

Business Ethics and Anti-Corruption Policy for Samdenkens Nigeria Limited

Introduction

Samdenkens Nigeria Limited is committed to conducting business with integrity, transparency, and accountability. This policy outlines our commitment to upholding the highest standards of business ethics and anti-corruption practices.

Scope

This policy applies to all employees, directors, contractors, and third-party representatives of Samdenkens Nigeria Limited.

Principles

- 1. Honesty and Integrity: We conduct business with honesty and integrity, avoiding any form of deception or fraud.
- 2. Transparency: We operate with transparency in all our dealings, ensuring clarity and accountability.
- 3. Accountability: We take responsibility for our actions, acknowledging and learning from mistakes.
- 4. Fairness: We promote fair competition, avoiding any form of bribery or corruption.
- 5. Respect: We respect the rights and dignity of all individuals, cultures, and communities.

Anti-Corruption

- 1. Prohibition of Bribery: We prohibit bribery in all forms, including offering, giving, receiving, or soliciting bribes.
- 2. Gifts and Hospitality: We limit gifts and hospitality to reasonable and legitimate business purposes.
- 3. Facilitation Payments: We avoid making facilitation payments, except in exceptional circumstances.
- 4. Conflicts of Interest: We identify and manage conflicts of interest to prevent undue influence.

Reporting and Whistleblowing

- 1. Reporting Obligations: Employees must report any unethical conduct or corruption concerns.
- 2. Whistleblowing: We protect whistleblowers from retaliation and ensure confidential reporting channels.

Consequences of Non-Compliance

Violations of this policy may result in disciplinary action, up to and including termination of employment or contracts.

Training and Communication

We provide regular training and communication on business ethics and anti-corruption to ensure employees understand and comply with this policy.

Review and Revision

This policy will be reviewed and revised as necessary to ensure its effectiveness and alignment with changing regulations and industry best practices.





