



Operational and Ethical Standards Anti-Bribery and Corruption Policy

Introduction

This policy outlines the operational framework for adhering to key legal and ethical standards, including anti-bribery and corruption measures, confidentiality and data protection protocols, and crisis management strategies. It ensures compliance with Nigerian regulations while providing effective and ethical public relations services tailored to the energy sector.

1. Purpose and Scope

- To uphold ethical standards by complying with anti-bribery and corruption laws in all operations.
 - To ensure the confidentiality and protection of client data in line with the Nigeria Data Protection Regulation (NDPR).
 - To develop robust crisis communication protocols to manage emergencies effectively and protect client reputation.
-

2. Anti-Bribery and Corruption Policy

2.1 Compliance with ICPC and EFCC Regulations

- **Zero-Tolerance Approach:** Adopt a strict zero-tolerance policy toward bribery, corruption, and unethical practices.
- **Employee Training:** Regularly train employees on the provisions of the Independent Corrupt Practices and Other Related Offences Commission (ICPC) Act and the Economic and Financial Crimes Commission (EFCC) Act.
- **Reporting Mechanism:** Establish a confidential whistleblowing channel for reporting suspected bribery or corruption cases without fear of retaliation.

2.2 Vendor and Partner Screening

- Conduct due diligence on vendors, subcontractors, and partners to ensure they comply with anti-corruption laws.
- Include anti-bribery clauses in contracts with clients, partners, and third parties.

2.3 Regular Audits and Monitoring





- Perform periodic audits to monitor compliance with anti-bribery policies and identify potential risks.
 - Submit compliance reports to relevant regulatory bodies as required.
-

3. Confidentiality and Data Protection Policy

3.1 Compliance with NDPR

- **Data Privacy Standards:** Ensure all client data is processed and stored in compliance with the Nigeria Data Protection Regulation (NDPR).
- **Data Minimization:** Collect only the data necessary for project execution and retain it for the minimum required duration.
- **Consent Management:** Obtain explicit consent from clients for data collection, processing, and sharing.

3.2 Safeguarding Sensitive Data

- Use secure storage systems for digital and physical records to prevent unauthorized access.
- Employ encryption and password protection for all electronic communications and documents.
- Regularly update cybersecurity systems to mitigate risks of data breaches.

3.3 Employee Awareness and Training

- Conduct regular training sessions on data protection policies and responsibilities.
- Implement an employee confidentiality agreement to ensure adherence to data protection standards.

3.4 Data Breach Response Plan

- Establish a protocol to identify, report, and mitigate data breaches swiftly.
 - Notify affected clients and relevant authorities within the timeline mandated by the NDPR in the event of a breach.
-

4. Crisis Management Protocols

4.1 Crisis Communication Strategies





- **Crisis Response Team:** Establish a dedicated team to handle crisis communication and response during emergencies.
- **Rapid Response Plan:** Develop a detailed plan for immediate action during crises such as oil spills, power outages, or community disputes.
- **Stakeholder Engagement:** Communicate transparently and proactively with affected stakeholders, including clients, regulatory authorities, and the public.

4.2 Scenario Planning and Drills

- Conduct regular simulations of potential crises to test the effectiveness of the response plan.
- Review and update crisis protocols based on lessons learned from drills or actual incidents.

4.3 Media Management

- Designate trained spokespersons to represent the company during a crisis.
- Monitor traditional and social media channels to manage misinformation and maintain control of the narrative.

4.4 Collaboration with Clients

- Work closely with clients to align crisis management strategies with their policies and industry regulations.
- Provide on-ground support to clients during emergencies to ensure consistent messaging and swift resolution.

5. Monitoring and Evaluation

5.1 Performance Indicators

- Number of anti-bribery training sessions conducted annually.
- Percentage of client data breaches mitigated or prevented.
- Effectiveness of crisis response during simulations or actual incidents, measured through stakeholder feedback.

5.2 Regular Reviews

- Bi-annual reviews of the policy to ensure alignment with evolving laws and industry standards.
- Update protocols based on new regulations, technological advancements, or lessons learned.

| RC:908079

| 24 Trans Amadi road, PHC.Nigeria | 7b Reeve road, Ikoyi, Lagos, Nigeria.

+234 806 12345 12 | +234 909 3030 708

www.wetclaymedia.com

Wetclaymedia@gmail.com





6. Consequences of Non-Compliance

- Breaches of anti-bribery or data protection policies will result in internal investigations and disciplinary action, including termination of employment or contracts.
- Severe non-compliance may lead to legal action in line with ICPC, EFCC, or NDPR regulations.

7. Conclusion

This policy demonstrates our commitment to operating ethically, protecting client interests, and effectively managing crises. By adhering to these standards, we aim to build trust and deliver exceptional public relations services in Nigeria's energy sector.

| RC:908079

| 24 Trans Amadi road, PHC.Nigeria | 7b Reeve road, Ikoyi, Lagos, Nigeria.

+234 806 12345 12 | +234 909 3030 708

www.wetclaymedia.com

Wetclaymedia@gmail.com

