

MODERN SLAVERY & HUMAN TRAFFICKING POLICY

Jodoa Properties Nigeria Ltd., (hereinafter referred to as “Jodoa”) is committed to preventing unethical labour practices occurring in any part of our business operations or in any part of our supply chain. This Policy applies to all Jodoa employees as well as, contractors, suppliers and joint venture partners, who must ensure that their businesses and supply chains work to our highest ethical standards and comply with this Policy.

Jodoa will take steps to ensure that labor abuses including, modern slavery and human trafficking are not taking place in our operations or in that of our supply chain.

We will ensure that:

- Any reports of labour abuses will be quickly and sensitively investigated, with the protection of victims being paramount. Investigations will be conducted in full cooperation with the Nigeria police and the Ministry of Interior (Department of Human Resources). All recruitment is carried out in a fair and transparent manner and will comply with relevant legislation and standards, notably the Nigerian Labor Act.
- We engage with the supply chain to communicate our expectations that employees as well as, contractors, suppliers and joint venture partners, in relation to the Federal Republic of Nigeria Labor Law, which will be clearly communicated and included within contractual terms.
- Suppliers will be expected to comply with the Trafficking in Person (Prohibition) Enforcement and Administration Act 2015, governing the entry and residence of foreign workers.
- Jodoa will take a partnership approach with regards to working with its suppliers to ensure that they are abiding by the Immigration Act (2015) combatting human trafficking and the threat of modern slavery and human trafficking across its sectors and all the industries in which it operates.
- Jodoa will train appropriate staff to understand the risks and issues surrounding modern slavery and human trafficking, including how to identify it and appropriate measures to prevent and report it.

All employees have an individual responsibility to ensure compliance with this Policy, including being alert to the risk of such unlawful practices and reporting anything suspicious. Any concerns may be reported to the Managing Director.

Modern Slavery and human trafficking are serious criminal offences and a violation of fundamental human rights. Any violation or breach of this Policy or any of the above-mentioned Nigerian Laws and regulations by an employee will result in disciplinary action, up to and including dismissal in appropriate circumstances. In addition, Jodoa will notify the relevant authorities of an individual or a supplier's contravention of the relevant regulations.

This Policy will be reviewed to ensure that it reflects current legislation and regulations is effective, consistently implemented and continually improved.