



PORTS & CARGO HANDLING SERVICES LIMITED

STANDARD OPERATING PROCEDURE (SOP)

WORKING COPY

For Circulation and Amendment Standard Operating Procedures for the Shipping Community

ARRANGEMENTS FOR VESSEL BERTHING

- i.** On a daily basis PCHS will communicate with the shipping lines/Vessel Operators and the NPA to agree on a berthing schedule, the agreed schedule will be forwarded to all interested stakeholders.
- ii.** Berthing will be on a first come first served basis with the following possible exceptions: If vessels are not geared and PCHS has no mobile cranes available to start vessel operations, other limiting factors could be LOA, Vessel draft or Terminal congestion.
- iii.** A Ship Entry Notice (SEN) will be required from the NPA this is an approval form from the Nigerian Port Authority notifying Terminal operators on approval to berth vessel at the terminal. It contains some important detailed information about the vessel, most especially the tonnage and length over all (L.O.A).
- iv.** A Cargo Manifest will be required which contains cargo description and names of owners.
- v.** The manifest is keyed into the company computer system to guide the Billing department on what to bill consignees.
- vi.** A cargo arrival list (CAL) which contains cargo details, names and residential address of owners for reconciliation.
- vii.** On receipt of a SEN and MANIFEST, a file is opened on a vessel.

VESSEL OPERATIONS

Vessel Discharge:

To handle a vessel at PCHS the following will be required:

- i.** Vessel Manifest
- ii.** A copy of the vessels discharge List
- iii.** Vessel Stowage Plan
- iv.** Port Rotation numbers, vessel codes, service codes, LOA and call sign of vessel.
- v.** The sailing schedule is to be received at least 14 days ahead of the eta and updated on a daily basis.
- vi.** Information on the type of vessel, geared or gearless to be received at least 7 days in advance of a vessels call.
- vii.** The amount of containers to be discharged
- viii.** All information on DG and OOG

- ix. The Shipping Line will be advised immediately of any short or over-landed containers
- x. After the vessel has completed discharge PCHS will provide confirmation of all containers which have been discharged within 24 hours.
- xi. As a general rule containers that are for an off dock will be block stacked in the Terminal for transfer

VESSEL LOADING

- i. Before being able to plan the loading of a vessel PCHS will need a stowage loading list at least 36 hours in advance of the ETA.
- ii. Exact stowage locations for containers such as out of gauge containers, reefers and dangerous goods.
- iii. PCHS requires a full load list with container numbers excluding the empty containers to be loaded this load list will be accepted as the Shipping Line release.
- iv. All container weights that are mentioned are gross so the cargo and weight is combined.
- v. PCHS will need a list of container numbers and the planned position for DG, OOG and reefer containers.
- vi. Any re-stow instruction detailing from position to position.
- vii. On completion of all vessel loading operations a report will be provided detailing the number of containers discharged, numbers of Laden & Empty containers which have been loaded to the vessel to include DG, OOG and any damaged containers

GATE OPERATIONS PROCEDURES

- i. PCHS will provide a daily report of all gated IN/OUT containers to each Shipping Line.
- ii. This report will be forwarded in soft copy from PCHS Customer Relations Department
- iii. Only trucks with four working twist-locks will be allowed into the Terminal
- iv. Trucks have to have working lights front & rear
- v. Trucks must have working brakes
- vi. Trucks & trailers must be in a reasonable working condition
- vii. Trucks must be able to safely carry the weight of the containers
- viii. Trucks must not leak Oil
- ix. If trucks break down in the Terminal they will be moved out at the owners expense

- x. Only the driver of the truck will be allowed to enter the Terminal and he must remain with the vehicle
- xi. Trucks must have a valid delivery/collection order
- xii. Only the driver is allowed to enter the Terminal and he should be in possession of a high visibility vest in case he needs to exit his vehicle.
- xiii. Billing Section Opening hours
 - Monday to Saturday – 0800 to 1700 hours
 - Gate Opening Hours – 24hrs seven days a week, except for public holidays

PROCEDURES FOR CONTAINER DOCUMENTATION & DISPATCH

- i. Containers are discharged from vessels at quay side and transferred to the stacking areas
- ii. We currently have areas 1,2,3 and 4 demarcated for Containers.
- iii. The tracking of Containers is carried out by the planning department who monitors the locations and positioning of containers using Psion machine, which captures data.
- iv. The agents representing the consignee who after completing releasing documentation at the shipping companies and at Customs house opposite the terminal, comes with the following documents:
 - v. Copy of bill of lading. Consignee's name on bill of Lading must correspond to name on the Container Arrival List (CAL)
 - vi. Copy of shipping company debit note and receipt of payment (original for sighting)
 - vii. Copy of duty-pay-in slip and receipt
 - viii. Copy of P.A.A.R
 - ix. Copy of Form M.
 - x. Copy of Payments schedule
 - xi. Copy of Release order and Customs assessment notice.
 - xii. Copy of Exchange control (Customs release)
 - xiii. I.D Card/ Port pass of the Customs agent
 - xiv. Agency stamp
 - xv. Customs Authority Card/P&CHS Authority
 - xvi. Copy of Bonded transire (original for sighting) for bonded consignment
 - xvii. Original of P&CHS debit note and receipt of payment
 - xviii. P&CHS Customs Examination Form
 - xix. Original Delivery Order (D/O) from shipping company
 - xx. With all these documents presented and assessed to be satisfactory, the terminal order will be prepared. The original delivery order (D/O) is collected and the receipt is crossed to prevent false presentation, before the TDO is issued
 - xxi. The TDO is then printed and a loading order is issued.

EXAMINATION PROCEDURES

All containers must either be examined or scanned.

- i. For containers needing examination, the following needs to be done:
- ii. The agent presents all the above-mentioned documents to PCHS documentation staff, who are located at the Customs house who will then fill in an examination form.
- iii. PCHS then await the readiness of the clearing agent before the examination is scheduled with the Customs personnel.
- iv. On the day arranged for the examination, the container is positioned by PCHS at the Examination Bay.
- v. PCHS provide a tally clerk and sufficient labour to off-load and reload the container.
- vi. After a satisfactory examination the agent brings the particulars of the trucks he intends to use to carry the container.
- vii. A loading order is then issued which must be presented to the out-gate for exit procedures.

SCANNING PROCEDURES

- i. The agent brings in the shipping company D/O, after completion of all other procedures.
- ii. The T.D.O is issued, alongside a loading order, which enables the agent to take the container to the scanning area for scanning.
- iii. After a satisfactory report is obtained from the Nigeria Customs Service, the agent is free to commence exit procedures at the exit gate.

REEFER UNITS (Refrigerated Containers)

- i. The planning department notifies the operations department and electrical staff of incoming reefers from vessels or road
- ii. The operations department checks the reefer units on board and confirms if they are in a good condition and also collects reefer units reading from chief officer/mate
- iii. Operations ensures reefer units are stacked at the correct location
- iv. Operations undertakes daily monitoring of reefer units, recording readings and alerting the Terminal Manager of any problems.
- v. Operations positions reefer units for examination
- vi. The delivery of reefer units to owners through agents shall only be done on the presentation of the following documents:
 - Terminal Delivery Order
 - Gate pass
 - Delivery order
- vii. Operations staffs are yet to provide reading reports for the Terminal Manager and Planning Department

PROCEDURES FOR GENERAL CARGO DOCUMENTATION & DISPATCH

Receiving into Shed & Stacking area:

- i. Upon discharge of general cargo from the vessels tally clerks tally same either to the waiting trucks as direct delivery or to the shed and stacking area.
- ii. For cargo going to the shed stacking areas, receiving tally clerks would receive and tally the consignment into shed & stacking area.
- iii. At the end of each day's work, reconciliation must be done by the officers in the general cargo section with the lines manifest to ascertain correctness of the quantity of the cargo delivered by the vessel.
- iv. If any difference is observed it must be brought to the attention of both parties - the vessel Agents and P&CHS as quickly as possible to trace anomalies.
- v. For cargo taken on direct delivery, receiving clerk from general cargo section would tally and record the relevant particulars of items so directly taken, using PCHS tally sheets.
- vi. During direct delivery operations, tally clerks will liaise closely with the Documentation Manager regularly for proper coordination and a good flow of information.
- vii. Delivery tally sheets will be prepared to capture all directly delivered cargo on each particular vessel. This will be taken to the out gate to confirm items so directly delivered.
- viii. For deliveries done from the stacking Areas, the following procedures will be followed:
 - The agent comes with the bill of lading to confirm ownership of the cargo as well as other relevant documents obtained from the shipping company and the Customs.
 - Normal Billing processes are followed leading to the agent obtaining PCHS invoice and paying for same.
 - Releasing is done at the billing (Customs house) and the agent can then come to the terminal to continue the delivery process.
- ix. At the terminal, the agent presents all document (as listed in above section on containers).
- x. Tally clerks checks all documents and prepares the delivery tally sheets which will be sent to the out gate pending when the agent will be ready to take delivery of cargo.

- xi. Documentation units prepare T.D.O, after sighting D/O issued by shipping company.
- xii. The Agent presents particulars of his truck and the documentation unit raises the loading order.
- xiii. After the cargo has been loaded, the gate pass is issued for exit procedures to commence

GATE OPERATIONS

- i. The gate control department liaises between documentation & billing department and yard operations in line with their functions, they are to scrutinize, detect and correct any document found not to be in order and alert the C.S.O and MD PCHS
- ii. We must note that processing of documents for delivery is centralized in the Documentation Unit of the PCHS billing department
- iii. The gate control department is made up the following sections:
 - Entry gate
 - Scanning gate
 - Final Exit Gate

ENTRY GATE

To ensure effective and proper control over entry point to PCHS terminal in respect to trucks and equipment, the following controls are in place:

- Gating into terminal the empty containers
- Gating into the terminal trucks for loading cargo for delivery
- Issuing gate pass

GATE PASS

When issuing gate pass, the agent is expected to present the following;

- Terminal Delivery Order (TDO)
- Bill of lading (BL)
- Debit Note (DN)
- Payment Receipt (PR)

EMPTY & IMPORT CONTAINERS

- Before Trucks and equipment are allowed to gain entrance into the terminal, the driver must present an Authority to load (A.T.L)
- All relevant payments must have been made and all other processes for clearing of the consignment must be done before an attempt is made to enter the terminal
- Entry gate clerk vets all documents with respect to which truck or equipment is entering the Terminal. All necessary clearance must be obtained.

EXPORT CONSIGNMENTS

- For Export consignments, all payments needed to allow the consignment to be exported must have been made before the entry gate clerk will allow the consignment into the terminal.
- All documents must be vetted and confirmed correct before entry is permitted.
- Copies of export document must be deposited at the entry gate.

DELIVERY

- Vetting of all relevant documents and payments before trucks is allowed into Terminal.
- Authority to load (A.T.L) must be presented. All agencies must have cleared their consignment for delivery.
- The same procedures apply to general cargo, bulk cargo and groupage etc. for trucks coming to PCHS facility to pick cargo on a direct delivery basis need to be recorded and documented to help monitor possible incidence at the quay side.

CONDITION REPORTS

- The Equipment Interchange Reports (EIR) for all empty containers returned to the terminal are issued at the entry gate.
- The number of empty containers allowed into PCHS depends on space availability in the yard.
- To avoid congestion of trucks in the yard the entry gate control the number of trucks allowed into the terminal.
- The gate entry & exit operates a 24 hour shift system.

GATE

Before cargoes are delivered into the Terminal for scanning, the following are required from the agent:

- Terminal Delivery Order
- Bill of Lading
- Gate Pass
- Debit Note
- Payment Receipt

FINAL EXIT GATE

The final exit comprises three gates:

- i. Exit for containers & transfers
- ii. Exit for general cargoes, groupage, trucks, caterpillars and empty trucks
- iii. The third gate is used for Ro-Ro cargo to include buses, cars trucks and pay loaders
- iv. Before cargo is exited from the terminal, it must be dispatched from the system at the final gate

- v. For it to be dispatched the following documents must be produced by the agent:
- Bill of lading
 - Debit note
 - Payment Receipt
 - Gate Pass

At the final gate cargo details are recorded electronically and manually as a backup.

Customs requirements before gate release:

- C.I.U (Customs Intelligence Unit)
- Valuation
- Enforcement
- All must be present at the final exit gate to release cargoes.
- Copies of all delivered cargoes are kept at the final exit gate for future references
- For cargoes to be dispatched effectively at the exit gate the traffic control units of PCHS H.S.E will always be seen controlling the traffic

CONTAINER TRANSFER

- It is normal to expect all APAPA containers discharged from the vessel to be transferred to SIFAX OFFDOCK BONDED TERMINAL where they will be delivered to customers/owners through their agents
- For this to happen, documents for processing at the three Nigeria Customs Service Command must be received 72 hours prior to vessel arrival

The three commands in order of processing are:

- Apapa (Reason, Sifax Bonded Terminal is under Apapa Command). Duration of processing is usually 2 days.
- Tin can (Vessel arrives here) Duration of processing is usually 2 days.
- Federal Operating Unit (provides escort for containers) Duration of processing is usually 1 day.

PROCEDURE

NCS Apapa Command

- Submission at Customs Area Controller office (C.A.C)
- C.A.C minutes to Asycuda Project manager/ Customs Processing Centre (APM/DC-CPC)
- APM/CDC-CPC minute to o/c Bond
- O/C Bond will apply bond number and return document to C.A.C
- C.A.C will attach a forwarding letters to Tin can Island Command.

NCS TINCAN ISLAND COMMAND:

- i. Letter and Transire form completed upon receipt of documents from planning.
- ii. Submission of Application to Customs Area Comptroller's office.
- iii. Applications moves from C.A.C to APM/DC-CPC for endorsement to bond office.
- iv. Bond office receives application and applies bond number.
- v. Application is sent to APM/DC-CPC who in turn sends it to the Technical supervisors (TS) for manifest checking.
- vi. Application is returned to APM/DC-CPC for recommendation to C.A.C
- vii. Application is granted.
- viii. Document is returned to Bond office for final directives to Enforcement Unit.
- ix. Enforcement endorses application to O/C Terminal "C" and O/C Ro/Ro Gate for provision Exit Disk.
- x. Several copies are made for distribution to O/C Gate for provision of Exit Disk.
- xi. Dispatch of copies to O/C Gate by Enforcement unit (Escort Officer).
- xii. Endorsement to Disk officer for placement of disk.
- xiii. Disk is placed and signed by operations officer and returned to O/C gate for approval.
- xiv. Approval granted and taken to gate officers for registration before eventual transfers of containers.
- xv. Finally copies of approved document are distributed to N.P.A gate and other agencies.
- xvi. Please note that registration and dispatch processes by relevant officers, is often the reason for delay experienced in obtaining quick approvals. Especially, as Transires/Bonds are usually lumped with numerous other documents requiring attention.

NCS FEDERAL OPERATING UNIT (IKEJA)

- Once the documents have been processed and giving the go ahead by CAC at the Tin Can Island Command a designated staff will go to the above unit and process the documents again and obtain the necessary customs personnel escort for the containers cannot be moved out of Tincan Island Port.
- The NPA documentation and the CARL are also processed before the completion of the transfer of containers from the vessel. This is done by the designated staff in conjunction with the departments resident custom escort officer.

MODE OF OPERATIONS

- The HOD and the Assistant Manager ensures transfer documents are received on time from the planning department and if not an alarm is raised
- Apapa Command- designated staff
- Tincan Command- designated staff
- FOU-designated staff

For logistical reasons the transfer department has an office at shed 5 where the clerks along with the haulage and yard operations ensures that the containers are loaded, documentation completed and containers transferred without delay.

P&CHS BILLING AND DOCUMENTATION PROCESS

This process is in two (2) stages which are enumerated below:

STAGE 1: VESSEL SET UP AND VESSEL BILLING

FORECAST REPORT

- When a vessel is due to arrive a report is generated by the planning department and communicated to all sections that are involved in the operations on the ship. This forecast report sensitizes all and preparations are made in advance for smooth operations. Most especially if the ship is coming for the first time.

FINAL BILL FOR VESSEL

- After the arrival and sailing of a vessel, the out turn report of the discharge and loading is requested from the operations department by the Billing Department and when received, the Final Billing is generated to the shipping company.
- The final bill/invoice is manually typed according to what is on the out turn report and documents received from the operations dept with additional reports on security and export storage document for vessels. When this

completed the final bill is processed both in foreign (Dollar) and local currency (Naira) in respect to the above a bill is raised.

- After the invoice is raised, it is registered in a book and then sent to internal audit at the head office for proper checking and dispatch to shipping company to effect payment.

STAGE 2: FOR CONSIGNEE BILLING

- First information about the berthing date of a vessel must be established, discharge/loading (empties and export containers) and sailing date of the vessel.
- The operations here are mainly billing and documentation (P&CHS) of individual containers (20ft and 40ft Dry, Reefers and Open Top and out of Gauge) Cars/Bus/Trucks/Trailers/Plant Excavators and other general cargo items. They are spread out into different sections within to ensure that laid down rules and process are followed based on the company Navision Program.

TRACKING UNIT

- Each consignee is entitled to a Billing of Lading issued by the shipping company. This document contains information about the nature of the imported goods.
- With the Bill of Lading number the tracking of units and general cargo in the terminal can easily be confirmed if it has been discharged or a vessel has arrived in the terminal.
- For vehicles the chassis number is used for identification

BILLING UNIT

- This unit's main responsibility is to issue an invoice through the company's debit note to the consignee or agents based on the Bill of Lading and P&CH approved agency letter of authority and with an I.D Card.
- Bills rating date is done to the request of the consignee or agent and with respect to the company's charges already entered into the company Navision System.

Items required here are:

- Bill of lading
- P&CH approved agency letter of Authority
- P&CH agency representatives identity card
- Shipping company delivery order- for Additional Debit Note on MSC vessels only or if vessel short landed

NOTE

- The Consignee is to clear their goods within 90 days of arrival otherwise it will enter overtime which needs customs authority before it is cleared.
- Agent will come for additional Debit Note once their invoices are about to expire and the consignment is still in the Terminal.
- Dispatch should not be allowed by the system if there is still demurrage showing on the system

RECEIPT UNIT

- Cash or bank draft can be used for payment at the company's designated Eco Bank situated at the Terminal.
- A bank teller filled with respect to the amount on the invoice is endorsed and a confirmation sent to PCHS.
- The next action is to print out receipt based on the presentation of the Bank teller, a copy of the invoice already stamped by the bank and further items required are:
 - a) A copy of the bank payment receipt
 - b) Bank endorsed copy of P&CH invoice

EXAMINATION UNIT

- This is one of the units in the documentation section where agents apply for an examination of their goods through an examination form.
- The examination staff must ensure the agent has made payment based on a recognized delivery date before the agent can book for examination.
- The physical examination is performed at the company's terminal examination bay by the government agencies e.g Customs. NAFDAC etc items required for the process are :
 - a) Printed company's invoice
 - b) Bill of lading
 - c) Face of entry
 - d) Authority letter from agent and
 - e) Agent representative identity card

EXIT UNIT

- At the exit unit office an exit or clearance note is issued after there is evidence that the customs duty and shipping company charges have been paid
- Documents required are:
 - a) Bill of lading
 - b) Customs SDG form
 - c) Customs duty receipt
 - d) Shipping company receipt

RELEASING UNIT (TERMINAL DELIVERY ORDER)

- This is a part of the documentation section where the final checking of all documents necessary for the clearing of goods is done.
- Here staff must ensure that all documents are scrutinized and also confirmed that all bills are paid up to date before a terminal delivery order is issued
- In this process we must have received a scanned copy of the shipping company confirmation of their delivery order (awaiting the hard copy from the agent) before we finally issue the PCHS Terminal Delivery Order (TDO).
- Documents necessary for this section are:
 - a) A valid original shipping company delivery order
 - b) A copy of each of the shipping company debit and receipt note
 - c) Agent's authority letter and identity card.
 - d) Form C 30
 - e) The yellow copy of the customs endorsed examination form
 - f) A copy of the Risk Assessment Report (RAR)
 - g) A copy of the Bill of Lading
 - h) Up to date payment of Ports & Cargo debit and Receipt note
 - i) A copy of the Exit Note

The next action is delivery and a gate pass must be issued for this exercise to allow the agent or consignee to exit with their consignment

ANTI FRAUD, BRIBERY, MALPRACTICE AND CORRUPTION POLICY STATEMENT

POLICY STATEMENT

Ports & Cargo Handling Limited holds corporate ethical values and image in the highest esteem and therefore shall passionately conduct its business in a corrupt-free anti-fraud and highly ethical manner that promote free enterprise, excellence and competitiveness.

Ports & Cargo Handling Services Limited defines FRAUD, in two simplest ways, as:

- a. Offering, giving, soliciting or acceptance of an inducement or reward which may improperly influence the action of any person
- b. An inducement or reward offered, promised or provided to gain personal, commercial, regulatory or contractual advantage

1.0 INTRODUCTION

1.1 Ports & Cargo Handling Services Limited is determined to maintain its reputation as a Corporate entity which will not tolerate fraud, bribery, corruption or abuse of position for personal gain, wherever it may be found in any area of corporate activity.

1.2 Our policy against corruption applies globally. We reject the idea that our policies should be flexible based on the acceptance of bribery, no matter how small the amount given or received and we would terminate relationships with our suppliers, service providers or channel partners that do not demonstrate the willingness to follow our anti-corruption policy.

1.3 The purpose of this policy is to set out, for members of our staff, clients, partners and Government agencies, the main principles for countering fraud, bribery and corruption. The policy links closely to the Company's Vision and support the Company's values openness, honesty and performing to the highest standards.

1.4 The Policy includes:

- a. The Scope;
- b. The culture and the stance against fraud and corruption;
- c. How to raise concerns and report financial malpractice
- d. The principle of having the Company anti-fraud, bribery and corruption strategy;
- e. The responsible officer

1.5 Our staff, clients partners and government agencies regulating the industry we operate in, should play a key role in counter-fraud initiatives. This includes providing a corporate framework within which counter-fraud arrangements will flourish, and the promotion of an anti-fraud culture across board.

1.6 this policy also reflects the principles and core values of ports & cargo handling services limited

1.7 parts of the External Auditor's statutory duties are to ensure that the company has in place adequate arrangements for the prevention and detection of fraud and corruption as well as ensure that government agencies and politicians do not use the company as a cover to launder fund or accept bribe from international companies and donor agencies

2. SCOPE AND EXPECTATION

2.1 The policy applies to members of staff (full time and part time) clients, partners, contractors and government agencies which regulate the industry we operate.

2.2 Therefore the Company expects that individuals and organizations (e.g partners, clearing agents, suppliers, contractors, government agencies and service providers) that it deals with will act with integrity and without thought or actions involving fraud, bribery and corruption. Where relevant, Company will include appropriate clauses in its contracts about the consequences of fraud, bribery and corruption; evidence of such acts are most likely to lead to a termination of the particular contract and may lead to persecution.

3. CULTURE AND STANCE AGAINST FRAUD AND CORRUPTION

3.1 Responsibility for anti-fraud culture is the joint duty of all those involved in giving political direction, determining policy and management. The strategy should be directed against fraud and corruption whether it is attempted against the Company from outside or from within its own workforce.

3.2 The Company expects that members of staff at all levels will lead by example in ensuring adherence to legal requirements, contract procedure rules, financial procedure rules, codes of conduct and best (professional) practice.

3.3 As part of this culture, the company will provide clear routes by which concerns can be raised by both staff and client, and those outside who are providing, using or paying for our services and products

3.4 Senior management is expected to deal swiftly and firmly with those who defraud the Company or who are corrupt. The Company will be robust in dealing

with financial malpractice and shall hold onto expertise, excellence and quality as key strength sources and shall NOT offer any sort of inducement to person or government officials to influence decisions that affect the Company.

3.5 The company also has in place two Department whose monitoring roles are relevant:

- a. The Admin/HR which set and monitors standards of conduct and compliance to this POLICY
- b. The Audit/ Internal Control Department, which ensures that adequate arrangements are established and operating to deal with situations of suspected or actual wrongdoing, fraud and corruption.

RAISING CONCERNS

4.1 Although this document specifically refers to fraud and corruption, it equally applies to any forms of malpractice that can reduce public confidence in the Company, its products and its services and may also include acts committed outside of official duties but which impact upon the Company's trust in the individual concerned. Examples may include, the criminal acts of theft of "Property". Which includes all assets and cash; false accounting; obtaining by deception; pecuniary advantage by deception; computer abuse and computer crime. Also, it includes bribery and corruption.

4.2 Members of staff, clients partners and our visitors are an important element in the company's stance on fraud, bribery and corruption, and they are positively encouraged and expected to raise any concerns that they may have on these issues where they are associated with the company's activity.

4.3 staff should normally raise concerns through their immediate manager, however it is recognized that they may feel inhibited in certain circumstances. In this case, the staff should contact either the Chief Executive Officer or ED Admin. The company's "whistle blowing" policy gives further guidance on how to raise concerns and gives detail about the support and safeguards that are available to those that do raise concerns

5 ACTIONS THE COMPANY WILL TAKE

5.1 All concerned will be treated in confidence and will be investigated promptly and fully in a professional manner. It should be noted that an allegation does not mean the individual or company is guilty of any wrong-doing, and so they will not treated as such until the case is proven.

5.2 If fraud, bribery or corruption has taken place, the company will, in appropriate cases

- A. Refer the case to the police
- B. Take appropriate disciplinary action where it involves an employee and this may lead to dismissal.

- C. Refer the case for local investigation by panel of enquiry
- D. Pursue recovery for any financial loss
- E. The result of any action taken including prosecution may be reported in the media.

5.3 there is, of course, a need to ensure that the investigation process is not misused, therefore, any internal abuse, such as raising malicious or vexatious allegations, may be dealt with as a disciplinary matter.

6. ANTI-FRAUD AND CORRUPTION STRATEGY

6.1 This policy also forms an important part of the Anti-fraud, Bribery and Corruption Strategy by setting out the tone, culture and expectations of the company, as part of the corporate framework.

6.2 The strategy is concerned with both operational activity to detect and investigate fraud, bribery and corruption and also proactive actions to deter and prevent fraud and corruption through the development of an anti-fraud and corruption culture.

7. PROHIBITED CONDUCT

In carrying out each of their responsibilities under the Agreement, Port & Cargo Handling Services Limited and its Directors, Officers, Employees, Representatives or other third parties acting on its behalf, have not and shall not pay, offer or promise to pay, or authorize the payment of, directly or indirectly through any other person or entity, any monies or anything of value to:

7.1 Any person or firm employed by, or actin for or on behalf of any customer or potential customer, whether private or government, for the purpose of inducing or rewarding favourable action, or the withholding of action, by the customer or potential customer in any commercial transaction or in any governmental matter.

7.2 Any person or frim employed by, or acting for or on behalf or any governmental entity (including state-owned or controlled entities or public international organizations) for the purposes of inducing or rewarding any action, or the withholding of any action, by such entity in any commercial transaction or any governmental matter and

7.3 Any governmental official or employee (Including employees of state owned or controlled entities or public international organizations), political party or official of such party, or any candidate for political office, for the purposes of inducing or rewarding favourable action, or the withholding of action, or the exercise of influence by such official, party or candidate in any commercial transaction or in any governmental matter.

8. OBLIGATION OF GOOD STANDING

In no event shall Ports & Cargo Handling Services Limited be obligated under this Agreement to take action or omit to take any action that it believes, in good faith, would cause it to be in violation of any Applicable Laws, including the FCPA, the

Corrupt Practices and Other Related Offences Act and the Economic and Financial Crimes Commission Act.

ALL OUR OPERATIONS, ACTIVITIES AND RELATIONSHIPS SHALL BE GUIDED BY THIS POLICY AND NO CLAUSE SHALL BE SUBJECT TO WAIVER.

THESE POLICY APPLIES TO ALL MEMBERS OF THE BOARD, CEO/OTHER MEMBERS OF MANAGEMENT TEAM AND ALL STAFF OF PORTS & CARGO HANDLING SERVICES LIMITED