



Ethics Compliance Manual

Ibadan Electricity Distribution Company

COMPLIANCE MANUAL Prepared by: Operational Compliance Department Reviewed/Concurrence: Iranola Ayodeji Chief Business Transformation & Strategy Officer	POLICY No: IBEDC/OCD/BTS001/2020
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ETHICS COMPLIANCE STATEMENT OF IBADAN ELECTRICITY DISTRIBUTION COMPANY

The Ethics Compliance Manual is a compendium of key documents, policies, procedural manual especially the all encompassing Condition of Service and toolkits IBEDC has initiated in order to drive the efficient implementation of its business operations.

It aims to make materials on business ethics, expected professional conduct, control measures and compliance in relation to the Code of Conducts for Directors, Condition of Service, Corporate Governance Framework and Whistle Blowing Policy.

It highlights the company’s ethical and governance stance of promoting transparent business practice initiatives.

The directors, management and employees of the Ibadan Electricity Distribution Company shall observe the laws, internal corporate rules and regulations, IBEDC business principles as set out in this manual, and shall conduct our business activities in compliance with high corporate ethical standards.

SCOPE

This Policy applies to members of the Board of Directors (in respect of the Code of Conduct for Directors and Corporate Governance Framework), and all employees of IBEDC regardless of the location.

This Policy also applies to IBEDC Agents, Third party vendors and Representatives



Dear Employees,

The peculiarities of our organization subjects our business operations to a wide range of statutory regulations and standards. Therefore, corporate ethics compliance is paramount to the success and sustainability of our business operation. Employees are urged to observe all legal and ethical charter – internal and external that governs the business affairs at all times.

Ethics Compliance is not abstract and/or theoretical, but a code of conduct that applies to everyone. It is valid for employees at all levels.

Strict adherence to laws, statutory regulations and standards will ensure that the organization avoids significant legal, reputational and economic risk to IBEDC, and thus to us all. As such, we preserve the legitimate rights and interests of all our stakeholders while respecting the needs of our society and/or environment.

Any business operation that is only possible by violation of the law or company rules must be avoided by IBEDC in order to achieve a sustained increase in corporate value and repute. No manager may issue any instruction to the contrary.

This manual has been formulated based on our Code of Conduct for Directors, Condition of Service, Corporate Governance Framework, Whistle Blowing Policy and business principles.

Employees are enjoined to internalize the principles contained in this manual, implement them fully in various job roles and take advantage of any and all training courses that may be provided on the subject matter.

Let us all work in commitment to ethical business practices and good governance to uphold IBEDC's good reputation.

Board of Directors



IBEDC MISSION, VISION & VALUES

Defining who we are, where we want to be and what we believe

Mission

“Distributing power, changing lives”.

Vision

“To be the best power distribution company in Nigeria”

Core Values

- ✓ Excellence
- ✓ Innovation
- ✓ Integrity
- ✓ Dependability
- ✓ Teamwork

Contents

1. Ethics Compliance Statement OF IBEDC	2
2. Scope of the Manual	2
3. IBEDC Mission, Vision & Values	4
4. Purpose of the Ethics Compliance Manual	6
5. Using the Manual	6
6. Ethical Decision Making	7
7. Ethics Compliance management in IBEDC	7
8. Business Principles, Conducts and Code of Ethics	8
a. Anti-Corruption and Anti Bribery	8-9
b. Human Rights	10
c. Accounting Records	11-12
d. Conflict of Interest	13
e. Gift and Hospitality	14
9. Protection and Use of Company Assets Resources	15
10. Dealing with Government and Public Agencies.	16-17
11. Quality, Health, Safety and Environment	18-19
12. Whistle Blowing	20
13. Role and Responsibility	21
a. Authority	21
b. Guidance	21
c. Responsibility	21
14. Consequence Management	21
15. Compliance and Monitoring	21
16. Implementation	21
17. Policy Changes	21
18. Closing Note	22



PURPOSE OF THE ETHICS COMPLIANCE MANUAL

IBEDC is required to conduct its affairs in accordance with her core values. Preserving the trust of our stakeholders is the responsibility of every individual in IBEDC.

The Manual explains IBEDC's policies on how we conduct our business around our franchise. It is pertinent to the success of our business operation that all employees including Senior Management and the Board of Directors must understand and abide by the business principles that govern our business operations.

Our business principles are in compliance with all regulations and thus a reflection of applicable laws and policies. It is a practical representation of how we conduct ourselves in doing business. Our corporate values are espoused in our dealings as we believe that the application of our ethical principles to our business decisions, positions IBEDC for **"success"**.

In conducting our business in a socially responsible and ethical manner thereby distinguishing IBEDC from its contemporaries, we take pride in unveiling our core values which guide our actions – respect of the law, supporting human right, protecting our society and environment, achieving operational excellence thus impacting positively in the communities in which we operate.

In a complex and competitive business environment, it is almost inevitable that sometimes we will encounter situations that will test our judgement and integrity. Nonetheless, when these tests arise, we should avail ourselves with this manual to aid us in answering the following:

- Is this legal and in keeping with IBEDC policy including our Anti-Bribery and Anti-Corruption and Human Right Policies?
- Is this consistent with IBEDC's core values?
- If these were made public, would I be comfortable?

Using the Manual

As a reflection of our core values, policies, processes, procedures and business principles, this manual intends to highlight the principles that guides our business conduct whilst providing scenario based questions and answers for situations that might be encountered on the job, listing resources for help and/or further information.

Employees are to familiarize themselves with the policies as contained in this manual which would guide them in the course of their career in IBEDC.

- Read through the entire Manual and familiarize yourself with the expectations.
- Think about how the principles apply to your role and job, and consider how you might handle situations to avoid improper, illegal or unethical actions.
- Use the case scenarios to help clarify situations that you may encounter.
- If you have questions, ask your supervisor or manager or contact any member of the Operational Compliance Department.
- It is vital that all employees of IBEDC understand the policies and related laws and comply accordingly.

ETHICAL DECISION MAKING

Ethical decision making is essential to the success of IBEDC. Some decisions are obvious and easy to make; others are not. When faced with a difficult situation, asking ourselves the questions below can help us make the right ethical decisions.

Four “**YES**” answers are required to qualify an action as ethical and in step with IBEDC’s values.

1. Is it legal?
 - i. If you think an action may be illegal, do not proceed.
 - ii. If you need information about which laws apply in a given situation, talk with your supervisor, manager or IBEDC’s legal team.
2. Is it consistent with Company policy, including our Anti-Bribery & Anti-Corruption and Human Rights Policy?
 - i. If the proposed action does not comply with Company policies, you should not do it.
3. Is it consistent with IBEDC Core Values?
 - i. Consider whether the action would be consistent with IBEDC’s core values.
4. If it were made public, would I be comfortable?
 - i. Ask yourself if you would make the same decision if you knew that it would be reported on the front page of tomorrow’s newspaper.

ETHICS COMPLIANCE MANAGEMENT IN IBEDC

The term “Ethics Compliance” is the guiding principle for the actions of IBEDC employees, therefore, Employees and Third Party Business Partners are expected to be familiar with the basic laws, regulations, industry standards and all in-house corporate policies that are relevant to the roles they undertake and areas they operate. The five areas of Ethical Compliance in IBEDC are:

1. Business Principles, Conducts and Code of Ethics
 - Anti-Corruption and Anti Bribery
 - Human Rights
 - Accounting Records
 - Conflict of Interest
 - Gift and Hospitality
2. Protection and use of Company Assets Resources
3. Dealing with Government and Public Agencies
4. Quality, Health, Safety and Environment
5. Whistle Blowing

Operational Compliance Department is responsible for ensuring that all compliance system is observed throughout IBEDC.

1. BUSINESS PRINCIPLES, CONDUCTS AND CODE OF ETHICS

It is our policy to conduct our business in a sustainable and transparent manner. IBEDC takes a zero-tolerance approach to bribery and corruption and is committed to acting responsibly and professionally with integrity in all our business dealings and relationships wherever we operate – *refer to the Conditions of Service*.

In essence, IBEDC expects that in line with our Know Your Business Partners and Customer policy (KYBP/C), our employees, representatives, advisors and other third party business partners with whom we contract, act professionally, fairly and with integrity in all business dealings and operation.

Our commitment to transparency in our Business Principles, Conducts and Code of Ethics is embedded in the four statements below:

1. **Policy Statement**

- *We are committed to good business practices.*

2. **Anti-Corruption Statement**

- *We are committed to integrity in business dealings – Zero Corruption.*

3. **Risk Management**

- *We are committed to the principle of sustainability – no violation of IBEDC’s enterprise risk management framework.*

4. **Bribery and Trade**

- *We are committed to upholding all laws relating to anti-bribery and anti-corruption.*

1.1 ANTI-CORRUPTION AND ANTI BRIBERY

We uphold integrity and credibility in our dealings, ensuring a corrupt-free, anti-fraud and highly ethical manner. We must respect and conform to our unique business practices in all our areas of operation. Above all, we must follow the laws and regulations of Nigeria

Responsibility for anti-bribery, anti-fraud and anti-corruption culture is the collective duty of all employees. All business strategies should be directed against bribery, fraud and corruption whether it is attempted against IBEDC from outside or from within its own workforce.

IBEDC expects that employees at all levels will abide by all anti-bribery and anti-corruption laws – local, regional and international at all times. All employees must lead by example in ensuring adherence to all anti-bribery and anti-corruption laws across all jurisdiction, legal requirements, contract procedure rules, financial procedure rules, codes of conduct and best (professional) practice.

As part of this culture, IBEDC will provide clear routes by which concerns can be raised by both employees and third party partners who are providing, using or paying for our services and products.

Executive Management will deal swiftly and firmly with those who defraud IBEDC or who are corrupt in line with the Company’s Conditions of Service.

Case Scenario 1



1.2 HUMAN RIGHTS

IBEDC supports universal human rights, we condemn human right abuses. IBEDC’s Human Rights Policy complements and brings together the human rights aspects from all the other Company policies, charters, processes, procedures and guidelines.

This includes but is not limited to –Fair Treatment and Equal Opportunities, Personal Health, Safety and Security and the Quality Health, Security, Safety and Environment.

Our Commitment	Your Responsibility
<p>Our People: We are committed to respect the human rights of our employees. We have developed our people policies to ensure that people are treated fairly.</p> <p>Our Conduct: We seek to respect and promote human rights when engaging with subcontractors, suppliers, customers, joint venture and other partners. Our policies have been developed to ensure that we conduct our businesses and our transactions in a manner where we act with integrity, comply with regulation and not condone corruption.</p> <p>Our Society: We seek to respect human rights and to develop an understanding of our society, encouraging our local community and making positive footprints.</p> <p>Our Environment: We seek to promote the realization of environmental sustainability and development through our core business and through our participation in any other multi-stakeholder activities where appropriate.</p>	<p>All our operations, activities and relationships shall be guided by this policy and no clause shall be subject to waive:</p> <p>Conduct yourself according to IBEDC’s Core Values and according to the commitments outlined in Human Rights Policy.</p> <p>Understand and adhere to the local laws, acting consistently with IBEDC’s policies and procedures.</p> <p>Read and acknowledge this Business Conduct and Ethics Code Reporting noncompliance with Human Rights</p>

1.3 ACCOUNTING RECORDS

Transparent and accurate books and records is key to IBEDC's business sustainability. IBEDC's books and records must be prepared accurately and honestly, both by our accountants who prepare records of transactions and by any employee whose responsibilities are integrated to the creation of business records – submission of time sheet, expense report- to ensure transparency in our book keeping through documentation. This will provide a complete, accurate, valid and auditable record of each transaction.

In order to sustainably manage our business, transparent and accurate book and/or record keeping is essential, thus, managing the business and maintaining the accuracy and integrity of IBEDC's financial and other regulatory reporting and disclosure. Our commitment to the value of Integrity is fundamental to the accuracy of financial and/or other reports IBEDC makes to the public.

IBEDC policy and related legislative laws /principles such as the Financial Reporting Council of Nigeria (FRCN) require the accuracy and completeness of our financial records. It is a serious offense to conceal or misstate information in IBEDC records; this will attract disciplinary actions in line with IBEDC's Conditions of Service/or criminal prosecution.

Employees are responsible for reporting any perceived violations (IBEDC's accounting and other operational policies and procedures) to their manager and/or supervisor, the Operational Compliance Department or send an email to ethicscompliance@ibedc.com

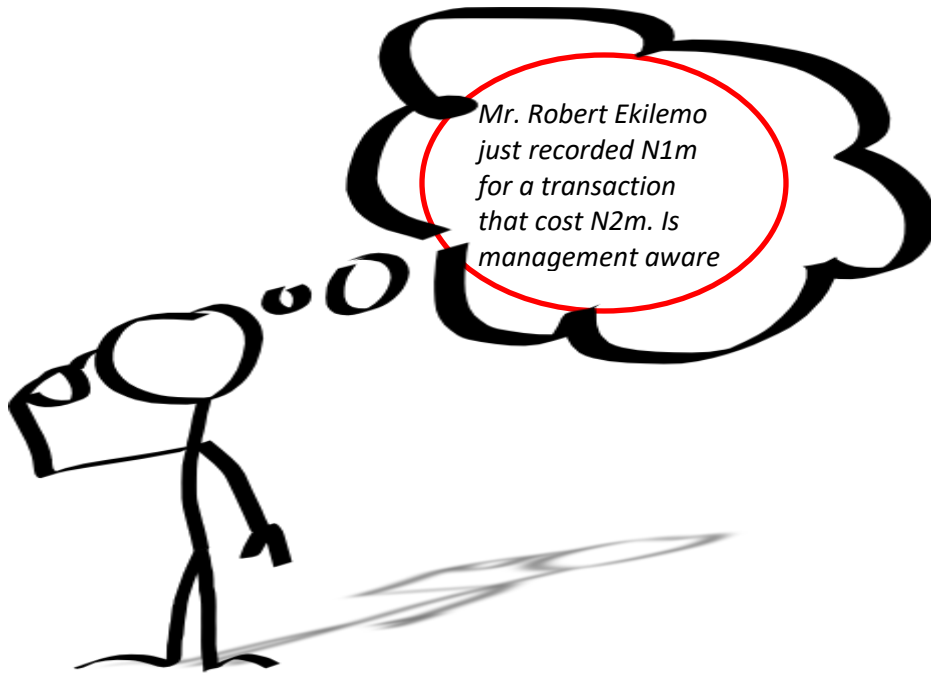
Internal Control

Efficient internal controls are critical for proper, complete and accurate record keeping, accounting and financial reporting. It is important that employees understand the internal controls pertinent to their job position whilst adhering to the policies and procedures related to those controls. Employees are encouraged to disclose any perceived infringements of the policies and procedures relating to internal controls to avoid inaccuracies, waste and/or fraud.

Audit

Audits performed by our internal and external auditors, boosts our stakeholder's confidence and the public in general while also ensuring that IBEDC is in compliance with established laws, regulations, policies, processes, procedures and controls. The Audit function also avails IBEDC an opportunity to proactively identify, analyze and provide solutions to potential risks and/or threats, thus resolving these concerns promptly and protecting IBEDC from additional costs that may have been incurred. Employees are therefore enjoined to provide clear and accurate information and cooperating fully during the audit process.

Case Scenario 2



*If anyone detects any official misconduct, please blow the whistle without fear of any form of retribution.
ethicscompliance@ibedc.com*

1.4 CONFLICT OF INTEREST

At IBEDC, we expect that Employees will always act in the best interest of the Company. IBEDC believes in the importance of interaction between IBEDC's businesses and the wider community. As such, IBEDC is faced with actual and potential conflict of interest periodically. The Conditions of Service however, addresses steps towards maintaining and operating an effective organizational and administrative system to identify and manage all relevant conflict. Here are a few examples of a conflict situation based on the business operation:

- An employee's sibling, business partner or friend works at a non-profit organization to which IBEDC is considering making a grant. (except set criteria's prior to shortlist are strictly adhered to).
- The employee serves on the board of directors of a company that IBEDC deals with and makes decisions on behalf of that company.
- The employee serves on the board of directors of a non-portfolio company which is directly involved in activities in IBEDC's investment area.
- The employee participates in discussions regarding the recruitment of a family member or an individual with whom he/she has a personal relationship, into IBEDC.
- The employee speaks at public or private events in his/her personal capacity, wearing IBEDC branded items and/or distributing his /her corporate complimentary cards.

Avoiding and reporting potential conflicts of interest in all our business decisions is essential to our vales of Integrity and Sustainability. Non-compliance with the Conflict of Interest guideline could have major impact on IBEDC's business which includes but not limited to the following;

- Negative impact on our business interests.
- Negatively affects IBEDC's reputation and/or relations with others.
- Interferes with an individual's judgment in carrying out his or her job duties.

Any activity that may be perceived as a Conflict of Interest whether or not a conflict exists should be avoided. Should any employee find themselves in a conflicting situation, it is important that the potential conflict is disclosed with your line manager/supervisor or a member of the operational compliance team immediately.



1.5 GIFT AND HOSPITALITY

It is not permissible for employees of IBEDC, either in their official or personal capacity to give or receive gifts or entertainment of more than nominal value or cash in any amount to or from people or companies doing or seeking to do business with IBEDC. Therefore we must not:

- Accept or give any gifts or consideration as an inducement or reward for doing or refraining from doing anything in line with their normal duties as staff of IBEDC.
- Show favor or disfavor to any 3rd party in expectation of a reward or as punishment for refraining from giving a reward for the fulfillment of their duties , as the case may be, in the normal course of their activities and job description.
- To receive money, gifts and/or consideration from a person and/or organization seeking to obtain a contract of service or for service or who already has a contract of service or for service in order to favor them.

In addition, gifts, hospitality or other benefits of over **₦30,000.00** (Thirty thousand naira) in value, must be disclosed formally to the staff’s Chief of Division/Head of Department or MD/CEO as applicable and must be registered with the Managing Director and/or Head of Department in accordance with the Conditions of Service on Solicitation and Receipt of Business Gifts - Gratification within 14 days of the date of receipt.

The handling of offers of hospitality is recognized as being much more difficult to regulate but it is an area in which employees must exercise careful judgment. It is recognized that it can be as embarrassing to refuse hospitality as it can be to refuse a gift. There is also a need to distinguish between simple, low cost hospitality of a conventional type, for example, a business lunch or evening meal compared with more expensive and elaborate hospitality. There is clearly a need for a sense of balance.

When in doubt about accepting hospitality or an invitation, you should consult your Chief of Division and/or Head of Department. In all instances where anything beyond conventional hospitality is offered, the approval of the Managing Director/Chief of Division/or Head of Department should be sought.

Case Scenario 3



IBEDC operates at a zero gift policy with a caveat - If in a situation where you cannot outrightly decline your customer’s gift, politely let them know that you aren’t allowed to accept gifts worth more than ₦30,000.00.

Accepting gifts and hospitable gestures from customers is prohibited. It is important that you disclose such gifts to your line manager as soon as possible afterwards.

It is important that Employees demonstrate a high level of integrity by being honest about gifts and hospitality given or received and such gifts must be disclosed to their line managers to avoid unfounded assumptions.

2. PROTECTION AND USE OF COMPANY ASSETS RESOURCES

Every Employee is responsible for protecting, preserving and putting into proper use, IBEDC's assets and resources. It is important that employees safeguard all company assets and never use them for any unlawful, unethical and/or personal purpose.

Employees are responsible for the protection of IBEDC's assets, both tangible (such as material, buildings, people, property, information, revenues) and intangible (such as communications networks, information systems, intellectual property).

All employees must act reasonably and take appropriate measures to prevent losses arising from willful action by others, both within and outside IBEDC, which may result in personal injury, property damage, theft, loss, abuse or unauthorized access to physical or logical assets, and intellectual property (including data).

Company property, facilities or physical resources shall not be used for solicitation or distribution activities that are not related to an employee's services to IBEDC, except the written approval of a Chief of Division/MD.

Persons either employees and/or non-employees of IBEDC may not solicit Company employees for any purpose(s) within the Company premises For more information on the use of Company Resources, please refer to the Conditions of Service.

Case Scenario 4



Protection of company asset, resources and information

Who is responsible for the protection of Company's asset, resources and information?

Efficient use and protection of Company's asset and/or resources, helps maintain the value of IBEDC's asset and/or resources.

Therefore it is the responsibility of all staff to protect, preserve and ensure proper use of Company's asset and resources for business sustainability.

3. DEALING WITH GOVERNMENT AND PUBLIC AGENCIES

IBEDC's business involvement with the Government, Regulatory and other Public Agencies, is conducted in accordance with the highest Ethical Standards. The nature of IBEDC's business operation promotes regular direct interface with the Government and its agencies. The integrity that we uphold is essential to the sustainability of our business and we must continually earn it.

It is therefore important that our business activities meet the highest Ethical Standards in compliance with internal guidelines, local and international laws. In all instance, it is imperative that employees seek adequate guidance in obtaining required approvals before engaging in Government or political discussions, engagement or any other activities.

Violation of laws and regulations can result in the Government blacklisting IBEDC and recommending very severe punishments for such violations. This includes and is not limited to:

- Fines and penalties
- Suspension and de-licensing
- Criminal proceeding against IBEDC

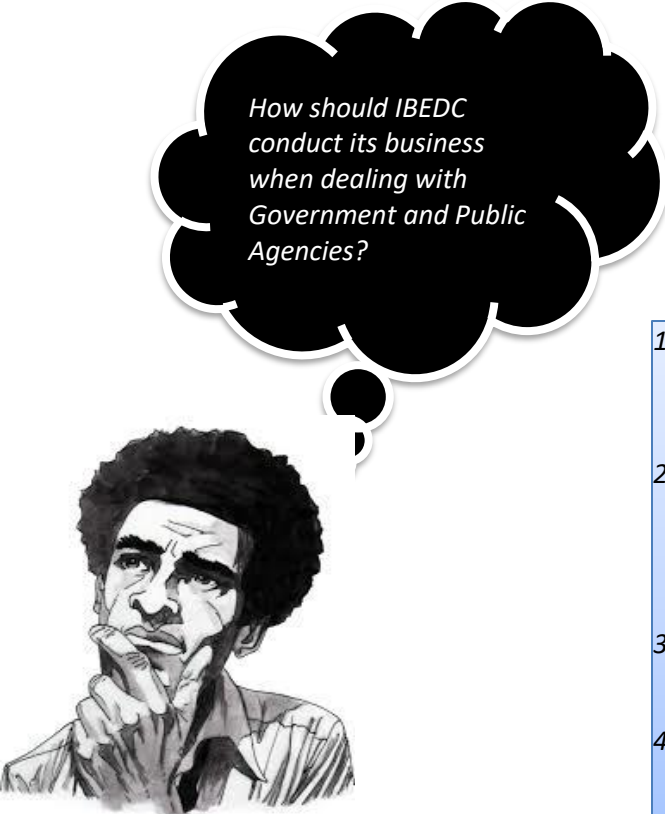
All Employees must comply with all applicable laws and regulations with respect to interactions with governments and government personnel and avoid interactions or situations that could be expected to result in reputational harm to IBEDC. Employees should ensure that they avoid the following:

- Violating national, state or local government laws or regulations concerning offering or providing business gift and gratitude's to the government employees or employees of government contractors or subcontractors.
- Making false statements or certifying false data to government employees, government agencies or government contractors or subcontractors.
- Deviating from government contract or subcontract requirements or making unauthorized contract or subcontract substitutions, including failure to perform required tests and inspections.
- Any other activities that might jeopardize the interest and reputation of IBEDC.

Employees must ensure that when dealing with the government and/or government agencies and representatives, they must abide with IBEDC policies, charters, procedures and processes such as – Anti-Corruption and Anti-Bribery, Gifts and Hospitality, Protection and Use of Corporate Asset, Resources and Information or any other policy of IBEDC current and future that provides guidance on the conduct of any employee of IBEDC.

IBEDC will not tolerate any financial malpractice and shall hold onto expertise, excellence and quality as key strength sources and shall NOT offer any sort of inducement to persons or government officials to influence decisions that affect IBEDC.

Case Scenario 5



*How should IBEDC
conduct its business
when dealing with
Government and Public
Agencies?*

- 1. Passionately conduct its business in a corrupt free and highly ethical manner that promotes transparency and compliance with regulations.*
- 2. Understand that violation of regulations can result to penalties, fines, debarment, or suspension from competing for government contracts and criminal prosecution of IBEDC or individual employee.*
- 3. Comply with all Company policies and applicable procurement laws and tender process requirement.*
- 4. Also require that all business partners working on behalf of IBEDC on a government project agree to comply with the government regulations and requirements.*

4. QUALITY, HEALTH, SAFETY AND ENVIRONMENT

IBEDC's policy is to ensure the Health and Safety of our people, their conduct and the quality of the environment by conducting our operation in a sustainable and reliable manner.

The operation of IBEDC not only focuses on value creation but on the health and safety of our employees as well as the environment in which we operate.

Therefore we are committed to:

- Compliance with Quality, Health, Safety and Environment policies that form an integral part of all our management objectives.
- Safe working ethics to achieve an incident free work environment.
- Educating employees that safety begins with 'U' – taking responsibility to ensure compliance with IBEDC's policies and procedures which are guidelines to good conduct.
- Developing contingency plans in case of emergencies.
- Training employees towards working safely and taking appropriate measures towards protecting their health and environment
- Ensuring medical support is made available as well as medical insurance plans.
- Ensuring continuous review of our policies and procedure towards safety.

It is our responsibility to comply with applicable Company policies, Government laws and regulations and to fully commit to ALWAYS meeting the requirements of the Safety policies in our work activities.

We expect compliance with the letter and the spirit of applicable Environmental, Health and Safety Laws, Regulations and Policies, regardless of the degree of enforcement.

Every employee has the authority and responsibility to stop – or not start – any work activity if hazards or risks pose a threat to safety or the environment.

Case Scenario 6



Just because you always did it that way, doesn't make it right.



THINK **Safety First**



**SAFETY FIRST,
LAST AND**



Staff must at all times;

- Comply with all relevant SAFETY provisions;
- Take reasonable care to protect the safety of ourselves and others who might be affected by our acts and omissions;
- Make correct use of any article or substance provided for our use and protection, including protective clothing and equipment.

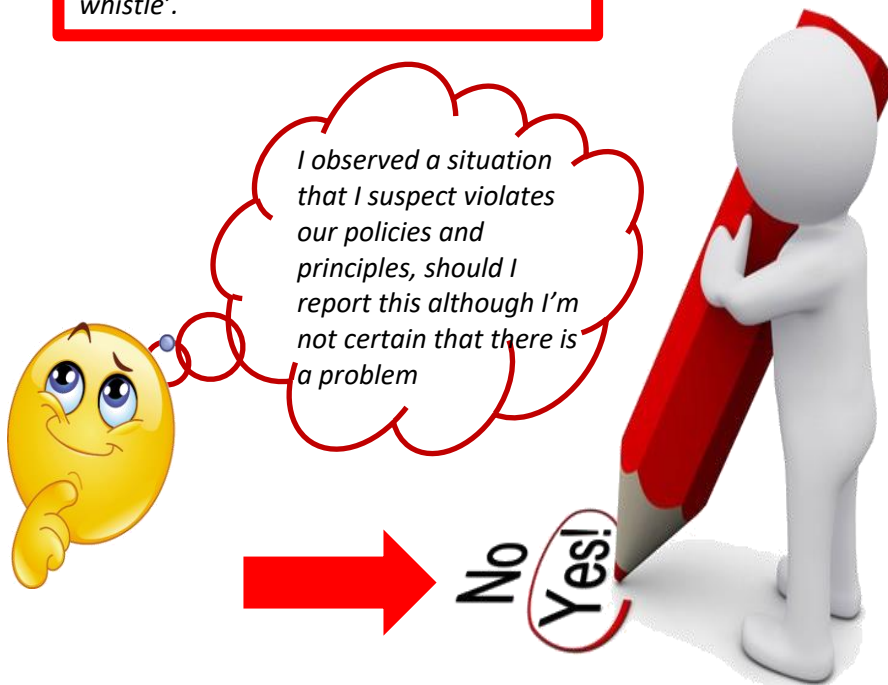
5. WHISTLE BLOWING

IBEDC operates a culture of openness, trust and professionalism. Every employee has a duty to disclose as soon as possible, all instances of unethical or illegal issues and suspected or intended acts against the Company or its employees, of which they have foreknowledge. Employees are required to make disclosures internally; the identity of the whistle-blower will be protected at all times and all disclosures shall be thoroughly investigated. Employees are encouraged to proactively report any suspicious behaviors that could cause damage to IBEDC's reputation or Employee's morale. Reports can be submitted to ethicscompliance@ibedc.com, which operates 24hours a day, seven days a week.

IBEDC does not tolerate any form of retribution for reports made in good faith which includes actions taken by managers and employees alike. For more information on the whistle blowing policy, please refer to the Conditions of Service.

Case Scenario 7

As a **whistleblower** you're protected by law - you would not be treated unfairly or lose your job because you 'blew the whistle'.



All employees are responsible for reporting possible violations to their supervisors or any other resource. It is better to report a suspicion that may not be an issue than to ignore a possible violation of the law. While you are encouraged to report to your supervisor, its usually best you report via the provision given- ethicscompliance@ibedc.com

Additional Resources

The platform provided for reporting is an option for people who for some reason or the other are not comfortable discussing the issue with their supervisor, manager or human resource representatives.



ROLE AND RESPONSIBILITY

Although our businesses are governed by significant and/or relatively different laws, regulations and customs, we are all responsible for respecting all applicable laws in our locality. This does not stop any Employee or representative (as contained in the Scope of this policy) from expressing themselves. IBEDC would ensure the confidentiality of any report, feedback or concerns.

Authority: Further to understanding this manual, Employees and all other persons within the scope of this manual must understand the level of authority attached to their job roles and description and must therefore be careful to act within the limits of that authority.

Guidance: No Policy or Manual can comprehensively provide answers to all questions, thus, we must rely on our initiative of what our Company's high standards require. This includes and is not limited to knowing when to seek guidance on the proper course of action. Where there are uncertainties and need for clarification on matters of ethics or compliance, whether as displayed in this manual or not, it is our responsibility to consult with our Managers, Supervisors, Operational Compliance staff, the Legal Department or send an email to operationalcompliance@ibedc.com. For more information on detailed knowledge of a particular compliance subject, all employees are encouraged to read the Company's Policies, Procedures, Processes, and Charters which can be found in the [IBEDC shared common portal](#).

Responsibility: Employees are responsible for familiarising themselves with this manual and other related documents and as such, must comply with the provisions as contained in this manual and with all other Company policies, procedures, processes and charters. It is important that insider dealings or perceived corruption is disclosed appropriately. Likewise, any officer, supervisor, manager and/or director aware of infringements on the law and/or regulations and does not report and/or correct it, shall be liable to similar consequences as outlined in the Employee's Conditions of Service and the Director's Code of Conduct.

Consequence Management: Non-adherence to this manual and related policies and procedures may result in disciplinary action up to and including termination of employment or criminal prosecution or both.

Compliance and Monitoring: Operational Compliance Department is responsible for ensuring that all compliance system is observed throughout IBEDC and will regularly review compliance with this manual.

Implementation: The Head Operational Compliance is responsible for the implementation and review of this manual and the policies contained herein/and any associated guidelines in accordance with the scope outlined above. All Managerial and Supervisory level officers are responsible for the operation of this manual. Enquiries on interpretation of this manual or the need for further advice should be directed to the Operational Compliance Department – operationalcompliance@ibedc.com

Policy Changes: This manual shall be an addition to others, as contained in the Conditions of Service or any other related document. IBEDC reserves the right to change this manual without notice. The latest version will always be available in the [IBEDC shared common portal](#) and should be referred to directly.

CLOSING NOTE

IBEDC's legal and ethical obligations are far more reaching than is displayed in this Ethics Compliance Manual. Everyone as contained in the Scope of this manual, must understand and comply with our manuals, policies, procedures, processes, charters, regulations and guidelines that affect our business.

Although employees are encouraged to express their concerns in terms of ethical obligations through guidance or counseling, we trust that employees shall ensure that their actions are consistent with IBEDC's Core Values and Ethics.

While this Manual cannot address every possible workplace situation, the manual can be used for guidance on our ethical standards and also providing information on the platform for whistle blowing reporting - ethicscompliance@ibedc.com

Additional Guidance/Related Policies/Resources - [IBEDC shared common portal](#)

Please familiarize yourself with the valuable resource for guidance on the Companies documents relating to Compliance issues.

- Code of Conduct for Directors -
- IBEDC Condition of Service
- Corporate Governance Framework
- Whistle Blowing Policy
- HR Policies
- BT&S Policies
- HSE Policies
- Technical Policies and all other policies in the IBEDC shared common portal/folder