ARROW CONSTRUCTION COMPANY LIMITED

HSE POLICIES

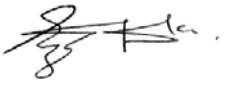
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Rev no: 000	Atuegbu Chidubem	Emeana Lubee Okechi	Emeka Ezekwe
	HSE CO-ORDINATOR	PROJECT CO-ORDINATOR	MD/CEO
Signature			

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ARROW CONSTRUCTION COMPANY LIMITED

HEALTH, SAFETY AND ENVIRONMENT (HSE) POLICY STATEMENT

ARROW CONSTRUCTION COMPANY LIMITED, is fully committed to conducting all our activities in accordance with the highest standards of Health, Safety, and Environmental (HSE) performance. Our goal is to achieve zero harm to people, assets, and the environment while contributing positively to sustainable development.

We operate in strict compliance with all applicable national laws, international conventions, and industry regulations. Where international standards provide higher levels of protection, we pledge to implement those standards across our operations.

In accordance with this policy statement, ARROW CONSTRUCTION COMPANY LIMITED is committed to:

- Comply with all relevant legal, regulatory, and international HSE requirements.
- Identify, assess, and manage HSE risks associated with our operations.
- Promote a proactive safety culture that encourages employee participation and accountability.
- Prevent incidents, injuries, occupational illnesses, and environmental pollution.
- Optimize resource use, minimize waste, and protect biodiversity in all project locations.
- Continuously improve our HSE performance through audits, reviews, and innovation.

Management at all levels is responsible for implementing this policy and providing the necessary resources to achieve its objectives. Every employee and contractor shares responsibility for adhering to HSE standards and reporting unsafe acts or conditions.



EMEKA EZEKWE
MANAGING DIRECTOR

14/02/2025

OCCUPATIONAL HEALTH POLICY

ARROW CONSTRUCTION COMPANY LIMITED has a policy of planning and executing its activities in such a way that the health of its employees, subcontractor and of any member of the public will be:

- Protected against health hazards arising from ARROW CONSTRUCTION Company Limited operations;
- Promoted through dedicated health programmes;
- Improved through a systematic critical analysis of the quality of medical care

Health standards and requirements for both ARROW CONSTRUCTION COMPANY LIMITED and Subcontractors' will be the same in all operations.

ARROW CONSTRUCTION COMPANY LIMITED always aims to reduce and/or eliminate work-related stress, illnesses and ailments for its personnel and Subcontractor.

All personnel (company and subcontractors' staff) to be engaged in company operations must be certified medically fit before employment.

The Company shall promote good health by preventing occupational illness or injuries and regular conduct medical fitness test.



EMEKA EZEKWE
MANAGING DIRECTOR
4/02/2022

SECURITY POLICY

ARROW CONSTRUCTION COMPANY LIMITED recognizes that security of personnel, equipment and materials is fundamental to the realization of both Project objectives as well as the objectives and expectations of our clients.

All Operational activities are therefore planned and executed in such a way as to;

- ✓ Ensure that all security hazards are adequately highlighted, communicated, documented and taken care of in all security plans,
- ✓ Regular safety meetings and talks,
- ✓ Be sensitive to the needs and concern of host communities,
- ✓ Subject all Personnel whether from the company, client, third party, community or elsewhere to security scrutiny at all security posts;
- ✓ Ensure that all staff wears identification cards whenever on official duties;
- ✓ Unauthorized entry into locations containing critical equipment must be checked.
- ✓ Ensure that no sensitive document is left carelessly around site.
- ✓ Ensure that no photograph is taken on site unless permitted to do so.
- ✓ Ensure effective implementation of access control in all operational areas or locations.
- ✓ Ensure compliance with clients' HSE policy standards.



EMEKA EZEKWE
MANAGING DIRECTOR
4/02/2022

ARROW CONSTRUCTION COMPANY LIMITED

ENVIRONMENTAL POLICY

It is the responsibility of every personnel of ARROW CONSTRUCTION COMPANY LIMITED to perform his work in an environmentally sound manner. ARROW CONSTRUCTION COMPANY LIMITED will always promote and encourage awareness to protect and preserve the environment.

In implementing this policy, staff is encouraged to pay appropriate regard and value to the environment by acting to preserve air, water, soil, plant and animal from adverse effects of their actions or those of the subcontractors to minimize any nuisance, which may arise from such actions.

All wastes generated when executing any project shall be collected, handled, treated and disposed off in such a way as not to have impact on the environment.

At the conclusion of any activity, our ultimate goal is to leave the work site in a condition as near as possible to the state in which it was found through housekeeping. Clean-up operations shall be carried out to remove all debris to prevent injuries to lives and preserve the environment.



EMEKA EZEKWE
MANAGING DIRECTOR
18/03/2022

ARROW CONSTRUCTION COMPANY LIMITED

QUALITY POLICY STATEMENT

Arrow Construction Company limited is a fully owned Nigerian Company which collaborates with some foreign technical partners to provide specialized services to diverse sectors of the Nigerian economy, especially in the Oil & Gas, Energy, Construction and Maritime sector.

We specialize in **Facility Maintenance(Pipeline Maintenance, Reinforcement And Repairs, Corrosion Prevention & Control Services), Subsea Intervention & Engineering Services, Painting And Coating Services, Canalization And Shore Protection Services, Heavy Duty Equipment Supply , Installation & Maintenance(Swamp Buggy, Forklift, Excavators), Civil And Electrical Installation And Maintenance, Offshore And Onshore Pipeline Laying, Procurement And Outsourcing Services, Inspection Of Flare Stack, Maintenance Of Process Plant, Project Management And Rehabilitation/Upgrade /Fabrication Works.**

This Policy provides a framework for setting and reviewing the process-based quality objectives, with performance indicators monitored / evaluated monthly, and maintained as part of the 'monitoring, measurement & analysis' and 'continual improvement' processes within the context of our organization and its strategic direction.

The Top Management of ARROW CONSTRUCTION COMPANY LIMITED is committed to:

- Satisfying all our clients, relevant International, National, applicable statutory and regulatory while their requirements are understood and consistently met. The Continual Improvement of our QMS is determined by ensuring that the risks and opportunities that can affect conformity of our products CCand services are addressed.

- The Continual Improvement of Quality Management System in our Processes and its performance through involvement with its relevant interested parties and monitoring of their needs and expectations. To assist with the above, we have implemented a Quality Management System that meets the requirements of ISO 9001:2015.

- Providing enabling environment for all our staff, Provisions for adequate Training and involving them in the consultation and participation of QMS in Arrow Construction Company Limited.

This Policy is communicated and understood by all employees, contract staff and relevant interested parties and applied within ARROW CONSTRUCTION COMPANY LIMITED. They are expected to cooperate and assist in the implementation of this policy, whilst ensuring that their own work is carried out without risk to themselves, others or the environment. This policy will be reviewed **biennially** by Top Management, where / when necessary, amended and re-issued

Emeka Ezekwe
MD/CEO
22/1/2022

ARROW CONSTRUCTION COMPANY LIMITED

DRUG, ALCOHOL AND TOBACCO POLICY

It's a termination offence for any employee of **ARROW** CONSTRUCTION COMPANY LIMITED to be under the influence of alcohol, in possession of or under the influence of any non-prescription drug such as cocaine, amphetamine, marijuana, hashish or other illegal drug on any work site, including all water borne operations or property under the control of ARROW CONSTRUCTION COMPANY LIMITED.

This applies to all Operations and Locations.

The Above policy therefore demands that all personnel:

- ❖ Disengage from alcohol consumption once they are on duty and are advised to freely and willingly reduce alcohol consumption while off duty:
- ❖ Accept unconditionally to undergo dope/alcohol test, whenever requested by the company or its CLIENT.

Authorized by



EMEKA EZEKWE
MANAGING DIRECTOR
18/03/2022

ARROW CONSTRUCTION COMPANY LIMITED

COMMUNITY RELATIONS POLICY

ARROW CONSTRUCTION COMPANY LIMITED strives at all times to maintain cordiality with its host community where ever its operations are based. In liaison with the Community Relations officer, the Company will enter into a memorandum of understanding with the host community.

Our Community Relations policy is focused on:

- Maintaining improved community public relations.
- Addressing grievances and problems presented by the community.
- Assisting in offering employment opportunities to the host community.
- Maintaining consultative forum to resolve community crises.
- Utilizing dialogue and negotiation to settle disputes.
- Protecting the environment from pollution.



EMEKA EZEKWE
MANAGING DIRECTOR
18/03/2022

INCIDENT INVESTIGATION POLICY

The company believes in accident prevention; however, it shall ensure that all cases/aspects of incidents are captured and investigated.

- All incidents/near-misses shall be reported, recorded.
- Priority shall be given to accident investigation.
- Reporting/management of near-misses shall be the first step to prevent accidents throughout the operations. No efforts will be overlooked to achieve this objective.
- The investigation of any accident shall be a prime idea, so as to determine the cause(s) of the accident and use these facts to prevent reoccurrence.
- As a policy, every employee is expected to report immediately any noticed accident. The supervisor shall investigate the accident to determine the circumstances/responsible factors. He shall correct any unsafe acts and/or conditions such responsible factors.
- Where such causes cannot immediately rectify, recommendations shall be made to management on what measures to be implemented in order to forestall reoccurrence. All accidents shall be investigated, be it real or near miss.
- Employees must co-operate during the investigation.
- All investigations must require personal sincerity and honesty. Investigation must be prompt and thorough with no assumptions.
- There shall be two stages of accident investigation; the interim report, and visit to the scene of accident.





EMEKA EZEKWE
MANAGING DIRECTOR
18/03/2022

LOGISTIC POLICY

ARROW CONSTRUCTION COMPANY LIMITED recognizes the dangers of road transport accident as a result of that all journeys no matter how short are to be properly managed and adequate measures taken to minimize risk.

Before being allowed to drive a company or client's vehicle, ARROW CONSTRUCTION COMPANY LIMITED employee involved shall be trained and tested to ensure that he is fit to drive.

Subsequently before driving any vehicle on any road, the vehicle shall be checked for roadworthiness. Particular attention shall be paid to safe driving when travelling.

The Following Points shall be considered.

- Speed,
- Road Condition,
- Over taking,
- Use of seat belt, in front and back before moving the vehicle,
- Unauthorized Passenger,
- Overloading

It will be the responsibility of the HSSE manager or the HSE officer to monitor the movement of vehicles and driving skill. Defaulter shall be sanctioned accordingly.

In order to minimize Road Transport Accident (RTA) and in keeping with the company's journey management procedure, it is binding on all employees of ARROW CONSTRUCTION COMPANY LIMITED to make use of his /her Seat Belt when in transit. Repeated violations of this policy will attract strict management wrath.

ARROW CONSTRUCTION COMPANY LIMITED

EMEKA EZEKWE
MANAGING DIRECTOR
18/03/2022

ARROW CONSTRUCTION COMPANY LIMITED

TRAINING POLICY

ARROW CONSTRUCTION COMPANY LIMITED believes in the principle that productivity depends on the acquisition of necessary knowledge and skills required for efficient performance.

Our Commitment to training and development of employees always**;**

- Provide competitive and Value-Added Service.
- Produce a highly motivated workforce.
- Bring respect for Company rules, regulations and standards.
- Lead to creative, competent, skilful and knowledgeable workforce.
- Create in an employee a safe and positive work culture.

We shall therefore determine competence requirements for employees performing HSSE Critical Tasks.

In addition to in-house training programmes, we shall engage the services of External Training Service Providers.

We shall periodically appraise staff training scheme to ensure that the training requirements are met.



EMEKA EZEKWE
MANAGING DIRECTOR
4/02/2022

RECRUITMENT POLICY

ARROW CONSTRUCTION COMPANY LIMITED considers efficient performance, devotion and dedication to duty as a prerequisite for productivity.

This is achieved by ensuring that:

- Fair selection process is put in place and followed up for selection.
- Employees meet minimum employment requirement.
- Only competent and qualified employees are offered employment.
- Employees qualify through pre-employment medical/certification
- Employees satisfy drug and alcohol test and certification condition.
- Induction is provided to employees to familiarize with company policies.
- Employees understand rules, regulations and standards.
- Employees understand usage of PPE.
- Employees are well-trained and assigned tasks.
- Provision is made to employ local labour from the host community.
- Neither discrimination nor tribal consideration shall override merit.



EMEKA EZEKWE
MANAGING DIRECTOR
4/02/2022

ARROW CONSTRUCTION COMPANY LIMITED

NIGERIAN CONTENT POLICY

The Management of ARROW CONSTRUCTION COMPANY LIMITED is committed to the implementation of the Nigerian Content policy.

We shall demonstrate this commitment by engaging Nigerian professionals, skilled and unskilled Nigerian labours in all our operations thereby meeting the objective of Nigerian human capacity building while ensuring that standards are not compromised.

We shall also utilize local raw materials to promote sustainable growth of Nigerian content.



EMEKA EZEKWE
MANAGING DIRECTOR
18/03/2022

ARROW CONSTRUCTION COMPANY LIMITED

CORPORATE SOCIAL RESPONSIBILITY

Arrow Construction Company Limited is committed to maintaining the highest standards of Corporate Social Responsibility in its business activities. We aspire to high standards of practice through a process of continual improvement and the adoption of international codes and standards where applicable. To achieve this commitment, we will implement management systems in our operations that accord with the requirements of our Corporate Social Responsibility standards and strive to;

- Comply with all applicable laws, regulations and other employment standards wherever we operate
- Consult with and respond to the concerns of our stake holders
- Behave with honesty and integrity in all our activities and relationships with others and reject bribery and corruption in all its forms.

Employees

Respect the rights and dignity of every employee and treat them fairly and without discrimination.

- Encourage team working and the sharing of knowledge throughout the organisation.
- Recognize individual and team contribution of employees and reward them appropriately
- Prohibit, eliminate and not be complicit in the use of forced or child labour.

Local Communities

- Respect the rights of indigenous peoples in all countries in which we operate
- Assist in the development of local community programmes where we operate in consultation with local government, the public and our stakeholders.

Suppliers

- Ensure that contractors and suppliers are aware of and where necessary work with them to meet our business principles, policies and standards.





EMEKA EZEKWE
MANAGING DIRECTOR
18/03/2022

HOUSEKEEEPING POLICY

At Arrow Construction Company Limited, we ensure a high degree of orderliness and housekeeping to mitigate risk of fires and other related hazard thereby contributing to a more effective way of doing business. Arrow Construction Company Limited implements the highest possible standard of housekeeping on all sites. It is every employee's responsibility to keep the workplace in good condition, clean and safe at all times.

Cleanliness and orderliness help to prevent accidents, save time and materials.

Management of Arrow Construction Company Limited shall ensure that the right materials are always provided to assist the workers maintain the highest level of good housekeeping on all sites.



EMEKA EZEKWE
MANAGING DIRECTOR
02/04/2022

ARROW CONSTRUCTION COMPANY LIMITED

MARINE OPERATION POLICY

It is policy of Arrow Construction Company Limited to carry out Marine Operations strictly within existing marine regulations and guidelines applicable in the marine industry and ensuring the safety of crew members, passengers and other third parties .

In pursuance of this the following must be adhered to:

- All Company Marine Procedures must be applied in all operations.
- Competent marine personnel shall be employed to supervise marine operations
- No night journey on in land waterways between 18:30 hours and 06:00 hours shall be allowed except in cases of emergencies involving significant threat to life or property.
- Entire crew members and visitors that come on board must be in possession of valid swimming passport.
- any crew member on deck must wear a work vest.
- Lifesaving and firefighting equipment on board are regularly checked and kept in top working condition at all times.
- Good radio communication network effective manned 24 hours as part of contingency planning





EMEKA EZEKWE
MANAGING DIRECTOR
2/04/2022

ARROW CONSTRUCTION COMPANY LIMITED

PERSONAL PROTECTION EQUIPMENT (PPE) POLICY

Arrow Construction Company Limited has a policy to provide Quality Personal Protective Equipment for its workers at all times in all work sites. The importance of the use of PPE at work sites shall be enforced on all our personnel.

Accordingly:

- All workers on site shall be made to wear their individual protective equipment at all work sites.
- No worker shall be allowed to stay or work on site without a complete safety gear.
- Adequate arrangements shall be made to stock the materials on site against emergencies and to keep records of such stock as available including requirements records.
- However, efforts towards this protection shall be guide by a sound PPE arrangement.
- CONTRACTORS working in any ARROWCONN site are bound by this PPE Policy
- VISITORS to ARROWCONN base yard or work site are also bound by this PPE Policy especially for all PPE mandatory designated areas.



EMEKA EZEKWE
MD/CEO
2/04/2022

PROCUREMENT POLICY

It is the policy of Arrow Construction Company Limited to maximize all local (in –country) sources for all materials used in all our projects, thereby aiding these sources in knowing what the international standards are and ensuring they exhaust all avenues in meeting up to these standards in line with the Federal Government of Nigeria directive on Nigerian Content Development.

Arrow Construction Company Limited agrees to source for Nigerian –made goods only from Nigeria.

ARROW CONSTRUCTION COMPANY LIMITED

EMEKA EZEKWE
MANAGING DIRECTOR
18/03/2022

JOURNEY MANAGEMENT POLICY

Arrow Construction Company Limited recognizes the inherent hazards in whatever mode of transportation used in conveying equipment and personnel. Therefore, all journeys, no matter how short MUST be adequately managed and planned with a view to bringing down incidents to the barest minimum.

Before being allowed to drive any official vehicle, all drivers must be tested to ensure competence and proficiency.

All Vehicles must be certified road – worthy before undertaking any Journey.

The following important aspects of a journey must be given the priority attention they deserve:

- Speed
- Road Condition
- Over taking
- Use of Seat beat (front and back seat passengers) before moving the vehicle
- Carrying unauthorized Passengers,
- Overloading

It is the responsibility of the HSE Co-ordinator to monitor the performance of a journey and the driver's compliance with the Company Journey Management Policy Guidelines.

ARROW CONSTRUCTION COMPANY LIMITED

EMEKA EZEKWE
MD/CEO
18/03/2022

ARROW CONSTRUCTION COMPANY LIMITED

SEAT BELT POLICY

Seat belts are provided for the safety of drivers and /or passengers in all vehicles. it is mandatory for all employees to put on seat belts at all times while on company business. we implement: **NO SEAT BELT NO ENTRY & NO TAKE OFF.**

To Ensure compliance to this policy directive, all drivers should prior to take off have seat belts fastened at all times and remind their passengers to do same by simply announcing: **FASTEN YOUR SEAT BELTS.**

The Security Officers at both the site and Company Premises should carry out Visual Inspections of any company or other vehicles entering the premises to ensure all occupants comply with this directive.

The Security Officers should bar any vehicle from leaving or entering the premises until all occupants of the vehicle have complied with the directive.

while in the premises or work sites, it the responsibility of the Safety Officer, supervisor and indeed any member of line management present to monitor and ensure that every one in company owned vehicle fastens his/her seat belts.

Appropriate disciplinary action may be taken against any staff that violates this policy directive.



EMEKA EZEKWE
MANAGING DIRECTOR
18/03/2022

HEALTH POLICY

Arrow Construction Company Limited has a policy to plan and execute its activities in such a manner that the health of its employees, subcontractors and all communities who may be affected by her operations are considered as their top most priority.

ARROWCONN shall

- Identify and protect employee against health hazards arising from its operations
- Provide Employee, contractors with relevant information, instructions, training on health matters, through dedicated health programmes
- Provide First Aid facilities at all work locations
- Maintain a Retainer-ship clinic that will cater for the health of its employee.
- Review health performance of her employees regularly.

Health Standards and requirements for Arrow Construction Company Limited and Subcontractors shall be the same in all Operations.

In implementing this policy ARROWCONN aims to reduce and /or eliminate work related stress, illnesses and aliments to acceptable levels of exposure for her employees to substances and agents hazardous to health.

All Company's (Personnel and Subcontractors Staff) to be engaged in Company Operations must be certified medically fit before employment.

Arrow Construction Company Limited shall always strive to promote good health for its employees by preventing occupational illness or injuries in all her operations.

ARROW CONSTRUCTION COMPANY LIMITED

EMEKA EZEKWE
MD/CEO
18/03/2022

SAFETY POLICY

Arrow Construction Company Limited is committed to managing all work related risk, hazards that may affect her employee and that of others in its operations. The company takes safety as its top most priority and as such is committed to managing and implementing safe work environment for her employees, Subcontractors and Host Communities.

Arrow Construction Company Limited aims at:

- Safe guarding the safety of her employees, all personnel , subcontractors and communities who maybe affected by her operations.
- Mitigate exposure to work risk in area of Operations.
- Promote a culture where employees will be aware of risk inherent in their jobs.
- Planning and implementing response measures to deal with hazards and emergencies.
- Providing all necessary Personnel Protective Equipment for all employee to safe guard them against risk inherent in our work operations.
- Ensuring that environment for work is conducive and safe for her employee.
- Executing her in line /compliance to standard as required by law.

All Employees under Arrowconn shall be trained and retained on all safety related matters as regards their jobs in order to improve their safety performance and level of competency. Arrowconn believes in "**IF ITS NOT SAFE " DONT WORK** principle.



EMEKA EZEKWE
MANAGING DIRECTOR
18/03/2022

ARROW CONSTRUCTION COMPANY LIMITED

HSE TRAINING POLICY

Arrow Construction Company Limited ensures that all employees shall complete mandatory safety Training classes as determined by their job description for assistance in identifying training needs and the frequency for training required.

The purpose of Safety Training is to provide the knowledge necessary to perform a job safely by establishing expectations for employees on how to perform job tasks. Knowledge acquired by participation in HSE training is one of the methods used to create a safe culture.

We ensure the HSE Trainings are mandatory for all staff to ensure that they understand the safety steps required to carry out their tasks. Failure to participate in mandatory safety training exposes the individual to the risk of injury and also could result in disciplinary action. This not only impacts our ability to conduct our work activities , but it also places the company in a state of non- compliance with various safety regulations.

ARROW CONSTRUCTION COMPANY LIMITED

EMEKA EZEKWE
MANAGING DIRECTOR
18/03/2022

ANTI – BRIBERY AND ANTI- CORRUPTION POLICY

POLICY STATEMENT

Arrow Construction Company Limited has ZERO TOLERANCE for corruption, Bribery, Fraud and any kind of business Malpractice that can affect our operations and tarnish our corporate image. Any staff of Arrow Construction Company Limited who engages in verifiable act of fraud bribery or any other form of malpractice inimical to the corporate goals of Arrow Construction Company Limited will be dismissed immediately from the service of the company.

Arrow Construction Company Limited is committed to

- ✓ Not offering bribes or condoning the offering of bribes on behalf of arrow construction company limited
- ✓ Not Accepting bribes or agreeing to them being accepted on behalf of Arrow Construction Company Limited
- ✓ making sure that Arrow Construction Company limited Representatives are aware of and abide by Arrow Construction Company Limited values and Policies.

The purpose of this anti bribery and anti-corruption policy is to

- ✓ Set out the company responsibilities and responsibilities of those working for or with Arrow Construction Company Limited in observing and upholding arrow construction company limited on bribery and corruption.

- ✓ Ensure that the company has adequate procedures in place to prevent and detect bribery and corruption.

TO WHOM DOES THIS POLICY APPLY TO?

This anti bribery and anticorruption policy applies to all directors. officers, employees (whether permanent, fixed term or temporary) technical, consultants, agents or any other person associated with or acting on behalf of Arrow Construction Company Limited.

BRIBERY AND CORRUPTION

Bribery is the most common form of corruption and can be broadly defined as offering, promising, giving, accepting or soliciting of an advantage as an inducement or reward for an action which is illegal or a breach of trust. bribery takes place if someone is given a gift, donation, loan, cash or non-cash incentive, benefit, or is taken out for particularly lavish hospitality and that in doing so the giver of such items has done so with the intention of inducing someone not to perform their function incorrectly . Arrow construction company limited will never give bribe whether direct (ie you give a bribe to someone) or indirect (ie you get someone else to give a bribe to another

person), promise to give or offer a payment, loan, reward, gift, or entertainment, to a public official or any third party with the expectation or hope that a business advantage will be received or to reward a business advantage already given like securing a permit , securing or renewing a contract with favourable terms.

FACILITATION PAYMENTS AND KICK BACKS

Facilitation payments which are typically small unofficial payments made to secure or expedite routine government action by a government official such as the issuance of permits, licenses, processing of visas or work permits etc while

kick backs are typically payments made in return for a business favour or advantage and can include discounts or other types of cash incentives. Arrow Construction Company Limited does not give facilitation payments or kick backs of any kind. All staff of Arrow Construction Company Limited are always instructed to avoid any activity that might lead to or suggest that a facilitation payment or kick back will be given by or on behalf of Arrow Construction Company Limited, a payment receipt will be demanded which details the reason for the payment and an evidence that the payment went directly to the appropriate payee who provided the goods or services. any suspicions, concern or queries regarding such a payment will be raised.

GIFTS, ENTERTAINMENT AND HOSPITALITY

The giving of gifts , corporate hospitality or entertainment is highly prohibited in Arrow Construction Company Limited.

Arrow Construction Company Limited shall not give gifts of any kind or entertain any body with the intention of influencing clients or third party to reward for the provision or retention of a business or in exchange for favors , contacts or benefits . No public official or a Government official shall be given gift , entertainment or corporate hospitality whether in secret or in the open by any staff of Arrow Construction Company Limited .

SPONSORSHIPS AND DONATIONS

Any Charitable Contributions, donations or sponsorships made or offered on behalf of the Arrow Construction Company Limited must:

- ✓ Not be related to, dependent on or made in order to win or influence a business deal or decision.
- ✓ Be given directly to the relevant charity or organization and not to any individual
- ✓ and must be only be given with the prior consent and approval of the CEO of Arrow Construction Company Limited

Arrow Construction Company Limited will conduct through investigation/due diligence on my third party to ensure that the recipient of any contribution or sponsorship or donation is legitimate . The recipient of such contribution or sponsorship or donation will be required to provide a receipt for the contribution /donation and confirmation of what such funds will be used for.

Arrow Construction Company Limited will never make any contributions to any public or private individual except in accordance with laws and with the written authorization of the CEO.

No staff of Arrow Construction Company Limited whether permanent or temporary is allowed /permitted to make or offer any political contributions or donations on behalf of the company .

Any Staff of Arrow Construction Company Limited that carries out any of such authorized activity , will be deemed to be acting in their own personal capacity not on behalf of the company.



EMEKA EZEKWE
MANAGING DIRECTOR
18/03/2022

MONITORING AND REVIEW ANTI BRIBERY AND ANTI CORRUPTION POLICY

At Arrow Construction Company Limited , the CEO monitors the effectiveness and review the implementation of this policy , regularly considering its suitability , adequacy and effectiveness. any improvements identified will be made a soon as possible . Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in countering bribery and corruption.

All staff of Arrow Construction Company Limited are responsible for the success of this policy and will ensure that they use it to disclose any suspected a danger or wrong doing.

All staff of Arrow Construction Company Limited normally contribute to this policy by suggesting ways in which it might be improved . all comments, suggestions and queries are addressed to the CEO.

This policy is reviewed periodically by Arrow Construction Company Limited and can be amended at any time . Employees, officers and directors are fully informed of any revisions to this policy.



EMEKA EZEKWE
MANAGING DIRECTOR
18/03/2022

ARROW CONSTRUCTION COMPANY LIMITED

TRANSPORTATION POLICY

Arrow Construction Company Limited always ensures that the safety remains a top priority in Mobilization, Demobilization and transportation of its personnel during its operations.

In Pursuance of this , the following must be adhered to:

- The vehicles to be used for mobilisation and demobilization must be premobbed.
- Seat belt must be worn at all times during the journey and must only be removed when vehicle comes to a final halt.
- The Speed Limit must not exceed 80 km/hr
- The vehicle must be equipped with IVMS in vehicle monitoring system.
- All Traffic Rules must be adhered to.
- The Driver must be certified and competent.

The policy applies to all Personnel , Client Representatives.

Anybody that defaults will face disciplinary actions by the Company Management.



EMEKA EZEKWE
MANAGING DIRECTOR
18/03/2022

ARROW CONSTRUCTION COMPANY LIMITED

EMERGENCY RESPONSE POLICY

It is the policy of Arrow Construction Company Limited to ensure that it can respond to hazards, accidents and emergency situations in a timely manner which will aid in the saving of lives and properties.

Arrow Construction Company Limited has identified potential emergencies and has taken the following steps to prepare for them.

To aid us in preparing for emergencies , we have in place the following

- Fire Drills to prepare personnel in the event of fire.
- Medevac Drills
- HSE Induction
- Fire Fighting Trainings

All personnel's are mandated to adhere strictly to emergency procedures and follow in carrying out drills. Our personnel are also mandated to adhere to client procedure when they carrying out operations in client site.

This Policy applies to all Personnel, Client Representatives

Any personnel that do not adhere to the emergency response procedure will be given query after which disciplinary actions will be taken against such person.

ARROW CONSTRUCTION COMPANY LIMITED

EMEKA EZEKWE
MANAGING DIRECTOR
18/03/2022

DRIVING POLICY

Arrow Construction Company Limited shall ensure

- That the vehicle used for mobilization of personnel is premobbed and certified by representatives
- Speed limits must always be adhered to strictly by the driver
- The driver must be medically fit at all times
- Drivers must adhere strictly to traffic conditions and know all road signs
- Seat belts should be worn at all times during the entire Journey Duration



EMEKA EZEKWE
MANAGING DIRECTOR
18/03/2022

CARBON FOOTPRINT REDUCTION POLICY

Carbon Reduction Policy Statement

It is a policy of the Arrow construction company Limited to reduce its environmental impact where practicable.

Carbon reducing measures form an integral part of our overall management strategy, helping us to improve both operational performance and a reduction in potentially harmful emissions to land, water, and air.

The management ultimate aim is for a 0% carbon balance to be achieved within all through periods yearly.

To help achieve this, Arrowconn management will:

- Minimize waste, promote recycling and the use of recycled products to help reduce the burden on landfill, and corresponding methane generation.
- Continue to promote and support the objectives of the policy.
- Promote environmental awareness and responsibility amongst employees and others, and seek where practicable to continuously improve our company environmental performance.
- Actively promote telephone conferencing as a means of reducing travel requirements.
- Evaluate the potential benefits of home-working when necessary.
- Evaluate the potential Comply benefits of carbon off-setting.
- continually review and develop the company's Occupational Driving Policy.

Actions currently being developed include:

- Integration of environmental issues into all aspects of the decision making processes.

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ENGINEERING | SUPPORT SERVICES | OUTSOURCING
ot 13 Trans-Amadi Ind. Layout, PORT HARCOURT No. 5 Yusuf Abiodun Way, Oniru, Victoria Island, LAGOS
3037111737 | 08052001059 bizdev@arrowconn.com | arrocong@yahoo.com
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➢Sustainable sourcing procurement policies.

➢Evaluation of energy efficient and correspondingly carbon reducing equipment, vehicles and plant

Driving Tips' initiatives.

➢Vehicle sharing and mileage reduction planning.

➢The assessment and procurement of fuel efficient vehicles, supported by effective delivery and field operations planning.

This Carbon Footprint Policy Statement underpins the existing Environmental, Procurement, Waste Management, Quality Assurance, Health & Safety, and Corporate Responsibility Policies already implemented throughout our company.

This policy clearly identifies the responsibilities and procedures for achieving the company's stated objectives in all aspects of our activities, leading to improved environmental performance, inclusive of reductions in both CO2 and methane emissions.

Carbon footprint reduction policy

Arrow Construction Company Limited recognizes that our work may have a direct or indirect effect on the local and / or regional environment. We are therefore committed to reducing any harm that this may cause. Our carbon footprint reduction policy is to constantly look for ways in which we can improve our green credentials, we are achieving this by holding regular meetings to explore ways to achieve our statement promises and to link with other likeminded organizations. Our carbon reduction strategy is aligned with our company environmental policy and company sustainability policy and current codes of practice on waste and environment protection. We will focus on:

• Reducing waste,

• Reducing materials at every opportunity,

• Repair rather than throw away where we can

• Recycle at any given opportunity where we can.

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As our "Green" culture becomes established and embedded, we aim to:

• Encourage our employees and suppliers to be responsible corporate green citizens,

• Utilize energies and water sparingly,

• Consider environmental impacts in our purchasing,

• Endeavour to work with partnering organizations that share our ethics on "carbon footprint"

• Reduce the need for transport and its impacts on the environment.

It is our intention to operate our business in an environmentally friendly and sustainable way as possible.

What we have already introduced:

• We reuse, or recycle, all of our packaging materials such as cardboard, polystyrene, shredded paper etc. All materials that can be recycled are segregated into specific waste bins / skips and forwarded to waste transfer stations.

• We minimize the use of paper in our offices through the use of email, this has greatly reduced the amount of paper used within the workplace,. Processing information electronically is also much more energy and carbon efficient than physically sending hard copy correspondence.

• Our consumption of fuel and energy is closely monitored and we take care that it is not wasted through inefficiency or casualness. We use signage to remind staff to turn off lights when leaving a room, and ask staff to use computers responsibly i.e turning them off at close of work and using standby mode during the daytime when not in use.

• We ensure that all our work places either in our offices or out on site adhere to current environmental standards and energy conservation requirements.

What we intend to do for the future:

• We intend to purchase our electricity from suppliers who re-invest in renewable energy sources

• Where possible we will source our materials from suppliers who operate in an environmentally friendly manner and who are geologically local to us to reduce road traffic, road traffic costs and carbon emissions.

• We will encourage suppliers to strive for the same level of environmental care as we provide to offset their carbon footprint.

• We will deliver awareness training on green issues and sustainable development to all employees in order to inspire them to reduce their carbon footprint and encourage them to take action to offset their carbon footprint in innovative ways.

• We will strive to reduce our carbon footprint year on year by measuring and calculating current standards in each of our offices..

• We will identify carbon reduction initiatives.

• We will carry out ongoing measurement of the impact of reduction initiatives in order to aid company reporting of greenhouse gas emissions.

Arrow Construction Company Limited will aim to reduce its carbon footprint in line with current Nigerian government legislations

Arrow Construction Company Limited will choose vehicles with fuel efficiency and CO2 emissions in mind, when our current fleet of company vehicles are due for replacement.

This policy will be reviewed yearly.

Yours Faithfully,
For: **Arrow Construction Company Limited**

Emeka Ezekwe
MD/CEO
3rd,July 2023

ARROW CONSTRUCTION COMPANY LIMITED

ACC/HSE/CRP/603/000/REV000