



BERGER PAINTS PLC

WHISTLE-BLOWING POLICY

STATEMENT OF COMMITMENT:

Berger Paints Nigeria Plc is committed to the highest possible standards and best practices in corporate Governance. In line with this commitment, we expect our employees and all stakeholders to be interested in all aspects of our work, transaction and products. To this end, our doors and ears are open to any information that will help move the company forward.

PROTECTION:

Berger Paints Nigeria Plc. recognizes that the decision to report a concern can be a difficult one to make mostly out of fear of victimization. However, the company is unequivocally committed and undertakes to protect all whistle-blowers.

Berger Paints Nigeria Plc. will not tolerate any harassment or victimization (including informal pressures) and will take appropriate steps to protect any employee and/or stakeholder who alert the company of any danger, wrong, fraud or threat of fraud.

CONFIDENTIALITY:

All information will be treated in strict confidence while the identity of the whistle-blower is protected. This policy encourages you to include your name, address and phone number when passing on any information to the company. However, as a matter of honour,

- Staff/stakeholder must disclose the information in good faith
- Staff/stakeholder must believe it to be substantially true
- Staff/stakeholder must not act maliciously or make false allegations
- Staff/stakeholder must not seek any personal gain

HOW TO RAISE A CONCERN:

For staff as a first step, you should raise concerns with your immediate supervisor/manager or their superior. For example, if you believe that management is involved, you should approach the Board or a Board member.

PROTECTION FOR WHISTLE BLOWERS

BPN has an obligation to adequately protect the Whistle Blower. Therefore reprisal against any employee who in good faith reports a concern about illegal or unethical conduct will not be tolerated.



The Company is also committed to maintaining confidentiality to the fullest extent possible and provides assurance that all reports will be subject to appropriate investigation and conclusion through an efficient process.

Therefore, whistle Blowers are encouraged to disclose their names when filing reports to enhance credibility. However, anonymous disclosures may be considered on the following discretionary basis:

- The seriousness of the issues.
- The significance and credibility of the concerns.
- The possibility of confirming the allegation

Whistle Blowers either Internal or External may be rewarded depending on the gravity of the case. Compensation may also be provided to Whistle Blowers who may have suffered loss in the course of the process. This is however at the discretion of management.

Review of Policy

This Policy will be reviewed every three years or as required.

NUMBERS TO CALL:

For other stakeholders, please call the following dedicated whistle blowing numbers:

09037775796, 08102164559, 08055770000.