

1.0 Policy Statement

This policy is intended to encourage staff and others to report suspected or actual occurrences of illegal, unethical or inappropriate events (behaviours or practices) confidentially, without fear of retribution.

2.0 Objective

The policy is designed to deal with bona fide concerns raised in relation to issues relating to fraud, bribery, corruption, misconduct, malpractice, child labour, trafficked labour, forced labour, discrimination and harassment issues within OOPC.

3.0 Scope

This policy is applicable to all staff, contractors, third parties, visitors, suppliers and non stakeholders of OOPC.

4.0 Definitions

4.1 Whistle blower: Is anyone who exposes (reports) fraud, extortion, or sabotage to the relevant authority as described herein.

5.0 Guidelines

- OOPC is committed to the aims and objectives of an effective whistle blower protection program.
- Crimes against person or property, such as assault, rape, burglary etc. should immediately be reported to the relevant authority, namely, security (08134631183/07050230442) or law enforcement personnel.
- OOPC does not tolerate improper conduct, as defined herein, by its employees, executives, clients, stakeholders and/or customers.
- OOPC recognises the value of transparency and accountability in its administrative and management practices, and supports the making of disclosures that reveal corrupt conduct, conduct involving a substantial mismanagement of company resources, conduct involving a substantial risk to our employee's, stakeholders or customers' health and safety, or conduct that represents a risk to the environment.
- OOPC will not tolerate any action, including reprisals, against those whistleblowers who come forward in good faith to disclose such conduct. If any of the above mentioned in the scope of this policy retaliate against the whistle blower (who reports an event in good faith) will be subject to severe disciplinary action, including termination of their employment or their contract and/or legal action against them by OOPC.
- The identity of the whistleblower shall at all times remain confidential to the persons directly involved in implementing this policy, unless the issue requires investigation by law enforcement, in which case members of the organization may be subject to subpoena.
- OOPC communicate this policy to all employees through supervisors, at departmental meetings, through signs posted, training sessions, monthly bulletin and through elected union representatives. OOPC regularly conducts toolbox talks for all operating departments to reinforce the importance of and ensure full compliance with this policy.
- If any employee discovers any act of fraud, extortion or sabotage committed by any person whatsoever and promptly reports this discovery to management, the whistleblower will be rewarded with 10% of the anticipated value of the fraud recovered. (Value to be determined by the company)

Any whistle blower with vital information pertaining to alleged theft, fraud, extortion, corruption, assault and/or sabotage should send such information to okomuinfo@okomunigeria.com or send a text to **08060361068**. Alternatively, information can be placed in any Suggestion Box, either at the Staff Club House, OOPC Main Gate, any suggestion box within OOPC or situated within selected communities. The MD is immediately notified and an investigation is carried out discreetly by the internal auditors who will then report back to the MD with their findings and for him to make a decision on it.

6.0 Record of Approval

Task	Name/signature	Job title
Approved by	Dr. Graham Hefer	Managing Director

Date
MANAGING DIRECTOR
OOPC
 24 JAN 2022
DR. G. HEFER