

Capabilities. Opportunities. Possibilities.



WHISTLE BLOWING POLICY



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ALPHA MEAD GROUP'S WHISTLEBLOWING POLICY

Policy Statement

- The Policy requires all employees and partners of Alpha Mead to disclose unethical, inappropriate and illegal conducts in the Company.
- Any employee and partner of Alpha Mead told not to raise or pursue any concern, even by a person in authority should not agree to remain silent.
- Any employee and partner who reports unethical behaviours and wrongdoings in good faith will be protected from adverse employment consequence or detriment or victimization, while there are punitive measures for employees and partners who makes such report not in good faith or maliciously done or for personal gain.
- Anybody who retaliate or undertake an adverse employment consequence against an employee or partner will be subject to discipline including employment termination and legal action as may be appropriate.

Why the Policy?

This Policy was created in demonstration of Alpha Mead's commitment to highest standards of ethical conducts and compliance with regulatory and statutory framework It is intended to create an avenue for all employees and all individuals or entities who has some degree of involvement with Alpha Mead's business dealings including but not limited to customers, contractors, sub-contractor, suppliers (hereinafter referred to as "partners") and agents to express their concerns through well - established mechanisms about unethical, inappropriate and illegal conducts in the organization, without fear of adverse consequences and also enable Alpha Mead to investigate and take corrective action.

What is the Scope of the Policy?

This Policy applies to the Alpha Mead Group, its subsidiaries and affiliates around the Globe.

What matter can I refer ?

The concerns which falls within the purview of this Policy includes but not limited to the following:

- Concerns which could amount to an offence or a breach of the law.
- Any improper conduct or unethical behaviours that undermines the Company's core values.

- Failure to comply with regulatory directives, administrative or internal policy framework.
- Failure to comply with legal obligation or statutes.
- Connected transactions.
- Insider Abuse.
- Non-disclosure of interest.
- Sexual or physical abuse of any staff, customer, applicant, service provider and other relevant stakeholders.
- Conduct amounting to gross waste of resources.
- Disclosures related to miscarriage of justice.
- Discrimination matters
- Actions detrimental to health, safety, security and the environment.
- Any form of criminal activity.
- All forms of financial malpractices or impropriety such as fraud, corruption, bribery or theft.
- Neglect or abuse of clients and other unethical conduct.
- Any form of corporate governance breaches.

How am I Protected as a Whistleblower?

A Whistleblower can report the possible unethical, inappropriate and illegal conducts with his/her identity or anonymously. All complaints and concerns will be treated in confidence and every effort will be made not to reveal the identity of the Whistleblower, should the Whistleblower choose to remain anonymous. Whistleblowers are also assured of no adverse consequence for reports made in good faith.

How Do I Report ?

1. All concerns should be presented in the following format:
 - a. Background facts (with relevant dates)
 - b. Reason(s) why the whistleblower is particularly concerned about the situation.
 - c. Supporting evidence for the allegations, if available.

2. The report should be sent via email or hardcopy mail to:

Alpha Mead Ethics and Compliance Desk

6, Mobolaji , 2nd Avenue Estate, Ikoyi, Lagos

Marked as *“Strictly to be Opened by the Addressee Only”* on the sealed envelope

Or Email: whistleblowing@alphamead.com

What next?

7.2.2 The Alpha Mead Ethics and Compliance Desk will arrange an investigation into the matter to be carried out under terms of strict confidentiality and feedback will be provided to the whistleblower accordingly.