



# CODE OF BUSINESS CONDUCT

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**FALCON CORPORATION LIMITED**

### Message from the MD

The Falcon Corporation Limited Code of Business Conduct is a declaration of our corporate commitment to the highest standards of ethics and integrity. It is my personal pride to see and experience this code being employed consistently in all that we do, and as a guide to all our daily activities.

As a company, we hold ourselves accountable to a high standard of ethical business and professional conduct – a standard which permeates the very fibre of our moral being. Indeed, the living out of this commitment is for us a source of corporate pride and differentiation. It is the standards that we hold ourselves to that allow us enjoy the level of trust, respect, and long-term commitment that we enjoy from our customers, our people, our host communities, our competitors and other stakeholders in our business. This Code of Business Conduct reinforces our non-negotiable core values of Professionalism, Integrity, Innovation, Leadership, Ownership, and Sound Corporate Governance. It is a ready tool that provides summary statements of some of our key policies, information about business compliance issues, minimum acceptable standards of behaviour in Falcon Corporation, and a listing of resources you can turn to when you need ethical advice or help as relates to your work or interaction with our company.

I cannot overstate our focus on complete adherence to the principles laid down in this Code of Business Conduct, because only in so doing will we ensure that our workplace culture fully reflects the Falcon Corporation Limited values. We make absolutely no room for improper conduct or unethical behaviour. We must work to continually maintain and build on our culture of integrity, honesty, and sound ethical practice that makes for personal growth for the individual, the company, the Nation and the world at large. We will continue to enforce strict compliance by our people, customers and other stakeholders to the conduct of our business in a highly ethical manner and within the defined norms of this Code of Business Conduct. Every user of this Code is encouraged to immediately report any acts of non-compliance with this code, and you have my highest assurances of confidentiality, as well as prompt investigation and action being taken.

I thank you all for your commitment to upholding the values of our company.

*Sincerely,*

***Prof. Joseph .C. Ezigbo***

## WHO WE ARE & WHAT WE STAND FOR

### VISION:

**‘To build a world class, value-driven conglomerate’**

We are building a group of smart companies that will be operated and managed on best global standards and practices; driven by a commitment to delivering long-term return on investment in an ethical and sustainable manner; while making tangible positive impact on the lives and the communities within which we operate.

### MISSION:

**‘To deliver superior solutions through operational excellence, people and partnerships’**

We will deliver world-class performance, driving sustainable economic progress, industrial and human capital development throughout the sectors in which we operate. We will achieve this through our strong operational and financial controls, socially responsible business models and excellent standards of corporate governance.

### CORE VALUES:

Our distinguishing values pilot our affairs, and guide our actions and relations with each other and with our stakeholders. Our values drive our culture and are the foundation on which our corporate reputation and long-term sustainability aspirations are based.

- **Professionalism:** We act appropriately and in a manner that is bold and acceptable. We are enthusiastic and committed in our day to day activities, operations and interactions with our staff and customers. We complete our tasks and responsibilities in a timely and efficient manner, and to the highest of standards.
- **Integrity:** We strive always to display high moral principles, reliability and trust. We work to entrench in our people the display of veracity, honesty, uprightness at all times as we engage in our daily activities and services to our customers (internal, external) and shareholders. This we recognize to be a critical element in long term business sustainability.
- **Innovation:** We understand that innovation is a competitive advantage in our business, and focus on this as a core competency for our people; constantly investing in their professional and skills development. We research modern technologies and approaches to improve the way we do business, actively seeking new opportunities

while maintaining an internal flexibility that allows us respond readily to operations and project-related change.

- **Leadership:** We are committed to building leaders at all levels of our organization. Our investments in training and development are increased annually in tandem with our business growth. We work strictly with training institutions of premium industry repute. We operate a rigorous performance management system, supported by an exciting reward system designed to draw out the very best of our people and motivate them to sustained high performance as we prepare them for next level responsibilities.
- **Ownership:** We are passionate about achieving results that exceed expectations – our own and those of others, and we push for results with energy and a sense of urgency. As such, our workforce is given the liberty to act and take complete charge of their roles in order to execute their functions with the mindset of an entrepreneur or proprietor. Our policies are designed to engender this same sense of ownership among our customers, contractors and our host communities.
- **Team Work:** We work effectively together towards a common vision, ensuring that our individual accomplishments are directed towards the organizational objectives. We encourage self-motivation, building confidence in our people to in turn motivate others, and thereby achieving remarkable synergy in the completion of tasks. Each and every member of staff maintains and shows due respect for self, for team members and their unique capabilities and inputs into the team; actively supporting each other to achieve our full potentials.
- **Sound Corporate Governance:** Effective corporate governance is at the heart of what we do. Our structures, processes and policies are designed to enable effective company direction, administration and control. Measures of accountability are maintained from the level of the Board of Directors, Management and every employee of the company to ensure everyone carries out their duties in a transparent and accountable manner.

## HEALTH, SAFETY, ENVIRONMENT & SECURITY

We are committed to the protection of the health and safety of our employees, contractors and other stakeholders in our areas of operation. As such our every work activity or operation is planned and executed in such a manner to avoid accidents, injuries to people or harm to the environment. At Falcon, safety is everybody's business as exemplified by our slogan 'If it's not safe, don't do it!'

We work in full compliance to statutory laws and regulations, to provide and maintain a safe, healthy working environment free from pollution and other hazards. We strive to identify, control and mitigate any environmental impact our activities may generate. We are focused on the continual improvement of our environmental performance in order to deliver on our duty of care towards future generations.

We ensure that our people, contractors/vendors, visitors and customers are provided with adequate information and training to ensure that they continue to work safely. Whereas compliance to the Policy is mandatory for all members of staff, contractors or vendors, visitors, customers and other stakeholders, we recognize the importance of Management's commitment to health, safety & the environment and the security of all our stakeholders, and this is evidenced in our HSES Policy and associated objectives, which have been established and are constantly communicated and reinforced to our people and stakeholders in our business.

It is expected and mandatory that all incidents, accidents, acts and/or near misses that have potential to cause injuries to people or damage to property are immediately reported to the HSES department for thorough investigation and corrective actions taken where necessary. We work to ensure a clean and healthy environment especially in the course of executing and/or carrying out routine operations.

**Acts/Threats of Violence** We are committed to promoting a safe and healthy work environment that is devoid of intimidation and acts or threats of violence in whatever form. We therefore operate a 'Zero tolerance' policy regarding acts/threats of violence in whatever guise, on any company location, office or work site. Employees, contractors, customers or visitors are encouraged to immediately report any acts/threats of violence however minor to Management for prompt

investigation and action. No form of retribution against anyone who reports an act/threat of violence is allowed, and any reported case will be dealt with summarily.

## ALCOHOL, DRUG & SUBSTANCE ABUSE

Safeguarding against the abuse of alcohol, illicit or illegal drug or substance and other related issues is a very critical aspect of our business practice. We consider alcohol abuse, use of illicit or illegal drug or banned substance a gross violation of Company Policy and subject to outright dismissal.

We are unequivocal and unapologetic about the following strict prohibitions in/on our company premises and work sites:

- Use of alcohol while on duty
- Possession of any illicit, illegal or banned drug or substance
- Use of any illicit, illegal or banned drug or substance
- Being under the influence of any illicit, illegal or banned drug
- Self-medication

*Note: Due authorization must be obtained before the use of any prescription drugs on company premises*

- Sale of alcohol, illicit, illegal drug or any banned substance

We fully expect our people to be guided by these policy provisions when representing the company at corporate or social engagements where – in so far as they are sent as a company representative, they are considered to be acting in an official work capacity and are bound by the same rules of conduct. Indeed, we encourage that all our people maintain an independent discipline to work within the tenets of this policy outside of the work environment.

Penalty for non-compliance to this policy shall follow established consequence management and disciplinary procedures of which all our employees, vendors, sub-contractors, Directors, and other stakeholders are kept aware.

## CONFLICTS OF INTEREST

It is strict Company policy that no employee should participate in any decision for which they may be unable to maintain their professional objectivity because of a personal situation, employment, or other conflicts of interest. No one who occupies role in a position of trust is expected to have any direct or indirect interest in an entity that has a business relationship with Falcon Corporation Limited. Direct or indirect interest includes any legal, equitable, or fiduciary interest or position in an entity held by a member of the company, or a member of that person's family. Such competing interests will make it difficult for the member of Falcon to fulfill his or her duties impartially. It is expected that there be full disclosure ab initio where any employee or Board member has an interest in an entity, at the time of introduction of the entity to Falcon and prior to its entering into a transaction with Falcon

**NON-COMPETE:** Our employees are not expected to compete with Falcon or to take personal advantage of business opportunities that they discover during the course of their employment, unless we expressly waive our interest in pursuing such an opportunity. We expect that any employee desirous of pursuing a business opportunity that might be of interest to the Company, should inform their Line Manager who is then expected to seek a management decision as to whether or not the Company wishes to pursue the opportunity. We expect that where the Company decides against pursuing the opportunity, the employee may seize the opportunity on his/her own behalf only in so far as this will not result in direct/indirect competition with our operations.

**FAMILY & FRIENDS:** The company allows for family members to be employed within the organization, in so far as they are not engaged in similar or sensitive work areas that could provide potential for collusion. Family member is interpreted to include a person's spouse, brothers, sisters, children, mother, father, grandchildren, mothers- and fathers-in-law, the spouses of brothers, sisters, children, grandchildren and anyone (other than domestic employees) who shares the person's home. Any member of the company with a conflict of interest is (ethically) expected to excuse themselves from discussions and decisions related to the engagement, appraisal, disciplining, dismissal or other issues related to the person based on whom such a conflict exists.

## GIFTS & ENTERTAINMENT

The acceptance of gifts, entertainment, or other personal favors from any party that does or seeks to do business with Falcon - including but not limited to vendors, may present an undesirable appearance of impropriety or may be highly inappropriate under specific circumstances.

We are proud of our output, and we have achieved the things we have achieved strictly on the basis of our focus on full compliance to international best practices and identified quality standards, safety, engineering excellence, customer satisfaction, compliance with statutory and regulatory provisions, and our deeply held faith in the goodness of God.

We do not expect our employees to be influenced by receiving gifts and/or favors, and neither therefore do we expect our employees to try to improperly influence others by providing gifts and/or favours. Our standard branded corporate office memorabilia and tools are distributed as a matter of course during the year as part of our brand visibility campaign and are not intended to influence any recipient in any way or manner. Such branded corporate items are distributed in a freely. Exceptions are therefore made for ordinary and customary tokens of nominal value and employees who receive such branded corporate items from vendors/sub-contractors/prospects are expected to disclose these to their immediate Line Manager.

Employees may only offer or accept reasonable meals which are appropriate under the circumstances, and they shall not accept or offer meals or entertainment if such behaviour could create the impression of improperly influencing the respective business relationship. In either situation, an employee must apply utmost consideration, diligence and discretion in order to avoid even the appearance of improper dealings. When in doubt, the employee shall seek guidance from his or her Line Manager before accepting or offering a meal or other entertainment.

On no account should any employee shall offer to or accept from any third party gifts taking the form of any of the following, whatever the value involved: – Money – Loans – Kickbacks – similar monetary advantages.



## FAMILY/RELATIVES & FRIENDS

**FAMILY & FRIENDS:** We allow for friends of our employees and/or family members to be employed within the Company, in so far as they are not engaged in similar or sensitive work areas that could provide potential for collusion.

By our definition a 'family member' is interpreted to include an employee's spouse, brothers, sisters, children, mother, father, grandchildren, mothers- and fathers-in-law, the spouses of brothers, sisters, children, grandchildren and anyone (other than domestic employees) who shares the same home as our employee.

Our recruitment policy calls for announcements of vacancies to be made internally to allow interested staff apply for positions, or intimate their contacts – including family and friends, about the available vacancy(ies). Any employee who puts forward a candidate for any position is required to disclose their relationship with the candidate, particularly if it has potential to put such an employee in a conflict of interest position.

Any member of the company with a conflict of interest as relates to a fellow employee of the company, is (ethically) expected and required to excuse themselves from discussions and decisions related to the engagement, appraisal, disciplining, dismissal or other issues related to the person based on whom such a conflict exists.

While we are committed to employing fairly, we maintain that only the best people – in terms of attitude, competence, and capacity will be employed by Falcon Corporation. Family members and friends of employees may be hired as employees or consultants to Falcon, only if the appointment is based on their having the required qualifications, performance, defined skills and experience. In sensitive positions, we will not employ family and friends of current employees where there might be direct reporting relationship between the employee and his or her relative or friend. These principles will continue to apply where a relationship develops between our employees after the might have joined the Company.

## BUSINESS THE RIGHT WAY

**ANTI-TRUST AND FAIR COMPETITION** We are committed to outperforming our competitors legally and ethically within the framework of a free enterprise system. We recognize that competitive intelligence can be obtained fairly and ethically from publically available sources, such as media reports, trade journals, government filings, speeches of company executives and from customers in the context of meeting competitive offers. We consider it highly unethical to try to obtain competition intelligence through misinterpretation, trespassing, theft, invasion of privacy, obtaining or manipulating/coercing co-workers to give information about previous employers. It is our policy and focus to:

- Respect the confidential information and intellectual property rights of our competitors and other third parties
- Always comply with antitrust and competition laws
- Only use legitimate means of obtaining competitive information
- Never comment on competitors' services in an inaccurate and untruthful manner
- Never disseminate or encourage the dissemination of any malicious information or untruth about our competitors

When dealing with competitors, we expect our employees never to enter into any agreement, whether formal or informal, written or verbal, to set prices or other terms of sale, coordinate bids, allocate customers, or engage in any other activity that violates applicable antitrust or competition laws.

**ANTI-CORRUPTION & MONEY LAUNDERING** We are committed to conducting business only with reputable clients and third parties engaged in legitimate business activities with funds derived from legitimate sources. Falcon has obligations under a variety of anti-money laundering laws in many countries, including in Nigeria, the Money Laundering (Prohibition) Act of 2004. We take seriously the obligations to join with governments, international organizations, and other members of the oil and gas industry to help close off the channels of money laundering. All forms of bribery or kickbacks are antithetical to our values and are thus strictly prohibited. No employee of Falcon should ever offer, directly or indirectly, any form of gift, entertainment or anything of value to any government official or his or her representatives in order to obtain or retain business, influence business decisions, expedite a process or secure an unfair advantage.

## **POLITICAL NEUTRALITY**

Falcon Corporation Limited takes politically neutral stance with regards to political issues, political parties and representatives. We however recognize, understand, and respect the rights of our employees or Board members to their individual political affiliations, as well as their right to exercise their civic responsibilities of voting. We demand however, that at no time should the Company name and assets be used for any form of political activities, rallying or campaigning in support of any political cause or in promotion of any political agenda.

We do not encourage business relationships with individuals currently holding political positions as well as persons or companies clearly related to them (i.e. families, close associates etc). We are also careful in our dealings with individuals who have previously maintained public office in order to avoid entanglements with politically-exposed persons whose reputation, aspirations, motives, character and integrity may create reputational risk exposures to our Company.

We will not make finance in any way, manner or form to political parties or in support of candidates for political positions at any level of government. We will also not make any form of donations or contributions to political parties directly or indirectly, irrespective of how such donations/contributions are couched.

The effectiveness of corporate citizenry shall be defined strictly by our compliance to government regulations, industry regulations and standards, prompt compliance with payments of statutory taxes and levies, and commitment to development of our host communities in a sustainable and responsible manner.

## CORPORATE GOVERNANCE

We recognize that a sound system of corporate governance is imperative to ensure that the Board and Management of the Company carry out their duties within a framework of accountability and transparency. We therefore have in place a full Corporate Governance Code (CGC) which is in substantial conformity with local and international codes of best practices in corporate governance. Our CGC is designed to ensure that we always have a well-structured Board of Directors that runs effective and efficiently on the highest ethical standards. Our Board of Directors is the highest policy making body and is a fiduciary of, and is accountable to the Shareholders of the Company as a whole for the proper and effective administration of the Company.

Our Board is responsible for setting strategic direction and overseeing our business affairs, and is bound to exercise responsibility, leadership, enterprise, integrity and judgment in directing the Company so as to achieve continuing prosperity and act in our best interest, in a manner that conveys transparency, accountability and equity. Our Board comprises Executive and Non-Executive Directors (including independent Non-Executive Directors) and is also structured in such a way to ensure that no individual or group of individuals can dominate the decisions of the Board. To further ensure good governance and balance of power at the highest levels of the Company, the roles of the Chairman of the Board and that of the Managing Director who is the Chief Executive Officer are separate and independent.

**Financial Compliance & Disclosure:** A key focus of our Code of Corporate Governance is to ensure that all Company affairs are managed in accordance with proper accounting standards and best practice. To this end, there is a high degree of accountability on the part of our Directors to our Shareholders and other stakeholders, and of the Management to the Directors in terms of financial accountability and disclosure. Our Annual accounts are subjected to statutory Audit followed by a rigorous review by the Board of Directors. The Board also maintains zero tolerance for non-compliance to prompt remittance of statutory government levies, taxes and other deductions. The Board Audit Committee and Risk Management Compliance committee have joint oversight in these regards. In carrying out their Assignment these Board committees are empowered to speak directly with any employee of the company, and our employees are expected to cooperate fully and maintain full disclosure in such interactions.

## EMPLOYEE SERVICE ON EXTERNAL BOARDS

We consider service on a Board of Directors that is external to our Company to be a significant way for our employees to gain experience, learning and networking opportunities, particularly in areas of corporate governance, business ethics, strategy development and implementation, policy development and community service.

We recognize that employees with a diversity of experiences and active commitment to the greater business environment and charitable communities at large, are a benefit to the Company. We also recognize that external Board service offers a wealth of opportunity for employees to gain knowledge and experience that will challenge and broaden their thinking and perspectives, and enhance their impact in and on their respective careers and work at our Company.

However, we require our employees to maintain full disclosure when invited to take up Board appointments, and to obtain the full approval and authorization of the Managing Director prior to accepting any external Board position.

New employees are expected to fully disclose any current Board positions that they occupy to the Human Resources department of the Company prior to acceptance of an offer for employment. Where we determine that an employee's proposed Board service may adversely impact the employee's job performance, constitute an actual or perceived conflict of interest or breach the employee's duty of loyalty to the Company, or to maintain sole and absolute discretion; we may require that such an employee reject the offered Board position. We reserve the right to withdraw an offer for employment where we believe a proposed employee's service on a particular Board present a potential/existing conflict situation (such as where the service is on the Board of a competitor or vendor/sub-contractor) and the proposed employee is unwilling to withdraw their service from such a Board.

Where an approval is given to serve on, or to continue in service on a Board which an employee was on prior to his/her engagement, we reserve the right to and may require that the employee to cease or limit participation on such external Board, if we find at a later time that changes in circumstances warrant the withdrawal of the permission to serve earlier granted.

## COMPANY ASSETS & BUSINESS CONTINUITY

We insist on the protection of all company's assets and therefore have systems in place to ensure we maintain appropriate controls to safeguard against theft, loss, damage, misuse, fraud, embezzlement, destruction, unauthorized access or disposition of our assets. Our assets include but are not limited to our physical assets, company or third party information, personnel information, electronic system, files, books, records, data in any form, technology, company reputation and external communication.

Our employees and vendors are expected to exercise reasonable judgment and discretion in using company assets. To the extent by which we are permitted under law, we reserve the right to monitor, inspect and to take determinate action regarding how our assets are used by our employees – such action including also the inspection of all e-mail, data and files kept on company network terminals.

## BUSINESS CONTINUITY PROCESS

We consider our business continuity strategy as an integral aspect of the maintenance of our company assets at the corporate level. The focus of our business continuity policy is to ensure that we have adequate contingency plans in place to ensure that we have the capacity to recover our business and assets from a major disaster, and continue to maintain critical operations during the recovery phase.

Our Business Continuity approach categorizes the handling of disruptions into three steps with accompanying solutions:

1. Response (incident management, communications management)
2. Continuation of critical services (redeploying personnel, relocate to an alternate site, or new facility and reestablishing normal operations)
3. Recovery & restoration (insurance recovery, data recovery from cloud storage).

## **RECORD KEEPING & DOCUMENT CONTROL**

### **RECORD KEEPING**

We understand the importance of keeping and maintaining records. To this end, we have adopted international best practice in our record keeping and record control system. All records are reported and kept in strict compliance to established and approved procedures, specifically the Company's Procedure for Control of Records, established in line with the requirements of **ISO 9001:2008** Standard, which has been duly communicated and understood on a company-wide basis. The procedure clearly states the requirements for effective control and protection of records in the company, including clear guidelines on records retention and disposition.

Records generated and maintained in Falcon are stored in such a way that the integrity of our records are not compromised by way of unauthorized access, breach of confidentiality, requirements for disclosure (especially for third party records) and protection from damage from fire, theft, damage and loss. All records are properly indexed and filed for easy retrieval. In compliance to statutory regulations and laws, certain classes of our records are kept in accordance with extant regulations and laws; their disposition and retention being dictated by the requirements of the relevant statute or regulation.

### **DOCUMENT CONTROL**

We maintain an approved Document Control Procedure which is in conformance to the requirements of ISO 9001:2008 Standard and clearly stipulates requirements for document approval, issue and review.

We are committed to the protection of the integrity of all documents that are in our possession whether internal or from external parties.

Our established system for document control ensures that the confidentiality of documents, their circulation, disposition and that specific or peculiar legal or contractual document management requirements are fully met.

## CONFIDENTIALITY

We are committed to the protection of the confidentiality of any information or intellectual property that may come into our possession in the course of business relationship with our customers or any third party entity.

By our definition, 'Confidential Information' includes all communications and all information - whether written, visual or oral, and all other material supplied to or obtained by employees and from the Company, or as a result of his/her employment, and all information, reports, recommendations or advice given to the Company by employees in pursuance of their duties. Confidential information includes - without limitation: business plans or dealings, marketing and information, inventions, secret processes, designs, formulae, pricing structures, technical data, personal details of other employees or officers, financial plans, designs or research activities, any document marked "Confidential", any information that employees would not have been privileged to have if they had not occupied the position they did while in the employ of the Company, or any information which has been classified as "Confidential" or which they ought reasonably to expect that the Company would regard as "Confidential", any information which has been given to the Company in confidence by customers, suppliers or other persons, any other information deemed to be confidential as set out in any policies that may be issued by the Company from time to time, any information from any source supplied to or obtained by the Company concerning the trade secrets, customers, business associations or transactions, financial arrangements and technical or commercial affairs of the Company, or any such information relating to any affiliate, subsidiary, supplier, customer, client, partner or parties to a contract with the Company;

Our employees, vendors and partners shall not, having been given access to Information on which the goodwill and competitive ability of the Company depends, during the period of their engagement with the company or afterwards divulge or use such information without the express written consent of the Company. Rather, we expect that they should as a matter of personal and corporate integrity, take all reasonable precautions to prevent unauthorized persons from having access to the Information; and make arrangements for the proper and secure storage of the Information.



## COMPANY REPUTATION & EXTERNAL COMMUNICATIONS

We recognize that our company's reputation and brand among key stakeholders, business partners and the general public is vital to our success, profitability and long-run sustainability. In order to safeguard our reputation and continue to use this key business asset to leverage on growth opportunities, our Managing Director – or any other senior officer to which he may delegate that authority, is the key spokesperson for our company. Information releases to the Press and other media outlets must be duly authorized by the Managing Director.

We guard our reputation as a good corporate citizen jealously, and all our employees - where authorized, are expected to follow uniform guidelines in communicating with the media and other third parties in recognition of this fact.

We continually strive to present a consistent and positive image to the public. This is important for the reputation of the company and to ensure continued shareholder and stakeholder confidence in our business and corporate integrity.

Our corporate communication guidelines allow us to maintain control of what information is shared with external and other third parties and to ensure that current, accurate, consistent information is provided in a timely manner. It also ensures compliance with our disclosure requirements, applicable laws and regulations. Our employees are continuously educated and reminded of the fact that inaccurate, untimely or inappropriate information shared with outside parties could threaten or damage our relationships with our customers and vendors, and may cause untold long-term hardships for each and every one of us.

## NON COMPLIANCE WITH CODES

Each of our employees is responsible to ensure full compliance with all provisions of this Code. Where an employee faces any uncertainty, they are required to seek clarification and guidance from their Line Manager or from the HR department.

We expect that each of our employees is committed to doing the right and ethical thing, it is our belief that personal integrity, personal accountability and responsibility are key elements of an individual's character that cannot be delegated and is a demand on our every employee. Any failure on the part of our people to comply with this Code may result in disciplinary action, including the possibility of dismissal and, if warranted, legal proceedings or criminal sanctions.

Our employees are expected to report any practices or actions believed to be inappropriate under this Code or even illegal to their Line Managers or the appropriate members of the HR. Where the misconduct warrants, in the view of an employee, a violations report may be made directly to higher levels of management or indeed, directly to the Managing Director.

Where the situation warrants, a complaint may be made on a confidential basis or via the feedback email [complaints@falcon-corporation.com](mailto:complaints@falcon-corporation.com). All complaints shall be properly investigated.

We reiterate our commitment that any form of retaliation against any employee for a report made in good faith, will not be tolerated. Strict confidentiality will also be maintained in the course of every investigation to ensure the reputation of the implicated person(s) is/are not damaged in the course of an investigation that may in the end, prove not to have substance, or which they may be shown not to be complicit in any form.

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