



Whistleblowing Policy



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POLICY STATEMENT

HGL is committed to the highest standards of openness, probity and accountability across our Portfolio.

Central to this ethos is providing a platform for our staff and stakeholders, including customers and suppliers, to voice concerns responsibly and effectively.

We expect all employees to diligently fulfill their duties, consistently adhering to the rules and guidelines outlined in their contracts, our HR manual, and Code of Conduct. Among these responsibilities, is the imperative to maintain the confidentiality of all information related to the company affairs. However, should an individual uncover information indicating serious malpractice or wrongdoing within HGL or our Portfolio Companies (PortCos), we encourage them to disclose it internally without fear of reprisal.

It is important to note that this policy aims to support individuals who believe they have discovered malpractice or impropriety. It is not intended to question financial, or business decisions made by the company or our PortCos, nor should it be used to revisit matters already addressed through grievance and disciplinary procedures. We expect our staff to utilise the whistleblowing policy rather than airing their complaints outside the organisation.



SCOPE

This policy enables employees of HGL and its PortCos, as well as external stakeholders to raise concerns at a high level, disclosing information they believe reveals malpractice or impropriety as defined by our staff handbook and code of conduct.

These concerns could include but are not limited to:

FINANCIAL MALPRACTICE
OR IMPROPRIETY OF
FUNDS

01

VIOLATION OF NIGERIAN
LAWS AND LEGAL
OBLIGATIONS

02

CRIMINAL ACTIVITY

03

IMPROPER CONDUCT OR
UNETHICAL BEHAVIOR

04

RISKS TO HEALTH AND
SAFETY OR THE
ENVIRONMENT

05

ATTEMPTS TO CONCEAL
ANY OF THOSE

06

SAFEGUARDS

1

PROTECTION

This policy ensures protection against adverse employment actions such as dismissal, demotion, suspension, harassment or other forms of discrimination for employees of HGL and our portfolio companies who disclose concerns. This protection applies when the disclosure is made in good faith, with the reasonable belief that it reveals malpractice or impropriety and is made to an appropriate person (see below).

2

CONFIDENTIALITY

HGL handles all disclosures in a confidential and sensitive manner. The identity of the individual making the allegation remains undisclosed unless it impedes the investigation process. In some instances, the investigation may necessitate revealing the source of information to members of the Whistleblowing Investigation Committee. The individual making the disclosure may also be required to provide a statement as part of the evidence.

3

ANONYMOUS ALLEGATIONS

While this policy encourages individuals to disclose concerns openly, anonymous allegations are considered at the discretion of the Committee. Factors such as the seriousness and credibility of the issues raised, as well as the likelihood of confirming the allegation from attributable sources, are taken into account in this discretion.

4

UNTRUE ALLEGATIONS

Individuals who make allegations in good faith, which are not confirmed by subsequent investigation, face no repercussions. However, individuals making malicious or vexatious allegations, confirmed to be untrue, may face disciplinary action, particularly if they persist with such allegations. It is crucial for individuals to exercise due care to ensure the accuracy of the information disclosed.

PROCEDURE FOR REPORTING CONCERNS

We encourage a culture of transparency and accountability. Therefore, if you have concerns regarding malpractice, there are several channels available to communicate them to the Whistle Blowing Investigation Committee:

1

You can send an email to whistleblower@honeywellgroup.com.



2

Alternatively, you can call our Whistle Blower's toll-free hotline on 0708 060 1099.



3

You may also submit a complaint form online through our website: www.honeywellgroup.com/whistleblowing/



4

We protect employee identities and initiate prompt investigations upon receiving complaints. Criminal evidence may be reported to authorities.

4o

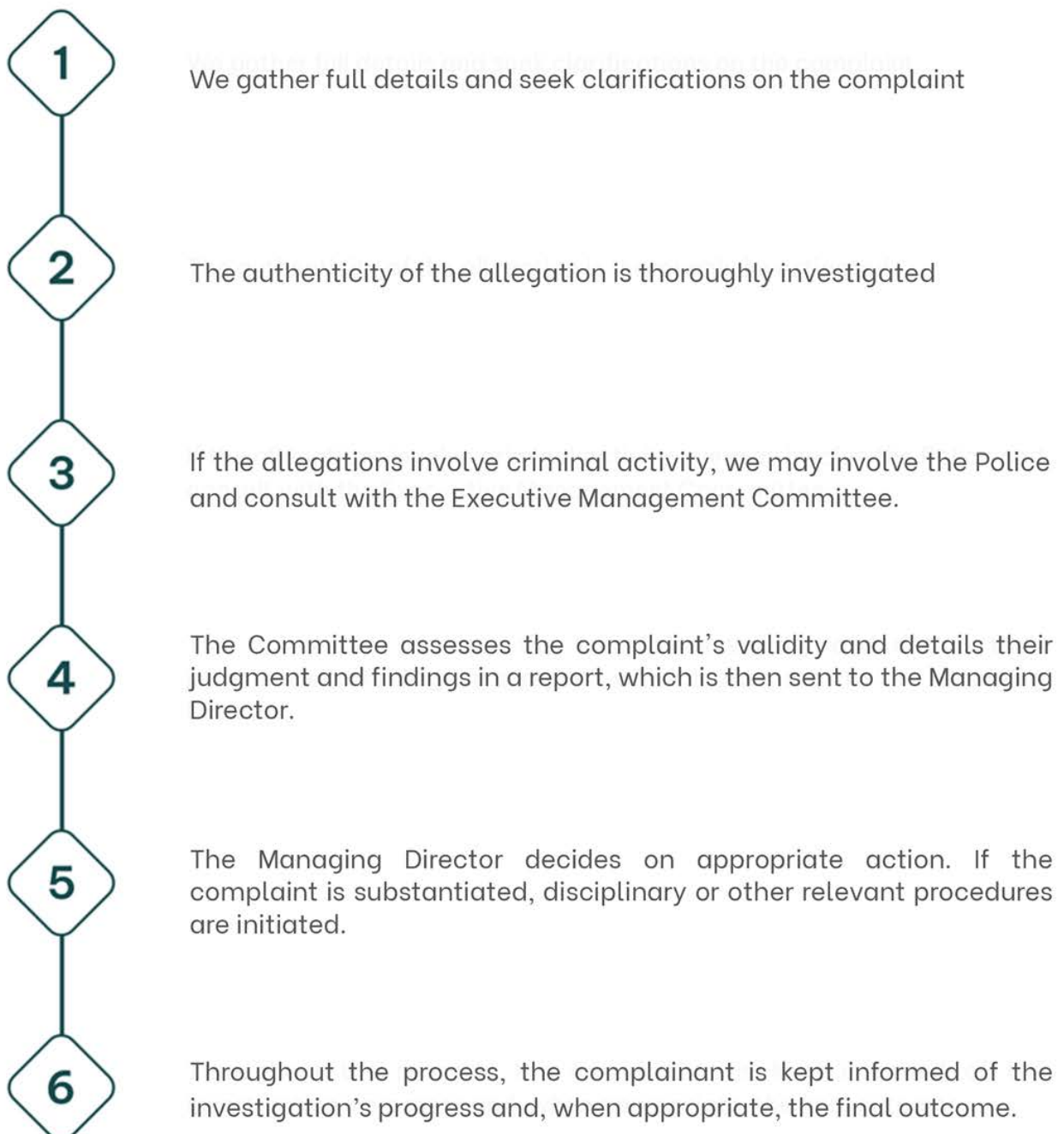


INVESTIGATION PROCESS

The Whistle Blowing Investigation Committee, made up of the Heads of Corporate Services, Governance and Sustainability, and the Chief Financial Officer, is entrusted with investigating allegations and concerns.

Here is what happens when a whistle-blower comes forward:

Here is what happens when a whistle-blower comes forward



If the complainant is not satisfied that their concern is being properly dealt with by the Committee, they have the right to raise it in confidence with the Managing Director

DISCIPLINARY MEASURES

If any allegation of misconduct is substantiated, we will take decisive disciplinary action against the responsible individual(s) in line with our staff handbook. Suspected criminal activities will be thoroughly investigated and prosecuted by the relevant authorities.

Furthermore, any confirmed act of retaliation or victimisation against a whistle-blowing employee will result in disciplinary action being taken against the perpetrator, including termination of employment if warranted.



| REPORT

A report on the final outcome of the matter shall be made to the Managing Director and the Chairman by the Committee upon conclusion of the investigation. For Portfolio Companies, a summary of whistle blowing related activities may be reported by the Company Secretariat during the board meetings.

However, matters presenting significant risks to the Company (such as reputational, financial, legal etc.) will be promptly reported to the Board at the first available opportunity following the report by the Whistle- blower.

The Board of Directors may make recommendations aimed at minimizing the risk of recurrence of any malpractice or impropriety uncovered.

