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Nigeria



WHISTLEBLOWER POLICY

Purpose

The purpose of this Whistleblower Policy is to provide a safe and confidential mechanism for employees, contractors, and stakeholders to report concerns about unethical or illegal conduct within 17 ASUS Resources Ltd. This policy ensures that whistleblowers are protected from retaliation and that reported issues are addressed appropriately.

Scope

This policy applies to all employees, contractors, vendors, and business partners of 17 ASUS Resources Ltd. It covers all types of concerns related to unethical behavior, illegal activities, or violations of company policies.

Core Principles

1. Reporting Mechanisms

- Confidential Reporting: Whistleblowers can report concerns confidentially through designated channels, including a confidential hotline, email, or direct reporting to the Compliance Officer.
- o **Anonymous Reporting:** Reports can be made anonymously if preferred. However, providing contact information may facilitate further investigation.

2. Protection Against Retaliation

- o **No Retaliation:** Whistleblowers will not face retaliation or adverse consequences for reporting concerns in good faith. Retaliation against whistleblowers will be considered a serious violation of company policy.
- Support: Whistleblowers who experience any form of retaliation should report it immediately to the Compliance Officer or Human Resources.

3. Investigation and Resolution

- o **Timely Investigation:** All reports will be investigated promptly and thoroughly. Investigations will be conducted in a fair and objective manner.
- o **Confidentiality:** Information related to the investigation will be kept confidential to the extent possible, consistent with the need to conduct a thorough investigation.

4. Reporting Process

 Documentation: All reported concerns will be documented, and outcomes of investigations will be reported to the relevant management or board committees. o **Follow-Up:** Whistleblowers will be informed of the outcome of the investigation, where possible, and any corrective actions taken.

5. Compliance and Review

- o **Policy Review:** This policy will be reviewed regularly to ensure its effectiveness and compliance with relevant laws and regulations.
- o **Training:** All employees will receive training on the Whistleblower Policy to ensure they are aware of the reporting mechanisms and protections available.

Implementation

- **Responsibility:** The Compliance Officer is responsible for overseeing the implementation of this policy, handling reports, and ensuring investigations are conducted effectively.
- **Monitoring:** Regular monitoring of the whistleblowing process will be conducted to assess its effectiveness and make improvements as needed.

Conclusion

17 ASUS Resources Ltd. is committed to maintaining a culture of integrity and transparency. Through this Whistleblower Policy, we encourage reporting of unethical or illegal conduct and provide protections to ensure that whistleblowers are treated fairly and without fear of retaliation.

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