

	Meeting : ECOM N° 16	Document: ECOM Minutes Title: GREL Ethics Committee n° 16	  
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Ethics committee Minutes of 01/02/2022

Written by: **Howard Y. NANEVIE**
Venue: **Boardroom / Head Office**

Participants:

Name	Role	Attendance
Lionel BARRE	Managing Director	X
Howard NANEVIE	Human Resources Manager	X
Dickson COBBINAH	Senior Accountant	X
Robert Kofi APPIAH	Site Manager	X
Appiah Kojo KUBI	Company Cashier	X
Cletus Chioma Oshile	Internal Auditor	X

PREVIOUS ECOM MINUTES VALIDATION

The minutes of January 11, 2022 has been sent to all participants without any adverse remarks.

1.1 Corrections

There were no corrections to the previous minutes and as such same was unanimously adopted by members present.

Issues

- **Destruction of an employee's rubber farm by BOPP & Compensation issues:** 01.02.22: The employee wants the established rate of GREL to be used to compensate him. BOPP has opted to offer a lower rate and the matter has ended up in the Court of Law. The employee feels GREL through its internal mechanisms seem not to support his course and is calling on the Ethics Committee to intervene in the matter. The Committee has requested for a formal complaint from the employee himself for consideration.
- **Revision of Conditions of Service:** 11.01.22: Revision of personnel policies in a bid to eliminate ambiguities. 01.02.22: Revision of the personnel policies must guard against the Company losing its resources or increasing its liabilities.
- **Apm Factory/ Suspicion of Fraud:** 11.01.22: There was no mistake on the invoice as there was clear intention to invoice and defraud the Company. Workshop Supervisor failed to follow due process as regards purchases. Clear intention of both the vendor and the worker to defraud. Mighty hands and its Directors to be blacklisted. Huge sanction: Recommendation for 3 month's suspension and then eventual transfer to another sector with lesser risks. Revision of KPIs for the buyers. Benchmark with SAPH. 01.02.22: Process ongoing with stakeholders.
- **Car loan Management:** 31.08.21: HR's refusal to grant car loans to newly recruited employees due to their limited assets to defray such loans in case of exits. During the review of the COS, the longer period must be determined. General Communication to be done to the workforce. 11.01.22: Not yet. 01.02.22: General Communication done on loans.

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- **Green retirement:** 31.08.21: Abuse of Green-retirement scheme loans. New scheme to be totally developed. 11.01.22: 3 categories affected:

 - Persons who supply partially: Reminder notice from Company.
 - Persons who not supply at all: Demand notice from Lawyer
 - Amendment to the new scheme with Scheme security through ESB

Data available to Ethics Committee shows ROU is also not deducting from some deliveries. As per the policy, ROU must deduct 40% (active employees) and 25% (retirees) from each delivery. The Head of ROU must be invited to explain to the Ethics Committee the deduction procedure. 01.02.2022:

 - The HOD of ROU met the committee and after exchanges, it is established that there is a system issue as regards the deduction of green retirement deliveries by percentage through SAP. MD to push with SIPH/ DSI for this issue to be resolved ASAP. Other deductions such as CESS, Credit Union, project loans are however working in percentages in SAP.
 - In that regard, the manual deduction (to be fine-tuned) would continue as we mount pressure on DSI for full resolution of the problem.

- **USE OF COMPANY ASSETS FOR PRIVATE USE & DURING WORKING HOURS:** 11.01.21: Query to be issued to all Managers involved in this practice by MD himself. 01.02.22: Query issued by MD to all persons, no matter their status, involved in these misconducts for the records.

- **Apm factory fuel theft:** 31.08.21: Unacceptable increase in the consumption of fuel. Allegation of employees' involvement. Management to take a decision to serve as deterrent to others. 11.01.22: Petition to Ethics committee for consideration and reversal of dismissal. Position of disciplinary committee upheld by the Ethics Committee; for that matter, the dismissal is justified.


- **Non-refund of medical bill/ Eye Surgery (Owusu Mensah):** 01.04.21: The Committee could not conclude on this subject matter due to the fire alarm at Head Office, the meeting venue. The Committee's meeting came to an abrupt end and inconclusively on this subject matter. 31.08.21: The refund would depend on the medical situation. GREL Dr. to determine whether it is for comfort or a life-threatening issue. 11.01.22: Report done by Company's Doctor. GREL to assume 80% of the medical cost. 01.02.22: Done.

- **CA & Conditions of TCs: Ethics Committee** to consider the CBA & other conditions of service for contractors if any. (to be discussed at next meeting). 11.07.19: Good to try as much as possible to share some information regarding the junior staff salary structure with the TC Contractors where necessary. 06.11.19. Not advisable for now. 01.12.20: On hold for now. 01.04.21: Possible revision of the CA to be more practicable & sustainable to reflect the current realities. 31.08.21: Negotiation still ongoing. 11.01.22: 10 items out of 15 resolved. Depending on the final redundancy rate under review with the Union, part of workers could be made permanent. 01.02.22: Ongoing.

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- **Provident Fund Management:** PF under management by banks (to be discussed at next meeting). Legal opinion by Amegashie on the possible legal risks with FC & CAM. Decision to be taken to officially inform SIPH. Total figure involved to be known. 11.07.19: Roughly 1.5 Mi Eur at stake. Provision to be set aside by company for retired and terminated Employees. Document to be signed by the workers involved. Company pursues case legally with Gold Coast Securities, the fund manager. Decision still ongoing for a new fund manager. 05.09.19: Investment at Zenith Bank paid to all workers in Sept. 2019. Complaint received from Union Chairman for not being consulted before the payment. At the moment, Union is not part of the management of the provident fund/TB. Letter from Lawyer sent to Gold Coast Securities. Proposal for internal management of Provident Fund (Mgt staff) & Terminal benefit (Junior Staff) issue to be studied by Internal Auditor. Proposal to be discussed with the Union as well. 06.11.19: HR to provide documentation regarding the choice of Gold Coast Security. Data to be provided for investments done so far. Very urgent for next week and for the closing of the year as well as the External Auditors. 29.04.20: No documentation available on record. However, New trustees in place (Reps from Executive & Senior Staff + FC) settled on Axis as Trustees, EDC as Fund Manager & Zenith Bank as Fund Custodian as required under the Pensions Act 2008 (Act 766). Proper documentation in place now. 07.05.20: No news from the receiver yet regarding the lock-up capital of employees. 01.12.20: Message received for GREL JS staff. HRM to follow-up and update the committee on the total liability and what has been approved and validated by GoG. 01.04.21: The total lock-up capital for employees stands at GHS 5,742,375.23/ 966,729.84 Eur. 31.08.21: Only 16.1% retrieved so far. The balance still with GOG. **01.02.22: No news from GOG.**
- **Threat at Div. 5 & 9:**

 - 16.04.19: Community is requesting for lands at Ed. 5 creating tension. Safety of staff & protection of Company properties. Felling has been suspended till end of April, 2019. Estates Manager (Wiafe) should review with Thierry in order not to replant too close to the main road in 2020. Military protection as soon as possible for the felling and replanting. Case of Ajumako to be used as precedence. HR to analyse the situation of employees at Ed. 5 for alternate solutions as plan B in case the situation gets out of hand. 11.07.19: Chief wrote to Reg. Minister to thank him for releasing the land which is not the case. Land Commission has confirmed GREL's concession at Ed. 5. There is complete bad faith by Reg. Minister & the Chief. GREL is sending a letter to the Reg. Minister about his attitude regarding the matter in question. 05.09.19: NY. On hold for now. 06.11.19: Meeting slated with Reg. min. on 12.11.19. 29.4.20. This situation has been reported to the board. All the land has been prepared for this year. The next challenge (invading planting by community) concerns planting slated to start next month. 27.05.20: Board were upset about the attitude of the Regional Minister. It has therefore been decided that the Rep of GoG at GREL Board books a meeting with the Reg. Minister. This is to ensure that GREL concessions are protected against any encroachment by the Communities. An official letter would be addressed to the Minister in that regard after the Board Minutes are ready. 01.12.20: No news. All possible land litigation due to pass documentation to be identified. Information to be sent to the Board for their intervention in securing GREL leases with GoG. 01.04.21: Small release of land by GREL for community expansion. To be approved by SIPH. 31.08.21: Everything has been approved by SIPH. Total of about 30ha to be released. 11.01.22: Approved given by the Board. 2 MOUS signed, 3 under negotiation; 1 MOU is more complex. **01.02.22: Negotiation still ongoing with no major issue.**

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- **Divulgence of Information on Ethics Committee**

- Ethics Committee Box. 16.04.19: 16 boxes done and to be stationed at vantage points. 11.07.19: To be followed by HR team. To be published again in the info board regarding the locations of boxes. 05.09.19: To be done in next week's publication. 06.11.19: Another sensitisation to be done on code of conduct. Extensive communication has been done through infoboard. 29.04.20: Done. 27.05.20: Some issues addressed by the Ethics Committee to be communicated in the infoboard. 01.12.20: To be done before end of the year 2020. 01.04.21: Still ongoing and to be shared with members for remarks before publication in infoboard. 31.08.21: More communication on the role of Ethics Committee within the Company. 11.01.22: To be done in January, 2022 for 2018 through to 2020. **01.02.22: Done.**

Next meeting date would be communicated.