



JOACO NIGERIA LTD

CODE OF CONDUCT AND ETHICS & ANTI-BRIBERY AND CORRUPTION POLICY

Effective Date: November 6th 2017

Approved by: Management of JOACO Nigeria Ltd

1. INTRODUCTION

JOACO Nigeria Ltd (“JOACO” or “the Company”) is committed to conducting its business with integrity, honesty, and transparency. This Code of Conduct and Ethics, including our Anti-Bribery and Corruption Policy, sets out the standards expected from all employees, directors, agents, contractors, and business partners in Nigeria and internationally.

We are fully committed to compliance with all applicable anti-bribery and anti-corruption laws and to promoting a culture of ethical conduct across all levels of our operations.

2. OBJECTIVES

This Code aims to:

- Promote ethical, honest, and lawful behavior.
 - Prevent bribery and corruption in all business dealings.
 - Ensure compliance with relevant Nigerian and international laws.
 - Protect JOACO’s reputation and foster trust with stakeholders.
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3. SCOPE

This policy applies to:

- All employees and directors of JOACO Nigeria Ltd.
 - Any third parties acting on JOACO's behalf (consultants, agents, intermediaries, distributors, etc.).
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4. CODE OF CONDUCT & ETHICS

4.1 Integrity and Honesty

All employees must perform their duties with integrity and honesty and avoid any conduct that could damage JOACO's reputation.

4.2 Respect and Fairness

We respect human rights and are committed to equal opportunity, diversity, and a harassment-free workplace.

4.3 Conflict of Interest

Employees must avoid any situation where personal interests conflict with the interests of JOACO. Any actual or potential conflict must be disclosed immediately to management.

4.4 Confidentiality

Employees are required to protect the confidentiality of all company, employee, and customer information.

4.5 Compliance with Laws

All staff must comply with Nigerian laws, international regulations, and internal company policies.

5. ANTI-BRIBERY AND CORRUPTION POLICY

5.1 Zero Tolerance

JOACO maintains a zero-tolerance stance on bribery and corruption. Offering, giving, requesting, or receiving any bribe or improper benefit, either directly or indirectly, is strictly prohibited.

5.2 What Constitutes a Bribe

A bribe is anything of value offered to gain an unfair advantage. This includes (but is not limited to):

- Cash payments
- Gifts, hospitality, or entertainment
- Kickbacks or commissions
- Political or charitable donations with corrupt intent

5.3 Facilitation Payments

JOACO prohibits all forms of facilitation payments, even if they are customary or expected in certain countries.

5.4 Gifts and Hospitality

Gifts and hospitality must be modest, appropriate, and not intended to influence business decisions. All gifts above a nominal value must be reported to management.

5.5 Third Parties

JOACO is liable for the actions of third parties representing its interests. Due diligence must be conducted before engaging agents, contractors, or distributors. All third parties must agree to abide by this policy.

6. REPORTING VIOLATIONS

Suspected violations of this Code or Policy must be reported immediately to:

- A supervisor or manager
- The Compliance Officer
- Kindly send mail to JOACO@joazubogu.com

Reports can be made anonymously and without fear of retaliation.

7. DISCIPLINARY ACTION

Any breach of this policy may result in disciplinary action, including termination of employment or contract, and possible legal consequences.

8. TRAINING AND AWARENESS

JOACO will provide regular training and communication on this Code and anti-bribery measures to ensure all personnel understand and comply with it.

9. POLICY REVIEW

This Code will be reviewed periodically and updated as necessary to reflect legal or operational changes.

ACKNOWLEDGEMENT

I, the undersigned, confirm that I have read, understood, and agreed to abide by the provisions of this Code of Conduct and Anti-Bribery and Corruption Policy.

Name: _____

Position: _____

Signature: _____

Date: _____
