter to the effect that his/her services are no longer required by the Company.
- HR would prepare the Employees End-of-Service (EOS) Statement Highlighting the financial obligation of the employee as well as entitlements (if any).



- HR shall ensure that the employee's entitlement payment is raised within 30days of the employee's discharge from the Company.

Dismissal

- The reasons and procedure for dismissal shall be as stated in Heckerbella Limited's disciplinary policy. An employee who is dismissed shall not be eligible to receive any final entitlements.

Abandonment of Duty

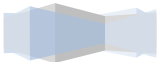
- This is the termination of an individual's employment where the individual has failed to report for duty for one week (except in the case of a "missing person") and does not intend to return to duty. An employee who, without oral or written explanation, is absent from duty without leave or fails to return to work after the expiration of the approved leave, for one week or more, is subject to separation for abandonment of duty. Management decisions will be made on his or her continued employment with Heckerbella Limited. An employee who is declared to have abandoned a position is not entitled to severance or final entitlement pay.

Redundancy

- Redundancy is the involuntary loss of employment through the fault of the employee, often caused by some form of restructuring of the company. Heckerbella Limited will determine the most appropriate formula for separation payment.

Exit Due to Disability or on Medical Ground

- Where an employee is unable to continue to perform his or her duties due to physical disability or ill health, Heckerbella Limited shall seek and obtain a medical opinion from the Company's approved hospital or Medical Consultant to ascertain the possibility of recovery to the full performance of his or her role at a satisfactory level.
- If the employee is declared unable to perform the duties for which he or she was employed due to physical disability or a health challenge(s), the employee's contract of employment may be terminated based on medical incapacitation and all due entitlements shall be fully paid to the employee.
- An employee may be deployed to a different role subject to availability and Management discretion, where it is established that the Employee will be able to perform such duties



despite his or her physical disability or health challenge(s) and without adverse effect to his or her health.

Death in Service/Employment

The employment relationship shall be automatically severed on the death of an employee. Final entitlement and refundable statutory deductions shall be paid to the next of kin. Payment to the deceased employee's next-of-kin shall be in line with the provision of the Pension Reforms Act. If an employee of the company passes away during active service, the company shall carry out the following;

- A letter of condolence signed by the Managing Director will be presented to the family.
- Payment of Three (3) months basic salary to the spouse named in the personnel record or the designated next of kin in the absence of a spouse.
- Without prejudice to the foregoing, Heckerbella Limited shall pay the following deceased entitlements.
 - Group Life Insurance claim to be paid to the designated next of kin of the deceased or the legal representative as at the date of death.
 - Salary of the deceased up to and including the day of death shall be paid to the legal representative or designated next of kin.
 - Accrued unutilized leave days to be commuted to cash and paid to the legal representative or designated next of kin.
 - Current Medical Insurance cover for the deceased dependent(s) shall continue until expiration.

8 ROLES AND RESPONSIBILITY

8.1 Employee

The employee must do the following:

- To abide by the guidelines of this policy.
- To understand the processes involved in this policy.



- To provide adequate information when required.

8.2 *Line Manager*

The Line Manager must do the following:

- To abide by the guidelines of this policy.
- To understand the processes and contribute to its implementation.
- To provide adequate information when required.

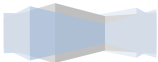
8.3 *Human Resources*

The Line Manager must do the following:

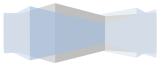
- Ensure overall adherence to this policy.
- Respond to all recruitment related enquiries.
- Ensure recruitment is carried out in line with the budgeted headcount.
- Ensure verification and confirmation process commence on time.
- Ensure Line Managers set up performance objectives and agree with employees.
- Ensure that all required benefits are paid to the Employee within the required period where applicable. (Either voluntary or involuntary exit).

9 *DEFINITION OF TERMS*

Definition / Abbreviation	Meaning
HR	Human Resource Department
Company	Heckerbella Limited
FTE	Full Time Employee



SOCIAL MEDIA USAGE POLICY



1. POLICY OVERVIEW

Heckerbella Limited provides its employees access to social networking sites to enable them to leverage social media platforms to create business value in this space. This provides significant advantages to our business in terms of obtaining customer feedback and enhancement of online talent acquisition, etc. To ensure employees are well informed and inspired by the information on social networks, Heckerbella Limited allows its employees to access social networking platforms. However, inappropriate use of such a platform might expose Heckerbella Limited to risks such as productivity loss, employee inefficiency, excessive use of bandwidth, damage to corporate reputation, legal issues, breaches of security, abuse and risks relating to data privacy and confidentiality.

2. SCOPE

This policy shall apply to all Heckerbella Limited Employees, contract employees, strategic partners, third-party employees, vendors, and others who provide services to Heckerbella Limited directly and/or indirectly.

3. PURPOSE

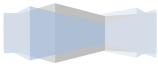
This policy provides guidelines on how employees conduct themselves while accessing social media platforms/sites. It also aims to encourage employees to find a voice on social media whilst informing them of their responsibilities in protecting the interest of Heckerbella Limited as well as themselves when accessing social media platforms/sites. The objectives of this policy include:

3.1 Define approved and prohibited social media access use.

3.2 Define controls to ensure secure access to social media sites.

4. POLICY STATEMENT

This policy provides guidance for employee's use of social media, which should be broadly understood for this policy. It guides the use of blogs, wikis, microblogs, message boards, chat rooms, electronic newsletters, online forums, social networking sites, and other sites and services that permit users to share information with others in a contemporaneous manner.



5. GUIDELINES

5.1 Social Media Platform

Social media platforms are defined for this policy as all online media sites which allow user participation and interaction including but not limited to:

- Social networking sites, e.g., Facebook, Myspace, LinkedIn
- Video and photo sharing websites, e.g., Flickr, YouTube, Blip, Instagram, Snapchat
- Micro-blogging and activity stream sites, e.g., Twitter, Yammer
- Blogs and blogging platforms, e.g., WordPress, Blogger.
- Forums and discussion boards, e.g., Trove Forum, Yahoo! Groups, Google Groups
- Online encyclopedias, e.g., Wikipedia
- Any other websites that allow individual users or organizations to use simple publishing tools e.g., wikis.

5.2 Official Use of Social Media

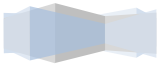
Only constituted authorities and any other designated persons are permitted to post material on the social media website in the name and/or on behalf of Heckerbella Limited. Any breach of this restriction amounts to gross misconduct.

5.3 Professional Use of Social Media

Professional use is when an employee posts articles or comments on social media as an experienced person in his/her field and not as an employee of Heckerbella Limited. For example, an HR personnel working with Heckerbella Limited might want to post an opinion about the future of work, which is not directly related to any Heckerbella Limited Policy. A high level of professionalism is required when using the social media platform.

5.4 Employee Interaction on Social Media

- Any employee who has Heckerbella Limited on his/her social network profile must provide a disclaimer making it explicit that their views do not represent those of the company e.g.: “This post, (or content, etc.) is for discussion purposes only and does not

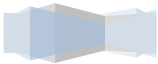


represent the official views of Heckerbella Limited. Any views expressed on this site are those of the individual author only.”

- Employees who do not explicitly identify themselves as Heckerbella Limited employees should exercise caution while posting on social media as people can trace individuals to their places of work.
- Employees must ensure all activities on such sites are in line with Heckerbella Limited policies and Code of Conduct.
- Employees must not disclose official information unless authorized to do so
- Employees must protect personal information entrusted to Heckerbella Limited from distribution into the public domain.

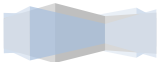
6. *PERSONAL USE OF SOCIAL MEDIA*

- Heckerbella Limited permits the use of social media websites for personal use subject to certain conditions set out below. However, it is important to state that this is a privilege, not a right and the company reserves the right to withdraw its permission at any time and its discretion. The use of social media websites must neither be abused nor overused.
- Employees must adhere to Heckerbella Limited Values and Code of Conduct even when a material is posted anonymously or using a ‘nickname’ or pseudonym when participating in private social media activity.
- Employees should not rely on the privacy provided by the site’s security settings, as material posted in a relatively secure setting can still be copied and reproduced elsewhere.
- Use must be minimal and take place substantially out of normal working hours (e.g., during lunch hours, before 8 am or after 6.00 pm)
- Use must not interfere with business or office responsibilities.
- Use must follow Heckerbella Limited policies including Code of Conduct, the Data Protection Policy and Disciplinary Procedure.



6.1 Rules for Use of Social Media

- To ensure adequate protection of company information, Heckerbella Limited makes it mandatory for employees and third-party employees while accessing social networking sites to comply with the following guidelines:
- Before commenting on any social media site, employees should observe the trend of social conversations to avoid using trigger words that may escalate the subject of the conversations.
- When making use of any social media platform, employees must read and comply with its terms of use.
- Employees and/or third-party employees shall not present personal opinions in ways that imply endorsement by Heckerbella Limited.
- Name, telephone numbers, email addresses, and images of Heckerbella Limited shall not be posted on social network profiles, for personal purposes. However, we encourage employees to share and disseminate ads, visuals, images.
- Employees shall abide by copyright laws and intellectual property rights, i.e., employees shall not upload, post or forward any content belonging to a third party without seeking their consent.
- Before including a link to a third-party website, employees must check that any terms and conditions of that website permit them to link to it. The links must be done such that it is clear to the user that they have moved to the third party's website.
- Proprietary information e.g., the company's financial information, intellectual property, information about customers, etc. must not be discussed or referred to on social media sites or in private messages between site members who have authorized access to the information.
- Social networking sites are prone to auto-download of viruses and spyware. It may damage the operating system, capture data, or otherwise compromise the privacy of the computer and the network, as well as affect others with whom the employee may communicate. Therefore, employees and third-party employees shall exercise due diligence while sharing and downloading files on social networking sites.



- Employees and third-party employees shall not refer or cite clients, partners, or customers of Heckerbella Limited without their express consent. In all cases, employees shall not publish any information regarding a client.
- Personal blogs shall include a disclaimer that employees' opinions do not represent those of Heckerbella Limited, wherever appropriate.
- Employees must be honest and open, but mindful of the impact their contribution might have on people's perceptions of Heckerbella Limited as a company.
- If an employee makes a mistake in a contribution, they must be prompt in admitting and correcting it. It is imperative to notify the Human Resources Team before making any follow up comment for guidance.
- Employees are personally responsible for the content they publish on social media platforms; they should be aware that what they publish will remain public for many years.
- Employees must always consider others' privacy and avoid discussing topics that may be inflammatory e.g. politics and religion.

7. *PROHIBITED USES OF SOCIAL MEDIA*

All employees of Heckerbella Limited are reminded that the use of the company's resources while accessing social media should never be abused nor inappropriately used. Heckerbella Limited explicitly prohibits the use of its electronic communication systems for any of the following purposes:

- Forwarding an employee's Microsoft Outlook/Lotus Notes email from the Company's network to the Internet.
 - Disseminating, viewing, downloading, storing, forwarding, or transmitting sexually explicit material or other potentially offensive information, including profanity, pornography, tasteless jokes, material that is bigoted, derogatory, discriminatory, or harassing to any specific group (i.e., any material inconsistent with the organization's values, policies, and Code of Conduct) is strictly prohibited.
 - Engaging in any criminal activity.
 - Unauthorized dissemination of internal organization documents or other communications outside the organization.
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- Any use of SaaS (Software as a Service) software, e.g., Google Docs, or use of public file-sharing software or any such service hosted on the Internet for sharing official documents.
- Making unprofessional comments about the organization in public forums/ electronic media
- Unauthorized solicitation of money or the operation of a personal business.
- Deliberate dissemination of inaccurate information.
- Dissemination of chain letters, junk email or similar correspondence.
- Download or storage of materials (including software) protected under copyright law, or electronic files intended for non-business use (e.g., music or video files etc.)
- Gaining unauthorized access to any computer system of Heckerbella Limited or any other organization or entity.
- Transmitting threatening messages.
- Downloading executable files without exercising extreme care. Executable files (e.g. shell scripts) may be ‘Trojan Horses’ or other such viruses containing commands designed to corrupt the system or to compromise security.
- Usage of Heckerbella Limited’s network/Internet facilities to deliberately propagate any virus, worm, or any other code with malicious intent such as spyware, hacking tools, etc.
- Using high bandwidth usage applications such as streaming media, Internet radio, etc. Access to any such websites must be justified by a valid business need.
- All existing organization policies such as non-discrimination, prevention of harassment, professional standards and protection of confidentiality apply equally to the technology environment. Violations of any of these policies, while accessing social media, may lead to disciplinary action including dismissal and/or other sanctions.



8. MONITORING USE OF SOCIAL MEDIA SITES

Employees should be aware that any use of social media websites (whether accessed for work purposes) may be monitored and, where breaches of this policy are found, action may be taken under Heckerbella Limited's Disciplinary Procedure and Consequence Management Policy.

- In response to concerns or complaints related to information provided by individuals, Heckerbella Limited may look up profiles on social networking sites and may use the information therein to initiate disciplinary proceedings against the employee and third-party employee.
- Heckerbella Limited reserves the right to restrict or prevent access to certain social media websites if we consider personal use to be excessive. Monitoring is only carried out to the extent permitted or as required by law and as necessary and justifiable for business purposes.

9. ROLES & RESPONSIBILITY

9.1 Human Resources.

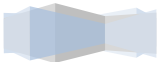
- Circulation of this policy to all employees within its scope
- Prompt investigation and action on any report of misuse or violation in line with the Code of Conduct and Disciplinary procedure, as well as the appropriate investigation team.

9.2 *Employee*

- Read and understands this Policy.
- Seeks clarifications from HR on any aspect of this policy, where required.
- Abides by the guidelines and rules of this policy.
- Promptly reports any violation of the rules of this policy to his/her line manager or HR as applicable.

9.3 Information Services

- Monitoring of employee's access to Social Media sites in line with the policy



- Prompt reporting of any misuse or violation to the HR department for investigation and action.

