



ETHICS POLICY
 LA-CS&IR_Ethics Policy_PROC_v1.0

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Review by			Date			
NatCom EXCO						
Board Policy Review Sub-Comm.						
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1. Policy Objectives

NatCom is committed to protecting employees, Shareholders, vendors and the company from illegal or damaging actions by individuals, either knowingly or unknowingly. When the Company addresses issues proactively and uses correct judgment, it will help set us apart from competitors and detractors.

Best practices show that core principles of Ethics are developed and imbibed when the employees participate in building, nurturing and spreading sustainable ethical values in a company.

NatCom will not tolerate any wrongdoing or impropriety at any time. NatCom will take the appropriate measures, act timeously in correcting the issue if the ethical code is broken.

2. Purpose

The purpose of this policy is to establish a culture of openness, trust, integrity and to emphasize the employee's and customer's expectation to be treated to fair business practices.

This policy will serve to guide business behaviour to ensure ethical conduct. Effective ethics is a team effort involving the participation and support of every NatCom employee. All employees are therefore, required to familiarize themselves with the ethical guidelines set out in this policy.

3. Scope

This policy applies to employees, contractors, consultants, interns, and other officers of the Company, including all personnel affiliated with third parties.

4. Policy Guideline

4.1 Executive Commitment to Ethics

- 4.1.1 Senior leaders and executives within NatCom must set a prime example.
- 4.1.2. In any business practice, honesty and integrity must be top priority for executives.
- 4.1.3 Executives must have an open-door policy and welcome suggestions and concerns from employees. This will allow employees to feel comfortable discussing any issues and will at the same time, alert executives to concerns within the work force.
- 4.1.4. Executives must disclose any conflict of interests with regards to their position within NatCom.



4.2 Employees' Commitment to Ethics

- 4.2.1 NatCom employees will treat everyone fairly, have mutual respect, promote a team environment and avoid the intent and appearance of unethical or compromising practices.
- 4.2.2 Every employee needs to apply effort and intelligence in maintaining ethics value.
- 4.2.3 Employees must disclose any conflict of interests with regard to their position within NatCom.
- 4.2.4 Employees will help the Company to increase customer and vendor satisfaction by providing quality products, services and timely response to inquiries.
- 4.2.5 Employees should consider the following questions to themselves when any behaviour is questionable:
 - a. Is the behaviour legal?
 - b. Does the behaviour comply with all appropriate Company policies?
 - c. Does the behaviour reflect Company values and culture?
 - d. Could the behaviour adversely affect company stakeholders?
 - e. Would you feel personally concerned if the behaviour appeared in a news headline?
 - f. Could the behaviour adversely affect NatCom if all employees, did it?

4.3 Company Awareness

- 4.3.1 Promotion of ethical conduct within interpersonal communications of employees will be acknowledged, valued and rewarded.
- 4.3.2 NatCom will promote a trustworthy and honest atmosphere to reinforce the vision of ethics within the company.
- 4.3.3. Legal and Policy awareness and briefings will be conducted from time to time on a need to know basis.

4.4 Maintaining Ethical Practices

- 4.4.1 NatCom will emphasise the importance of the integrity message and the tone will start at the top. Every employee, manager, director needs to consistently maintain an ethical stance and support ethical behaviour.
- 4.4.2 Employees at NatCom should encourage open dialogue, get honest feedback and treat everyone fairly, with honesty, integrity and objectivity.
- 4.4.3 NatCom has established a best practice Ethics Ambassadors to ensure that the ethical code is delivered to all employees and that concerns regarding the code can be addressed.



4.4.4 Employees are required to re-certify their compliance to Ethics Policy on an annual basis.

4.5 Unethical Behaviours

4.5.1 NatCom will avoid the intent and appearance of unethical or compromising practice in relationships, actions and communications.

4.5.2 NatCom will not tolerate harassment or discrimination.

4.5.3 Unauthorized use of company trade secrets & marketing, operational, personnel, financial, source code, & technical information integral to the success of our company will not be tolerated.

4.5.4 NatCom will not permit impropriety at any time and we will act ethically and responsibly in accordance with applicable laws.

4.5.5 NatCom employees will not use corporate assets or business relationships for personal use or gain.

5. Policy Compliance

5.1 Compliance Measurement

The NatCom Compliance Team will verify compliance to this policy through various methods, including but not limited to, training and induction, reports, internal and external audits, and feedback.

5.2 Compliance Program

NatCom will evolve suitable programs that will stimulate ethical conducts amongst employees in their day to day dealings. The Ethics programs will adopt suitable employees' involvement and engagement as much as possible to imbibe the consciousness and understanding of the ethical stance of the company and enhance conformity.

5.2.1 Doing What is Right: Natcom shall implement a quarterly campaign targeted at training and empowering employees on doing what is right when faced with everyday real-life ethical questions. The campaign shall ride on the Company Code of Conduct and approved Policies.

5.2.2 Ethics Platform: These shall form the basis of ethical discussions amongst employees during Ethical awareness sessions, team meetings or any such forum where the discussions of ethical issues can add value to the way we conduct our business and interreact with our customers. The key driver for the Ethics Platform campaign shall be to demonstrate ethics and integrity.

5.2.3 Culture Value: Culture in Natcom as advocated by the Nigerian Code of Corporate Governance and the NCC Code of Corporate



Governance for Telecommunications Industry shall be built on the principles of Accountability, Transparency/Openness/Honesty, Responsibility, Independence, Integrity, Justice, Equity and Fairness. This shall form the basis for all business discussions and decisions. The business shall consciously strive to build an ethical culture that is genuine and will stand the test of time. Ethical values are the ones we make ethical choices based on them, or they are the kind of values that have to do with being good or doing the right thing. The business through the Executive Committee or the Ethics Ambassadors adopt a suitable value and conduct conversation on the adopted value at a specified interval which could be weekly, fortnightly or monthly.

5.3 Non-Compliance

An employee found to have violated this policy may be subject to disciplinary action, up to and including termination of employment.

6. Ethics Ambassadors:


- 6.1 There shall be a selective representation of employees from the various units and regions of the business to assist in evolving and implementing a desired ethical culture.
- 6.2 The representation of employees shall be appointed as Ethical Ambassadors and these representatives shall be shouldered with a duty to foster and champion ethical culture and values as ambassadors for ethics within the business during the duration of their appointment.
- 6.3 The Ethics Ambassadors are meant to support the success of the implementation of the Ethics Program by advocating a business case for ethics within their work circle and amongst their peers.
- 6.4 Hence, appointed Ethics Ambassadors should promote the Ethics programme with the objective of encouraging ethical behaviour in all aspects of the business in the Company, in all regional offices and all business divisions within Natcom.
- 6.5 The roles and coordination of the Ethics Ambassadors shall be contained in the Charter for Ethics Ambassadors

8. Related Standards, Policies and Processes

Anti CMT. Conflicts of Interests Policy, Code of Conduct, Disciplinary Policy.



9. EXCO and Stakeholder Review and Sign-Off

Action	Name	Job Title	Signature
Prepared by	Nicholson Okwori	AM, Policy & Legal Compliance	
Reviewed by	Olubukola Izevbaye	Head, Marketing Segments & Propositions (For Commercials)	
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Reviewed by	Chinedu Anochirionye	Financial Controller	
Reviewed by	Ngozi Ezigbo	GM Human Resources	 20/01/2020
Reviewed by	Anthony Iloh	GM Customer Experience & Direct Sales	
Reviewed by	Anthony Adegbola	Director, PMO & IT	 17th/Dec 2019
Reviewed by	Inusa Bello	Director, Indirect Sales	 17/12/19
Reviewed by	Oluwatosin Bamidele	Chief Technology Officer	 17/12/2019

