

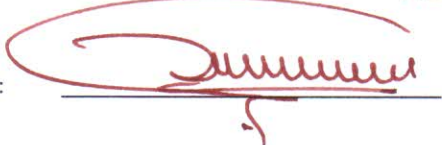
## POLICY ON COMMUNICATION

**APPROVAL:** This Policy was approved by the Board of Directors of R.T. Briscoe (Nigeria) PLC on December 14, 2017.

**NAME:** SIR SUNDAY NNAMDI NWOSU *kss*

**POSITION:** ACTING CHAIRMAN, BOARD OF DIRECTORS

**SIGNATURE:**



**DATE:** December 14, 2017

## POLICY TITLE

## COMMUNICATION POLICY

### Definition:

For the purpose of this policy, unless the context otherwise indicates, **“Communication”** refers to the activities undertaken by R.T. Briscoe (Nigeria) PLC to disseminate and share information with its internal and external stakeholders as well as with the wider public within the context of its business. The term implies an emphasis on promoting a sense of corporate identity and ownership, thus presenting a consistent and coherent corporate image.

### Objective:

The purpose of this policy is to outline the principles, guidelines, practices and processes that the company will embrace in fostering excellent internal and external communication.

R. T. Briscoe aims to improve internal communications by providing a framework which:

- Encourages individuals to connect with others at different levels.
- Invites qualitative two-way communication.
- Enables employees to be easily able to access key information and be able to talk to Managers, Heads of Department/Businesses, Management and Board of Directors.

Implementing the policy, the company will realize its vision, mission and core values by reaching out to its stakeholders with messages that help to create a sense of ownership of the policy.

### Philosophy:

R.T. Briscoe (Nigeria) PLC aims at achieving and maintaining a workplace which fosters productive and harmonious working relationships through mutual respect for each other thereby facilitating better business for every stakeholder.

## Scope:

This policy is applicable to all staff directly employed by R. T. Briscoe (Nigeria) PLC irrespective of location of assignment. This includes employees on permanent, short-term or fixed term contracts directly to Briscoe and individuals on secondment.

The policy covers all communication activities the company wishes to share with its stakeholders as well as external public. It is also intended to cover the use of facilities provided by the company to facilitate communication within its business context.

## Policy Statements

It is R.T. Briscoe's policy that:

1. Employees shall have equal rights in the workplace, within the ambit of the Labour/Employment Laws and in line with the provisions of the HCD Policies and Procedures Document.
2. The purpose of communication should be to help others and to make our business run as effectively as possible, thereby gaining the respect of our colleagues and customers.

Therefore, at R. T. Briscoe (Nigeria) PLC, tact and consideration will guide each employee in relationship with fellow colleagues and the public. It is mandatory that each employee shows maximum respect to every other person in the organization and other contacts in a business context.

3. Conservative criticism — that which will improve business by clarifying or instructing will be welcomed when delivered with respect and tact. However,

destructive criticism which is designed to harm business or another person will not be acceptable or tolerated.

4. The company shall provide appropriate and adequate facilities to improve business communication. The use of these facilities shall be governed by the terms of this policy,

## 1. **GENERAL PRINCIPLES**

- 1.1 To achieve the objective of ensuring that communication is well managed, deliberate and reliable and thus valued by all stakeholders, the company shall encourage openness in sharing information with colleagues, customers and the public and is committed to consulting with stakeholders on a regular basis.
- 1.2 Employees must strive to maintain a civil work atmosphere at all times and refrain from confrontational communications. Differences of opinions should be handled privately and discreetly without negatively impacting on the company's business or its customers.
- 1.3 We shall strive to foster an environment that thrives on courtesy, friendliness and a spirit of helpfulness to fellow colleagues, customers and other stakeholders.
- 1.4 At R. T. Briscoe, communication plays an essential role in the conduct of our business. How we communicate with people not only reflects on us as individuals but also as an organization. We value our employees' ability to communicate with colleagues, customers and other business contacts, and we shall invest substantially in information technology and communications systems which will facilitate efficiency at work.
- 1.5 Employees must use R. T. Briscoe's information technology and communication facilities sensibly, professionally, lawfully and consistently with their duties, in accordance with this policy and other company's rules and procedures.
- 1.6 Whilst the policy recognises the need for a range of styles of communication, it encourages face-to-face communications whenever possible, as face-to-face communications are generally more effective. All Departmental or Subsidiary level Communications Policies must operate within the ambits of this policy.

## 2 INTER-PERSONAL COMMUNICATION

- 2.1 The standard of R. T. Briscoe is to ensure a work environment that respects diversity, free from disparaging remarks about religion, ethnicity, sexual preferences, appearance and other non-work related matters. Each employee has the responsibility to foster an understanding of others' differences in order to create an environment where those differences contribute to a better organization.
- 2.2 Inappropriate remarks based on any of the following are not tolerated and such behaviour will result in immediate termination of employment: race, religion, ethnic origin, physical attributes, mental or physical disability, colour, ancestry, marital status, pregnancy, medical condition, citizenship and/or age.
- 2.3 Inappropriate remarks include those that treat a group of people in a uniform way, assign a behaviour in a disparaging way, imply inferiority of a group, and are supposedly funny at someone else's expense, and/or cause embarrassment or distress to others based on comments about a particular group of people.

## 3 BUSINESS COMMUNICATION

- 3.1 Electronic communication (email), should be the primary mode of written communication to internal stakeholders (employees), and IT access is made available to the widest possible number of staff. Shared IT resource will be made available for those who do not have access to a Personal Computer as a part of their everyday role. Where applicable, paper-based memos and letters may be used for official communication. The use of this method must be minimized in line with the company's strategy on cost management.
- 3.2 Communication in the form of business correspondences representing the interest of the company must be presented on the company's Letterhead, signed by the appropriate signatories. On no account should unauthorized employees sign correspondences on behalf of R. T. Briscoe. Violation of this, attracts sanction on documentation as prescribed in the HCD policy manual.
- 3.3 Communication is a two-way process which includes the opportunity for feedback and a commitment to listening on both sides. Feedback from employees will be encouraged at all meetings and where appropriate, via survey and focus group activities.

3.4 The Company shall encourage clear and effective communication about policies, performances and operational issues to maintain an environment in which individuals feel valued and are empowered. . Effective communication leads to a shared understanding of the company's mission and key objectives which allows decision making to be decentralized.

3.5 R. T. Briscoe shall encourage its employees to be more involved, informed and actively motivate individual knowledge of other areas of work in the company to stimulate internal career progression. Every employee will have a clear job description and undertake an annual Professional Development and Appraisal Review meeting.

#### 4. **USE OF ELECTRONIC MAIL**

##### 4.1 **Generally**

4.1.1 Always use the email template which contains the appropriate disclaimer notice from R. T. Briscoe (Nigeria) PLC and do not amend this notice in any way.

4.1.2 Do not amend any messages received and, except where specifically authorized by the other person, do not access any other person's inbox or other email folders nor send any email purporting to come from another person.

4.1.3 It is good practice to re-read and check an email before sending.

4.1.4 If you copy an email to others, it may breach the Data Protection Act if it reveals all the recipients' email addresses to each recipient (e.g. in the case of marketing and mailing lists).

It can also breach duties of confidentiality. Accordingly, it may be appropriate to use the 'Bcc' (blind carbon copy) field instead of the 'Cc' (carbon copy) field when addressing an email to more than one recipient. If in doubt, seek advice from your Line Manager/departmental head.

##### 4.2 **Business use**

4.2.1 Each business email should include the appropriate business contact details and/or references.

4.2.2 If the email message or attachment contains information which is time-critical, bear in mind that an email is not necessarily an instant

communication and consider whether it is the most appropriate means of communication.

- 4.2.3 If you have sent an important document, always follow up with a telephone call to confirm that the email has been received and read.
- 4.2.4 In every instance, file a hard copy of any email (including any attachments) sent to or received; especially from customers before cloud-saving or deleting the electronic copy. The same applies to all internal email transmissions concerning employee matters.
- 4.2.5 In light of the security risks inherent in some web-based email accounts, you must not email business documents to your personal web-based accounts. You may send documents to a customer's web-based account if you have the customer's express written permission to do so.

### 4.3 **Personal Use**

- 4.3.1 Although R. T. Briscoe's email facilities are provided for the purposes of our business, the company accepts that employees may occasionally want to use them for personal purposes. This is permitted on the condition that all the procedures and rules set out in this policy are complied with. Be aware, however, that if an employee chooses to make use of the company's facilities for personal correspondence, it should be expected that very little privacy may apply because the company may need to monitor communications in line with regulatory and legislative obligations.
- 4.3.2 Under no circumstances should R. T. Briscoe's facilities be used in connection with the operation or management of any business other than that of Briscoe or a customer of the company unless express permission has been obtained from the employee's Line Manager/departmental head.
- 4.3.3 All personal emails sent from R. T. Briscoe facilities must be marked PERSONAL in the subject heading, and all personal email sent or received must be filed in a separate folder marked "Personal" in your inbox should you wish to retain it after reading. Contact IT Support if you need guidance on how to set up and use a personal folder. All email contained in your inbox and your sent items box are deemed to be business communications for the purposes of monitoring.

Employees must ensure that their personal email use:

- (a) does not interfere with the performance of your duties;

- (b) does not take priority over your work responsibilities;
- (c) is minimal and limited to taking place substantially outside of normal working hours (i.e. during any breaks which you are entitled to or before or after your normal hours of work);
- (d) does not cause unwarranted expense or liability to be incurred by R.T. Briscoe
- (e) does not have a negative impact on R. T. Briscoe in any way; and
- (f) is lawful and complies with this policy.

4.3.4 By making personal use of the company's facilities for sending and receiving email, you signify your agreement to abide by the conditions imposed for their use, and signify your consent to R. T. Briscoe monitoring your personal email.

## 5. **USE OF INTERNET AND INTRANET**

- 5.1 We trust employees to exercise integrity to use the internet sensibly. When visiting a website, information identifying your PC may be logged. Therefore any activity you engage in via the internet may affect R. T. Briscoe. IT reserves the right to block an employee's access to a website that may pose as enterprise risk to the company.
- 5.2 We recognise the need for individuals to have to carry out some personal tasks during working hours, e.g. for internet banking or online shopping, this will be permitted subject to the same rules as are set out for personal email use in item 4.3.3 of this policy.
- 5.3 If the activities require additional software to be installed onto your PC, an official request must be made to IT Support, who may be able to arrange this for you. [Whenever you need to download software to enable you to access an online service you must obtain the express permission of the Head of IT, who will consider the request in line with R. T. Briscoe's policy
- 5.4 Employees are strongly discouraged from providing your R. T. Briscoe's official email address when using public websites for non-business purposes, such as online shopping. This must be kept to a minimum and done only where necessary – maybe for the purpose of filling out forms for work- knowledge acquisition or subscription to trade journals, as this may result in you and the company receiving substantial amounts of unwanted email.



- 5.5 Access to certain websites is blocked during normal working hours. If you have a particular business need to access such sites, please contact Head of IT for permission.

Employees MUST not:

- 5.5.1 introduce packet-sniffing or password-detecting software;
- 5.5.2 seek to gain access to restricted areas of R. T. Briscoe's network;
- 5.5.3 access or try to access data which you know or ought to know is confidential;
- 5.5.4 intentionally or recklessly introduce any form of spyware, computer virus or other potentially malicious software; nor
- 5.5.5 carry out any hacking activities
- 5.5.6 Use R. T. Briscoe's systems to participate in any internet chat room or post messages on any external website, including any message board or blog, unless expressly permitted in writing to do so by Management.

- 5.6 Breach of items above, would contravene the terms of this policy and thereby attract sanctions according the company's policy.

## 6. MISUSE OF R. T. BRISCOE'S FACILITIES AND SYSTEMS

- 6.1 Misuse of the company's facilities and systems, including its telephone, email and internet systems, in breach of this policy will be treated seriously and dealt with in accordance with R. T. Briscoe's disciplinary procedure. In particular, viewing, accessing, transmitting, posting, downloading or uploading any of the following materials in the following ways, or using any of company's facilities, will amount to gross misconduct capable of resulting in summary dismissal

This list is not exhaustive:

- 6.1.1 material which is sexist, racist, homophobic, xenophobic, pornographic, paedophilic or similarly discriminatory and/or offensive;
- 6.1.2 offensive, obscene, derogatory or criminal material or material which is liable to cause embarrassment to R. T. Briscoe and any of its staff or its customers or bring the reputation of the company and any of its staff or its customers into disrepute;
- 6.1.3 any defamatory material about any person or organisation or material which includes statements which are untrue or of a deceptive nature;

- 6.1.4 any material which, by intent or otherwise, harasses the recipient;
- 6.1.5 any other statement which is designed to cause annoyance, inconvenience or anxiety to anyone;
- 6.1.6 any material which violates the privacy of others or unfairly criticises or misrepresents others;
- 6.1.7 confidential information about R. T. Briscoe and any of its staff or customers
- 6.1.8 any other statement which is likely to create any liability (whether criminal or civil, and whether for the employee or the company
- 6.1.9 material in breach of copyright and/or other intellectual property rights;
- 6.1.10 online gambling; or
- 6.1.11 unsolicited commercial or advertising material, chain letters or other junk mail of any kind.

If R. T. Briscoe has evidence of the examples of misuse set out above it reserves the right to undertake a more detailed investigation in accordance with its disciplinary procedures.

## 7. **SYSTEM SECURITY**

- 7.1 Security of our IT systems is of paramount importance. We owe a duty to all of our stakeholders to ensure that all of our business transactions are kept confidential. If at any time we need to rely in court on any information which has been stored or processed using our IT systems it is essential that we are able to demonstrate the integrity of those systems. Every time you use the system you take responsibility for the security implications of what you are doing.
- 7.2 R. T. Briscoe's system or equipment must not be used in any way which may cause damage, or overloading or which may affect its performance or that of the internal or external network.
- 7.3 Employees must keep all confidential information secure, use it only for the purposes intended and do not disclose it to any unauthorized third party.
- 7.4 Employees must ensure their system passwords safe. They are not to be disclosed to anyone. Those who have a legitimate reason to access other users' inboxes must be given permission from that other user. IT Support will provide

guidance on how to do this. If you have disclosed your password to anyone else (e.g. in response to a request from the IT staff) ensure that you change your password once the IT staff no longer needs it. Contact IT Support for guidance on how to do this.

- 7.5 If a document is highly commercially confidential or price sensitive, you should mark it as "private and confidential" and password-protect the document itself. Documents which are NOT marked "private and confidential" can be accessed by all users of the network.
- 7.6 Copies of confidential information should be printed out only as necessary, retrieved from the printer immediately, and stored or destroyed in an appropriate manner.
- 7.7 Employee should not download or install software from external sources without having first received the necessary authorisation from [the IT department/line manager/departmental head/partner].
- 7.8 No external device or equipment, including flash drives and other data storage devices, should be run on or connected to R. T. Briscoe's systems without the prior notification to and approval of the Head of IT department or Line Manager.
- 7.9 You should always exercise caution when opening emails from unknown external sources or where, for any reason, an email appears suspicious; the Head of IT department or Line Manager should be informed immediately in such circumstances.

## 8. **WORKING REMOTELY**

- 8.1 This part of the policy and the procedures in it apply to your use of our systems, to your use of our laptops and also to your use of your own computer equipment or other computer equipment (e.g. customer's or vendor's equipment) whenever you are working on R. T. Briscoe's business away from the company's premises (working remotely).

When you are working remotely you must:

- 8.1.1 password protect any work which relates to R. T. Briscoe's business so that no other person can access your work;
- 8.1.2 position yourself so that your work cannot be seen by any other person;

- 8.1.3 take reasonable precautions to safeguard the security of our equipment, and keep your passwords secret;
  - 8.1.4 inform the police and our IT department (as appropriate) as soon as possible if either the company's laptop in your possession or any computer equipment on which you do the company's work, even if this is personal IT equipment, has been lost or stolen; and
  - 8.1.5 ensure that any work which you do remotely is saved on R. T. Briscoe's system or is transferred to our system as soon as reasonably practicable.
- 8.2 Pocket computers, mobile phones and similar hand-held devices are easily lost or stolen so you must password-protect access to any such devices used by you on which is stored any personal data of which the company is a data controller or any information relating our business, our customers or their businesses.

## 9. PERSONAL BLOGS AND WEBSITES

- 9.1 This part of the policy and procedures in it apply to content that you publish on the internet (e.g. your contributions to blogs, message boards and social networking or content-sharing sites) even if created, updated, modified or contributed to outside of working hours or when using personal IT systems.
- 9.2 R. T. Briscoe recognises that in your own private time you may wish to publish content on the internet. For the avoidance of doubt, such activities are expressly prohibited during work time or using the company's systems.
- 9.3 If you post any content to the internet, written, vocal or visual, which identifies, or could identify, you as a member of R. T. Briscoe workforce and/or you discuss your work or anything related to the company or its business, customers or staff, Briscoe expects you, at all times, to conduct yourself appropriately and in a manner which is consistent with your contract of employment and with the company's policies and procedures. It should be noted that simply revealing your name or a visual image of yourself could be sufficient to identify you as an individual who works for R. T. Briscoe.
- 9.4 If you already have a personal blog or website which indicates in any way that you work R. T. Briscoe, you should report this to your Line Manager/departmental head/partner].
- 9.5 If you intend to create a personal blog or website that will say that you work for R. T. Briscoe or in any way could identify you as someone who works for Briscoe, then you should report this to your Line Manager or Business Head.
- 9.6 If a blog posting clearly identifies that you work for R. T. Briscoe and you express any idea or opinion then you should add a disclaimer such as "these are my own personal views and not those of R. T. Briscoe".
- 9.7 The following matters will be treated as gross misconduct capable of resulting in summary dismissal

(This list is not exhaustive):

- 9.7.1 Revealing confidential information about R. T. Briscoe in a personal online posting. This might include revealing information relating to the company's customers, business plans, policies, staff, financial information or internal discussions. Consult your Manager or Business Head, if you are unclear about what might be confidential.
- 9.7.2 Criticising or embarrassing R. T. Briscoe, its customer or staff in a public forum (including any website). Employees should respect the corporate

reputation of R.T. Briscoe and the privacy and feelings of others at all times. If you have a genuine complaint to make about a colleague or workplace matter the correct procedure is to raise a grievance using the company's grievance procedure.

- 9.7.3 Accessing or updating a personal blog or website from R. T. Briscoe's computers or during work time.
- 9.8 If you think that something on a blog or a website could give rise to a conflict of interest and in particular concerns issues of impartiality or confidentiality required by your role then this must be discussed with your Line manager/ Business Head.
- 9.9 Online publications which do not identify the author as a member of R. T. Briscoe's workforce and do not mention R. T. Briscoe and are purely concerned with personal matters will normally fall outside the scope of the company's communications policy.

## 10. **MONITORING OF COMMUNICATIONS BY R. T. BRISCOE (NIGERIA) PLC**

- 10.1 R. T. Briscoe is ultimately responsible for all business communications but subject to that will, so far as possible and appropriate, respect your privacy and autonomy while working. The company may monitor your business communications for reasons which include:
  - 10.1.1 providing evidence of business transactions;
  - 10.1.2 ensuring that the company's business procedures, policies and contracts with staff are adhered to;
  - 10.1.3 complying with any legal obligations;
  - 10.1.4 monitoring standards of service, staff performance, and for staff training;
  - 10.1.5 preventing or detecting unauthorized use of the company's communications systems or criminal activities; and
  - 10.1.6 maintaining the effective operation of R. T. Briscoe communications systems.

- 10.2 R. T. Briscoe will monitor telephone, email and internet traffic data (i.e. sender, receiver, subject; non-business attachments to email, numbers called and duration of calls; domain names of websites visited, duration of visits, and files downloaded from the internet) at a network level (but covering both personal and business communications) for the purposes specified at item 9.3. For the purposes of your maintenance of your own personal privacy, you need to be aware that such monitoring might reveal sensitive personal data about you. For example, if you regularly visit websites which detail the activities of a particular political party or religious group, then those visits might indicate your political opinions or religious beliefs. By carrying out such activities using the company's facilities you consent to our processing any sensitive personal data about you which may be revealed by such monitoring.
- 10.3 Sometimes it is necessary for R.T. Briscoe to access its employees' business communications during their absence, such as when they are away due to illness or while on vacation. Unless your mailbox settings are such that the individuals who need to do this already have permission to view your inbox, access will be granted only with the permission of one of the persons authorized to grant such access in accordance with IT policy.
- 10.4 Emails which are not stored in employee's "Personal" folder in their mailboxes and which are not marked PERSONAL in the subject heading will be treated, for the purpose of availability for monitoring, as business communications since the company will have no way of knowing that they were intended to be personal. Therefore employees must set up a rule to automate the routing of personal emails to their personal folders – ask IT Support for guidance on how to do this.
- 10.5 Furthermore, there is a risk that any person authorized to access your mailbox may have their own preview pane option as a default setting, which would reveal the content of any of your personal email not filed in your "Personal" folder, whether or not such email are marked PERSONAL. It is up to you to prevent the inadvertent disclosure of the content of personal email by filing your personal email in accordance with this policy. In particular, you are responsible to anybody outside Briscoe who sends to you, or receives from you, a personal email, for the consequences of any breach of their privacy which may be caused by your failure to file your personal email.
- 10.6 In certain very limited circumstances the company may, subject to compliance with any legal requirements, access email marked PERSONAL. Examples are when we have reasonable suspicion that they may reveal evidence of unlawful activity, including instances where there may be a breach of a contract with R.T. Briscoe.

## 11. DATA PROTECTION

- 11.1 As a member of R. T. Briscoe, who uses our communications facilities, you will inevitably be involved in processing personal data for R. T. Briscoe as part of your job.
- 11.2 Whenever and wherever you are processing personal data for R.T. Briscoe, you must keep it secret, confidential and secure, and you must take particular care not to disclose them to any other person (whether inside or outside the company unless authorized to do so. Do not use any such personal data except as authorized by Briscoe for the purposes of your job. If in doubt get help from the Head of IT. .
- 11.3 The Data Protection Act gives every individual the right to see all the information which any data controller holds about them. Bear this in mind when recording personal opinions about someone, whether in an email or otherwise. It is another reason why personal remarks and opinions must be made or given responsibly, and they must be relevant and appropriate as well as accurate and justifiable.
- 11.4 While a data controller of all personal data processed for the purposes of our business, you will be a data controller of all personal data processed in any personal email which you send or receive. Use for social, recreational or domestic purposes attracts a wide exemption under the Data Protection Act, but if, in breach of this policy, you are using our communications facilities for the purpose of a business which is not Briscoe's business, and then you will take on extensive personal liability.
- 11.5 To help you understand and comply with R. T. Briscoe obligations as a data controller under the Data Protection Act you may be offered, and you may also request, training. Whenever you are unsure of what is required or you otherwise need guidance in data protection, you should consult our Data Protection Officer [or any member of the data protection team].

## 12. COMPLIANCE WITH THIS POLICY

- 12.1 Failure to comply with this policy may result in disciplinary action being taken against you under the company's disciplinary procedures, which may include summary dismissal, and/or the withdrawal of permission to use the company's equipment for personal purposes. If there is anything in this policy that you do not understand, please discuss it with your Line Manager/ Business Head.



12.2 Please note that the procedures and policies outlined in this policy, and in any related policy, may be reviewed or changed at any time. Employees will be alerted to important changes and updates will be published through our Outlook.