

WHISTLEBLOWING POLICY: REPORT UNETHICAL BEHAVIOUR

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

- 1. Commission or concealment of a criminal offence/fraud/theft or collusion to commit the same;
- Non-compliance with Laws of the Federal Republic of Nigeria or a legal obligation and breaches of statutory legal obligations;
- Any illegal or unethical operation;
- Serious unprofessional or unethical 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;
- 6. Miscarriage of justice;
- Endangering the health and safety of an individual; Damage to the environment;
- 8. Breach of internal control;
- Intentional misrepresentation directly or indirectly affecting financial statements;
- 10. Damage to our Ground Support Equipment and other infrastructure in the premises.
- 11. 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, i.e. the Conditions of Service.

Procedure

Talking to the whistleblowers: As soon as you become aware of a situation, you have the opportunity to make comments to the officers in charge of the whistleblowing lines, whose telephone numbers are published on the nahco aviance website as indicated below. Reports made in good faith will not be held against you.

The underlisted e-mail address and phone numbers may be used to report concerns via **<u>electronic mail, text message</u>** (SMS), or voice call:

- 1. E-mail: whistleblowing@nahcoaviance.net
- 2. 07071783007-MTN
- 3. 07061279679-MTN
- 4. 07073495602-MTN
- 5. 07042249317-MTN

Thank you.

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Olumuyiwa Olumekun Group Managing Director/CEO