



CODE OF CONDUCT



This document is an integral part of the Company Employees Handbook for management and Junior Employee.

Lagos, Nigeria Sept, 2020

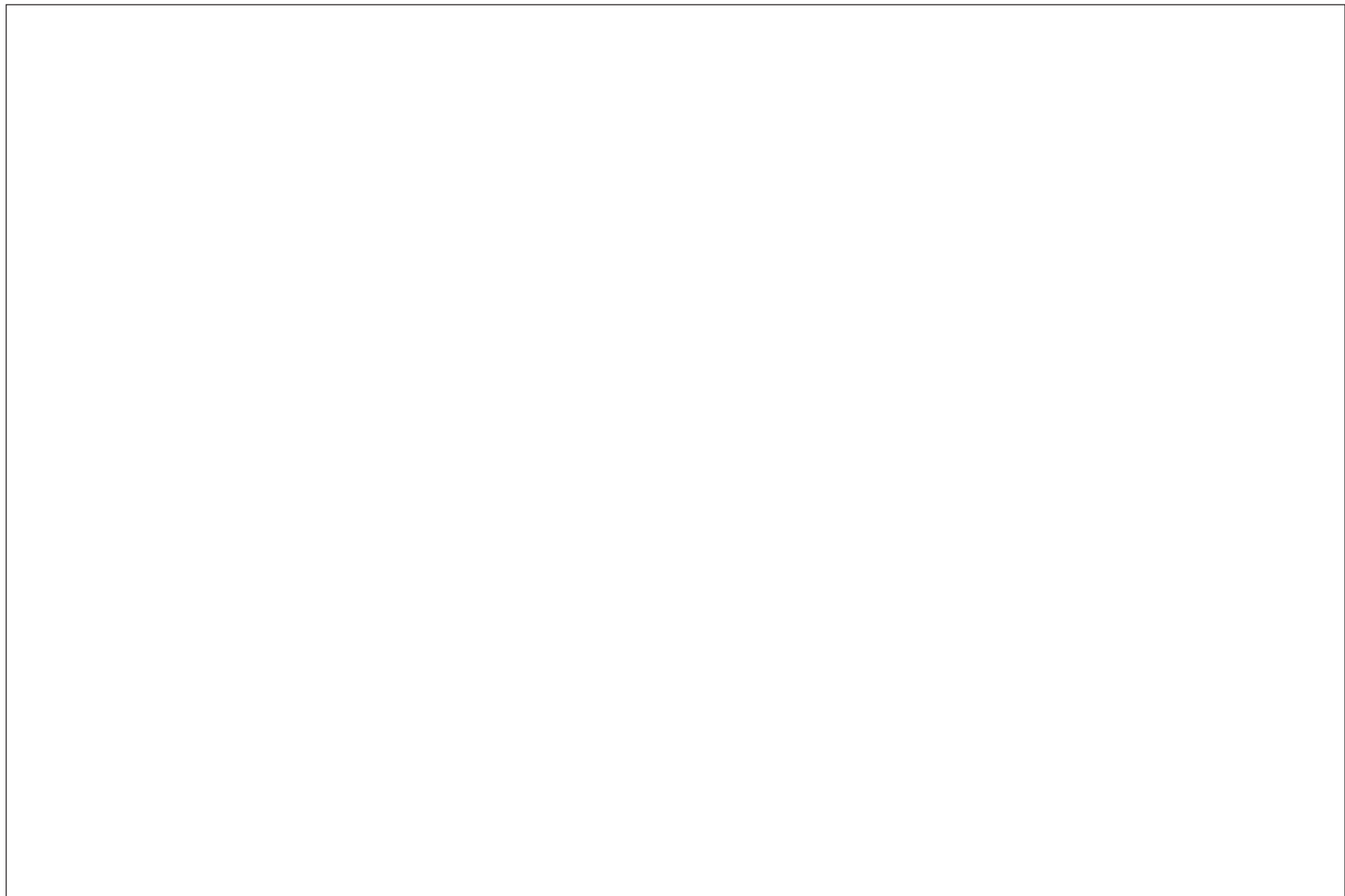


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Our Corporate Philosophy

Our Vision

To be a world class conglomerate, spreading across Africa and beyond

Our Core Values

Respect

We must respect both our internal and external customer's values and differences, cultures, customs and backgrounds. We must also recognize that everyone is important and has a role that matters. No individual is more important than anyone else, and no individual's time is more valuable.

Innovation

We must be creative and innovative ourselves, as 'old factory thinking' will not win the race. We will innovate to continually provide top notch services to our internal and external customers.

Our Mission

To provide high quality product and services with a focus on Total Quality Management.

Commitment

We must be dedicated to working together towards one common goal and ensuring that our internal and external customers are valued, supported, and empowered.

Excellence

We must not rest on our accomplishments, but will rather build on them in our personal and professional journey to be the best we can be. We must endeavor to exceed expectations in every project.

Our Employee Code ► TEAMWORK | INTEGRITY | PASSION | PROFESSIONALISM

Objectives

BUA Group aims to provide a working climate in which its people are able to develop their abilities in a rational and secure employment environment. For this reason, a Code of Conduct and Grievance Procedure is necessary for the fair and equitable administration of discipline. The Code of Conduct, which applies to Management and Junior employees alike, sets the nature of offences which, experience has shown, are taking place in our Company.

The disciplinary procedures assign the measures which are to be taken to discipline the individual committing these. This removes all doubt from the administration of discipline, and will ensure consistency of application throughout the Company.

Please Note:

In this Code, for the guidance of users, specific posts are sometimes set for specific offences. This should be treated as being for guidance only and does not absolve those in the positions of authority and/or responsibility from their accountability for actions of their subordinates.



Section 1

Use of Attendance Register/Clocking Machine

Rationale:

The Attendance Register and the Clocking Machine are Official Records for checking the attendance of an employee at work and also the record of the time he renders work on a particular day. Therefore, such employee is required to ensure that he/she is punctual in reporting for work at a designated time and his/her reporting time duly noted on the attendance register/ clocking machine. The employee who is duly-bound to keep custody of the attendance register/clocking machine is obliged to keep the same in order.



VIOLATIONS		PENALTIES				
1.1	Refusal or Failure to sign attendance register /clocking in and out"-	Verbal Warning	1st Written Warning	Final Warning	Suspension	Termination/ Dismissal
	1st Offence	✓				
	2nd Offence		✓			
	3rd Offence			✓		
	4th Offence				✓	
	5th Offence					✓

Section 1 - Use of Attendance Register/Clocking Machine cont'd.

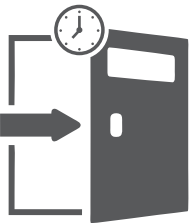
VIOLATIONS		PENALTIES				
		Verbal Warning	1st Written Warning	Final Warning	Suspension	Termination/ Dismissal
1.2	Removal of attendance or tampering with clocking machine cards without authorization					
	1st Offence				✓	
	2nd Offence					✓
1.3	Knowingly signing the attendance register or clocking in/out on behalf of another employee and/or falsification of resumption time/record					
	1st Offence					✓
1.4	Unauthorized alteration, erasures, Insertion and/or correction of entries in the attendance register/clocking card.					
	1st Offence					
	2nd Offence					✓

Section 2

Attendance and Punctuality

Rationale:

To achieve excellence, each employee is required, and has to ably accomplish the tasks or jobs assigned to him/her. An employee can ably accomplish his/her assigned tasks or jobs only when he/she is punctual in reporting for work and regular in his/her attendance. Thus, it is important that each employee is in his/her office or work place regularly and /or at the time designated in his/her work schedule.



VIOLATIONS		PENALTIES				
2.1	Leaving office / work place 15 minutes or less before official closing hours on two or more occasions within a 30-day cycle:	Verbal Warning	1st Written Warning	Final Warning	Suspension	Termination/ Dismissal
	1st Offence	✓				
	2nd Offence		✓			
	3rd Offence			✓		
	4th Offence				✓	
	5th Offence					✓

Section 2 - Attendance and Punctuality

VIOLATIONS		PENALTIES				
		Verbal Warning	1st Written Warning	Final Warning	Suspension	Termination/ Dismissal
2.2	Late arrival or early leaving of more than 30 minutes without permission					
	1st Offence		✓			
	2nd Offence			✓		
	3rd Offence				✓	
	4th Offence					✓
2.3	Absence without permission or without leave for <u>one</u> day					
	1st Offence			✓		
	2nd Offence				✓	
	3rd Offence					✓
2.4	Absence without permission or without leave for <u>two</u> consecutive days					
	1st Offence				✓	
	2nd Offence					✓

Section 2 - Attendance and Punctuality

VIOLATIONS		PENALTIES				
		Verbal Warning	1st Written Warning	Final Warning	Suspension	Termination/ Dismissal
2.5	Absence from duty without permission /leave for three consecutivedays (abandonment of duty)					
	1st Offence					✓
2.6	Leaving duty without permission					
	1st Offence		✓			
	2nd Offence			✓		
	3rd Offence				✓	
	4th Offence					✓
2.7	Failure to report for overtime work, for which advance notice was given, without an acceptable reason:					
	1st Offence		✓			
	2nd Offence			✓		
	3rd Offence				✓	
	4th Offence					✓

Section 2 - Attendance and Punctuality

VIOLATIONS		PENALTIES				
2.8	Going outside the company premises during official hours without prior permission of the departmental manager:	Verbal Warning	1st Written Warning	Final Warning	Suspension	Termination/ Dismissal
	1st Offence		✓			
	2nd Offence			✓		
	3rd Offence				✓	
	4th Offence					✓

Section 3

Employee Conduct

Rationale:

Every BUA Employee is expected, and enjoined to duly observe reasonable standards of conduct in the performance of his/her work/job, as well as in relationships with co-employees and in dealings with the public.



VIOLATIONS		PENALTIES				
		Verbal Warning	1st Written Warning	Final Warning	Suspension	Termination/ Dismissal
3.1	Unauthorized removal of company products from sales/delivery trucks, finished products store or production line:					
	1st Offence				✓	
	2nd Offence					✓
3.2	Unauthorized removal or defacing of official circular/ notices on the company's notice boards					
	1st Offence		✓			
	2nd Offence			✓		
	3rd Offence				✓	
	4th Offence					✓

Section 3 - Employee Conduct

VIOLATIONS		PENALTIES				
		Verbal Warning	1st Written Warning	Final Warning	Suspension	Termination/ Dismissal
3.3	Rudeness to customers, consumers and/or other employee:					
	1st Offence			✓		
	2nd Offence				✓	
	3rd Offence					✓
3.4	Cases of verbal abuse in the workplace					
	1st Offence			✓		
	2nd Offence				✓	
	3rd Offence					✓
3.5	Gross Misconduct:					
	The following violations constitute gross misconduct and are punishable as indicated:					
	· Fraud · Physical Attack on others · Theft · Illegal haulage · Tampering with Tracking device in Company vehicles · Bribery					
	1st Offence					✓

Section 3 - Employee Conduct

VIOLATIONS		PENALTIES				
		Verbal Warning	1st Written Warning	Final Warning	Suspension	Termination/ Dismissal
3.6	Proven cases of gross insubordination or disrespect to member of management, senior employee placed in position of authority					
	1st Offence					✓
3.7	Exhibiting any undesirable behavior which may adversely affect Company's image and reputation:					
	1st Offence					✓
3.8	Disobedience in complying with or carrying out reasonable and valid order or instructions of supervisors/Superior Officer					
	1st Offence				✓	
	2nd Offence					✓

Section 3 - Employee Conduct

VIOLATIONS		PENALTIES				
		Verbal Warning	1st Written Warning	Final Warning	Suspension	Termination/ Dismissal
3.9	Unruly behavior which causes or is capable of causing disorder, work disruption, annoyance, scandal or disturbance within the company premises which do not cause damage to company property or no loss is incurred:					
	1st Offence			✓		
	2nd Offence				✓	
	3rd Offence					✓
3.10	Sexual Harassments of any manner					
	1st Offence					✓
3.11	Act of serious disrespect, use of foul, obscene/ abusive language or sign against and/ punching/ slapping and/ challenging to fight of fisticuff and/ giving or writing threats against any superior, subordinate and/ peer whether or not in the course of work, due to or arising from work related causes, whether during office hours or off duty time, whether within or outside the company premises					
	1st Offence					✓

Section 3 - Employee Conduct

VIOLATIONS		PENALTIES				
		Verbal Warning	1st Written Warning	Final Warning	Suspension	Termination/ Dismissal
3.12	Making a false report or statement or submitting false evidence:					
	1st Offence					✓
3.13	Seeking and/or deriving personal benefits in the course of official duties from acts likely to result in conflict between personal and Company interest					
	1st Offence					✓
3.14	Unauthorized alteration, erasures, insertion and or correction of the company's records and other documents					
	1st Offence					✓
3.15	Refusal to submit to personal search when requested to do so whilst leaving or about to leave the premises					
	1st Offence				✓	
	2nd Offence					✓

Section 3 - Employee Conduct

VIOLATIONS		PENALTIES				
		Verbal Warning	1st Written Warning	Final Warning	Suspension	Termination/ Dismissal
3.16	Failure to use Company's identification materials (I.D card and uniform) within the company premises:					
	1st Offence	✓				
	2nd Offence		✓			
	3rd Offence			✓		
	4th Offence				✓	
	5th Offence					✓
3.17	Reporting for work or working under the influence of liquor or alcoholic drinks and prohibited drugs and/or their derivatives:					
	1st Offence					✓
3.18	Consuming alcohol or drugs while on duty (except drugs prescribed by authorized medical personnel):					
	1st Offence					✓

Section 3 - Employee Conduct

VIOLATIONS		PENALTIES				
		Verbal Warning	1st Written Warning	Final Warning	Suspension	Termination/ Dismissal
3.19	Possession of prohibited drugs within the company premises					
	1st Offence					✓
3.20	Drunkenness or drug abuse /addiction that renders or is capable of rendering an employee incapable of performing his/her duties properly:					
	1st Offence					✓
3.21	Failure to report any accident or damage to Company's property:					
	1st Offence			✓		
	2nd Offence				✓	
	3rd Offence					✓
3.22	Giving Company identification material to any person not entitled to it, or assisting any person to enter any restricted area without permission					
	1st Offence					✓

Section 3 - Employee Conduct

VIOLATIONS		PENALTIES				
		Verbal Warning	1st Written Warning	Final Warning	Suspension	Termination/ Dismissal
3.23	Entering or attempting to enter any area designated by the Company as restricted					✓
	1st Offence					
3.24	Unauthorized sale of Company's property					✓
	1st Offence					
3.25	Accepting of services or goods not according to specified quantity or quality whether for personal gain or not					✓
	1st Offence					
3.26	Sleeping on duty					
	1st Offence			✓		
	2nd Offence				✓	
	3rd Offence					✓
3.27	Unauthorized use of machinery, tools or equipment resulting in injuring to self and other employees:					
	1st Offence					✓

Section 3 - Employee Conduct

VIOLATIONS		PENALTIES				
		Verbal Warning	1st Written Warning	Final Warning	Suspension	Termination/ Dismissal
3.28	Taking the Company's vehicle home overnight without authorization					✓
	1st Offence					
3.29	Conviction for a criminal offence:					✓
	1st Offence					
3.30	Keeping new/unused spare parts in personal lockers and/or unauthorized place:					✓
	1st Offence					
3.31	Unauthorized possession of Company's property or providing assistance for such acts:					✓
	1st Offence					
3.32	Playing game of chance (gambling) for money within company premises:					✓
	1st Offence					
3.33	Fictitious loading of sales/delivery trucks with company product:					✓
	1st Offence					

Section 3 - Employee Conduct

VIOLATIONS		PENALTIES				
		Verbal Warning	1st Written Warning	Final Warning	Suspension	Termination/ Dismissal
3.34	Disloyalty, including failure to disclose any misconduct committed or about to be committed against the company and which is known to the employee:					
	1st Offence					✓
3.35	Driving any vehicle, including forklift truck, without authorization, and/or valid driver's license resulting in accident or damages:					
	1st Offence					✓
3.36	Granting an unauthorized interview to pressmen on official matters:					
	1st Offence					✓
3.37	Unauthorized use of machinery, tools or equipment or driving of Company vehicles with or without a valid driver's license:					
	1st Offence				✓	
	2nd Offence					✓

Section 3 - Employee Conduct

VIOLATIONS		PENALTIES				
		Verbal Warning	1st Written Warning	Final Warning	Suspension	Termination/ Dismissal
3.38	Misrepresentation of facts or presentation of fake documents to the company with an intent to mislead and/or resulting in financial loss to the company					
	1st Offence					✓
3.39	Selling of employee sampling through the sales truck:					
	1st Offence					✓
3.40	Carrying out instruction (either from a superior or colleague) and/or giving instruction that is against the interest of the company:					
	1st Offence					✓
3.41	Conversion of cheque to cash for /or on behalf of supplier:					
	1st Offence				✓	
	2nd Offence					✓

Section 3 - Employee Conduct

VIOLATIONS		PENALTIES				
		Verbal Warning	1st Written Warning	Final Warning	Suspension	Termination/ Dismissal
3.42	Holding of meetings of whatever nature on the premises without management's approval					
	1st Offence				✓	
	2nd Offence					✓
3.43	Selling of goods within Company premises or aiding same:					
	1st Offence					✓
3.44	Giving false information either about self or company to government agencies or any other external body or organization in order to mislead such agency/body/ organization into making wrong decision/assessments/ evaluation of the employee and/ or the company:					
	1st Offence					✓

Section 4

Maintenance of Clean, Safe Environment and Working Conditions

Rationale:

It is the duty and responsibility of each employee, to follow at all times, the Company's prescribed hygienic safety/security rules and regulations so that a clean and safe working environment is ensured. Apart from this, compliance with the said rules will ensure that the company will not be open to law suits from the public for violation of pertinent legislations such as the Labour Law and/or legislations, Factory Act, Food and Drug Law among others.



VIOLATIONS		PENALTIES				
4.1	Failure to report immediately personal injury which occurs during company time, work/assignment:	Verbal Warning	1st Written Warning	Final Warning	Suspension	Termination/ Dismissal
	1st Offence		✓			
	2nd Offence			✓		
	3rd Offence				✓	
	4th Offence					✓

Section 4 - Maintenance of Clean, Safe Environment and Working Conditions

VIOLATIONS		PENALTIES				
		Verbal Warning	1st Written Warning	Final Warning	Suspension	Termination/ Dismissal
4.2	Failure to observe rules of hygiene and wearing of Personal Protective Equipment (PPE) required for safety or hygiene consideration:					
	1st Offence		✓			
	2nd Offence			✓		
	3rd Offence				✓	
	4th Offence					✓
4.3	Intentionally creating unsanitary conditions in the Company premises:					
	1st Offence		✓			
	2nd Offence			✓		
	3rd Offence				✓	
	4th Offence					✓

Section 4 - Maintenance of Clean, Safe Environment and Working Conditions

VIOLATIONS		PENALTIES				
		Verbal Warning	1st Written Warning	Final Warning	Suspension	Termination/ Dismissal
4.4	Smoking in the manufacturing areas:					
	1st Offence		✓			
	2nd Offence			✓		
	3rd Offence				✓	
	4th Offence					✓
4.5	Unauthorized removal of safety equipment and/or firefighting equipment					
	1st Offence				✓	
	2nd Offence					✓
4.6	Act likely to endanger the Company's property, well-being and operations or the safety of employee:					
	1st Offence		✓			
	2nd Offence			✓		
	3rd Offence				✓	
	4th Offence					✓

Section 4 - Maintenance of Clean, Safe Environment and Working Conditions

VIOLATIONS		PENALTIES				
		Verbal Warning	1st Written Warning	Final Warning	Suspension	Termination/ Dismissal
4.7	Committing acts against proper sanitation, good hygiene and good housekeeping such as but not limited to littering, hanging of personal belongings in the factory and company premises not intended therefore and/or eating in restricted area etc:					
	1st Offence		✓			
	2nd Offence			✓		
	3rd Offence				✓	
	4th Offence					✓
4.8	Urinating and defecating in area outside the toilets					
	1st Offence					✓
4.9	Unauthorized carrying or possession of fire arms, explosives and other deadly weapons and/or accessories within company premises:					
	1st Offence					✓

Section 5

Performance of Duties and Responsibilities

Rationale:

An employee is expected to accomplish his/her assigned tasks/job/work very well; to perform his/her duties and responsibilities to the best of his/her ability, as well as to discharge his/her functions with due diligence, high degree of care and utmost prudence and to take care of company's property with the degree of prudence and diligence required under the circumstance so that he/she will be able to meet the time, quality and quantity standards of work prescribed by the company and with a view to protecting company's interest and property.



VIOLATIONS		PENALTIES				
5.1	Acts which causes or results in minor damage to company property, equipment and products whether or not with the intention of disrupting operations:	Verbal Warning	1st Written Warning	Final Warning	Suspension	Termination/ Dismissal
	1st Offence	✓				
	2nd Offence		✓			
	3rd Offence			✓		
	4th Offence				✓	
	5th Offence					✓

Section 5 - Performance of Duties and Responsibilities

VIOLATIONS		PENALTIES				
		Verbal Warning	1st Written Warning	Final Warning	Suspension	Termination/ Dismissal
5.2	Acts which causes or results in major or substantial damage to company property, equipment and products with the intention of disrupting operation:					
	1st Offence					✓
5.3	Removal with a view of disclosing to unauthorized persons or competitors classified document, information or trade secrets relating to the company's operations without due authorization:					
	1st Offence					✓
5.4	Using company property for a purpose other than what it is officially assigned					
	1st Offence					✓

Section 5 - Performance of Duties and Responsibilities

VIOLATIONS		PENALTIES				
5.5	Minor cases of negligence, damage, loss or misuse of company property not exceeding N10,000.00:	Verbal Warning	1st Written Warning	Final Warning	Suspension	Termination/ Dismissal
	1st Offence		✓			
	2nd Offence			✓		
	3rd Offence				✓	
	4th Offence					✓
5.6	Negligent loss, damage or misuse of company's property resulting in loss or damage valued at more than N10,000.00 but not exceeding N50,000.00:					
	1st Offence			✓		
	2nd Offence				✓	
	3rd Offence					✓

Section 5 - Performance of Duties and Responsibilities

VIOLATIONS		PENALTIES				
		Verbal Warning	1st Written Warning	Final Warning	Suspension	Termination/ Dismissal
5.7	Performing a task or duty without the exercise of due care resulting in loss or damage to company property exceeding N50,000.00 but not exceeding N100,000.00:					
	1st Offence				✓	
	2nd Offence					✓
5.8	Substantial neglect of assigned duties resulting in loss/damage to property in excess of N100,000.00:					
	1st Offence					✓
5.9	Properly documented cases (in line with PMS process) of inability of employee to cope with the demands of the job (declining performance):					
	1st Offence					✓

Section 5 - Performance of Duties and Responsibilities

VIOLATIONS		PENALTIES				
		Verbal Warning	1st Written Warning	Final Warning	Suspension	Termination/ Dismissal
5.10	Negligent workmanship to the extent that tasks have to be repeated or equipment or persons are exposed to damage or injury:					
	1st Offence			✓		
	2nd Offence				✓	
	3rd Offence					✓
5.11	Negligent workmanship resulting in substantial loss (in excess of N100, 000) to the company:					
	1st Offence					✓
5.12	Failure to complete set task without valid reason:					
	1st Offence			✓		
	2nd Offence				✓	
	3rd Offence					✓
5.13	Lack of skill which the employee implied he/she held himself/herself out to possess:					
	1st Offence					✓

Section 5 - Performance of Duties and Responsibilities

VIOLATIONS		PENALTIES				
		Verbal Warning	1st Written Warning	Final Warning	Suspension	Termination/ Dismissal
5.14	A sales manager and/or sales supervisor who allows a salesman who has not cleared the previous day's sales proceeds to go out on route sales shall be liable to:					
	1st Offence					✓
5.15	Deliberately allowing a truck/trailer boy to drive trucks/trailers or leaving routine job to truck/trailer boys:					
	1st Offence				✓	
	2nd Offence					✓
5.16	Negligent driving which is likely to cause injury to person or damage to company's property:					
	1st Offence					✓
5.17	Sales/delivery of products outside designated location without authorization					
	1st Offence			✓		
	2nd Offence				✓	
	3rd Offence					✓

Section 5 - Performance of Duties and Responsibilities

VIOLATIONS		PENALTIES				
		Verbal Warning	1st Written Warning	Final Warning	Suspension	Termination/ Dismissal
5.18	Misrepresentation of facts or information required by, or given to the company:					
	1st Offence			✓		
	2nd Offence				✓	
	3rd Offence					✓
5.19	Collection of a second I.O.U. by employee who has not cleared an earlier I.O.U.:					
	1st Offence			✓		
	2nd Offence				✓	
	3rd Offence					✓
5.20	Unauthorized issuance and or unauthorized redemption of temporary credit sale (TCS) or trade discount incentive(TDI) :					
	1st Offence			✓		
	2nd Offence				✓	
	3rd Offence					✓

Section 5 - Performance of Duties and Responsibilities

VIOLATIONS		PENALTIES				
		Verbal Warning	1st Written Warning	Final Warning	Suspension	Termination/ Dismissal
5.21	Accepting from suppliers or purchasing used or reconditioned spare parts as new:					
	1st Offence					✓
5.22	Issuance or authorizing the issuance of an LPO for item(s) that are overpriced:					
	1st Offence				✓	
	2nd Offence					✓
5.23	Accepting from suppliers or purchasing of fake items/equipment/spare parts:					
	1st Offence					✓
5.24	Failure to follow laid down procedure in the award of contracts or disposal of company's properties and equipment:					
	1st Offence					✓
5.24	Failure to comply with laid down procedures for requisitioning for spare parts into the store and or procurement of items/equipment/spare parts:					
	1st Offence					✓

Section 5 - Performance of Duties and Responsibilities

VIOLATIONS		PENALTIES				
		Verbal Warning	1st Written Warning	Final Warning	Suspension	Termination/ Dismissal
5.26	Failure to apply disciplinary procedure as laid down in the code of conduct to associate for any established violation of company's rules and regulations:					
	1st Offence	✓				
	2nd Offence		✓			
	3rd Offence			✓		
	4th Offence				✓	
	5th Offence					✓
5.27	Failure to comply with content of the individual job description:					
	1st Offence					✓
5.28	Preventing security personnel from conducting personal search and or interrogation of any company premises or aiding same :					
	1st Offence					✓

Section 5 - Performance of Duties and Responsibilities

VIOLATIONS		PENALTIES				
		Verbal Warning	1st Written Warning	Final Warning	Suspension	Termination/ Dismissal
5.29	Splitting orders for spare parts for one vehicle/ equipment / any other use to bring the value within a certain authority limit					
	1st Offence					✓
5.30	Raising purchase request for items whose current stock is above the approved re-order level:					
	1st Offence		✓			
	2nd Offence			✓		
	3rd Offence				✓	
	4th Offence					✓
5.31	Failure by a spare parts stock keeper to submit requisition at correct re-order level					
	1st Offence		✓			
	2nd Offence			✓		
	3rd Offence				✓	
	4th Offence					✓

Section 5 - Performance of Duties and Responsibilities

VIOLATIONS		PENALTIES				
		Verbal Warning	1st Written Warning	Final Warning	Suspension	Termination/ Dismissal
5.32	Failure of an employee to protect company's property entrusted to his/her care resulting in substantial loss to the company:					
	1st Offence				✓	
	2nd Offence					✓
5.33	Paying a supplier before a certificate of parts supplied has been completed :					
	1st Offence				✓	
	2nd Offence					✓
5.34	Making a false declaration of any document including, among others, stores requisition ,LPO, certificate of parts supplied, stores received note, stores issue note, waybill, quotation, (fake or duplicate) etc:					
	1st Offence					✓

Section 5 - Performance of Duties and Responsibilities

VIOLATIONS		PENALTIES				
		Verbal Warning	1st Written Warning	Final Warning	Suspension	Termination/ Dismissal
5.35	Failure of Heads of Finance and Sales to ensure cash proceeds are banked i.e Short- banking					
	1st Offence				✓	
	2nd Offence					✓
5.36	Failure of HR manager to complete the appeal process within the specified period of 7days from the date of receipt of the appeal letter which must be delivered within 7days of the date of receipt of the letter conveying the disciplinary action which gave rise to the appeal:					
	1st Offence			✓		
	2nd Offence				✓	
	3rd Offence					✓

Section 5 - Performance of Duties and Responsibilities

VIOLATIONS		PENALTIES				
		Verbal Warning	1st Written Warning	Final Warning	Suspension	Termination/ Dismissal
5.37	Failure of HR manager to communicate the management's decision to an appeal of the Appellant within the period stipulated in this code of conduct:					
	1st Offence			✓		
	2nd Offence				✓	
	3rd Offence					✓
5.38	Failure of HR manager to forward record of disciplinary process (Manager grade and above) to appropriate authority within the stipulated period					
	1st Offence			✓		
	2nd Offence				✓	
	3rd Offence					✓

Explanatory Notes

Hearing Process

i. Subsidiaries: Junior employee

There shall be established in each subsidiary a three man disciplinary panel, where the Head of Human Resources or his designate shall be a permanent member and two managers to be appointed by the Head of the subsidiary to assist him in each hearing session, the two other members being transient members, one of whom should preferably not be from same department as the offender.

ii Managers in Business Units

The panel would consist of the Head, Human Resource and two Management Staff appointed by the Managing Director/the Head of the SBU

iii Disciplinary Process

When a report is made to the head of department, he investigates and issues a query, where necessary, which must

be replied within 48 hours of receipt by the offender. Upon the issuance and receipt of response to the query, the matter is taken to the disciplinary panel which will be headed by the Head, HR or his designate for the subsidiary

The duty of the Head of department is to present the allegation against the offender before the panel. (He/she is not a member of the panel).The employee will be entitled to call a witness to give evidence in his/her support during the hearing session. The decision of the panel will be communicated to the affected employee by the Head of Human Resources at the conclusion of the hearing.

Group Office: Junior Employee

Panel shall consist of Employee Relations Manager and two other members appointed by the Group Head, Human Resources.

Explanatory Notes - Hearing Process

COMPOSITION OF DISCIPLINARY PANEL

Senior Employees:

Senior employee cases have been classified into two groups which are:

- a. Cases that would attract various warnings and two weeks suspension without pay.

All cases that would ordinarily attract a warning, two weeks suspension without pay will now be handled at Subsidiary (Domestic) level, using the process highlighted below:

- i. Subsidiary/Departmental Managers/Head of function issue query as appropriate, in consultation with the Head of Human Resources and Employee Relations Manager in the case of Group Office with a copy forwarded to the Group Head of Human Resources (Group Office only).
- ii. Upon receipt of the employee response, the Subsidiary/ Departmental Manager/ Head of function shall review the

matter, express his/her opinion on the reply and issue letter of warning as appropriate ,while a copy of the query, response and disciplinary action taken is forwarded to the office of the Head of Human Resources/Managing Director/Head of Subsidiary and the Group Head, Human Resources in the case of Group Office.

- iii. In cases that would result in suspension, the Subsidiary/ Departmental Manager/Head of function, upon reviewing the matter would express his or her opinion on the reply with recommendations to the office of the Head of Human Resources in the case of subsidiaries and Group Head, Human Resources in the case of Group Office for final decision on the matter to the affected employee.

The above process (steps i-iii) must be concluded within two weeks of commencement of disciplinary process (i.e query).

CASES THAT CAN RESULT IN TERMINATION/ DISMISSAL

Using the existing hearing process, all cases resulting in termination are to be signed off by the Managing Director/Subsidiary Head and

Explanatory Notes - Hearing Process

Group Head, Human Resource in the case of the Group Office. All processes are to be concluded within two weeks of receipt or issuance of query.

Appeal:

In the event of the employee not being satisfied with the decision taken on his/her case, he/she has the right to appeal within seven days of the receipt of the decision in accordance with the provision of the code of conduct.

Other modifications implied under the new dispensation are:

Any query not sent to the Head of Human Resources at any location of the group shall not be put in the affected employee record and cannot be used as reference point.

Appeal Process

An employee who considers that he has been treated unjustly or has been subjected to unjust treatment, shall have the right to appeal against any disciplinary action taken against him/her.

However, an employee who fails to sign the hearing process form on account of not being satisfied with the recommendation/ decision of the hearing panel will forfeit his/her right to appeal.

Group Office: Junior Employee

Appeal should be addressed first to the Group Head, Human Resources.

Senior Employee - Appeal should proceed to the Function Head/ Director, and thereafter to the Group Executives or the Executive Chairman for employees from the level of Senior Manager upward.

Subsidiary - In view of the fact that the departmental/function head or immediate superior was involved in the earlier decision, appeal from the affected junior employee will be directed to the Head of the Subsidiary/ General manager/Managing Director as the case may be while that of the senior employee will be directed to the Managing Director or Head of the subsidiary within seven days from the date the disciplinary action is communicated to the employee.

The appropriate officer to whom the appeal is directed will go

Explanatory Notes - Hearing Process

through the case and if need be, direct the Head of Human Resources to further investigate after which a decision will be taken on whether to review the case or not. The decision taken will again be communicated to the affected employee within seven days from the date of receipt of the appeal.

Where the appropriate officer in the above paragraph is not satisfied with the Head of Department's decision, he will direct a final appeal to the Group Executives at the Group office for consideration before pursuing the appeal through an established grievance procedure. At every stage of the appeal process, a copy of the letter of appeal must be forwarded to the HR Manager at the subsidiary or Employee Relations Manager in the case of Group Office for his/her records.

Endorsement of Hearing Form

In addition to the Head of Human Resources or his designate, the Managers appointed to compose the panel would also sign along with the Head of Human Resources or his/her designate indicating their names, status and signature whatever the outcome of the hearing process.

DURATION OF EFFECT OF THE DISCIPLINARY ACTIONS

The effect of various disciplinary cases shall expire after the following periods.

First written warning	-	3months
Second/Final warning	-	6months
Suspension	-	12months

In all cases, where an employee commits an offence within the duration of the validity of a similar offence previously committed, the repeated offence shall attract a more severe penalty.

Any offence committed that requires a written warning while two written warnings for different offences are still valid shall automatically lead to suspension.

Verbal warning has no duration of validity. However, in every case, it will take the form of counseling by immediate superior. Counseling made and the commitments of the employee to be noted see

Explanatory Notes - Hearing Process

(Appendix A) with a copy to the affected employee's file and a copy in the departmental file.

At the expiration of a particular disciplinary action, though the disciplinary letter will not be removed from the personal file of the individual for administrative reason, it will be stamped cancelled in effect, the warning or suspension once expire will not contribute to any disciplinary action against the employee in the future.

However, when an employee is suspended for any period of time, with the effect of such suspension letter lapsing after twelve months from the date of issue, this will result to automatic loss of annual increment.

Suspension without pay after a second and final warning for an offence will be for a period ranging between 7 and 14 days depending on the gravity of the offence.

When an employee is considered to have committed any breach of rules or discipline which might make him or her liable to termination or dismissal, he/she may be subjected to indefinite suspension until his/her case is decided. If ultimately found guilty, his/her termination/dismissal will take effect from the date of his/her suspension.

However, where an employee is suspended to enable management carry out proper investigation, the period of suspension will not exceed thirty (30) days. In this case, half salary will be paid. If after the investigation the employee is reinstated at the discretion of management, the employee may be paid another half salary for the period during which he was under suspension.

Any employee dismissed will only be entitled to salary up to the date of dismissal plus earned leave in accordance with necessary provisions of the employee hand book. All other benefits of whatever nature shall be forfeited by the dismissed employee.

Responsibility for Enforcement of Code of Conduct

It shall be the primary responsibility of Heads of Subsidiary and Functional Heads of Department to ensure that a very high degree of discipline is maintained in their Subsidiary/division/department. This responsibility would however be delegated to department/sectional head who are usually in closer touch to employee in their respective departments.

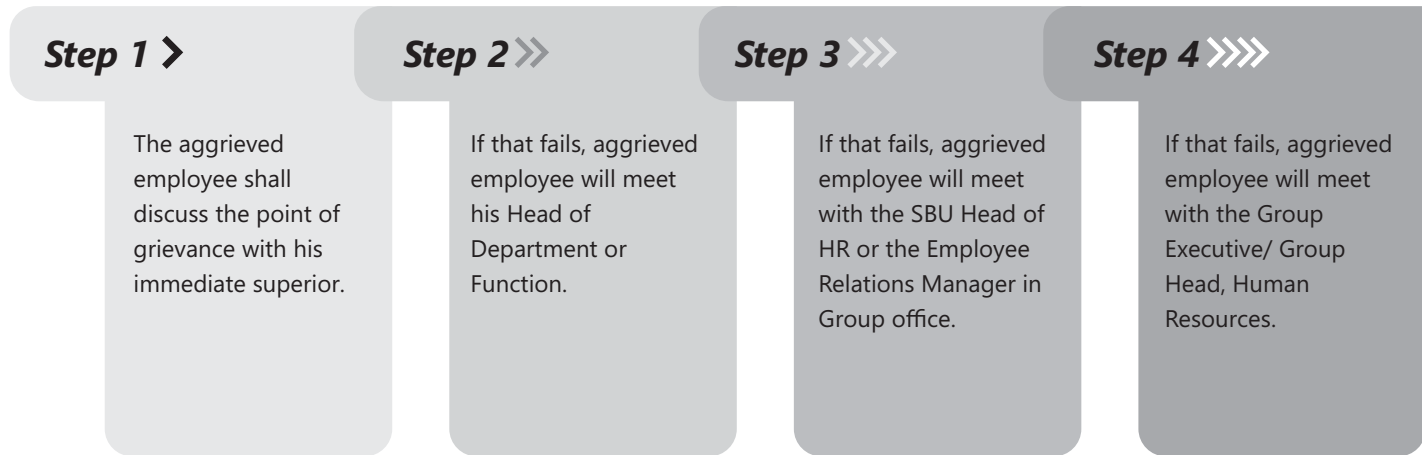
A department head would therefore be held responsible by the Functional / Divisional Head or Head of Subsidiary in the event of lapses occurring in the department. For the avoidance of doubts, the following hierarchical arrangement is defined for the purpose of the enforcement of the code of conduct.

<i>Subsidiary</i>	<i>Managerial Employee</i>	<i>Junior Employee</i>
Functional Head of Department	Director, Plant Manager or General Manager	Departmental Managers, e.g. Sales Manager, HR Manager, Plant Engineer etc.
Group Office Functional Head	Function Head	Functional Head i.e. Departmental Manager

Grievance Procedure

Individual Grievance

Every effort shall be made to deal with all individual grievances at the company level as expeditiously as possible and the following procedure shall apply.



Appendix A

Employee Counselling Form

Date.....

From:
.....

To:
.....

Subject (Nature of Offence)

This will confirm our counselling made on 20 regarding your
..... commitment on 20

Your commitment
.....
.....

.....
Name of Manager/Supervisor

cc: Departmental File

Appendix B

Date.....

From:

.....

To:

.....

INVITATION TO HEARING SESSION

Further to the query of

from the undersigned in which it was alleged that

.....

Please attend the hearing session with an employee of your choice at a meeting to be held in my office in

on at

Your attendance would further enhance a fair disposition of the allegation against you.

.....

cc: *HR Manager*
Disciplinary File

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Appendix C - Form SS/HP/97

Hearing Process Form - Senior / Management Employee

GUIDELINES FOR USE:

Form would be used in all cases involving any disciplinary action against a senior employee. It is only when such cases involve termination of appointment that it will be signed by the Chief Executive Officer. Whatever the nature of the offence of the senior employee, a copy of the report of hearing process in respect of the affected employee must be forwarded to the Group Head of Human Resources for his records and further action. After form SS/HP/97 had been duly signed by all concerned, the disciplinary action would be communicated to the affected employee in writing by the Group Head of Human Resources. Upon expiry of the period of validity of the written warning and suspension, it should be marked "CANCELLED" in the employee's personal file.

Report of Hearing Process

In the case of

.....

Involving (Name of offender, department/subsidiary

.....

.....

.....

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Appendix C - Form SS/HP/97

Hearing Process Form - Senior / Management Employee

Full description of offence
.....
.....
.....

State of defence
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Signature of affected Employee

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Appendix C - Form SS/HP/97

Hearing Process Form - Senior / Management Employee

Comments by Department Head / Immediate Superior

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Comments of the Hearing Panel

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Conclusion

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Penalty.....

Validity

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Appendix C - Form SS/HP/97

Hearing Process Form - Senior / Management Employee

..... Name of Dept. Head (Immediate Supervisor)	 Designation	 Signature/Date
..... Name of Affected Employee	 Designation	 Signature/Date
..... Name of Wife (if any)	 Designation	 Signature/Date
..... Name of Functional Manager	 Designation	 Signature/Date
..... Name of Moderator	 Designation	 Signature/Date

CONFIDENTIAL

Appendix C - Form SS/HP/97

Hearing Process Form - Senior / Management Employee

Group Head of Human Resources comments

.....

.....

Group Executive’s Decision

.....

.....

.....
Group Executive’s Signature

Decision of Executive Committee

.....

.....

.....

Appendix C - Junior Employee

GUIDELINES FOR USE:

To be used for a violation of a Code of Conduct which invites any of a two types of recorded warnings i.e. First and final written warnings, suspension and termination of the appointment of a junior employee. Properly completed and a signed form should be put into employee's file for record purposes. Upon expiry of a period of validity of the written warnings and suspension it should be marked "CANCELLED" in the employee's file. Clearly specify the nature of the offence, any aggravating or mitigating factors, date, time, and place of offence, the nature of injury or damaged caused, if any, and whether other warnings were previously given for the same or similar offence. After it has been duly signed by all concerned, the HR Manager will communicate a disciplinary action in writing to the affected person.

Report of Hearing Process

Name of Offender Employee No.

Full details of Offence
.....
.....
.....
.....

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Appendix C - Hearing Process Form - Junior Employee

Statement of Defence
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.....

Signature of Affected Employee

Comments by Departmental Head/Immediate Supervisor
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Appendix C - Hearing Process Form - Junior Employee

Findings of Hearing Panel
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Conslusion
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Penalty.....

Validity

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Appendix C - Hearing Process Form - Junior Employee

..... <i>Name of Dept. Head (Immediate Supervisor)</i>	 <i>Designation</i>	 <i>Signature/Date</i>
---	-----------------------------	--------------------------------

..... <i>Name of Affected Employee</i>	 <i>Designation</i>	 <i>Signature/Date</i>
---	-----------------------------	--------------------------------

..... <i>Name of Wife (if any)</i>	 <i>Designation</i>	 <i>Signature/Date</i>
---------------------------------------	-----------------------------	--------------------------------

Name and Signature of Panel Members

..... <i>Name of Member</i>	 <i>Designation</i>	 <i>Signature/Date</i>
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..... <i>Name of Moderator (Personnel)</i>	 <i>Designation</i>	 <i>Signature/Date</i>
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Appendix C - Hearing Process Form - Junior Employee

Group Head of Human Resources comments
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Group Executive’s Decision
.....
.....

.....
Group Executive’s Signature

Decision of Executive Committee
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.....
.....

Confirmation of Receipt of the Code of Conduct

Name _____

Department _____

Date joined the Company _____

Date Copy of Code of Conduct was issued _____

I confirm receipt of a copy of the Code of Conduct and that same had been disseminated to me by the HR Manager . I also understand that this document is an integral part of the Employee handbook for both senior and junior which I have agreed to, and that it should be handed over to the Personnel department in the event of my leaving the company.

Signature _____

Date _____

Name of Witness _____

Signature _____

Date _____

Approval

Executive Chairman, BUA Group

Acknowledgment Copy

*I, having read and understood the
content of the Code of Conduct, hereby accept to comply with the details therein.*

Name

Signature

Date

