



Seplat Petroleum Development Company Plc



Security Classification: **Restricted**

SEP-CHR-GEN-W01-0014

BULLYING AND HARASSMENT POLICY

October 2019

Rev	Date	Description	Issued by	Checked by	Approved by
				ORIGINAL SIGNED	
AO1		Issued for Approval / Implementation	Human Resources	Alero Onosode	Austin Avuru
R01		Issued for Review	HR/BI/Legal	Alero Onosode	

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ADDITIONAL APPROVAL / REVISION HISTORY TABLE

Party	Name	Sign	Date

Revision Philosophy

All draft documents for review will be issued at R01, with subsequent R02, R03, etc as required.

All revisions approved for issue / implementation will be issued at A01, with subsequent A02, A03, etc as required.

All revisions approved for design will be issued at D01, with subsequent D02, D03, etc as required.

Documents approved for Construction will be issued at C01, C02, and C03 respectively.



Documents or drawings revised as “As built” will be issued as Z01, Z02 Z03 etc.

Narrative sections revised from previous approved issues are to be noted in the table below and/or highlighted in the RH margin (using the appropriate revision status) thus: | A02

Previous revision highlighting to be removed at subsequent issues.

Drawings/diagrams revised from previous approved issues are highlighted by 'clouding' the affected areas and by the use of a triangle containing the revision status.

Revision History		
Revision No.	Date of issue	Reason for change
R01	15 th May 2017	<ul style="list-style-type: none">- Policy was reviewed to further emphasize SEPLAT's commitment to equality diversity- A review panel was instated- Roles and responsibilities of various teams (Legal, BI) etc. were specified
R02	17 th October 2019	<ul style="list-style-type: none">- Definitions for ‘Bullying’ and ‘Harassment’ were outlined separately- Implications of Bullying and harassment were added

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1. INTRODUCTION AND PURPOSE



- 1.1 SEPLAT recognises that its Employees are one of the Company's greatest assets and stakeholders. The Company is committed to protecting and nurturing the diversity amongst its Employees in order to create a safe work environment. Our Code of Conduct requires every Director and Employee to follow the timeless, universal principle of treating each person with respect, whilst embracing a culture of diversity inclusion. Negative conduct, such as Bullying and Harassment, contravene this principle and our value for diversity.
- 1.2 Bullying and Harassment creates a hostile work environment, and adversely impacts on productivity and Employee morale. SEPLAT will therefore enforce a zero tolerance approach against any conduct that contravenes its commitment to diversity, including acts of Bullying and Harassment.
- 1.3 This Bullying and Harassment Policy (this "**Policy**") has been developed to set the parameters within which the Company which will deal with Bullying and Harassment in the workplace. The aims of this Policy are to:
 - (a) reinforce the Company's commitment to diversity inclusion and mutual respect;
 - (b) create a platform for rewarding conduct that aligns with the Company's value for diversity; and
 - (c) outline the Company's zero tolerance approach to addressing all acts of Bullying and Harassment.

2. APPLICABILITY

- 2.1 This Policy applies to all Employees of SEPLAT, and any third party dealing with them.
- 2.2 This Policy applies to acts of Bullying and Harassment that occur: (a) inside or outside the work premises of SEPLAT or (b) during or outside of the normal business hours of SEPLAT, provided that the Respondent was acting in relation to or further to his/her employment or role in SEPLAT (e.g., conduct at an offsite meeting, training course, conference, work-related social event, etc.).

3. RESPONSIBILITY

- 3.1 The **Review Panel** shall be responsible for the review, decision-making, and initiation of disciplinary action pursuant to this Policy.
- 3.2 The **General Manager, Human Resources** shall be responsible for:
 - (a) ensuring that this Policy is updated as required to reflect current issues related to Bullying and Harassment
 - (b) the day-to-day embedding, implementation and strict enforcement of this Policy, including the conduct of training and the interpretation of this Policy. In so doing, the **General Manager, Human Resources** shall be responsible for:
 - (i) explaining the Policy and complaints procedure to new Employees as part of their induction into the Company;
 - (ii) explaining the Policy to all Employees in order to ensure that they understand their roles and responsibilities and how the Complaints procedure operates;

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- (iii) monitoring any Complaint until its proper resolution and thereafter following up on the situation around the Complaint in order to ensure that the behaviour complained of does not recur;
- (iv) responding promptly and discreetly to requests from Employees to intervene; and
- (v) maintaining a proper record of all Complaints that are brought to the Company's attention. the GM HR shall report these complaints on a bi-annual basis to the Leadership Team.

3.4. **The Head, Business Integrity** shall be responsible for:

- (a) investigating reports of Bullying and Harassment that are made through the Company's Whistleblowing channels;
- (b) investigating reports of Bullying and Harassment that are escalated to the Business Integrity unit.

3.5. **Managers and Supervisors** have a responsibility to make every effort to ensure that Bullying and Harassment does not occur, particularly in work areas for which they are responsible. Managers and supervisors have an obligation to deal seriously, promptly and effectively with any incidents of Bullying and Harassment of which they are aware or ought to be aware. In so doing, the Company requires all Managers and Supervisors to always ensure the following:

- (a) Monitor the behaviour of new Employees during their probationary period to ensure compliance with this Policy;
- (b) Promote awareness of (and participation in the embedding of) this Policy amongst Employees on an ongoing basis;
- (c) Set a good example by treating all Employees and any other person with whom they come into contact in the workplace with courtesy, respect and fairness;
- (d) Be vigilant for signs of Bullying and Harassment, and intervene before a problem escalates; and
- (e) Respond sensitively to any Employee who makes a Complaint.



3.6. It is the responsibility of **all Employees** to help prevent Bullying and Harassment in the workplace by:

- (a) embracing diversity in the Company;
- (b) recognising and valuing the skills and talents of others;
- (c) treat other Employees, any person they meet in the workplace, fairly and equitably with courtesy and respect;
- (d) report every act of Bullying and Harassment observed; and
- (e) promoting the awareness of and compliance with this Policy, including participating in activities to embed this Policy.

4. DEFINITIONS

For purposes of this Policy, the following definitions of key terms shall apply:

- 4.1 **"Buddy"** means an Employee nominated by the Complainant or Respondent to provide support during the Review Process. E.g. Change Agents, Joint Consultative Committee ("JCC") Representatives, and Seplat Way Champions.



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- 4.2 **“Bullying”** means any behaviour characterized as offensive, intimidating, malicious or insulting. An abuse or misuse of power through conducts that undermine, humiliate, belittle or injure the recipient. Bullying can include the use of personal strength or the power to coerce through fear or intimidation, not necessarily from someone in a position of authority. Bullying may be physical, verbal or non-verbal. It can include conduct that is not face-to-face, including via text message, email and social media.”
- 4.3 **“Harassment”** means any unwanted conduct that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them.
- 4.4 Examples of behaviour that may amount to Bullying and Harassment include but are not limited to:
- (a) Intimidation;
 - (b) Verbal abuse or threats, including screaming or using offensive language;
 - (c) Unreasonably excluding or isolating a person from workplace activities;
 - (d) Inappropriately undermining responsibility and/or authority;
 - (e) Making subtle threatening comments regarding a subordinate’s upcoming performance appraisal;
 - (f) Abuse of authority or Company processes, including making false reports, misusing the appraisal process, etc;
 - (g) Withholding information essential to do a task properly;
 - (h) Copying emails that criticise an Employee to others who do not need to know;
 - (i) Making threats or comments about an employee’s job security without foundation;
 - (j) Spreading malicious rumours;
 - (k) Blackmail or extortion;
 - (l) Leaving offensive items around your work area, after being notified of its offensive nature;
 - (m) Persistently and inappropriately finding fault with a person’s work and using this as an excuse to humiliate the person rather than trying to improve performance;
 - (n) Constantly picking on a person when things go wrong even when he/she is not responsible;
 - (o) Cyber bullying (the use of electronic communication to bully a person, typically by sending messages of an intimidating or threatening nature); and
 - (p) Physical abuse.

4.5 **Implication of Bullying and Harassment**

Bullying and harassment can damage the health, confidence, morale and performance of employees who are affected by it. They are both unlawful under our Constitution. They may also be civil or criminal offences and also contravene health and safety law.

Quite apart from the legal implications, both harassment and bullying are contrary to the standards of behaviour that we expect of our employees. Both types of behaviour are unacceptable in our workplace and are not permitted or condoned. We will treat such behaviour as misconduct which may warrant dismissal from employment.

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4.6 It should be understood that Bullying and Harassment often stem from discrimination on the basis of:

- (a) Gender
- (b) Ethnicity
- (c) Religion
- (d) Work Grade (Manager/Subordinate relationship)
- (e) Marital Status
- (f) Pregnancy/Maternity
- (g) Political Affiliation
- (h) Age
- (i) Facial Appearance (Beard or Tribal Marks)
- (j) Disability
- (k) Race
- (l) Sexuality

4.7 The following behaviours do not constitute Bullying and Harassment:

- (a) Reasonable management practices, including performance management and disciplinary procedures;
- (b) A directive to carry out assigned duties and reasonable instructions; and
- (c) A directive to comply with SEPLAT's rules, policies and procedures.

4.8 "Complainant" means a person who is a victim of Bullying and Harassment in SEPLAT and makes a report pursuant to this Policy.

4.9 "Complaint" means a claim of Bullying and Harassment that is made pursuant to this Policy.

4.10 "Employee(s)" for the purpose of simplicity only, means someone employed by SEPLAT and non-Employees such as: contract staff, agents and consultants working for SEPLAT.

4.11 "Leadership Team" means the Senior Management Team of SEPLAT.

4.12 "Respondent" means a person against whom a Complaint has been made, pursuant to this

4.13 "Review Process" means the process of investigating all Complaints, as outlined in Sections 7 and 8 below.



4.13 "Review Panel" means the Bullying and Harassment Review Panel, which shall, at a minimum, consist of the following individuals (or their nominees):

- (a) General Manager, Human Resources
- (b) General Counsel
- (d) Head, Business Integrity

The Review Panel may from time to time invite the appropriate Senior Manager(s) to play an advisory role.

Where any member of the Review Panel is a Respondent to a Complaint, then such member shall not act as a member of the Review Panel for purposes of the Complaint, and the Chief Executive Officer of SEPLAT ("**CEO**") shall appoint a suitable replacement.

4.13.1 "SEPLAT" or "the Company" means Seplat Petroleum Development Company Plc and all of its subsidiaries, as appropriate to the circumstances.

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4.14 “Sexual harassment” is any form of unwanted verbal, written or physical conduct of a sexual nature which has the purpose or effect of violating a person’s dignity and creating an intimidating, hostile, degrading, humiliating or offensive environment for the person. The unwanted conduct may include acts, requests, spoken words, gestures or the production, display or circulation of written words, pictures or other material. Sexual harassment may consist of a single incident or repeated inappropriate behaviour. It may be targeted at one person or a group of persons.

4.14.1 The following are some examples of inappropriate behaviour which may constitute sexual harassment. These examples are illustrative but not exhaustive:

- (a) Physical conduct of a sexual nature, e.g. unwanted physical contact such as unnecessary touching, patting or pinching or brushing against another person’s body
- (b) Verbal conduct of a sexual nature, e.g. unwelcome sexual advances, propositions or pressure for sexual activity, continued suggestions for social activity outside the workplace after it has been made clear that such suggestions are unwelcome
- (c) Unwanted and offensive flirtations, suggestive remarks, innuendos or lewd comments
- (d) Non-verbal conduct of a sexual nature, e.g. the display of pornographic or sexually suggestive pictures, objects, written materials, emails, or text-messages
- (e) Unwanted or derogatory comments about dress or appearance
- (f) Leering and suggestive gestures

5. RELEVANCE OF MOTIVE

The intention of the person engaging in the unwelcome behaviour is irrelevant – the effect of the behaviour on the Employee concerned is what is important.

6. CONFIDENTIALITY

All allegations of Bullying and Harassment will be dealt with seriously, promptly and in confidence. The need to maintain confidentiality will be paramount, except in circumstances where the alleged incident is serious enough to pose a risk to the Complainant or another person.



7. PROCEDURE FOR MAKING A COMPLAINT

Due to the seriousness with which SEPLAT views Bullying and Harassment, different levels of reporting are in place as a mechanism for dealing with Complaints. These levels seek to ensure minimal stress to the persons involved, timely resolution of Complaints, and a degree of flexibility appropriate to individual circumstances.

7.1 Step 1 – Report to Line Manager. Employees are encouraged (but are not compelled) to initiate a Complaint with their Line Manager in an attempt to resolve the Complaint. It is expected that following this procedure will promote an amicable and timely resolution of the Complaint.

7.2 Step 2 – Report to Line General Manager. Where Step 1 fails, or is not appropriate, the Employee should discuss the Complaint with his/her Line General Manager.

7.2.1 Line Managers and General Managers who have received a Complaint are required to notify the Department’s Human Resources Business Partner (copying the Complainant) of the existence of the Complaint and the resolution reached. This

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notice shall be in furtherance of the record-keeping and follow-up responsibilities of the General Manager, Human Resources outlined in Section 3.3 above.

7.3 Step 3 – Report to Human Resources. An Employee may raise a Complaint to Human Resources under any of the following circumstances:

- (a) if the Employee does not wish to follow the mediation procedure outlined in Sections 7.1 and 7.2 above; or
- (b) if the mediation in Sections 7.1 and 7.2 has failed to resolve the Complaint; or
- (c) if the Respondent is the Employee's Line Manager or Line General Manager.

7.3.1 To make a Complaint to Human Resources, the Employee should send the details of the Complaint via email to his/her Human Resources Business Partner. Complaints may be difficult to investigate if the Complainant does not provide sufficient information, such as:

- (a) nature of the incident;
- (b) people involved;
- (c) date(s) of incident;
- (d) place of occurrence;
- (e) Witnesses (if any)
- (f) how the incident occurred; and
- (g) any other useful information



7.3.2 Upon receipt of a Complaint, the Human Resources Business Partner shall do the following:

- (a) promptly send an appropriate acknowledgement to the Complainant and, if necessary, discuss with the Complainant for clarification;
- (b) notify the Respondent of the Complaint and request a formal response within 3 working days;
- (c) take immediate steps to protect the Complainant from further acts of Bullying and Harassment;
- (d) advise the Complainant and the Respondent of their right to each nominate a Buddy;
- (e) follow the Human Resources procedures for reviewing and resolving reports;
- (f) maintain proper documentation of the review process and resolution.

7.4 Report to Business Integrity. In line with Seplat's Whistleblowing Policy, a Complainant may choose to make a Complaint directly to the Business Integrity Unit. In such a case, Business Integrity shall investigate the Complaint and report to the Review Panel.

8. MAKING AN APPEAL / WHISTLEBLOWING

8.1 A Complainant or Respondent who is not satisfied with the outcome of the Review Process should contact any staff of Business Integrity Unit or make an anonymous report via **the SEPLAT Whistleblowing Hotline on 0800 444 1234 (SpeakUp@seplatpetroleum.com) or the KPMGethicsline on 0703 000 0026 (kpmgethicsline@ng.kpmg.com)**. Please be assured that all reports to the Whistleblowing Hotline will be treated in strict confidence.

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- 8.2 The Business Integrity Unit will act to investigate, and the findings would be submitted to the Review Panel for necessary action.

9 DUTY TO REPORT BULLYING AND HARASSMENT

- 9.1 SEPLAT requires each Employee to report any act of Bullying and Harassment that is observed. Any failure to report observed acts of Bullying and Harassment is a violation of this Policy and may be considered as contributory to the act. This means that the Employee in violation may be subject to disciplinary action.

9. DISCIPLINARY ACTION

If an allegation of Bullying and Harassment is proven under Sections 7 and 8 of this Policy, then the Respondent could be subject to disciplinary action up to and including summary dismissal.

10. RETALIATION

Employees must not victimise or otherwise subject another person to detrimental action as a consequence of that person raising, providing information about, or otherwise being involved in the resolution of a Complaint under this Policy.

11. FALSE REPORTING

Making false reports can be a form of Bullying and Harassment. Therefore, SEPLAT will also take very seriously any malicious or, in its opinion, any unwarranted allegations of Bullying and Harassment or inappropriate behaviour, as these can have a serious and detrimental effect on the Respondent. Should these occur, SEPLAT will take appropriate disciplinary action where necessary.

12. DOCUMENTATION AND RECORD KEEPING



- 12.1 The General Manager, Human Resources will maintain a register containing all Complaints that are brought to the Company's attention. The General Manager, Human Resources will corroborate with the Head, Business Integrity in this regard.
- 12.2 The register of Complaints will primarily include a summary of the Complaints, whether it was investigated, the process followed and findings of the investigation and any action taken as a result of the investigation.

13. SEEKING CLARIFICATION

- 13.1 Employees who are uncertain whether an act constitutes Bullying and Harassment or require other clarification should contact their Human Resources Business Partner, Change Agent, JCC Representative, Seplat Way Champion, any staff of the Business Integrity Unit, or unanimously using the Whistleblowing lines outlined in Section 8.1 above.
- 13.2 The GM, Human Resources will ensure that the persons highlighted in Section 13.1 above are properly and regularly trained to play their respective roles outlined in this Policy.

14. REVIEW OF THIS POLICY

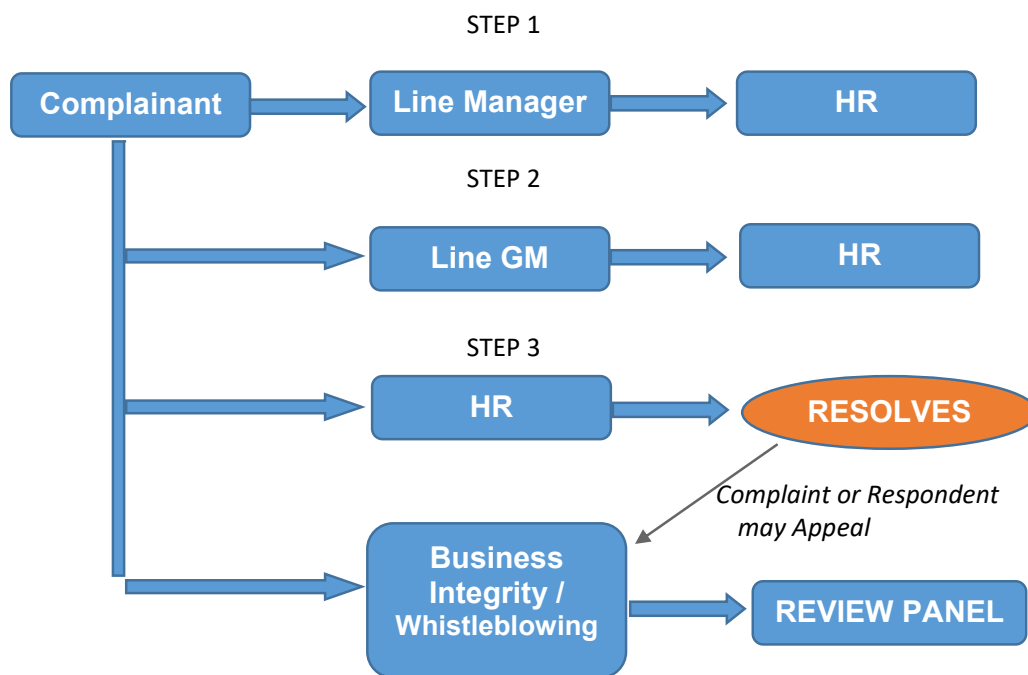
- 14.1 The Review Panel, led by the General Manager, Human Resources, will review this Policy every two (2) years or when there is a new regulation affecting the content of the Policy. The goal of each review shall be to ensure that this Policy continues to meet its objectives, SEPLAT's legal obligations, and reflect best practice.

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15. EXCEPTIONS AND AMENDMENTS TO THIS POLICY

Any exception or amendment to this Policy must be approved in advance by the CEO.

Appendix 1 **Illustration of Bullying and Harassment Complaint Procedure**



For more information, please read Sections 7 and 8 of this Policy or seek clarification (Section 13.1).