

RASAD NIGERIA LIMITED

POLICY 07

Grievance Redress and Whistleblower Reporting Policy

VERSION	Version 1 · August 2026
POLICY OWNER	Company Secretary
APPROVED BY	Board of Directors, Rasad Nigeria Limited
REVIEW	Annually

1. Why this policy exists

Problems we don't hear about don't get fixed. This policy explains how Rasad receives, records, investigates, escalates and closes concerns, and how we protect the people who raise them.

2. Who can use it

Anyone can raise a concern: employees, casual workers, farmers, LBAs, aggregators, hauliers, community members, buyers, contractors and members of the public.

3. What can be raised

- **Grievances:** complaints about how Rasad or our suppliers have affected you. Examples include pricing, weighing, late payment, working conditions, treatment by staff, land, noise, damage or safety.
- **Whistleblower reports:** serious wrongdoing, such as bribery, fraud, theft, child labour, forced labour, abuse, harassment, deforestation, falsified origin data, safety dangers, or breaches of law or of any Rasad policy.

Suggestions and questions are also welcome.

4. How to raise a concern

You can raise a concern in any of these ways:

- in person, with any hub manager, field agent or community focal person;
- by phone, WhatsApp or email, using the contacts published on the grievance page at rasadng.com;
- in writing, left at any Rasad hub or sent to our head office at I Cocoa House, Rasad Plaza, Ago Owo Quarters, Ayetoro, Yewa North, Ogun State, Nigeria;

- directly to the Company Secretary, or to the Chairman of the Board if the concern involves senior management.

You may raise a concern in any language, verbally or in writing, and you may do so anonymously. Raising a concern is free.

5. Our process

Step	What happens	Timeline
1. Receive	The concern is logged in the grievance register with a reference number.	Same day
2. Acknowledge	The person is told it has been received and what happens next (unless anonymous with no contact).	Within 3 working days
3. Assess	The concern is classified by type and severity and assigned to a handler with no conflict of interest.	Within 5 working days
4. Investigate	The facts are gathered through interviews, documents and site visits, with confidentiality protected.	Within 30 days for most cases
5. Resolve	Action is agreed. This may be corrective action, remedy, compensation, disciplinary steps or supplier action.	As agreed
6. Respond	The person is told the outcome and the reasons for it.	Within 5 working days of the decision
7. Close	The case is closed once the person is informed and actions are done. If they are not satisfied, they may appeal.	On completion

Complex cases may take longer. If they do, we keep the person updated at least every 14 days.

6. Escalation

- **Urgent risks to life, safety or a child** are acted on immediately and reported to the Managing Director on the same day. Child cases follow Policy 02.
- **Serious wrongdoing** (bribery, fraud, abuse, forced labour or falsified data) goes straight to the Company Secretary, who informs the Board. Cases are investigated independently of the line management involved.
- **Concerns about directors or senior managers** go to the Chairman of the Board, who may appoint an outside investigator.
- **Criminal matters** are reported to the relevant authorities.

7. Appeals

If you are not satisfied with the outcome, you may appeal within 30 days to the Managing Director. For cases involving senior management, you may appeal to the Chairman. The appeal is reviewed by someone who was not involved in the original decision. You remain free to seek remedy through the courts, regulators, certification bodies or other channels at any time.

8. Protection for people who raise concerns

- **Confidentiality:** your identity is shared only with those who need it to handle the case, and only with your consent, unless the law requires otherwise.
- **Anonymity:** anonymous reports are accepted and investigated as far as the information allows.
- **No retaliation:** no one may be dismissed, demoted, harassed, refused payment or dropped as a supplier for raising a concern in good faith, even if it turns out to be mistaken. Retaliation is a serious disciplinary offence.
- **Good faith:** knowingly making a false report to harm someone is itself a breach of this policy.
- **Data protection:** all records are kept securely in line with the Nigeria Data Protection Act 2023.

9. Records

The grievance register records the reference number, date, channel, type, severity, handler, actions, outcome and closing date for each case. Personal details are kept separately with restricted access. Records are kept for at least six years.

10. Roles and responsibilities

Role	Responsibility
Board of Directors	Approves this policy and reviews grievance trends and serious cases.
Chairman	Receives concerns about senior management.
Managing Director	Handles appeals and makes sure actions are resourced.
Company Secretary	Owns this policy and the grievance register, and oversees whistleblower cases.
Hub managers and field agents	Receive concerns and log them the same day.

11. Monitoring and reporting

We track concerns received by type, channel and gender, time to acknowledge and resolve, outcomes and appeals. We publish a summary each year without identifying anyone, and use the trends to improve our operations.

12. Related policies

All Rasad policies, particularly Policy 02 Child Labour Prevention and Remediation, Policy 03 Human Rights and Labour, Policy 06 Community Engagement and Policy 09 Anti-Bribery and Corruption.