



WALLS INTEGRATED SERVICES LTD

Ethics Charter

The present Charter is communicated and distributed to all employees through posting and on the intranet. It is also accessible to all our partners and to the public on the website of the

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Preamble

The present Ethics Charter was presented to the Supervisory Board on June 10th 2014, and approved by the Board of Directors that same day to confirm the Company commitment to base its development on principles which clearly assert its commitment to ethics and social responsibility.

The Charter covers all managers and employees of the Company and applies to all its entities and operations.

The responsibility of WALLS more specifically covers:

Its shareholders, with the objective to ensure a good return on their investment and providing them with complete and transparent information on a regular basis.

Its customers, in the center of its activities, with the commitment to supply quality products and services.

Its employees, with the implementation of policies for human resources and competence development, and continuously improved working conditions.

Its suppliers and partners, through clear and respected contractual terms and conditions.

The civil society in each country where the Company operates, in compliance with local laws and regulations, respecting the culture and the environment.

The Ethics Charter's principles and objectives are based on and refer to international Conventions such as:

The principles of the 1948 Universal Declaration of Human Rights.

Respect for Human Dignity

WALLS grants great importance to respect for human dignity and pays particular attention to the laws, regulations and international principles established to protect the security, the dignity and the welfare of its employees, clients and all the stakeholders it interacts with

WALLS refuses any form of discrimination and pays particular attention to equal opportunities to employment and career development to all employees according to their competencies and work independently of origin, religion, race, age, gender or adherence to a political party or worker's union.

The Company respects the ILO core conventions, by committing to ban direct or indirect child or forced labour.

The WALLS pays particular attention to the prevention of harassment (sexual or moral) as well as to the protection of occupational health and safety at the work place.

Respect for Company Property

WALLS underlines the importance to prevent the misuse of company property and takes all the necessary measures to avoid deliberately using company assets contrary to company interests and/or for personal gain.

The Company grants great importance to the protection and safety of its economics properties, in particular of its confidential information. It invites all its employees to take the necessary measures to secure the company's sensitive data and enjoins them to respect the obligation not to disclose any confidential professional information by oral, written or electronic route, except in cases of delegation or express authorisation by management.

An IT Charter regulates the use of Group's computing

Respect for Trade Regulations

WALLS strictly abides by all applicable laws and regulation in all the countries where it operates.

The Company is committed to fight against corruption and money-laundering, and to promote ethically responsible relationships with the authorities of the different countries.

The Company is committed to not conclude or execute any agreements aiming to distort the rules of fair competition and requires that its employees refuse to discuss prices and market distribution with the competitors.

The Company enjoins its employees to select suppliers and to determine purchasing terms based on objective evaluations of quality, price and the capacity to supply and guarantee services corresponding to its requirements and specifications.

Respect for Behavioural Principles

WALLS expects from its employees and representatives to adopt exemplary ethical behavior under any circumstances, making sure to protect the company image.

The Company more specifically focuses on the following principles:

It encourages its employees to exercise the utmost vigilance to avoid any conflict of interest and any situation that could lead others to believe that they might favor their own personal interest or the interest of their relatives or friends over the interests of the company.

The Company authorizes the giving or receiving of gifts and invitations by employees in the name and on behalf of the company only if they are of a reasonable value and given/received during certain occasions which cannot have any incidence on the progress of a commercial transaction.

It is authorized to donate to charities and to contribute to causes of general interest, in accordance with philanthropic and with the social and environmental responsibility values of the Company. These actions must be made in a disinterested manner without expecting any advantages in return.

WALLS strictly respects States sovereignty and does not intervene in political debates and as a matter of principles, it maintains the strictest neutrality with regards to politics, and the financing of political parties.

Respect for the Charter

The present Charter is communicated and distributed to all employees through posting and on the intranet. It is also accessible to all our partners and to the public on the website of the Group (www.walls.com.ng).

WALLS expects all its employees to develop a positive contribution to the Company ethics policy, as they are the vectors of the policy on a daily basis. The Company requires employees to respect the Charter and the Code of Business Conduct, which rolls out the commitments of the Charter through action principles. Any violation of the Charter engages personal responsibility and can result in sanctions.

The follow up on the Charter is under the responsibility of the Department of General Control, that communicates to the Company's Ethics Committee on a regular basis.

WALLS Ethics Committee is in charge of the follow up of ethical issues within the Company, and as such it:

Presents any useful recommendations to the President of the Board of Directors,

Initiates the necessary trainings for developing practices and behaviour compliant with the principles of the Charter,

Draws the attention of the general managers of the entities within the Company to the risks of any non-compliant behaviour with regards to the Charter,

Promotes the contents and principles of the Charter and the Code of Business Conduct,

Ensures that procedures are setup in order to guarantee the comprehension and the respect of the Charter,

Recommend any measures or provide advice about any issue related to the application and the respect of the Code of Business Conduct.

No one could be prejudiced or punished for alerting a manager, the Director of General control, also acting as the Compliance officer of the Company, or the Ethics Committee of non-compliant behavior when done in in good faith

A handwritten signature in blue ink, reading "Christian Nmah". The signature is written in a cursive style and is centered within a large, light blue circular graphic that has a grid pattern similar to the one in the logo above.

Christian Nmah

Christian Nmah
Managing Director

Contact

1 Engineering Close, Victoria Island, Lagos
Tell: +234 705555 5248, Tell:+234 1270 1440,
Email: info@walls.com.ng Web: www.walls.com.ng