



**THE NIGERIAN AVIATION HANDLING COMPANY PLC**

**WHISTLE BLOWING POLICY**

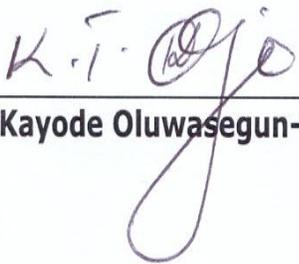


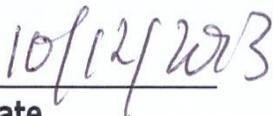
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**Date**

**Distribution List:**

1. MD/CEO
2. ED, OPERATIONS
3. ED, BUSINESS DEVELOPMENT
4. CHIEF FINANCE OFFICER (CFO)
5. GM, OD & HR
6. HEAD, ERM
7. HEAD, CORPORATE COMMUNICATIONS
8. COMPANY SECRETARY
9. HEAD, INTERNAL AUDIT AND COMPLIANCE
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23. BUSINESS MANAGER, ENUGU STATION

## **Introduction**

An important aspect of accountability and transparency is a mechanism to enable all individuals to voice out concerns internally but in a responsible and effective manner when they discover information which they believe shows serious malpractice.

Consultation goes to the heart of the company's culture, and avoids an individual having to resolve a difficult ethical situation all alone. Staff should in the first instance consider consulting their line manager, or Supervisors/ Leaders. If uncomfortable about taking up the matter through the company's normal reporting channels or with their human resources contact (Human Resources Partners), they may want to seek assistance from this whistleblowing policy.

Our whistleblowing policy is therefore fundamental to the company's **core value** (*Safety, Integrity, Reliability, Innovation and Respect for Individual*). In addition, it reinforces the value **nahco aviance** places on staff to be honest and respected members of their individual professions. It provides a method of properly addressing bona fide concerns that individuals within the company might have, while also offering whistleblowers protection from victimization, harassment or disciplinary proceedings.

It should be emphasized that this policy is intended to assist individuals who believe they have discovered malpractice or impropriety. It is not designed to question financial or business decisions taken by the company nor should it be used to reconsider any matters which have been investigated under the harassment, grievance or disciplinary policies and procedures.

## **Policy Statement**

The Board and Management of **nahco aviance** are committed to ensuring openness and communication in all the dealings of the company with its officers, employees, suppliers and all other stakeholders and publics with whom it engages for business and other relations. This is in line with the company's core values. The company recognizes that effective and honest communication is essential to maintain our core values and to ensure that negative business practices are detected and dealt with promptly with a view to preserving the reputation and integrity of the company with its various publics.

## **Objective of Whistle Blowing Policy**

The objective of this policy is to encourage everyone, whether part-time or full time employees, agents, contractors, suppliers, staff of suppliers, customers or people however remotely related to the company, to report any business misconduct without risk to themselves or any inhibition or victimization.

Appropriate incentives will be offered to a whistle-blower whose action significantly promotes the Company's interests.

## **Scope**

The policy covers all employees of **nahco aviance** and all other stakeholders as described above.



## **The Policy**

This policy will apply in all cases where an individual genuinely and in good faith have reasons to believe that a misconduct is occurring, has occurred or may occur within the **nahco aviance operating environments**, irrespective of location. Such misconduct will include but is not limited to the following:

- ❖ Commission or concealment of a criminal offence/fraud/theft or collusion to commit the same;
- ❖ Non-compliance with law of the Federal Republic of Nigeria or a legal obligation and breaches of statutory legal obligations;
- ❖ Any illegal or unethical operation;
- ❖ Serious un-professional or un-ethical behaviour, including harassment of any sort and/or bullying;
- ❖ Use of deception to obtain an unjust or illegal financial advantage for the business unit or personally;
- ❖ Miscarriage of justice;
- ❖ Endangering the health and safety of an individual;
- ❖ Damage to the environment;
- ❖ Breach of internal control;
- ❖ Intentional misrepresentation directly or indirectly affecting financial statements;
- ❖ Deliberate concealment of information relating to any of the above.

This policy is very distinct from the grievance procedure as enunciated in the company's employee handbook (Conditions of Service).

## **Procedure**

**Talking to the whistle blowers:** As soon as you become aware of a situation representing misconduct as described above, you should, in the first instance raise the matter with your line manager or, if you do not feel this is appropriate or where he/she is the person involved, there are suggestion boxes provided at strategic places in each business unit and the Head Office (at nahco aviance House, Murtala Muhammed International Airport, Ikeja, Lagos) where you can drop your memorandum for the attention and action of Management.

You also have an opportunity to make comments **to the officers in charge of the whistle blowing lines (whose telephone numbers were circulated previously as indicated below)** which will **not** be held against you.

If you are unable to use suggestion box option, you should feel free to contact the under listed e-mail address and phone numbers by **electronic mail or texts (SMS) ONLY**:

1. **E-mail: whistleblowing@nahcoaviance.com**
2. **081 000 00137- MTN**
3. **081 000 00139- MTN**
4. **070 522 00200- GLO**
5. **070 575 00500- GLO**
6. **080 999 96662- Etisalat**
7. **081 711 11112- Etisalat**

All instances of whistle-blowing to any of the above lines of communications will be logged in a register for immediate investigation by the Head, Internal Audit & Compliance who will then after forward the report to the Managing Director/CEO for immediate action as appropriate.

Where the MD/CEO is the officer of the company against whom the complaint is being made, the investigation report will be forwarded to the Chairman of the Board's Governance & Remuneration Committee **and also** the Chairman of the Board **and not to the MD/CEO himself**.

### **Investigation**

Once an allegation of misconduct is made, the Head, Internal Audit & Compliance will agree an appropriate investigation plan with the MD/CEO or Chairman of the Board's Governance & Remuneration Committee and will endeavor to respond to the whistle blower within seven (7) days of receipt of the memorandum, text messages/ e-mail of the further investigation, if any, is planned.

Once the investigation is completed, report shall immediately be sent to the MD/CEO or the Board's Governance and Remuneration Committee. The whistle blower shall be advised of the outcome of the investigation as well as the corrective actions which are being taken so as to serve as an encouragement to the blower of the whistle.

Where the whistle blowing is done anonymously, communication will be to the generality of the employees at the appropriate '*location*'.

**Nahco aviance** is committed to running its business without misconduct and expects its employees and other stakeholders to share this objective. However, the company also recognizes that whistle-blowing is a potentially sensitive issue. Therefore, if you have reason to believe that you are being victimized or penalized in any way for whistle-blowing or if you do not consider that you have had a satisfactory response to your disclosure, you should write to the MD/CEO or Chairman of the Board's Governance & Remuneration Committee setting out the facts.

### **Safeguards**

The Company would take all reasonable steps to protect the identity of whistle blowers. However, you should be aware that action taken as a result of your disclosure may lead to your identity needing to be revealed. Any whistle-blowing employee is protected against adverse employment actions (i.e. dismissal, demotion, suspension, harassment

or other forms of discrimination) for raising allegations of misconduct by the Board of Directors of the Company and specific legislation in force in Nigeria.

A whistle-blowing employee is also protected even if the allegations proved to be incorrect or unsubstantiated, provided the disclosure is made in good faith under the honest belief that the information and any allegation therein are true.

### **Disciplinary Action**

In the event that any allegation of misconduct is substantiated, appropriate disciplinary action will be taken against the responsible individual(s) up to and including termination of employment, dismissal from service and criminal prosecution by the relevant authorities.

Furthermore, any act of retaliation or victimization against a whistleblowing employee will result in disciplinary action being taken against the perpetrator, up to and including termination of employment.

The malicious use of the whistle-blowing policy will result in disciplinary action against a whistle-blowing employee, up to and including termination of employment.

### **The fundamental elements of this policy**

- ❖ All staff members are protected from victimization, harassment or disciplinary action as a result of any disclosure, where the disclosure is made in good faith and is not made maliciously or for personal gain. Where disclosures are made in the public interest, staff will have statutory protection.
- ❖ Any disclosure will be investigated fully including interviews with all the witnesses and other parties involved.
- ❖ Anonymity: Normally, individual should make disclosures internally. The identity of the whistleblower will be protected at all stages in any internal matter. While the company can provide internal anonymity, it cannot guarantee this will be retained if external legal action flows from the disclosure. If the whistleblower prefers to make a disclosure outside the company, **nahco aviance** will not be accountable for maintaining anonymity, i.e. where the whistleblower has told others of the alleged infringement.

**Note:** Whilst the company encourages self-identification of whistleblowers, anonymous calls will nevertheless be taken seriously and investigated fully. However, the effectiveness of any whistleblowing enquiry may be limited where an individual chooses not to be identified.