

Code of Business Ethics and Behaviours

NATIONAL IDENTITY
MANAGEMENT COMMISSION
(NIMC)

CONTENTS

NIMC Code of Practice	3
1. Introduction	4
Purpose	4
NIMC Policy on Work Ethics	4
Understanding the Code	4
2. Legal Compliance	5
3. Confidentiality	5
4. Conflict of Interest	6
Outside Activities: Other Employment and Directorships	6
Relationships with Customers and Contractors	6
Gifts and Hospitality	7
Investments: Work-Related and Personal	7
5. Equal Employment Opportunities	8
6. Environmental and Social Responsibility	8
Health and Safety at Work	8
Environmental Conservation	9
Political Activity	9
7. Commission's Property	9
8. Knowledge Management & Operating Procedures	10
9. Contact with Outside Organisations	10
Representing NIMC	10
Media Relations	10
Corporate Citizenship	11
10. Document Retention	11
11. Compliance	11

NIMC Code of Practice

This Code of Practice has been developed as part of the Commission's commitment to good corporate governance. The Code commits the Commission and its employees to achieving the highest standards of corporate behaviour in three areas:

1. Ethical standards of operational conduct and personal behaviour
2. Honesty, transparency and integrity in everything we do
3. Personal responsibility and accountability for our actions

The Code of Ethics has been developed as part of the corporate transformation programme for the Commission and represents the new business culture for the Commission. The Code is fully owned, approved and supported by the governing Board and Executive Management Team and represents the interests of the wider stakeholder community

**Director General/ Chief Executive Officer
NIMC**

1. Introduction

As an employee of Commission, working in the Commission, **you** are personally responsible and accountable for ensuring that you behave in an ethical manner at all times whilst performing your duties at work or whilst conducting business on behalf of the Commission. The Commission's vision is to become successful, responsible and dependable agency of the Federal Government and it has adopted this Code of Ethics as part of its commitment to world class standards of corporate governance. The Commission expects and requires all of its employees to understand this Code of Ethics and to fully comply with its provisions. Failure to do so may result in dismissal.

Purpose

Ethical organisations, applying best-in-class standards of occupational behaviour, are the most successful organisations. Successful organisations have codes of ethics which are rigorously applied. As such, they have efficient internal processes and procedures, honest and diligent staff, and are committed to serving both their customers and their shareholders. They are admired and respected throughout the communities in which they operate. This respect contributes to and reinforces their organisation's success.

The Commission is on a journey to world class status, and is therefore committed to conducting all business activities according to the highest standards of professionalism, integrity, honesty and diligence. This code outlines the moral values and beliefs by which we will all work. It also defines the behaviours that demonstrate our commitment to these moral values. However, it is important to remember that the behaviours which are listed in this Code of Ethics cannot deal with every aspect of our working lives. Therefore, you should be guided by your conscience to **do the right thing** and demonstrate that you are behaving ethically at all times

The Commission's Policy on Business Ethics

The policy is simple:

1. We are honest
2. We are reliable and do what we say we will do
3. We do not abuse our positions for personal gain
4. We treat everyone equally and give no favours
5. We maintain confidentiality and can earn our customer's trust

This policy should be understood and applied by everyone in the Commission. You need to understand **what this means for you** and how you need to apply the policy in your daily work.

Understanding the Code

Compliance with this Code of Ethics is mandatory throughout the Commission. It applies in equal measure to the governing Board, Top, management & middle management, all other managers and employees. There are no exceptions. You should read this Code of Ethics carefully and understand the requirements. If you have any questions or need clarity, please contact your line manager or the Head of Legal, Regulatory & Compliance Services.

If you suspect that a colleague is not following the Code of Ethics, it is **your duty** to inform the Head of Compliance.

2. Legal Compliance

You must comply and be guided by the Laws and Regulations in Nigeria whilst carrying out your work for the Commission. If you conduct any assignment outside the country on behalf of the Commission, you must comply with international laws and the laws of the local jurisdictions wherever you are based. The Commission will not condone any violation of the law and any employees who have committed illegal acts in the course of their work will be subject to summary dismissal as well as criminal prosecution. This covers, but is not limited to:

- Fraud
- Bribery
- Money laundering
- Health and safety at work violations
- Regulatory compliance violations
- Criminal misuse of confidential or commercially sensitive information
- All policies, Guidelines and Regulations approved by the Commission

3. Confidentiality

The Commission operates in highly secured environment, where confidentiality of information is of vital importance to the success of its mandate. You are required to safeguard information belonging to the Commission of its processes and or its customers (information of registrable persons), whether the information is contained in hardcopy paper format, electronic format or verbal information.

The Commission has different types of information which are categorised as “confidential”:

1. **Strategic Business Information:** business plans, correspondences with other stakeholders, government approvals and decisions, due diligence reports, product development and marketing initiatives, minutes of meetings, and passwords, PIN or access details for buildings and systems
2. **Database Information:** all information about our customers, their names and addresses and all information about the Customers identity
3. **Any other information** – marked “Confidential” or “Classified”

The general principle should be that you do not divulge any information to people outside the Commission unless there is a routine or approved operational reason to do so.

Confidential or classified information can only be shared with fellow employees where there is a clear operational need to do so. This type of information may only be divulged to external people with the written authority of the Director General/Chief Executive Officer.

Information about our customers may only be supplied to third parties in accordance with the Commission’s guidelines and Regulations. However, this rule does not apply when the information is required under the laws of Nigeria and after the proper internal process has been followed and authorised by the Director General.

4. Conflict of Interest

The Conditions of Service and your job description define the work outputs that you have contracted to deliver in return for a salary. Within this “contract”, the Commission expects you to use your skills, knowledge and experience solely to help run a successful identity Data capture, management and secure business that meets the needs of our customers, stakeholders, partners and the wider community.

You must not use your position as an employee (or any knowledge gained at work) for any private or personal advantage. There should be **no conflicts arising between the Commission’s interests and your own private interests**. A conflict of interest may arise when:

- You or a relative wins a business contract as a result of your position within the Commission.
- You use business information from your work in Commission to gain private business advantage for yourself or your relatives
- You use the Commission’s equipment or facilities for private business advantage
- You are a sibling or spouse to another staff of the Commission working in the same location.

Outside Activities: Other Employment and Directorships

The Commission supports the efforts of individual employees to participate in the activities of their local communities (such as elected civic roles, or voluntary support for charities, religious, sporting and educational institutions) as long as there is no conflict of interest.

If you participate in activities outside work, you should follow 3 basic rules:

1. Outside activities are carried out during your own time, not work time
2. Outside activities do not in any way influence your judgement at work or your ability to act solely in the interests of the Commission
3. Outside activities, interests and obligations do not compromise your ability to act fairly at work, treating all customers, colleagues and staff with equality

Relationships with Customers and Contractors/Suppliers

In the course of your work, you will frequently develop close relationships with customers and contractors/suppliers. This may create situations where conflicts of interest arise – real or perceived. To safeguard integrity, you must avoid all personal interests in companies or organisations which has the Commission’s customer or supplier contracts. In practice, this means that you must avoid:

- Financial investments in these companies
- Contractual relationships with these companies

As an employee or agent of the Commission, it is your duty to ensure the following:

1. Notify your Head of Compliance if a contractor/supplier or contractor/supplier’s agent attempts to bribe you
2. Ensure that no bribe is paid to any supplier of the Commission, and report any suspicions that you may have to your Head of Compliance

3. Ensure suppliers receive payment as defined by the Federal Government payment policy.
4. Protect all confidential data on customers and contractors/suppliers and ensure that it is not exploited for personal gain or unfair commercial gain by the Companies
5. Your personal affairs are clearly separated from the business activities of the Commission.

Gifts and Hospitality

In carrying out your normal duties as an employee of the Commission, it is **forbidden to accept any gifts from customers or suppliers**. The only exceptions are corporate hospitality, as defined below:

1. Standard promotional gifts: of no commercial value, branded with the supplier's or customer's logo
2. Business entertainment limited to:
 - (a) occasional lunches, dinners or cocktail parties and
 - (b) invitations to standard sporting or cultural events which are hosted/sponsored by the supplier or customer

You should offer no personal favours or preferential treatment in return for these permissible gifts and corporate entertainment.

The policy of the Commission is not to offer gifts to its customers and contractors/suppliers except as defined below:

1. Standard promotional gifts: of nominal commercial value, branded with the Commission's logo
2. Business entertainment limited to:
 - (a) occasional lunches, dinners or cocktail parties and
 - (b) invitations to standard sporting or cultural events which are hosted/sponsored by the Commission.

As an employee, you must not offer nor accept any gifts other than specifically defined in the list above.

Investments: Work-Related and Personal

There are two areas of investment activity which are covered by this Code of Ethics: making investments on behalf of the Commission ; and making personal investments. The key concerns relate to potential conflicts of interest and to the misuse of commercially sensitive information.

Investments on Behalf of the Commission

If you are work in Treasury or in other areas of Finance or Business Development function, you may be called upon to make investments on behalf of the Commission. You are therefore required to comply with all laws, codes of practice and regulations governing investment activities. These are mainly (but not restricted to) provisions specified by:

1. NIMC ACT
2. Companies and Allied Matters Act
3. Insider Trading Act
4. Stock Exchanges, Securities Regulation
5. Federal Government guidelines

Personal Investments

This Code of Ethics requires you to ensure that in making personal investments, you observe the following rules:

1. Personal investments do not create any conflict of interest with your role as an employee and affect your ability to carry out your work in a diligent and professional manner on behalf of the Commission.
2. You do not use any confidential or privileged information obtained in the course of your duties at work for the purposes of personal gain

5. Equal Employment Opportunities

The Commission is an equal opportunities employer. All recruitment, training, development and promotion decisions are based on published criteria and transparent processes. The general principle is that of meritocracy – everyone is treated fairly and objectively according to standard rules and procedures, and career progression is determined solely by the abilities and performance record of each individual employee. The Commission provides equal employment opportunities in respect of:

- Gender
- Religion
- Ethnicity
- Colour
- Age
- Tribe
- Or any other form of unjustifiable discrimination which has no bearing on an individual's competence to do a specific job

The Commission is committed to the successful implementation of this policy and will undertake routine monitoring to ensure that it is being applied effectively and in compliance with the Federal Character guidelines of the federal government.

The Commission will not tolerate any breaches of this equal opportunities policy. It specifically prohibits all forms of favouritism and you are expressly prohibited from actions that may be defined as:

- Nepotism – deliberately favouring your own relatives/friends whilst performing your duties in the Commission or influencing other staff to act in a way that favours your relatives/friends
- Tribalism – deliberately favouring members of your own tribal group whilst performing your duties in the Commission, or influencing other staff to act in a way that favours your tribal group

6. Environmental and Social Responsibility

Health and Safety at Work

The Commission is a responsible employer and is committed to providing safe working environments for all employees. This means that the Commission will comply with all Federal government health and safety laws and regulations, and ensure full compliance. As an employee, **you have a duty to:**

1. Understand all health and safety regulations that affect you and the employees that you manage/supervise
2. Attend relevant training and briefing sessions provided by the Commission on matters related to health and safety at work

3. Ensure a safe environment in the work areas for which you have responsibility
4. Monitor compliance with health and safety regulations in the areas for which you have responsibility

Under current legislation, the responsibility for ensuring health and safety at work in areas that you control **is your responsibility**.

Environmental Conservation

The Commission is environmentally responsible organisation with a commitment to conserving scarce natural resources and minimising degradation of the environment. To support this commitment, you are required to observe the following rules:

1. Re-cycle scrap paper
2. Switch off electrical appliances when they are not being used (in cases where this will not negatively impact on operational efficiency)
3. Use Commission's vehicles only for essential business reasons
4. Use the telephone in preference to travelling to meetings
5. Use the email and email attachments to transmit data in preference to written memos
6. Constantly look out for opportunities to increase efficient use of resources

Political Activity

The Commission is a public organisation and as such, the Commission is politically neutral and simply comply with laws and regulations affecting its business operations. Political affiliations are a personal matter and the Commission will not allow any political activities, campaigning, or use of commission's property in support of any political causes by any of its employees.

7. Commission Property

The Commission has implemented procedures to safeguard all corporate property. It is your duty to implement these procedures and ensure full compliance. You are personally responsible for all the Commission's property that is entrusted to your care and you will be held fully accountable for its safe keeping. The main procedures are as follows:

1. All employees who have access to, or control over the Commission's monies and financial assets will follow the procedures for managing these assets, as defined in the Financial Regulations and Manual. You are personally responsible and accountable for all financial assets under your control
2. All treasury management activities should be carried out in accordance with guidelines established by the governing Board and Executive Management
3. All of the Commissions' assets assigned to you as part of your job responsibility should be entered on to the Asset Register, with your name clearly recorded against the asset items as the responsible and accountable person
4. All other operating processes and procedures relating to commission's property and its safekeeping should be adhered to by you and all of the employees that you supervise
5. All commission assets may only be used for their intended purposes. **Private use of any commission property is expressly forbidden**

You are responsible for the commission property in your care. Ignorance of the rules will not absolve you of your responsibilities. Wilful misuse or carelessness will lead to dismissal.

8. Knowledge Management & Operating Procedures

The Commission is committed to efficient knowledge management. All systems and processes will be documented, all transactions will be recorded, all assets be recorded, and all employees will be held to account for procedural compliance and for the resources which are entrusted to them. Efficient records allow the business to be operated in an efficient manner and reduce the opportunities for misuse of assets and behaviour which contradicts policy and good governance.

The commission will establish an efficient knowledge management system so that all employees have instant on-line access to the information that they need to carry out their jobs.

It is the intention to document all processes, procedures and job functions as part of the application for international quality accreditation.

9. Contact with Outside Organisations

Representing the Commission

As an employee of the Commission , you have a duty to represent the commission in a professional manner which supports and reinforces its public image. In dealing with members of the public (including customers) you are required to:

- Take ownership of problems and issues and seek resolution inside the Commission , reporting back to the enquirer or customer as quickly as possible
- Respond to all enquiries within two working days (internal and external)
- Be polite and courteous at all time
- Provide honest, accurate and reliable information
- Honour all promises and commitments which you make
- Never seek to publicly blame colleagues
- Never publicly criticise or disparage other staff
- All formal external communications must use the branded templates (slides, letter headed note paper, logos) and must be approved by the Director General.

Media Relations

All communications with national and international media organisations **must** be made through the Commission's Corporate Communication Unit. If you are representing the Commission in any public media forum, you must have prior authority from the Corporate Communication Unit and work within guidelines which they provide. The general rules for external communications are:

1. Do not say anything that will compromise the business activities of the Commission
2. All scripts must be reviewed and agreed to by Corporate Communication before they are released
3. Corporate Communication Unit must provide a briefing before you represent the Commission
4. Corporate Communication Unit must obtain input of relevant departments and check legal requirements before it published any information in the public domain.
5. You should draw a clear distinction between your personal views and the Commission's position on any issues, and only represent the Commission's position if nominated to represent the Commission.

6. As an employee of the Commission, your media performance should reflect well on the Commission and the Federal Government.

Corporate Citizenship

The Commission wants to be seen as responsible corporate citizen. All community relations and corporate citizenship activities will be coordinated by the Corporate Communication Unit.

Your role is to ensure that, within your areas of responsibility, the Commission

- Complies with all legal and regulatory requirements
- Respects all rights of citizens, customers, contractors/suppliers and employees
- Pays all relevant taxes and duties

10. Document Retention

In addition to privacy and commercial confidentiality as defined in section 3, the Commission will carefully manage all other information that is relevant to its activities. The rules are as follows:

- Only relevant operational records and documents will be retained
- All records will be collated and stored in clearly labelled files and organised in a logical order
- **Official records will be available at all times** to everyone who needs access to them as part of their work responsibilities
- All financial records shall be retained for the duration provided in the Financial & Accounting Policies.
- All tax records shall be retained for the number of years allowed by relevant legislations & policies.
- All personal information in the NIDB shall be retained in perpetuity and for the period of existence of the Commission or its assigned.
- All customer correspondence shall be retained for 8 years or for the period to which the correspondence applied.
- All supplier correspondence shall be retained for 8 years, for the period to which the correspondence applies or as provided by the public procurement Act.
- All regulatory, legal and Government correspondence shall be retained for the number of years or for the period to which it applies and as provided in the document retention policies of the federal government.
- All non-essential documents shall be confidentially destroyed after 8 years

11. Compliance

The Commission regards any contravention of this Code of Ethics as a serious matter and will pursue transgressors through the Commissions' disciplinary procedures and other available legal means. Non compliance could lead to dismissal.

If you have reason to believe that any colleague has contravened this code, it is your duty to report your suspicions in confidence to the Head of Legal, Regulatory & Compliance