INTRODUCTION

AVA Capital PLC Limited also known as "AVA Capital PLC" is committed to fostering an open and accountable culture where all individuals including employees, officers, directors, clients, vendors, contractors, and other third parties can report concerns about actual or suspected unethical, illegal, or improper conduct without fear of retaliation or disadvantage.

This policy establishes a structured process for reporting such concerns ("whistleblowing") and affirms AVA Capital PLC' commitment to protecting whistleblowers and investigating allegations in a fair, timely, and confidential manner.

This policy applies across all AVA Capital PLC's entities and locations, and aligns with applicable laws in Nigeria and international best practices.

OBJECTIVES

The objectives of this policy are to:

1. Provide a safe, confidential channel for reporting suspected misconduct or wrongdoing.
2. Promote a culture of transparency, accountability, and ethical behavior.
3. Support early detection and proactive response to fraud, corruption, and breaches of policy.
4. Reinforce AVA Capital PLC' zero tolerance for unethical, fraudulent, illegal, or unsafe practices.

SCOPE

This policy applies to:

- All AVA Capital PLC employees, officers, directors, interns, casual staff, contractors, and consultants.
- Clients, vendors, service providers, shareholders, and other stakeholders with a legitimate relationship with the Company.
- Concerns may be raised in relation to actual or suspected:
- Criminal offences
- Breach of legal or regulatory obligations
- Unethical or corrupt behavior
- Misuse of company assets or information
- Insider trading or market abuse
- Conflict of interest or abuse of office
- Health and safety violations
- Sexual harassment, bullying, or harassment

- Attempts to conceal any of the above

DEFINITIONS

Whistleblowing: The disclosure of information related to suspected wrongdoing, misconduct, or dangers at work or involving the Company.

Protected Disclosure: A good-faith report by a whistleblower based on reasonable belief that wrongdoing has occurred.

Whistleblower: Any employee, client, vendor, or third party who reports a concern under this policy.

Detriment: Any negative consequence suffered by a whistleblower for making a report, including dismissal, discrimination, threats, or harassment.

CONFIDENTIALITY & ANONYMITY

All whistleblowing reports will be treated confidentially. AVA Capital PLC will:

1. Keep the whistleblower's identity confidential unless disclosure is required by law or consented to.
2. Encourage whistleblowers to identify themselves where possible to facilitate effective investigation.

Accept and consider anonymous reports, though such reports must include sufficient detail to support proper investigation.

PROTECTION FOR WHISTLEBLOWERS

Whistleblowers who report in good faith will be protected from reprisal, retaliation, or detriment.

Protection applies regardless of whether the reported issue is ultimately substantiated.

Whistleblowers found to have reported maliciously or in bad faith may be subject to disciplinary or legal action.

OBLIGATIONS OF WHISTLEBLOWERS

Whistleblowers are expected to:

- Act in good faith with a reasonable belief in the truth of their report.
- Provide as much detailed, factual information as possible.
- Avoid using the whistleblowing process for personal grievances, which should be addressed through the grievance procedure.

REPORTABLE MISCONDUCT

Examples of reportable issues include (but are not limited to):

1. Fraudulent activities

2. Bribery and corruption
3. Conflict of interest and abuse of office
4. Insider dealings
5. Breach of AVA Capital PLC policies or codes
6. Sexual harassment or abuse
7. Theft or misuse of company assets
8. Unsafe work practices
9. Forgery or fake documentation
10. Concealment of malpractice

Any activity likely to harm the company's reputation or operations

REPORTING PROCEDURES

Internal Reporting Channels may be submitted via:

- **Email**: whistleblow@avacapitalgroup.com, info@avacapitalgroup.com
- **Whistleblowing Portal:** avacapitalgroup.com/whistleblowing/
- **Toll-Free Line: 0700-0000-AVA**

Report to immediate supervisor or line manager. If the concern involves the supervisor or is sensitive, report directly to:

- HR Manager
- Risk Manager
- Compliance Officer
- Chief Executive Officer (CEO)

External Reporting Channels

Third parties may use the same confidential channels listed above to report concerns. Reports are handled with the same level of seriousness and protection as internal disclosures.

WHISTLEBLOWING PROCESS

Submission: Whistleblowers should include the following where possible

- Name(s) of the person(s) involved
- Date and nature of misconduct
- Location of occurrence

- Supporting documents or evidence
- Estimated impact or value (if applicable)

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  - Date and nature of misconduct
  - Location of occurrence
  - Supporting documents or evidence
  - Estimated impact or value (if applicable)

Investigation:

- The HR or Risk Management Unit receives and logs the report.
- An initial assessment determines if a full investigation is needed.
- Investigations may be led by internal or external investigators.
- If criminal activity is suspected, the matter may be referred to law enforcement or regulators.

Feedback

- Whistleblowers will receive an acknowledgment within five (5) business days (unless anonymous).
- Updates on investigation status will be provided as appropriate.

Feedback may be limited to protect confidentiality and legal obligations.

OUTCOMES AND DISCIPLINARY ACTION

Possible outcomes include:

1. No action (if unfounded)
2. Disciplinary action (e.g., warning, suspension, dismissal)
3. Process improvement or policy amendment
4. Referral to external authorities or regulators

If the whistleblower is dissatisfied with the outcome, they may escalate to senior management or an external authority.

RECORDS AND RETENTION

All whistleblowing reports and related investigation records shall be securely maintained by the Risk and Compliance Department.

CONCLUSION

AVA Capital PLC affirms its commitment to integrity, accountability, and responsible corporate behavior. Whistleblowing is a critical tool to safeguard our values and protect our stakeholders. We encourage all parties to speak up in good faith when misconduct is observed.

This policy will be reviewed periodically or as required by changes in law, regulation, or internal practices. The Risk and Compliance Department is responsible for review and updates, subject to Board approval.