

Federation of Fisheries Organizations Uganda,

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FFOU HUMAN RESOURCE MANUAL

Human Resources Policies and Procedures

2017

Prepared by FFOU Legal Department

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PURPOSE OF THE MANUAL

This Manual summarizes all major human Resource policies and procedures that are currently in force in Federation of Fisheries Organizations Uganda (FFOU) and its subsidiaries. Any terms and conditions of employment not covered, in part or in whole, in this Manual shall be subject to the provisions of Employment Act of 2006 in Uganda.

The Manual is intended to serve as a reference guide to full-time employees on the human Resource policies and procedures of FFOU as well as the rationale and principles of how they should be implemented and enforced. The provisions stipulated in this Manual shall be subject to change from time to time at the discretion of FFOU Board of Directors.

Where appropriate and specified, certain sections of this Manual, in particular Sections 10 and 11 on House Rules & Ethical & Legal Responsibilities, are also applicable to temporary employees.

HUMAN RESOURCE PHILOSOPHY

FFOU recognizes the contributions of its employees and treats each individual employee fairly and consistently in all matters, with a uniform application of the following human Resource philosophies:

- ❖ Human Resource is best allocated to achieve optimum productivity and efficiency.
- ❖ Pay and benefits offered are fair, equitable and competitive.
- ❖ Employees are always encouraged to well-equip themselves for the present job and future development of FFOU.
- ❖ Reward is based on merit. High performers are given priority to take up more responsible positions.
- ❖ Two-way communications between employees and the management are promoted as a means of building mutual understanding and trust.
- ❖ Workplace safety is given top priority to protect human health and enable employees to deliver their best performance.
- ❖ The protection of human rights in employment is supported, as guided by relevant internationally accepted principles such as those in the Universal Declaration of Human Rights (<http://www.un.org/en/documents/udhr/>), and is reflected in our Employment Policy and Equal Opportunities Policy. Employees' freedom of speech and association are respected as long as they are within the legal boundaries.

EMPLOYMENT POLICY

It is the policy of FFOU to recruit the best qualified people and to maintain a pool of human Resource according to the manpower requirement and planning of FFOU.

It is also the policy of FFOU to transfer or promote well performing and capable employees to fill vacancies so that employees are provided with opportunities to widen their exposure and further their career development within FFOU.

All applicants have equal opportunities of employment irrespective of their age, sex, marital status, pregnancy, family status, disability, race, nationality or religion (provided that these do not impede the abilities of the prospective appointees to carry out normal job duties or affect the health and safety of fellow employees).

Job applicants are treated fairly and equally. Employment is offered only to the best qualified applicants with reference to their merits and abilities to meet the requirements of the jobs irrespective of whether they are referrals or direct applicants.

The Human Resource Department provides recruitment advice and services to all Departments and is responsible for the entire process leading to employment. FFOU will not be bound by offers of employment other than by the Human Resource Department. Employment – Manpower Plan & Control.

MANPOWER PLAN & CONTROL

1. PURPOSE

- The aims of manpower planning of FFOU are:
- To ensure that FFOU acquires and retains the optimum number of employees with the required skills, expertise and competence;
- To exercise effective control of staffing and the associated cost; and
- To assist in optimum Resource allocation so that potential manpower surplus or shortage can be anticipated and alleviated as much as possible.

2. MANPOWER PLAN

Head of Departments are required to conduct a thorough review of the operations, structure and manpower of their Departments each year, and furnish recommendations of manpower plan for the following financial year to the Human Resource Department.

The Human Resource Department is responsible for reviewing the recommendations and compiling a corporate manpower plan for the financial year. The manpower plan sets out the number of posts by level and by Department.

3. CHANGES TO APPROVED MANPOWER PLAN

The manpower plan for the financial year, once approved by the Executive Committee/Board, is regarded as official. No change is permitted unless major developments or functional requirements emerge. Any requisition of unbudgeted headcount needs the approval of the Chief Executive Officer.

4. MANPOWER CONTROL

In order to optimize human Resource utilization and to maintain cost effectiveness, stringent manpower control should be exercised. Recruitment should only be carried out in accordance with the bases of operational needs and approved manpower plan.

Whenever an employee leaves FFOU, the Head of Department should assess the manpower of his Department to see if a replacement is necessary. Where a replacement is required, internal transfer or promotion should be considered before pursuing external recruitment. Employment.

RECRUITMENT

1. PURPOSE

The purpose of recruitment of FFOU is to acquire, in a cost effective manner, the optimum number of high quality employees for the operations and development of FFOU. In order to appoint the most appropriate persons for the positions, it is crucial that potential candidates are drawn from a wide pool and equal opportunities are ensured for all candidates. The following guidelines seek to ensure transparency and fairness throughout the recruitment process and maximize the diversity of applicants.

2. RECRUITMENT FOR THE CHIEF EXECUTIVE OFFICER, THE SENIOR MANAGEMENT STAFF, THE ORGANIZATION LEGAL SECRETARY AND THE HEAD OF INTERNAL AUDIT

2.1 Definition of Senior Management Staff

Senior management staff herein refer to the Chief Executive Officer (CEO), the National Programs Coordinator, (NPC) Chief Financing Officer (CFO), the Counsel, the Human Resource Manager (HRM), the Heads of Departments and all other FFOU Staffs.

2.2 Selection Committee

Selection Committees of different compositions shall be constituted by the Board to shortlist and interview the prospective candidates for the positions of CEO, other senior management staff, the Organisation Legal Secretary and the Head of Internal Audit, the Selection Committee shall consist of a minimum of 5 Employees.

2.3 Sourcing Methods

Generally, one or more of the following recruitment approaches, to be decided by the Selection Committee, can be adopted to identify interested and suitable candidates.

2.3.1 Advertising the Post

Advertising the post helps communicate clearly and openly to the public the requirements of the position and the selection criteria which apply. The methods for advertising the post shall include:

- A. advertising in the local press and/or
- B. advertising on FFOU website and/or recruitment websites.

2.3.2 Executive Search

Recruitment consultants can tap into private sector networks and are skilled at promoting opportunities to potential candidates. They can reach a wide pool of candidates, and can reduce the time burden on the Selection Committee. In using executive search.

2.3.3 Network Referrals

Referral is one of the widely used methods for identifying potential candidates in both the public and private sectors. Possible referral sources may include senior management staff of organization.

2.3.4 Internal Candidates

Given that having continuity at the senior management level can be beneficial to the operation of FFOU, internal candidates with the relevant technical expertise and management experience may be recommended for the consideration of the Selection Committee, by the Chairman for the CEO position, and by the CEO in consultation with the Senior Management Committee for other senior management positions. Any internal candidates will be evaluated on the same basis vis-à-vis other candidates. Where an internal candidate and an external candidate for the same position are deemed to have comparable qualifications, experience, and competencies, etc., the internal candidate will be given preference.

2.4 Selection Criteria

The following two sets of selection criteria shall be considered in the recruitment process:

2.4.1 Shortlist Criteria

The shortlist criteria shall focus on the factual requirements of the person specification. In short-listing candidates for interview, the following factors shall be considered:

- A. academic, professional and technical qualifications;
- B. relevant work experience; and
- C. leadership and management experience.

There shall be no discrimination on the grounds of age, sex, marital status, family status, sexual orientation, disability, race, nationality or religion in any circumstances. All candidates shall be assessed fairly and equally irrespective of the sources they come from.

2.4.2 Final Selection Criteria

The final selection criteria are applied to evaluate the evidence gathered through interviews and discussions following the initial shortlist. The final selection criteria shall focus on, inter alia, personal qualities, attributes and competencies, past performance, aspirations, potentials, communication and interpersonal skills, professional and personal integrity.

2.5 Reference Check

Reference check shall be conducted at the final stage of the selection process with prior permission of the selected candidate or shall be conducted immediately after the candidate has accepted FFOU's offer of employment, whichever is practicable. All offers shall only be finalized subject to the receipt of satisfactory references. If a

candidate is found to have provided false information or have misrepresented any information or have not disclosed any material facts in his or her application, it shall be deemed to be sufficient grounds for FFOU to withdraw the offer or terminate his or her service summarily, as the case may be.

2.6 Offer and Approval

2.6.1 Offer

Remuneration packages for the CEO and the senior management staff shall be negotiated and set on an individual basis.

2.6.2 Approval

- a. The appointments of the CEO of FFOU all other management staffs are subject to the approval of the Board of Directors and the President.
- b. The appointments of other senior management staff, the FFOU Legal Secretary and the Internal Audit are subject to the approval of the Selection Committee.

3. RECRUITMENT FOR THE OTHER STAFF

3.1 Staff Requisition

Where replacement or additional employee(s) is required, the Head of Department should complete and forward a Staff Requisition Form to the Human Resource Department to initiate recruitment. The form should specify clearly the job summary and job requirements of the vacant position and be endorsed by the Head of Department.

If the request for additional employee(s) is unbudgeted, the Chief Executive Officer's approval has to be sought. For Departments which are reporting to the National Programs Coordinator, the request has to be endorsed by the National Programs Coordinator before submitting to the Chief Executive Officer for final approval.

Where the headcount is approved, the Head of Department should first consider internal transfer or promotion before pursuing external recruitment.

3.2 Sourcing

3.2.1 Internal Sourcing

The Human Resource Department will issue an internal vacancy announcement to invite applications from employees. Employees may apply to the Human Resource Department in accordance with the policy for Transfer as provided in Section 2-5 or Promotion as provided in Section 2-6. Employees may also refer their friends or relatives to the Human Resource Department if they are interested in the vacant position. The referrals will be considered together with other candidates and undergo the same selection process.

3.2.2 External Sourcing

If it is decided that an external recruitment advertisement is necessary, the Human Resource Department will adopt one or a combination of the following external sources of recruitment which is/are considered to be appropriate and cost effective. The Head of Department may suggest other sources if he/she thinks appropriate.

a. Media

The Human Resource Department will liaise with the Department to prepare the recruitment advertisement.

- ✓ Job Opportunities Section of FFOU's Web Site or other recruitment web site(s) as appropriate; and
- ✓ Most appropriate and effective newspaper(s) and/or other publication(s).

b. University/College Recruitment

For fresh graduate job vacancies, the Human Resource Department will approach the universities or colleges.

c. Recruitment Consultant

Where there are genuine difficulties in finding suitable candidates, a recruitment consultant may be used with the approval of the Head of Human Resource.

3.3 Selection Guideline and Criteria

3.3.1 Shortlist Criteria

In short listing candidates for interviews, the following factors should be considered:

- ❖ Academic, professional and technical qualifications;
- ❖ Working experience;
- ❖ Job knowledge and technical know-how; and
- ❖ Management experience for managerial positions.

There should be no discrimination on the grounds of age, sex, marital status, pregnancy, family status, disability, race, nationality or religion unless these will impede the prospective appointees' abilities to carry out normal job duties. All candidates will be assessed fairly and equally irrespective of whether they are referrals or direct applicants.

3.3.2 Information Gathering during Interviews

During the interviews, interviewers should only ask questions that relate directly to the job requirements. Where it is necessary to assess whether personal circumstances will affect job performance, interviewers should discuss these objectively without questioning the candidates about their age, marital status, pregnancy, family status, race, nationality or religion.

In case of a disabled applicant, job-related information on disability and medical history can be asked to determine the applicant's ability, and the need for special services and facilities, to carry out normal Employment.

It is however unlawful to request medical information for the purpose of discriminating against applicants on the basis of pregnancy or disability.

Assessment of the candidates and due recommendation of the interviewers should be properly documented on the Interview Assessment Form after interviews. All forms and documents containing personal data of applicants should be returned to Human Resource Department for further handling, irrespective of whether the applicants are appointed.

3.3.3 Final Selection Criteria

Judging from information gathered through interviews, the final selection criteria including desirable personal attributes, potential for further development, past performance, job expectation and career aspiration are applied to further evaluate the suitability of the candidates to the job.

If all things are equal, preference will be given to internal candidates taking into consideration the recommendation of their Heads of Department in addition to all other criteria.

3.4 Offer and Approval

3.4.1 Offer

When a suitable candidate is identified, the Human Resource Department will discuss with the recruiting officer and/or the Head of Department, as appropriate, on the terms and conditions to be offered to the candidate. In determining the entry grade and salary of a prospective employee, the following factors will be considered:

- Academic, professional and technical qualifications and working experience;
- Job knowledge and technical know-how;
- Recent earnings;
- Prevailing market rate of the vacant position;
- Availability of suitable candidates in the market;
- Internal relativity of FFOU; and
- Job grade and salary range of the vacant position.

3.4.2 Approval

The selection process and approval authority for the recruitment of all positions should involve at least two levels to ensure that a fair selection process has taken place.

Positions

Approval Authority

Heads of Department reporting to the Chief Executive Officer.

Chief Executive Officer reporting to the FFOU President and Board.

Other employees reporting to Heads of Department.

Except for senior management staff, the Organization Legal Secretary or the Head of Internal Audit Department where the approval authority mentioned in Clause 2.6.2 should apply

3.5 Employment Formalities

3.5.1 Vetting of Documents

Prior to confirmation of appointment, the Human Resource Department will ensure that the candidates are lawfully employable and hold a valid Ugandan Identity Card or other valid identity documents that are acceptable to the Immigration Department. Candidates are required to certify their qualifications and working experience by producing the original copies of their academic and professional credentials, reference letters from previous employers and other relevant documentation.

3.5.2 Employment Visa

For prospective employees who require an employment visa to work in Uganda, the offer of appointments will be subject to their obtaining a valid employment visa from the Government of Uganda.

In a Special way, the Human Resource Department will assist in the process of visa application when necessary.

3.5.3 Reference Check

With the written authorization of the new employees, FFOU will conduct reference checks with their previous employers as far as practicable, immediately after they have accepted FFOU's offer of employment. This is to ensure that the information provided by employees in their applications is correct and that their supervisors are alert at an early stage to any adverse comments about them. If it is impracticable to make a reference check with their latest employers, a reference check with their second latest employers will be conducted first while the reference check with the latest employers will be processed immediately after the employees have reported for duty.

If an employee is found to have provided false information, misrepresented or not disclosed any material facts in his application, it shall be deemed to be sufficient grounds for FFOU to terminate the employee's service summarily, unless the employee can give a satisfactory explanation.

3.6 Reporting on Duty

On their first day of employment, new recruits will usually report to the Human Resource Department to complete the engagement formalities and attend a brief Organization induction before they report for duty to the designated Department.

Heads of Department should arrange for new employees' job induction once they have reported for duty. New employees will also be invited to attend a Staff Orientation Program conducted by the Human Resource Department to help them better understand the *Vision, Mission, Core Values, Goal, Objectives and organizational structure of FFOU, as well as its rules and regulations, and code of conduct.*

PROBATIONARY PERIOD

1. PURPOSE

The purpose of the probationary period is to allow time for new employees and FFOU to ensure their expectations on employment and job performance are met.

2. POLICY

- 2.1. Unless otherwise stated in the contract of employment, all employees are required to undergo a probationary period of six months as provided for in the Employment Act of 2006.
- 2.2. If a resigned employee rejoins FFOU in the same Department or in a capacity in which the job nature is similar to his previous position with FFOU, the probationary period may be waived at the discretion of FFOU. However, if an employee rejoins FFOU in a different Department or in a position where the job nature is different from his previous position, a probationary period may be required in order to ensure that the employee is suitable for the job.
- 2.3. Subject to satisfactory performance, employees will be confirmed after the probationary period as permanent employees of FFOU and eligible for employee benefits as appropriate.
- 2.4. During the probationary period, the notice period required to terminate employment by either FFOU or the employees is hereby referred to the Employment Act of 2006:

3. CONFIRMATION OF EMPLOYMENT

Approximately four weeks before the probationary period expires, the Human Resource Department will send a Confirmation of Employment Form and a Performance Development Form to the Heads of Department for assessment of their new employees' performance and suitability for employment.

The Heads of Department should assess the performance of their new employees during the probationary period and recommend if their employment should be confirmed. The Head of Department should return the completed Confirmation of Employment Form to the Human Resource Department three days before the expiry of the probationary period of the employee. If the employee serves his probationary period satisfactorily, he will be confirmed as a permanent employee and a letter of confirmation will be issued to him through his Head of Department by the Human Resource Department.

4. EXTENSION OF PROBATIONARY PERIOD OR TERMINATION OF EMPLOYMENT

If the Head of Department considers that the performance or working attitude of a new employee is not satisfactory and a longer period of observation is required, the employee will be requested to undergo an extended probationary period, normally for another three months. Employees who perform unsatisfactorily or are not suitable for the job may be terminated at any time in accordance with the law. (Employment Act of 2006)

If the Head of Department decides to extend the probation or terminate the service of the employee, he should state his intention clearly on the Confirmation of Employment Form and return it to the Human Resource Department at least three days before the expiry of the probationary period of the employee. Where assistance is required on employee training, counseling or disciplinary action, the Human Resource Department will work closely with the Head of Department.

TRANSFER

1. PURPOSE

Internal transfer is encouraged by FFOU as it gives employees opportunities to widen their exposure and pursue development in other streams within FFOU. It also enables FFOU to deploy employees to areas where they can best contribute to and meet the manpower requirement and planning of FFOU.

2. POLICY

- 2.1. It is the policy of FFOU to consider internal transfer for existing employees whenever a suitable job opportunity arises. All things being equal, preference will be given to internal candidates so that employees are provided with opportunities to widen their exposure and further their career development within FFOU.

All employees should have equal opportunities for transfer. It should be nondiscriminatory and based on job related factors. Age, sex, marital status, pregnancy, family status, disability, race, nationality or religion should not be considerations for transfer.

- 2.2. Employees may be transferred from one post to another or from one Department to another for career development or operational/structural reasons. Requests for transfer may be made either by Heads of Department or by employees. Transfer should not, however, be used as a means to shift undesirable or problem employees to another Department. Neither should it be used for internal staff poaching.
- 2.3. Transfer can only be successful if agreed by both the releasing and the recruiting Heads of Department. A waiting period is normally required to enable the releasing Department to find a replacement.
- 2.4. In principle, no probationary period is necessary for transfer. Termination notice will be adjusted, if applicable, to the employment conditions of the new position. If a probationary period is deemed necessary and the termination notice differs from that of the previous position, the new termination notice will apply only upon completion of probation.
- 2.5. As one of the main reasons for transfer is career development, frequent transfer is not encouraged. Employees should remain in their positions for at least one year before any transfer is considered.

PROMOTION

1. PURPOSE

FFOU aims to provide career advancement opportunities for employees to develop and utilize their potential whenever possible, while at the same time recognizing their outstanding performance.

2. POLICY

- 2.1. It is in the interest of both the Organization and the individual that employees be encouraged to seek and gain advancement within the Organization. Whilst the management reserves the right to appoint the most suitable person to any particular post, whether an internal candidate or external one, it is the Organization's policy to promote from within whenever and wherever possible.
- 2.2. The basic principles of promotion in FFOU are equal opportunities, non- discriminatory and the best person for the job. Selection for promotion should be based on merit with due consideration of the following factors:
- ❖ Job knowledge and technical know-how;
 - ❖ Competence and potential;
 - ❖ Performance and quality of work;
 - ❖ Academic/professional/technical qualifications;
 - ❖ Honesty, integrity and commitment to work;
 - ❖ Working attitude and interpersonal skills; and

❖ Personal attributes and tact.

Age, sex, marital status, pregnancy, family status, disability, race, nationality or religion should not be considerations for promotion.

- 2.3. Promotion based on merit provides pathways or potential avenues for employees to aspire for higher grades, so as to maintain a clear and stable career development structure enabling the advancement and retention of quality staff.
- 2.4. Whenever vacancies arise, the Heads of Department should consider the possibility of promoting existing employees from within before recruiting externally.
- 2.5. Under normal circumstances, Heads of Department may recommend promotion for their employees, if they meet the requirements of and are suitable for the vacant positions.
- 2.6. Alternatively, employees who fulfill the requirements of and consider themselves suitable for the vacant positions may apply for the positions by responding to internal vacancy announcements.
- 2.7. Under exceptional circumstances, promotions driven by business/operational needs, individual merit and competency, and/or added responsibilities will be considered on a case-by-case basis. Heads of Department should provide full justifications when making recommendation of the promotion.
- 2.8. To be eligible for promotion to the next higher grade, employees should have demonstrated potential for further development and possess relevant experience, qualifications and attributes prescribed for the position. As a general rule, they should have served in their present job for a minimum of 12 months.
- 2.9. In general, promotion driven by vacancy is subject to approval of the Heads of Department. In the case of employees reporting directly to the Heads of Department, approval from both the Heads of Department and the Chief Executive Officer has to be sought. Promotions other than vacancy driven are subject to approval of the President.
- 2.10. Normally, employees will be promoted to positions which are one grade higher than their current ones, and their new job titles have to be in line with FFOU's titles.
- 2.11. On promotion to a higher grade, employees will normally receive the entry pay of the new grade or a promotional increase which is equitable to other employees of the new grade. They will also be eligible for benefits applicable to the new grade.

3. PROCEDURE

- 3.1. For promotion recommendation, the Head of Department should complete and forward a Personnel Movement/Contract Renewal/Salary Revision Form with full justification to the Human Resource Department.
- 3.2. The Human Resource Department will review the recommendation and ensure that appropriate approval is granted.
- 3.3. Upon approval of the promotion, the Human Resource Department will prepare a letter incorporating all changes in terms and conditions of employment and send the letter to the promoted employees. They are required to sign and return a copy of the letter to the Human Resource Department, signifying acceptance of the new terms and conditions.

8. TERMINATION

1. PURPOSE

This policy sets out the conditions and procedures relating to termination of employment with FFOU. It aims to ensure that FFOU is in line with good employment practice and complies with all statutory requirements.

2. RESIGNATION

2.1. Notice Period

A contract of employment may be terminated by either party giving notice in writing or payment in lieu as specified in the contract of employment. Unless otherwise specified in the contract of employment, the notice or payment in lieu to be given by either party for termination of employment is as follows:

Notice Period		
Grade	During Probation	After Confirmation
Grade 6 and above	No notice required in the first month 1 month in subsequent months	3 months
Grade 7 and below	No notice required in the first month 7 days in subsequent months	1 month

The length of notice to be given by either party in the event of an extended probationary period shall be the same as during probation.

Employees who fail to fulfill the required notice period will have their final payment deducted in proportion to the period of short notice.

Employees may not extend their notice period to take advantage of rest days or public holidays falling immediately after the expiry of their required notice period. Extended notice is only accepted with valid reasons and the approval of their Heads of Department and the Head of Human Resource Department.

Employees are not allowed to use outstanding compensation leave or annual leave in lieu of termination notice without the approval of their Heads of Department. Similarly, maternity leave cannot be served as notice for termination of employment.

If an employee has applied for annual leave prior to submission of his resignation and the approved leave falls within the notice period, he must obtain re-approval from his Head of Department.

Any request to waive the whole or part of the termination notice must be provided with justification and approved by the Head of Department.

2.2. Procedure

2.2.1. Submission of Resignation

An employee who wishes to terminate his employment must submit a letter of resignation to the Human Resource Department with a copy to his Head of Department. The Head of Department should endorse the letter to signify his acknowledgement of the resignation and send his copy to the Human Resource Department.

Upon receipt of the letter of resignation, the Human Resource Department will acknowledge the resignation in writing and confirm with the employee the last working day and the effective date of his resignation with a copy to his Head of Department.

2.2.2. Return of Organization Property

Upon leaving the service with FFOU, the employee must handover to his Head of Department or designated officer all accounts, contacts, data, records and documents, whether in paper, tape, diskette or electronic form, related to his job.

On his last working day, the employee is required to return all Organization property (please refer to Section 10-2 on House Rules for the definition of Organization property) to his Head of Department, the Administration Department, the Exchange Library and/or the Human Resource Department as appropriate. FFOU reserves the right to deduct from the resigned employee's final payment an amount equivalent to the value of any property which is not returned or is damaged and any amount due to FFOU.

2.2.3. Exit Interview

The Human Resource Department will normally conduct an exit interview with the resigning employee to obtain a better understanding of his needs and to solicit his feedback in FFOU's policies and practices so as to improve the overall working environment and conditions.

2.2.4. Final Payment

The final payment including basic salary, job related payments or reimbursements, payment in lieu of accrued annual leave and money due to the employee, if any, will be paid to the resigned employee by cheque or autopay into his bank account within seven days from his effective date of resignation.

2.3. Calculation of Salaries

2.3.1. Salary payment in lieu of termination notice (calculated on the basis of calendar days)

Monthly basic salary x No. of calendar day(s) in lieu of notice

No. of calendar days in the month

2.3.2. Final salary payment (calculated on the basis of calendar days)

Monthly basic salary x No. of day(s) employed in that month

No. of calendar days in the month

2.3.3. Salary payment in lieu of accrued annual leave or salary deduction for advanced annual leave (calculated on the basis of working days)

Monthly basic salary x No. of working day(s) of

21 accrued/advanced annual leave

2.4. Reference Letters

Reference letters will be issued by the Human Resource Department to former employees who have completed their probationary periods. Employees who wish to have their reference letters made under the official titles of their Heads of Department can apply direct to their Departments. A copy of the reference letter should be sent to the Human Resource Department for record purpose.

2.5. Leaving Uganda upon Resignation

In accordance with the statutory requirements of the Inland Revenue Department, employees are required to notify FFOU if they are going to leave Uganda for more than one month following their resignation. The Human Resource Department is responsible for settlement of salaries tax with the Inland Revenue Department. Employees are required to settle their outstanding salaries tax with the Inland Revenue Department before leaving Uganda. Final payment will only be made to employees upon submission of a letter of release issued by the Inland Revenue Department.

2.6. Withdrawal of Resignation

Withdrawal of resignation must be made in writing by employees and approved by their Heads of Department. A copy of the approved withdrawal should be sent immediately to the Human Resource Department.

3. DISMISSAL

While the law recognizes an employer's right to terminate the employment of an employee with legitimate reasons, Heads of Department must cautiously exercise the right in order to minimize the adverse impact on other employees, their Departments.

Unless the subject matter is of a very serious nature where termination of employment is inevitable, Heads of Department are advised to adopt the disciplinary procedures as specified in Section 12.

3.1. Approach

If a Head of Department wishes to terminate the employment of an employee, he should consult the Human Resource Department about the approach to be adopted.

3.1.1. Termination by Notice or Payment in lieu.

If an employee's performance is unsatisfactory or not up to the required standard; or his working attitude is poor; or he is found to be unsuitable for the job; or under any other circumstances other than those specified for Summary Dismissal in Clause 3.1.2, FFOU may lawfully terminate his contract of employment with notice in writing or payment in lieu as specified in the contract of employment.

This is the most common approach to termination of employment by an employer for minor and/or trivial transgressions.

3.1.2. Summary Dismissal (Without Notice or Payment in lieu)

If an employee, in relation to his employment:

willfully disobeys a lawful and reasonable order;

misconducts himself, such misconduct being inconsistent with the due and faithful discharge of his duties;

is guilty of fraud or dishonesty;

is habitually neglectful in his duties;

becomes involved in improper securities transactions, or without approval discloses to a third party any confidential information obtained from his employment; or on any other grounds which would entitle FFOU to terminate the employment without notice, FFOU may lawfully terminate his contract of employment without notice or payment in lieu.

This approach of termination of employment by an employer should only be applied to cases where an employee has committed very serious misconduct or fails to improve himself after the employer's repeated warnings.

3.2. Suspension of Employment

If an employee is suspected of a violation that could lead to summary dismissal, FFOU may, during the investigation, suspend his employment for a period not exceeding 14 days. However, where the investigation is of a criminal nature and proper criminal proceedings cannot be concluded within 14 days, the suspension may be extended till the conclusion of the criminal proceedings.

During the period of suspension, the employee will be paid salary as normal and will be given an opportunity to state his case. During the hearing of the case, he may be accompanied by a colleague if he so wishes. In exceptional cases, suspension without pay may be warranted but such a decision can only be made by the approval of the Head of Department and Head of Human Resource Department.

3.3. Prohibition against Termination

The Employment Manual imposes the following limitations on termination:

3.3.1. Maternity Protection

After an employee's pregnancy has been confirmed by a medical certificate and has served notice of her pregnancy, termination of employment, on grounds other than summary dismissal due to the employee's serious misconduct, is prohibited from the date on which she gives notice of her intention to take maternity leave until the date on which she is due to return to work.

If a pregnant employee is dismissed before she has served notice of pregnancy, she may serve notice immediately after being informed of her dismissal. Under these circumstances, the dismissal or notice of dismissal must be withdrawn.

Where it has been explicitly agreed that the employment is on probation, dismissal during the probationary period is not prohibited. However, the employee cannot be dismissed by reason of her pregnancy.

3.3.2. Sick Leave Protection

An employee shall not be dismissed whilst on paid sick leave. This restriction does not apply to summary dismissal due to the employee's serious misconduct.

3.3.3. Annual Leave

When an employee is taking accrued statutory annual leave, neither FFOU nor the employee is permitted to terminate employment by giving the other party notice of termination during the period which is being taken as annual leave. This restriction does not apply to annual leave which is in excess of the provisions under the Employment Manual.

3.3.4 Giving Evidence or Information to the Labour Department

An employee shall not be dismissed for giving evidence or information in any proceedings or inquiry in connection with the enforcement of Labour legislation, industrial accidents or breach of work safety regulations.

3.3.5 Injury at Work

FFOU shall not dismiss an injured employee before having entered into an agreement with the employee for his compensation or before the issue of a certificate of assessment.

3.4. Procedure

3.4.1. Before any dismissal decision is made, the Head of Departments advised to study all the facts leading to dismissal and seek advice from the Human Resource Department with regard to the approach and action to be taken.

3.4.2. If dismissal is deemed necessary, the Head of Department should complete and forward a Personnel Movement/Contract Renewal/Salary Revision Form with reason(s) to the Human Resource Department.

3.4.3. The Human Resource Department is responsible for determining the approach to be taken, issuing the dismissal letter and final payment.

3.4.4. A dismissal interview should be conducted by the Head of Department or his designated officer and the Human Resource Department, if required.

RETIREMENT

1. PURPOSE

FFOU values the contributions made by its employees during their service with FFOU and provides benefits at their retirement.

2. POLICY

2.1. Normal Retirement

The retirement age for employees of FFOU is 60. Employees will normally retire on the last day of the calendar month in which they attain age 60.

Retirees are entitled to the normal retirement benefits of the Staff Provident Fund Scheme upon retirement. The normal retirement benefits will include a lump sum equal to the full amount of the member's balance, employer's balance and any prior service balance.

If the amount of the employer's balance plus prior service balance under the Scheme is less than the long service payment to which the retirees would be entitled under the Employment Manual, they will receive the retirement benefits under the Scheme plus the difference between their statutory long service payment and their employer's balance plus prior service balance under the Scheme.

As a recognition of retirees' contributions to FFOU, a gold medal will be presented to them on their last working day.

2.2. Post-Retirement Employment

Under the following special circumstances, where it is mutually agreed between the employees and FFOU, post-retirement employment may be considered, provided that the health of the retiring employees and their performance are satisfactory, subject to: needs of FFOU; difficulty of finding a replacement; and special skills and knowledge of the job.

Post-retirement employment must be recommended by Heads of Department and approved by the Head of Human Resource Department, and is subject to the retirees' health and fitness for employment.

Post-retirement employment will be offered to retirees on a contract basis, normally for a period of one year subject to renewal by mutual consent on an annual basis until age 65.

The terms and conditions including fringe benefits of the post-retirement employment may not be the same as those of employment under age 60. Retirees should refer to their contracts of employment for the specific terms and conditions applicable to their post-retirement employment.

HOURS OF WORK

1. Normal Working Hours

The normal office hours of FFOU are Monday to Friday, between 8:30 a.m. and 6:00 p.m. with lunch hour from 1:00 p.m. to 2:00 p.m.

Employees will work either one of the following staggered office hours depending on the job requirements and subject to Head of Department's approval:

8:30 a.m. to 5:30 p.m. or 9:00 a.m. to 6:00 p.m.

2. Lunch Hour

By arrangement with Heads of Department, employees may have lunch, not exceeding one hour, at flexible times.

3. Shift Duties

Employees who are required to work on shift owing to the nature of their duties should refer to their supervisors -or above for their shift schedules and should comply with the duty roster. Supervisors who are responsible for setting the schedules should inform the employees well in advance of any changes in the roster.

4. Overtime Work

Employees may be required to work additional hours when operational or contingency needs arise, or during typhoons or rainstorms, to carry out their duties. The policy and procedure governing overtime compensation are detailed in Section 4- 6.

5. On-call Duties

In exceptional cases, there may be a need for employees to be on-call outside normal working hours to handle operational or contingency matters. If the matters cannot be dealt with over the telephone, FFOU may require the employees to return to the workplace for emergency action. Extra hours worked may be compensated in accordance with the policy and procedure governing overtime compensation as required by the laws in force

REST DAYS

The rest days are generally Sundays and Saturdays for employees with normal working hours. For employees on shift work, rest days will be in accordance with the shift schedules arranged by their supervisors above Senior Manager Grade. Supervisors should inform them of the appointed rest days before the beginning of each month.

In case of urgent business needs, employees may be required to work on their rest days. The extra hours worked may be compensated in accordance with the policy on overtime compensation as detailed in the Section of Job Related Payments and Reimbursements.

PUBLIC HOLIDAYS

Employees are granted paid public holidays as gazetted by the Government of Uganda. These gazetted holidays are inclusive of statutory holidays.

For employees on shift work, if the normal shift working hours fall on public holidays, they are required to report for duty on these days. They will be compensated by time-off on other working days.

SALARY POLICY

1. PURPOSE

FFOU aims to provide employment which offers fair and equitable remuneration in relation to responsibility and performance. The salary policy of FFOU is designed to attract, motivate and retain a high-calibre workforce.

This policy sets out the guidelines for salary administration in FFOU. It should be noted that while the Human Resource Department formulates the salary policy and oversees the salary administration, it is primarily the responsibility of Heads of Department to execute the policy in accordance with the principles set out.

2. PRINCIPLES

FFOU's salary policy is governed by the following principles:

2.1. External Competitiveness

FFOU aims to pay salaries which are competitive in the market for similar jobs. Consideration is given to the market pay levels, pay trend and supply and demand in the labour market.

2.2. Internal Equity

All jobs are categorized into job grades with reference to the job contents and job sizes. The same salary range should apply to individuals of the same job grade.

2.3. Individual Profile

Salary should commensurate with the individual employee's qualifications and experience.

2.4. Performance

Results achieved and personal effort are prime factors in determining the salary progression of individual employees.

2.5. Cost Efficiency

FFOU aims to achieve these principles at a reasonable cost and within budget.

3. SALARY ON TRANSFER AND REDEPLOYMENT

Employees transferring between Departments on the same grade or to a different professional business stream without taking up a higher level of responsibility will not receive a salary increase.

4. SALARY ON PROMOTION

On promotion to a higher grade, a promotional increase which is equitable to other employees of the new grade, or a salary progression scheme will be worked out by their Heads of Department and the Human Resource Department.

5. SALARY FOR TEMPORARY APPOINTMENTS

The salaries to be offered for temporary appointments such as student trainees, temporary assistants, part-time employees or secondees, do not fit into the salary structure for permanent employees. Their salaries will be determined by taking into consideration the prevailing market rates and cost-planning of FFOU.

6. CONFIDENTIALITY OF SALARY INFORMATION

Salary information is strictly confidential. Only the individual employee, his Head of Department or his designated officer and employees who process salary and benefit administration will have access to the employee's salary information. Employees should not disclose their salaries to persons other than their Heads of Department or his designated officer. Employees who have access to salary information in the course of their duties must handle the information with extreme care to ensure confidentiality.

PAY REVIEW

1. PURPOSE

The objectives of pay review are to reward employees in accordance with their responsibilities and performance throughout the year, and to review their remuneration against the market so that they are rewarded equitably internally and competitively with the market.

2. ELIGIBILITY

It is not mandatory for FFOU to conduct pay review for individual employees. Generally, employees who have successfully completed the probationary period on 31 December of the year may be considered for pay review.

Employees who are not entitled to pay review or have submitted their resignation letters prior to the formal notification of the pay adjustment will not be granted any increase.

3. PAY REVIEW

The pay review will normally be conducted on 1 January each year.

In order to ensure that reasonable and equitable pay adjustments are made, the Human Resource Department will issue guidelines to all Heads of Department. Heads of Department are required to make their recommendations in accordance with the guidelines.

The Human Resource Department may provide indicative adjustment rates for specific job grades or positions that require special attention. While the Heads of Department are to use the guidelines for reference, they should make adjustments in their recommendations to accommodate specific circumstances in their Departments. However, they should provide justification to the Human Resource Department for any exceptional pay increase or promotion.

As recommendations for pay review and promotion are subject to final approval of the Chief Executive Officer and the President, Heads of Department should not make any premature commitment or disclosure to employees.

JOB RELATED PAYMENTS & REIMBURSEMENTS

1. PURPOSE

This Section sets out the compensation to eligible employees for hours worked in excess of normal working hours as specified by management in the form of compensation leave, or job related payments and reimbursements when granting of compensation leave is not feasible.

2. POLICY

It is the management's responsibility to ensure that overtime work is only performed when necessary and unavoidable. Regular or perpetual overtime is discouraged and considered inappropriate. Management should review the circumstances leading to regular overtime and should look for other means to alleviate the situation. Consideration should be given to "shift" or staggered working hours. Prior approval from supervisors -or above is required for performance of overtime work with compensation. Overtime work should be compensated by compensation leave whenever situation permits.

3. OVERTIME COMPENSATION

3.1. Compensation Leave

Compensation leave is calculated on a one-to-one basis. Eligible employees may apply for compensation leave provided that they work for at least one hour beyond normal working hours and without overtime payment or meal allowance claim. After the first hour of overtime, the compensation leave is calculated on a half-hourly basis. Compensation leave should be arranged at such times that will cause minimum interruption to the operations of the Department subject to approval by supervisors. It should be scheduled on where situation allows.

Compensation leave must be taken within twelve months after overtime work has been performed, and will be forfeited automatically if not taken within the specified period of time. A detailed record on the overtime work and compensation leave of each employee should be maintained by a designated staff member of each Department.

Unless under very special circumstances where approval of Head of department is obtained, compensation leave should not be used for notice of termination. Under no circumstances shall the accrued compensation leave be compensated by payment

3.2. Overtime Payment

Eligible employees may be compensated by overtime payment whenever compensation leave cannot be granted. Eligible employees may apply for overtime payment provided that they work for at least one hour beyond the normal working hours. After the first hour of overtime, the payment is calculated on a half-hourly basis.

3.3. Meal Allowance

On top of overtime or checklog payment, eligible employees will be paid meal allowance under the following circumstances:

3.4. Shift Allowance

Employees will be granted a shift allowance equivalent to a maximum of 24 per cent of the monthly basic salary/cash package for performing regular overnight shift duties on a 24-hour basis. Since shift hours vary due to operational requirements, different shift allowances will apply. The rate of shift allowances will be determined by the respective Heads of Department and Human Resource Department. Employees will not be eligible for reimbursement of meal or travelling expenses as stipulated in Clauses 3.5 and 3.6 for performing overnight shift duties in accordance with the duty roster. The allowance will be automatically withdrawn if they no longer be required to perform overnight shift duties.

3.5. Checklog Payment

Employees in the Information Technology may be required to check the console logs from the trading host systems to ensure the trading systems' integrity at the end of each trading day. For each checklog performed after normal working hours, eligible employees will be paid a checklog payment instead of overtime payment.

3.6. Reimbursement of Travelling Expenses

Reimbursement of travelling expenses between the employees' residence and workplace will be given to them if they are required to work overtime before 7:00 a.m., after 10:00 p.m. The reimbursement depends on the actual expenses subject to submission of original receipt.

LEAVE

1. POLICY

The objectives of providing leave benefits by FFOU are to release its employees from the pressure of work and to provide them time-off under circumstances such as sickness, marriage and pregnancy. The leave benefits set out in this Section are applicable to full- time permanent employees. Application for leave is subject to the approval of FFOU CEO and must be supported by relevant documents proving the eligibility of the employee to the satisfaction of FFOU.

Details of the leave policy are set out in the following paragraphs. The policy shall be subject to change from time to time at the discretion of FFOU.

2. ANNUAL LEAVE

2.1. Entitlement

Employees are entitled to paid annual leave according to their grade and seniority as follows:

Number of Working Days of Annual Leave Grade under 8 Years' Service, 8 Years' Service or More Grade 1 (only for CEO of FFOU&NPC).

Employees who are employed or promoted during a calendar year will have their annual leave calculated on a pro-rata basis. Employees are only eligible for annual leave upon completion of six months' service.

2.2. Duration of Leave

Employees of grade 5 and below must take their annual leave for a minimum of seven consecutive days, including rest days and public holidays, at one time and the remaining days either consecutively or separately at other times. Employees -and above must take their annual leave for a minimum of 14 consecutive days, including rest days and public holidays, at one time

and the remaining days either consecutively or separately at other times. Supervisors should ensure that their subordinates take leave in such a manner. Nevertheless, annual leave shall be taken at such time(s) as approved by their supervisors -or above.

If an employee is sick during the approved period of annual leave, the sick days will be counted as part of the annual leave.

To help arrange work schedules, at the beginning of the year, an employee is requested to input his provisional annual leave schedule into the HR e-Leave. The annual leave planner will be available for viewing by Head of Department, approving manager(s) and leave administrator. Annual leave should be taken according to the leave planner as far as practicable.

2.3. Accumulation of Leave

The maximum annual leave employees can carry forward to the following year will be their one year's entitlement. If an employee's annual leave entitlement changes during the year, the maximum annual leave to be accumulated will be his new entitlement. Leave balance carried forward will be forfeited if it is still not taken by the end of the following year.

Notwithstanding the above, employees should be encouraged to clear their annual leave as far as possible during the year. Accumulation of annual leave should be due to work-related reasons such as:

- The employee is required to work on a major or special project with a deadline to meet and cannot be released.
- The superior(s), subordinate(s) of the employee or several employees within the same Department are on leave or absent from the office for a long period and the presence of the employee is required in the office.
- The workload at the Department is particularly heavy which makes the employee impossible to be released.

2.4. Leave Balance upon Termination of Employment

Employees, upon submitting their resignation letters, are not allowed to use their outstanding annual leave in lieu of termination notice unless approval is obtained from their managers in charge of the department or above.

If an employee has applied for annual leave prior to submission of his resignation letter and the approved leave falls within the period of termination notice, he must re-obtain approval from his manager in charge of the department or above before taking leave.

If an employee terminates his employment with FFOU after completion of three months' service, he will be paid salary in lieu of any accrued annual leave. Calculation of salary payment in lieu is as follows:

Monthly basic salary 21 X No. of working day(s) of accrued/advanced annual leave.

If an employee terminates his employment, he is required to compensate FFOU for any advanced leave taken in excess of his annual entitlement, calculated in accordance with the above formula.

3. SICK LEAVE

Employees will be granted paid sick leave for reasons of physical or mental illness as certified by registered medical/dental practitioners. The maximum sick leave that can be taken by employees is governed by the provisions as stipulated in the Employment Act.

Employees are required to notify their supervisors -or above by telephone in the first instance of any illness precluding them from work.

Sick leave applications for half a day or more must be submitted to supervisors -or above immediately upon resumption of duties. Sick leave applications for one day or more must be supported by medical certificates issued by registered medical/dental practitioners. Otherwise, the leave taken will be counted as annual leave or no pay leave.

Employees taking sick leave exceeding their statutory entitlement and supported by medical certificates issued by registered medical/dental practitioners will have their salaries deducted as follows:

Monthly basic salary No. of calendar days in the month x No. of day(s) of sick leave exceeding statutory entitlement Benefits.

EDUCATION/EXAMINATION LEAVE

4.1. Eligibility

Education and Examination leave will be granted to employees subject to the job relevance of the program and examination, career development, and/or other conditions specified in Section 7 - Training & Development. For the avoidance of doubt, an employee who has submitted notice of resignation is not eligible to apply for education/examination leave. If an employee's application for education/examination leave has been approved prior to his submission of notice of resignation and the approved leave falls within his notice period, the approved leave will be subject to cancellation.

4.2. Education Leave

For training programs that are initiated and/or fully sponsored by FFOU, employees are not required to apply for leave. They will be granted time-off to attend the programs.

For training programs that are partially/not sponsored by FFOU, employees are required to apply for leave. Time-off will only be granted subject to the job relevance of the program at the discretion of their supervisors -or above and the Human Resource Department.

For academic programs with regular scheduled sessions or residential sessions held within office hours, employees are required to apply for annual leave to cover their time-off.

Applications for Education Leave must be accompanied by supporting documents including program confirmation notice/timetable and/or the approved sponsorship notice issued by the Human Resource Department.

4.3. Examination Leave

For examinations that are held within office hours, employees are required to apply for examination leave. For examinations that are held in the morning or afternoon, only a half day's leave will be granted.

Applications for Examination Leave must be accompanied by supporting documents including examination notice/timetable and/or the approved sponsorship notice issued by the Human Resource Department.

4.4. Amendment of Leave

Employees granted time-off for training or examination should undertake to complete the program or to sit for the examination.

If an employee is absent from the training program or examination due to operational or contingency needs, he should report for duty and cancel the applied education/examination leave; otherwise, the leave taken will be counted as annual leave or no pay leave.

If the absence is due to sickness, the employee should notify the Human Resource Department for leave cancellation and submit a sick leave application and doctor's certificate upon resumption of duty.

5. MATERNITY LEAVE

5.1. Eligibility

5.1.1. Unpaid maternity leave will be granted to female employees who

- A. have completed four weeks of continuous service with FFOU immediately before the commencement of maternity leave;
- B. have properly given notice of pregnancy to their supervisors -or above; and
- C. have produced a medical certificate issued by a registered medical practitioner specifying the expected date of confinement.

5.1.2. Paid maternity leave will be granted to employees who have completed 40 weeks of continuous service with FFOU immediately before the commencement of maternity leave and satisfied conditions as specified in Clause 5.1.1.b and Clause 5.1.1.c.

5.2. Entitlement

5.2.1. Paid maternity leave should be a maximum period of 10 weeks:

- ❖ With the agreement of her supervisor -or above, a pregnant employee may decide to commence her maternity leave from two to four weeks before the expected date of confinement. The employee should, as soon as possible, reach a mutual agreement with her supervisor on the commencement date of her leave so that appropriate work arrangement during her absence can be made in advance;
- ❖ If the employee does not decide on the date, or the date is not agreed between the employee and her supervisor -or above, the employee shall commence her maternity leave four weeks before the expected date of confinement.
- ❖ Maternity leave commences on the date of confinement if it occurs before the scheduled maternity leave. In this case, the employee should give notice of the date of confinement and her intention to take 10 weeks' maternity leave to her supervisor -or above within seven days of her confinement.

5.2.2. Apart from the 10 weeks paid leave, if confinement occurs later than the expected date of confinement, the employee may apply annual leave or no pay leave for a further period equal to the number of days from the day after the expected date of confinement to the actual date of confinement. In addition, the employee may apply no pay leave for a further period of not more than four weeks on grounds of illness or disability due to the pregnancy or confinement.

5.3. Procedure

Application for maternity leave must be made as soon as the expected date of confinement is known but not later than 12 weeks prior to the expected date of confinement. The employee must produce a medical certificate issued by a registered medical/Chinese medicine practitioner, specifying the expected date of confinement. A copy of the birth certificate must be submitted to the Human Resource Department upon resumption of duty for employee benefits.

5.4. Prohibition of Assignment of Heavy, Hazardous or Harmful Work

A pregnant employee may, on producing a medical certificate with an opinion as to her unfitness to handle heavy materials, decline to work in places where gas injurious to pregnancy is generated, or do other work injurious to pregnancy as specified in the medical certificate, and request the Head of Department to refrain from giving her such work during her pregnancy.

After a pregnant employee has produced a medical certificate, the Head of Department may not allocate such work to the employee. If the employee is already performing this work, the Head of Department shall within 14 days remove her from such work.

6. PATERNITY LEAVE

A male employee who is the expecting father of an expecting child or father of a new born child will be granted a maximum of five days paid paternity leave.

- ❖ The male employee has completed not less than 40 weeks of continuous service with FFOU immediately before the expected date of birth of the child.
- ❖ Application for paternity leave must be supported by documents proving the eligibility of the employee to the satisfaction of FFOU. The supporting documents include a medical certificate issued by a registered medical practitioner specifying the expected date of birth of the child, a medical certificate issued by a registered medical practitioner specifying the date of birth of the child if so required by FFOU and a copy of the birth certificate of the child showing that the employee is the father of the child.
- ❖ The period within which paternity leave must be taken is one month immediately before the expected date of birth of the child up to one month immediately following the birth of the child. Leave can be taken in one single block or in blocks of day or days during the eligible period.
- ❖ Where more than one child is born as a result of the same pregnancy, the child in this policy shall refer to the first child born only and a maximum of five days paid paternity leave will be granted in respect of the same pregnancy.

For the avoidance of doubt, an employee who has submitted notice of resignation is not eligible to apply for paternity leave. If an employee's application for paternity leave has been approved prior to his submission of notice of resignation and the approved leave falls within his notice period, the approved leave will be subject to cancellation.

7. MARRIAGE LEAVE

Employees who plan to get married will be granted a maximum of five working days paid marriage leave for their wedding preparations subject to the following criteria:

- ✓ Completion of one year of service with FFOU at the time of registration of marriage; and

- ✓ Resumption of duties with FFOU after the marriage.

Marriage leave, if granted, must be taken within one month before or after the registration of marriage.

Application for marriage leave must be supported by a copy of the marriage certificate or marriage notice issued by the marriage registry or authorised body, stating the date of marriage.

For the avoidance of doubt, an employee who has submitted notice of resignation is not eligible to apply for marriage leave. If an employee's application for marriage leave has been approved prior to his submission of notice of resignation and the approved leave falls within his notice period, the approved leave will be subject to cancellation.

8. COMPASSIONATE LEAVE

A maximum of three working days paid compassionate leave will be granted to employees in the event of death of any close relative including spouse, child, parents, grandparents, brother, sister, parents-in-law, or grandparents-in-law.

Employees may be requested to supply evidence in support of their applications.

9. COURT LEAVE

Paid leave will be granted to employees who are summoned for Court service.

Applications for Court leave must be supported by a copy of the Summons to Juror issued by the Court.

10. EMPLOYEE VOLUNTEERING LEAVE

Employees will be granted one-day paid leave per annum for the purpose of participating in community service/volunteering activities for the benefit of our society subject to the following criteria:

- Employee Volunteering Leave is only applicable to community service/volunteering activities without pay or any tangible rewards. In principle, Employee Volunteering Leave will apply to employees' participation in FFOU sponsored/organised/approved community service/volunteering activities or other community service/volunteering activities organised by recognised charitable Organisations. For the avoidance of doubt, volunteering service does not include activities designed to promote religious or political beliefs or in raising funds to support religious or political activities.
- Employees will be entitled to one day or half-day Employee Volunteering Leave/ compensatory time off for performing at least 8 hours or at least 4 hours of community service/volunteering activities respectively per annum. Pre-event and post-event briefings and meetings held on other dates before or after the event date will not be counted as volunteering hours.
- Employee Volunteering Leave can be taken as a whole day or two half days. The Leave, if not taken on the event date, must be taken within 2 months after the event has taken place or within two months after a whole day's leave has been accumulated. In any event, the Leave must be taken before end of each calendar year.
- Employee Volunteering Leave that is not taken will be forfeited at the conclusion of each calendar year and will not be carried over into the following year.

- Employees must seek the approval of supervisor/Department Head and apply at least one week in advance for the Leave, so that appropriate work arrangement during the employee's absence can be made in advance.
- Application for Employee Volunteering Leave must be supported by documents proving the employee's eligibility to the satisfaction of FFOU. The supporting documents include written evidence specifying the nature of the community service/volunteering activity, the date and time of the service/activity held, its duration as well as certifying the employee's attendance, issued and signed by the person in authority overseeing/supervising the community service/volunteering activity. Failure to provide the appropriate evidence document will result in the leave being counted as "Annual Leave"
- Under no circumstances shall the Employee Volunteering Leave be compensated by payment
- For community service/volunteering activities that are initiated and/or fully sponsored by FFOU and held during office hours, employees are not required to apply for Employee Volunteering Leave. They will be granted time-off to attend the activities subject to the approval of supervisor/Department Head.
- This Employee Volunteering Leave policy is subject to change from time to time at the full discretion of FFOU

11. ADVANCED ANNUAL LEAVE

Employees are not encouraged to apply for advanced annual leave unless they have valid reasons. In addition, advanced annual leave will only be granted provided that there is sufficient manpower in their Departments during their absence and approval is obtained from their supervisors -or above. However, if advanced annual leave exceeds 14 consecutive days, including rest days and public holidays, further approval from their Heads of Department is required.

Applications for advanced annual leave must not exceed the employees' next calendar year's annual leave entitlement.

Salary deduction in lieu of advanced annual leave upon termination of employment is calculated on the basis of working days in accordance with the following formula:

Monthly basic salary $21 \times$ No. of working day(s) of advanced annual leave

12. NO PAY LEAVE

Employees are not encouraged to apply for no pay leave unless they have valid reasons. In addition, no pay leave will only be granted provided that there is sufficient manpower in their Departments during their absence and approval is obtained from their supervisors -or above. However, if no pay leave exceeds 14 consecutive days, including rest days and public holidays, further approval from their Heads of Department is required.

No pay leave taken will result in a salary deduction, calculated on the basis of working days, in accordance with the following formula:

Monthly basic salary $21 \times$ No. of working day(s) of no pay leave

13. APPLICATION FOR LEAVE

13.1. Leave Application Form

Employees who do not possess e-mail account should use the paper form for leave application. The Human Resource Department will maintain their leave records in the HR e-Leave for viewing purpose.

To apply for leave, the employee should:

- ❖ Obtain a Leave Application Form from the Human Resource Department or download it from the homepage on EIP;
- ❖ Complete and submit the form to his approving supervisor designated by his manager in charge of the department or above for approval; and
- ❖ Forward the approved form to the Human Resource Department for record purpose.

Application for leave of over one week, except sick leave, should be applied for at least two weeks in advance. FFOU may accept or reject leave application and make alternative arrangements if necessary.

14. CANCELLATION

14.1. Leave Application Form

Employees who do not possess e-mail account should use the paper form for leave amendment and cancellation. The Human Resource Department will maintain their leave records in the HR e-Leave for viewing purpose.

To amend or cancel a leave application, the employee should

- ✓ Revise the approved leave application, specifying the change;
- ✓ Obtain approval from his approving manager; and
- ✓ Re-submit the amended Leave Application Form to the Human Resource Department as soon as practicable.

PROVIDENT FUND

FFOU sponsors a staff provident fund scheme which is registered (National FFOU Fund SACCO) under the Ministry of Trade and Cooperatives for all full-time permanent employees.

EMPLOYEES MEDICAL INSURANCE SCHEME

1. POLICY

FFOU has established a comprehensive Employees Medical Insurance Scheme which provides 24-hour medical coverage to employees and their dependants on a non-contributory basis.

2. ELIGIBILITY

All full-time permanent employees aged below 65 are eligible to join the Employees Medical Insurance Scheme upon joining FFOU.

All dependants will become eligible on the day the employees become eligible. If an employee or dependant is in hospital on the date that coverage should become effective, the coverage will commence on the date following discharge from the hospital.

Dependants include the spouse of the employee aged under 65 and unmarried children from the age of 15 days to 17 years inclusive, or under 23 years old if they are full time students (copy of student identity card is required).

EMPLOYEES DENTAL INSURANCE SCHEME

1. POLICY

As part of the employee benefits package, FFOU provides all employees and their dependants 24-hour worldwide coverage for dental treatment on a non-contributory basis.

2. ELIGIBILITY

All full-time permanent employees aged below 65 are eligible to join the Employees Dental Insurance Scheme upon joining FFOU.

All dependants will become eligible on the day the employees become eligible.

Dependants include the spouse of the employee aged under 65 and unmarried children from the age of 4 to 17 years inclusive, or under 23 years old if they are full time students. (copy of student identity card is required)

EMPLOYEES' COMPENSATION INSURANCE SCHEME

1. PURPOSE

All employees of FFOU are covered under Insurance Scheme in the event of temporary or permanent disability or death as a result of accident arising out of and in the course of employment.

2. ADDITIONAL COVERAGE

The following additional coverage also extends to employees:

- Whilst they are travelling directly to and from their place of work by any means of transport service (excluding motor cycle) if they are instructed to execute duties of FFOU outside their normal hours of work;
- Whose attendance at their place of employment is required by FFOU during extraordinary weather conditions whilst proceeding directly to and from their place of work.
- Whilst they are staying within FFOU premises during meal and lunch time;
- When participating in any recreational sport or social activities organised or sponsored by FFOU or
- Working overseas.

3. COMPENSATION

The amount of compensation will be assessed by the Commissioner for Labour or the District Labour Officer. The Human Resource Department is responsible for forwarding the payment to the employee.

BUSINESS TRAVEL INSURANCE SCHEME

FFOU provides a Business Travel Insurance Scheme to all employees who are required to travel outside Uganda on business purposes. The Scheme provides 24-hour worldwide coverage with an aggregate limit for any one accident. It provides benefits for accidental death/permanent disablement, medical and hospital expenses for accident and sickness, and claims related to the business travel. **MEDICAL CHECK-UP**

Eligible employees will be provided with a medical check-up arranged by the appointed medical service providers of FFOU every one or two years.

PERFORMANCE DEVELOPMENT

1. PURPOSE

FFOU has developed a Performance Development Process which aims at:

- ❖ Driving FFOU to become a high performance and focused organisation
- ❖ Aligning individual objectives with FFOU's objectives and core values
- ❖ Encouraging employees to think about and communicate their performance objectives/targets
- ❖ Focusing on performance improvement
- ❖ Helping staff to continue self-value-adding
- ❖ Tracking and rewarding high performers

2. PERFORMANCE DEVELOPMENT PROCESS

Performance Development is a systematic approach to maximizing both individual and organizational performance. Performance is defined as a combination of **Results (Achievement of Objectives)** plus **Behaviors (Competency Development)**.

2.1. Achievement of Objectives

FFOU uses a "cascading objectives" system, which links individual objectives to department objectives. In turn, department objectives are linked to FFOU's strategic objectives. By linking individual performance to FFOU's strategic objectives, FFOU ensures that:

- Individuals at all levels of the organization will work towards achieving FFOU's objectives and financial success
- Managers effectively communicate Department objectives to employees
- Employees learn how to set their performance objectives in direct support of Department objectives

- The performance development schedule is aligned with the strategic planning and budgeting schedule

In setting individual objectives, employees should follow their Department's objectives as set out in the Department's Annual Operating Plan. Performance

2.2. Competency Development

2.2.1 Competencies are observable and applied *knowledge, skills and behaviors* important for the success of the organization, personal performance and enhanced contribution.

2.2.2 FFOU's Competency Model is directly linked to its core values and vision/mission. By linking competencies to FFOU core values, FFOU ensures that employees are focused on the "right" behaviors. In summary, the competencies include:

FFOU Core Values

Core Competencies

Focus

- ✓ Orientation
- ✓ Work Planning / Organization Skills
- ✓ Problem Solving
- ✓ Analytical Skills Member Matters
- ✓ Employee ship Focus
- ✓ Technical Excellence
- ✓ Attention to Details Team Collaboration
- ✓ Teamwork and Collaboration
- ✓ Communication Skills
- ✓ Interpersonal Skills People Count
- ✓ Leadership / Delegation
- ✓ Supervisory Skills Fairness and Integrity / Public Responsibilities
- ✓ Judgement and Decision Making Innovation
- ✓ Innovation / Change Orientation
- ✓ Initiatives / Motivation Competitive Technology

- ✓ Technology Literacy

2.3. Key Phases of the Performance Development Process

FFOU follows four phases to achieving performance development success: Planning, Leading, Reviewing and Rewarding. Through these phases, FFOU follows a systematic, scheduled approach, from setting overall corporate objectives at the beginning of the year to rewarding employees at the end of the year.

1. Planning

Setting organization- wide, department-specific and individual objectives

2. Leading

On-going coaching and feedback to employees about their performance

3. Rewarding

Determining rewards and incentives

4. Reviewing

Assessing performance for the year with individual appraisal interviews between employees and their appraisers

2.3.1 Planning

- ❖ **Set FFOU Objectives** –An organization-level Annual Operating Plan comprising strategic objectives and initiatives for FFOU will be set by top management.
- ❖ **Set Department Objectives**– Each Department will set its own activities and objectives through the preparation of the Department’s Annual Operating Plan.
- ❖ **Set Individual Objectives** – Department objectives will be cascaded to individual employees to facilitate their setting of individual objectives. The objectives should include project objectives, personal & career development initiatives and training plan for the upcoming year.

2.3.2 Leading

- It is the **on-going process** of giving realistic evaluations of employees' performance, through **coaching** and **performance feedback** throughout the year, to ensure that performance strengths and needs for improvement are identified and/or corrected.

Effective feedback should be:

- ✓ **Supportive** which reinforces "excellent" behaviors

- ✓ **Constructive** which influences change in "unacceptable/poor" behaviors and encourages better skills/behaviors Performance Development.
- Managers are also expected to review employees' objectives throughout the year to ensure alignment with Department objectives or modification of objectives.

2.3.3 Reviewing

- It is the process of appraising past performance, assigning ratings, and reviewing the employee's personal & career development status and training progress through a performance appraisal exercise. The process effectively accommodates both the **Results** and the **Behaviors** necessary to achieve performance objectives and provide information to the management for making informed decisions on compensation, reward and career planning.
- An **individual appraisal interview** between the employee and appraiser should be conducted to discuss the individual achievements. Previously established performance expectations, and the assessment of actual performance against the expectations provides a foundation for a strong link between performance and reward as well as training and development.

The following should be discussed and recorded:

- ✓ Ad hoc project
- ✓ Change of job/appraiser
- ✓ Change of priority
- ✓ Special circumstances that have affected performance
- ✓ Special contributions/strengths
- ✓ Any disagreement and appeal

2.3.4 Rewarding

- ❖ It is the process of linking performance with rewards. A strong link requires maximum effectiveness in planning, leading, and reviewing individual performance.
- ❖ Assessment results will influence:
 - Base pay increases
 - Variable bonus decisions
 - Promotions
 - Transfer and secondment

TRAINING & DEVELOPMENT GUIDELINES

1. PURPOSE

The main objective of training and development in FFOU is to help develop key competencies which enable individuals to perform current or future jobs successfully.

In this regard, all training and development programs organized by the Human Resource Department will be geared towards the following objectives:

- Strengthening the job skills/knowledge of employees;
- Improving operational efficiency and productivity; and or
- Developing the potential of employees for maximizing mutual benefit to individuals and FFOU.

2. POLICY

The basic policy in administering and implementing any type of training or development activity is in accordance with the strategic business objectives of FFOU. The Human Resource Department will work closely with Heads of Department in assessing areas that need training and development support.

3. TYPES OF TRAINING/DEVELOPMENT ACTIVITIES

3.1. Staff training/development activities can be employer- or employee-initiated. In either case, it has to be approved by the manager in charge of the department or above with additional endorsement from the Human Resource Department or the Chief Executive Officer.

3.2. Employee-initiated training/development activities may include external programs that are organized by external training institutes or by FFOU or with other institutes for the general public.

3.3. Employer-initiated programs may take the form of offering sponsorship for employees to attend external programs or organizing such programs in-house.

3.4. Depending on the nature of needs and operational requirements, training/development programs may also be implemented as job induction, job rotation, on-the-job coaching, counseling, individual or Employees projects, and secondment.

4. CONDITIONS FOR SPONSORSHIP

Employees are eligible to apply for sponsorship under the following conditions:

4.1. External Training Programs

4.1.1. They have satisfactorily passed the probationary period. However, exception can be made if an employee on probation is highly recommended by his Head of Department to attend a program urgently required for his job.

4.1.2. They have not previously been sponsored for the same or similar programs. Refresher programs will normally not be sponsored.

4.1.3. They have the capacity to receive and complete the training and have satisfactory overall work performance.

4.1.4. They will normally be sponsored for only one program at a time unless the additional program is a luncheon or short seminar, an in-house program or a sit-in securities/derivatives-related program that is highly recommended by their Heads of Department and urgently required for their jobs.

4.1.5. The program is related to their jobs and/or the operation/development of their Department.

Private interest or personal career aspirations are not sufficient reasons for seeking training sponsorship.

4.1.6. If training is conducted after office-hours, the time taken to attend training will not be considered as overtime.

4.1.7. If the program is initiated by employees and takes place within office hours, they are required to apply for annual leave to cover their absence.

4.1.8. Their release to attend the program will not adversely affect the operation of their Departments.

4.1.9. Overseas training will be granted subject to the following conditions:

- The training is genuinely required and not available locally;
- Manager or above with a minimum one year service with the Organization;
- Staff with consistently good performance record (overall performance rating “A” or better); and
- Flight passage and hotel arrangement should follow FFOU Business Travel Guide.

Prior written approval by FFOU President is required for all overseas travel. Overseas training should be approved by Heads of Department and Head of Human Resource. Any exceptions to the above conditions should be approved by the Chief Executive Officer and the FFOU President.

4.1.10. A completed Training Sponsorship Form must be submitted to the Human Resource Department at least two weeks prior to the commencement of the program or its deadline, whichever is earlier. Failure to do so, the applications may not be approved or the applicants will be required to pay the institute first if the application is approved.

4.1.11. They must agree to the payment method of sponsorship, undertake to fulfil the required obligatory service, if any, and refund FFOU if circumstances require in accordance with the policies stated in Clause 6, 7 and 9.

4.2. Academic Programs

In addition to conditions specified under External Training Programs in Clause 4.1, employees applying for sponsorship to pursue academic programs are required to fulfill the following criteria at the time of program commencement:

- having at least one year in service with FFOU;
- Overall performance rating is “A” or better;

Doctoral degrees will not be sponsored.

5. AMOUNT/LEVEL OF SPONSORSHIP

5.1 External Training Program

The level of sponsorship will be 100% or 75% or 50% depending on the job relevancy of the program.

5.2. Academic Programs

5.2.1. Master degree program

- Level of sponsorship will be 50 per cent of the program fee with a maximum reimbursement for the whole program.

5.2.2. Bachelor degree program

- Level of sponsorship will be 50 per cent of the program fee with a maximum reimbursement for the whole program.

5.2.3. Other tertiary program

- Level of sponsorship will be 75 per cent of the program fee with a maximum reimbursement for the whole program.

For all categories of programs, the sponsored fee will only include tuition fees. Examination fees, registration fees and expenses incurred for the purchase of books will not be included. Exceptions, however, are allowed when the associated expenses are inseparable from the tuition fee.

For sponsorship of examination fees, employees can apply for reimbursement under the Examination Fee Reimbursement Policy.

6. OBLIGATORY SERVICE

For all categories of programs, if the sponsorship exceeds USHS 3,000,000 the employee will be required to serve an obligatory service period upon satisfactory completion of the whole program, counting from the calendar date after the last training session or the issuance date of result/certificate, whichever is later.

7. REFUND OF SPONSORED FEE

7.1. Under normal circumstances, employees will be required to refund the sponsored fees to FFOU by cheque under any of the following conditions:

- ❖ Failure to attend or complete the program;
- ❖ Failure to pass the examination of the program;
- ❖ Tendering resignation before the program commencement and FFOU is unable to find suitable staff to take the place;
- ❖ Resigning before completing the program; or
- ❖ Resigning before completely fulfilling the required obligatory service.

7.2. The amount of refund will be equivalent to the full amount of pre-payment made by FFOU or the amount already reimbursed to the employee. **EXAMINATION FEE REIMBURSEMENT**

1. PURPOSE

FFOU encourages and assists employees to further their technical or professional standards by sponsoring them for relevant Courses.

2. POLICY

All applications for examination fee reimbursement will be considered on their degree of importance to employees' jobs and their relevance to the operational requirements of the employees' Departments. Private interest or personal career aspirations will not be valid grounds for receiving Organization sponsorship for examination fee.

3. CONDITIONS FOR REIMBURSEMENT

Employees are eligible to apply for examination fee reimbursement under the following conditions:

3.1. They have satisfactorily passed the probationary period. Employees who have tendered resignation will not be eligible to apply for reimbursement, and the application they submitted before will be automatically cancelled if it has not been reimbursed.

3.2. The qualification acquired is related to their jobs and/or the operation/development of their departments.

3.3. The examination is held by the Examination Examinations Board or a recognised examination board/professional institute.

3.4. A completed Examination Fee Reimbursement Form must be submitted to the Human Resource Department at least two weeks prior to the examination or its deadline, whichever is earlier.

The application should have:

- ✓ Approval from the manager in charge of the department or above; and
- ✓ Details on the examination, e.g. the subject and level of examination, examination/professional body, breakdown of the examination fee for each subject, examination time table.

Late application will not be processed.

3.5. Reimbursement will be subject to passing the examination and provision of a copy of the result slip, certificate and payment supporting documents.

3.6. All reimbursement requests should be made within six months of the issuance of examination results. Late requests will not be processed unless valid justification is provided.

3.7. All reimbursements will be paid in UG. SHS. If an employee has paid the examination institute in foreign currency, the exchange rate indicated on the bank receipt will be used as the conversion rate to UG. SHS; otherwise the prevailing rate adopted by FFOU will be used.

4. AMOUNT OF REIMBURSEMENT

The amount will normally be 100 per cent of the examination fee, exclusive of registration fee and evaluation fee. Exception will be made when associated fees are inseparable from the examination fee.

Exemption fees will not be reimbursed.

5. METHOD OF REIMBURSEMENT

Reimbursement will be by cheque or deposit in employee payroll account.

PROFESSIONAL EMPLOYEESHIP FEE REIMBURSEMENT

1. PURPOSE

FFOU encourages and assists employees to further their technical or professional standards by sponsoring them for professional Employees hip.

2. POLICY

All applications for professional Employees hip fee reimbursement will be considered on their degree of importance to employees' jobs and their direct relevance to the operational requirements of the employees' departments. The application will be reviewed each year based on the prevailing situation. History of reimbursement of professional Employees hip fee will not be valid grounds for receiving it again each year.

3. CONDITIONS FOR REIMBURSEMENT

Employees are eligible to apply for reimbursement under the following conditions:

- 3.1. They have satisfactorily passed the probationary period. Employees who have tendered resignation will not be eligible to apply for reimbursement, and the application they submitted before will be automatically cancelled if it has not been reimbursed.
- 3.2. The professional designation is related to their job and/or operation/development of their departments.
- 3.3. Annual subscription fee of one professional Employees hip per calendar year can be applied for reimbursement.
- 3.4. The Employees hip must be of a recognized professional institute.
- 3.5. Applications for reimbursement must be made within the subscription year, unless late application is due to the fault of the professional institute.
- 3.6. Applications received before the subscription year will not be processed until the first month of the subscription year.

3.7. Reimbursement for any two consecutive subscription periods that overlap in some months is permitted only on condition that the two periods concerned must designate different subscription years. Training & Development

Reimbursement for the second subscription will be processed only upon completion of the first subscription period.

3.8. A completed Professional Employee ship Fee Reimbursement Form must be sent to Human Resource Department.

The application should have:

- Approval from the manager in charge of the department or above; and
- A copy of professional designation and original payment supporting documents.

3.9. All reimbursements will be paid in UG. SHS. If an employee has paid the professional institute in foreign currency, the exchange rate indicated on the bank receipt will be used as the conversion rate to UG. SHS; otherwise the prevailing rate adopted by FFOU will be used.

4. AMOUNT OF REIMBURSEMENT

4.1. The amount reimbursed will include Employees hip/renewal fee but exclude any penalty fee, bank charges, magazine subscription or other associated expenses, unless they are inseparable in a lump-sum amount.

4.2. Reimbursement will be the full amount of the Employees hip subscription fee except for the following cases:

- ❖ If the subscription period commenced before the employee joined FFOU, reimbursement will be pro-rated from the date of joining FFOU.
- ❖ As specified in Clause 3.7, where the applications for two different subscription years have overlapping subscription periods, reimbursement for the second subscription will be pro-rated from the day after the expiry of the first subscription.

5. METHOD OF REIMBURSEMENT

Reimbursement will be by cheque or deposit in employee payroll account.

STAFF SOCIAL CLUB

1. OBJECTIVES

The objectives of the Staff Social Club are:

- To build and maintain harmonious relationships, and to strengthen communication and understanding among employees of different departments;
- To cultivate a sense of belonging; and
- To enhance the morale of employees.

2. ROLES

The Staff Social Club representatives will achieve its objectives by

- Proposing, planning and organizing staff social activities for staff Employees and, if Resource allow, their guests
- Promoting the staff social activities for wider participation
- Contributing to Organization events for the well-being of staff Employees

The Human Resource Department will play the following roles in different occasions as appropriate:

- ✓ Budget allocation
- ✓ Driving
- ✓ Facilitator
- ✓ Advisor
- ✓ Official interface between FFOU and external parties in relation to organising activities

3. COMPOSITION

The Staff Social Club is governed by a committee which comprises representatives from each FFOU District Office. The committee Employees will be nominated by the District Chairpersons once a year.

4. ELIGIBILITY

All full-time employees will become Employees of the Staff Social Club automatically upon joining FFOU.

5. ACTIVITIES

The Staff Social Club organizes social and recreational activities for employees throughout the year. All employees are informed of the details through internal announcements and are encouraged to participate in the activities.

COMMUNICATION

1. PURPOSE

FFOU encourages open and candid two-way communications between employees at all levels. It believes that effective communication helps build mutual understanding and trust, and contributes to a constructive and cheerful working environment, high performance and organizational success.

2. POLICY

2.1 All employees are required to support the communication initiatives implemented by FFOU.

2.2 All employees have rights and obligations to express their views to their superiors about FFOU activities and vice versa.

2.3 Views raised by employees should be well respected, listened and considered carefully.

2.4 Questions raised by employees should be attended to by the management in an effective and efficient manner and be treated in strict confidence.

2.5 There should not be any prejudice against individuals due to differences in opinions.

2.6 Employees should be well informed of the development and major events of FFOU, in particular those that may have an impact on their jobs and/or welfare.

2.7 Suggestions regarding improvement of communication and staff relations in FFOU are most welcome.

3. MANAGEMENT'S ROLE

The management (employees at managerial level and above) of all departments are responsible for understanding their staff's concerns at work, sharing information and encouraging suggestions.

The management should treat communication as equally important to other business priority.

The management should treat matters raised by employees in a balanced and fair manner and in strict confidence.

4. EMPLOYEES' ROLE

Employees are encouraged to discuss their views of FFOU with their immediate supervisors, Heads of Department, the Human Resource Department and/or the Chief Executive Officer.

Employees are responsible to clarify with the management about the issues of which the hearsay may hamper the employee relations and de-motivate the staff morale.

Employee should actively communicate their views, express their opinions, and raise their concerns verbally or in writing through the following communication channels as appropriate:

- ❖ Staff communication Employees s;
- ❖ Staff briefing sessions;
- ❖ Private interviews with superiors or Human Resource personnel;
- ❖ FFOU's publication or newsletter;
- ❖ Training and development activities; and
- ❖ Lunches, dinners or other Organization social functions.

GRIEVANCE PROCEDURE

1. PURPOSE

As an Organization policy, FFOU is committed to ensuring fair treatment of all employees when dealing with their grievances with a view to addressing problems in the best possible manner.

2. POLICY

FFOU's policy is that employees should

- Be provided a fair treatment on their grievances by the management of the Organization;
- Be given a fair hearing concerning any grievances;
- Have the right to channel their grievances to the Chief Executive Officer and in the case of grievances against the Chief Executive Officer to the Chairman; and
- Have the right to appeal to the FFOU President against a decision made by the Chief Executive Officer.

The aim of this policy is to establish a proper channel for employees to voice out their grievances and to settle grievances. Employee grievances may include but are not limited to management deficiency, unfair treatment to staff, sexual harassment and concerns about possible improprieties in financial reporting or internal control. Regardless of the issues and/or individuals involved, no one shall suffer retaliation for involvement in employee grievances. All grievances shall be handled independently and treated in strictest confidence. Grievances which are made anonymously shall not be handled.

3. PROCEDURE

3.1 If an employee considers that his grievance is unlikely to be resolved through discussions with his supervisor, the Head of Department, the National Programs Coordinator or the Human Resource Department or is of a very sensitive or serious nature which requires the attention of the management, he can raise his grievance direct with the Chief Executive Officer in the form of a signed letter. In the case of a grievance against the Chief Executive Officer, the employee can lodge it to the FFOU President.

3.2 The President, as the case may be, shall acknowledge receipt of the grievances in the first instance. He or his designate shall review and examine the case and decide whether any meeting with the employee and/or other relevant parties is required so as to obtain further information or better understanding of the case. All cases shall be handled independently and treated in strictest confidence.

3.3 Having reviewed and evaluated all the facts relating to the grievance, the FFOU President, as the case may be, shall come to a conclusion. The aggrieved employee shall duly be advised of the views/decisions of the FFOU President as well as any follow up actions, if warranted. A written report of the conclusion shall be issued by the FFOU President, as the case may be, and shall be filed as an official record by the Organization Legal Secretary, for grievances against the Chief Executive Officer, and by the Chief Executive Officer Office, for all other grievances.

3.4 In the case of a grievance lodged to the Chief Executive Officer, if the employee is not satisfied with the decision made by the Chief Executive Officer, he may appeal to the Chairman. The Chairman shall render the final resolution to the employee. This represents the final decision of FFOU.

OCCUPATIONAL SAFETY AND HEALTH POLICY

FFOU is committed to achieving a high standard of occupational safety and health. It will adhere to the principle that occupational safety and health of employees should be given the first and foremost consideration at work.

1. EMPLOYER'S ROLE

1.1. The Administration Department will assign responsible persons to attend risk assessment training, identify any actual and potential hazards and risks to each individual and work towards a safe and hygienic work environment for employees by reducing, eliminating and controlling hazards at workplace.

1.2. The Administration Department will monitor and review the safety management system and perform regular audit on safety and health performance.

1.3. The Administration Department will maintain a complete set of emergency procedures and see to it that the procedures are being tested, drilled and updated systematically as required by law.

1.4. The Human Resource Department will, from time to time, organize safety and health programs to equip employees with the knowledge and skills to perform their duties in a safe manner.

2. EMPLOYEES' ROLE

2.1. Employees should comply with the safety and health measures instituted by FFOU and cooperate in all safety-related tests, drills and auditing.

2.2. Employees should be fully aware of their personal responsibilities regarding occupational safety and health. They must be constantly alert to potential risks and hazards related to their activities, and should avoid improper behaviour or operation that may lead to accidents or occupational diseases or injury.

2.3. Employees liaising with external contractors should ensure that those contractors will meet the same safety standards and requirements as FFOU.

SMOKE- FREE WORKPLACE POLICY

1. PURPOSE

FFOU is committed to providing a healthy workplace for its employees. In view of the harmful effects that are caused by smoking as well as secondhand smoke, it is considered necessary to have a smoke-free workplace policy in FFOU.

2. POLICY

FFOU's smoke-free workplace policy is that:

- ❖ Smoking is prohibited in the entire office premises covering enclosed offices, open office areas, conference rooms, pantries, toilets and lift lobbies.
- ❖ Host employees should take the initiative to advise their guests and visitors of FFOU's smoke-free policy, where appropriate.
- ❖ Non-Compliance to the policy may result in disciplinary action.

PURPOSE

This policy sets out the general rules and regulations that employees should observe during their employment with FFOU for achieving an orderly and harmonious working environment.

STAFF RECORD

Employees should inform the Human Resource Department of any change in their personal data. They should complete and submit a Change in Personal Data Form with copies of supporting documents, if any, to the Human Resource Department. Timeliness of submission of the form is important as it may affect the payroll arrangements and/or benefit entitlements of the employees and their dependants.

All data provided by employees before and during their employment of FFOU are recorded in personal files kept at the Human Resource Department. These files are strictly confidential and access is restricted to the employees themselves, employees' Heads of Department or their designated officers, and the employees' potential Heads of Department if they are being considered for a transfer. The ways in which FFOU deals with personal data of employees are detailed in Section 11-3 for Personal Data (Privacy) Policy.

STAFF CARD

Employees will be issued a staff card with access control function upon commencement of service with FFOU. They are required to carry their staff card while discharging duties in FFOU's premises or at FFOU's functions. They should be able to produce it for inspection when requested.

Loss of staff card must be reported immediately to the Human Resource Department for cancellation. In addition, employees should apply for a replacement card by completing a Card Replacement Application Form. A non-refundable replacement fee of UG. SHS 50,000 will be charged for each card.

The staff card is the property of FFOU and is not transferable. It must be returned to the Human Resource Department on the employee's last working day.

ORGANIZATION PROPERTY

Organization property includes but not limited to:

- Office furniture, computer, printer, mobile phone, stationery, staff card, medical card, corporate card, telephone card and other office equipment and facilities;
- Organization records and documents including memos, correspondences, forms, Board/Committee papers & minutes, library reference materials, Organization accounts, client related information, contacts, etc. in paper, tape, diskette or electronic form.
- Employees should take good care of and avoid waste when using Organization property. It is employees' responsibility to safeguard the Organization property being used by them from damage and loss. They are liable for the replacement cost of damaged or lost items.
- Upon termination of employment, they should return all Organization property in their possession to their Heads of Department, the Administration Department, the Exchange Library and/or the Human Resource Department as appropriate.

USE OF PERSONAL COMPUTER

Employees should be aware of the IT security standards and guidelines established and communicated by Information Technology Division, especially those relevant to their daily work on PC and various computer application systems. Employees shall observe the following corporate policies and standards regarding the use of corporate PC hardware, software and related system services.

1. PROPRIETARY OR LICENSED SOFTWARE/HARDWARE

Must not bring in any illegal/unauthorized software and/or hardware;

Must not install any special PC software/hardware for testing or evaluation purposes without obtaining prior approval from their Heads of Department;

Must never disassemble, add or alter the hardware configuration of their assigned PC;

Must not make unauthorized copies of FFOU's software by whatever means; and

Must ensure their software is properly licensed and only used in accordance with the rights of the software licensing conditions and agreements.

2. SECURITY SYSTEMS

- a) Should have responsibility for protecting and maintaining integrity of FFOU information and data resided on their desktop PCs;
- b) Should ensure that virus checking programs are always active on their desktop PCs and scan all import data files to ensure they are free from virus;
- c) Must not develop, write, generate, copy, propagate, execute or be involved with introducing virus or malicious code;
- d) Should change their PC e-mail and system passwords at least once every 3 months and should not use passwords, which can be easily guessed. The password length should have at least 6 characters;

- e) Should ensure that their passwords are kept confidential and not known to others;
- f) Should not connect dial-up modems to PCs on the LAN. All PCs having dial-up modems for remote access must be stand-alone PCs without connectivity to the PC/LAN file servers;
- g) Should logoff their PCs after work; and
- h) Should activate a screen saver with password protection when he/she is away from the machine for a long time (more than 15 minutes).

3. DATA BACKUP

Should backup their PC data regularly to minimize data loss due to hard disk failures

4. PC USAGE AND CONTROL

Should not use their office PC to do personal work not relevant to their Organization job duties. All data and files are sole properties of FFOU; and

Should report any irregularities on their PC hardware and software to the IT Help Desk.

5. GUIDELINES ON THE USE OF E-MAIL

- ❖ E-mail communication is becoming more and more common due to its convenience and efficiency. **FFOU provides e-mail to its employees for the purpose of conducting business-related activities.** It is important to note that any misuse of e-mails or use of improper statements in the e-mails may expose the employee and the Organization to liabilities and result in disciplinary action being taken against the employee. It is therefore considered necessary to establish some general guidelines on the use of e-mail.
- ❖ Beware of what is said in the e-mail. Improper statements (including sexually offensive statements, abusive or defamatory messages) may expose the employee and the Organization to liabilities and result in disciplinary action being taken against the employee.
- ❖ Always remember that e-mail, however confidential, may have to be disclosed in court proceedings or investigations (hard copies should be retained as documentary proof for business or regulatory record-keeping purposes). E-mails will be treated as a formal communication and scrutinized thoroughly when there are challenges. Employees should be careful in the wordings when communicating via e-mail.
- ❖ Do not forward internal e-mails, which are meant for internal review, to external parties. **If it is considered absolutely necessary to forward an internal e-mail to an external party, the consent of the originating person must be obtained.**
- ❖ Do not automatically forward incoming e-mails to any external e-mail account(s) (including other personal e-mail account(s) owned by the employee.).
- ❖ Avoid sending sensitive or confidential message through e-mail.

- ❖ Do not create e-mail congestion by sending trivial or personal messages to a large Employees of recipients; by sending or copying e-mails to a wider Employees of recipients than is necessary.
- ❖ Do not disclose e-mail login password to others.
- ❖ Do not attach big files (total size exceeding 2 MB) to e-mails. Large attachment which is to be sent to a large number of recipients should be posted on the EIP and distributed via a link to the EIP as far as possible.
- ❖ Change e-mail password regularly at least once every 3 months.
- ❖ The following standard disclaimer should be attached to all outgoing email (this process will be automated by the Information Technology Division):

“This e-mail is confidential and is intended solely for the addressee. Any unauthorized use of the contents is expressly prohibited. If you are not the intended recipient, you are hereby notified that any use, distribution, disclosure or copying of this e-mail is strictly prohibited. If you have received this e-mail in error, please immediately notify the sender and delete it from your system. E-mail communication cannot be guaranteed to be reliable, secure, error-free or virus-free. Accordingly, we cannot accept liability for any damage sustained as a result of any virus, error or incompleteness of this e-mail or any failure to deliver promptly or at all information exchanged between you and us by this means. If you suspect that this e-mail may have been intercepted or amended, please contact the sender.”

- The out of office message should be confined to business purpose, any personal, political or religious messages should be avoided. The following standard auto-reply message can be used as a reference:
 - *“I will be out of the office starting [date] and will not return until [date]. For urgent matters, please contact [name of designated officer] at [telephone number].”*
- The Organization acknowledges that it may be necessary for employees to send personal messages from time to time via e-mail but these should be kept to a minimum.
- As no guidelines can cover all possible issues that may arise in handling e-mail communication, employees should exercise their good judgement in protecting the best interest of FFOU in handling such matters. **The most essential criterion is that the piece of information to be transmitted by e-mail should never cause any embarrassment or inconvenience to FFOU.**

6. GUIDELINES ON THE USE OF INTERNET

- ✓ Internet access is provided for the purposes of research, keeping up-to-date on work related information and other work-related assignments.
- ✓ The public internet and the corporate intranet should be used for business purposes and in a manner that is consistent with FFOU's standards of business conduct. They should support the goals and objectives of FFOU and its departments.
- ✓ Employees are not permitted to display, download or distribute defamatory, discriminatory, offensive or obscene materials. FFOU Internet access must not be utilized to communicate information that may infringe any intellectual property rights or violate the terms of any applicable laws or regulatory requirements.

- ✓ Visits to unlawful or inappropriate web sites and chat rooms are strictly prohibited.

7. NON-COMPLIANCE TO THE PC USAGE POLICIES AND STANDARDS

- Non-compliance to the PC usage policies and standards may result in disciplinary action such as reprimand, warning, suspension or summary dismissal.

8. USE OF TELEPHONE

Telephones are for business use. Employees should minimize private phone calls during working hours for personal interests in order to avoid interruption to the work and operations of their Divisions/Departments.

9. EMPLOYMENT OF FAMILY EMPLOYEES

- In general, FFOU has no restriction on the employment of family Employees including spouse, children, parents, brothers, sisters and in-laws of serving employees. However, due to the sensitive nature of our business, employees of the same family are not encouraged to work in the same Department. Whenever and wherever possible, FFOU will assign employees from the same family to work in different departments.
- Employees in the same Departments who are contemplating marriage should inform their Heads of Department and the Human Resource Department as soon as possible.

10. CONTACT WITH THE MEDIA

1. News media contacts should be centralised through Communications Department.
2. Employees should avoid making personal comments to or answering queries about FFOU from the media. They should refer all media enquiries to the Communications Department.
3. All media enquiries will be answered by the Chief Executive Officer, the Head of the Communications Department or other authorized spokesman by the FFOU President.

11. DELIVERY OF SPEECHES OR LECTURES

- a) Employees should seek the Chief Executive Officer's approval or advice from the Head of the Corporate Communications Department before accepting invitations from external parties or organisations to speak or lecture on topics related to their duties or FFOU's business.
- b) They should also inform the Communications Department of the date, venue and target audience of the speech or lecture.
- c) Speeches or lectures should contain no confidential or sensitive issues and no defamatory text which will expose FFOU to legal liability. In case of doubt, the advice of the Head of the Legal Department, or the Chief Executive Officer, should be obtained in advance.
- d) Employees are reminded to use their common sense when speaking in public and to say or do nothing to embarrass themselves or FFOU.

12. ARRANGEMENT OF HONORARIUM REWARDED FOR DELIVERY OF SPEECHES OR LECTURES

- i. At times, our staff will be invited by various external parties or organisations to speak or lecture on topics related to their duties or FFOU's business.
- ii. They may be rewarded with an honorarium in the form of cash payment for these speaking engagements. While FFOU recognises the importance of external speeches to communicate FFOU's policies and services, in consideration of propriety and public confidence in the integrity of FFOU, retention of cash compensation by individual staff for engaging in these activities should be governed by certain guidelines.
- iii. Staff should not solicit or retain any cash honorarium for services or external speaking engagements that relate to their official positions or duties, even those services may be rendered, at times, after office hours. Staff should decline to accept the offer of cash honorarium in the very first instance. Having regarded to the occasion the honorarium is offered, if it is considered inappropriate to decline the offer or impolite to do so, the honorarium should be accepted by FFOU only on condition that the related cash payment should be used by the Department of the staff speaker for funding its social functions such as Christmas party, New Year party, etc.; or sharing among colleagues for perishable food and drinks. In such cases, approval from the respective Heads of Department, the National Programs Coordinator or the Chief Executive Officer, as the case may be, must be sought vide the Approval and Declaration of Honorarium Rewarded for Delivery of Speeches or Lectures Form.
- iv. Staff concerned should advise the host organisation to make a cheque payable to "Federation of Fisheries Organizations Uganda". Upon receiving the cheque, the staff concerned should forward it to the Finance Department for crediting to the Staff Welfare Fund account of the respective Department, together with the completed Approval and Declaration of Honorarium Rewarded for Delivery of Speeches or Lectures Form. A copy of the form should also be sent to the Human Resource Department for record.
- v. Where staff speakers receive non-cash gifts, they should refer to the guidance on acceptance of advantages as specified in Section 11-1-3 of the Human Resource Manual on Soliciting & Accepting Advantages.
- vi. For those employees taking up outside business employment not related to their positions or job duties for any reward, they should seek prior written approval of their Heads of Department, the National Programs Coordinator or the Chief Executive Officer and the Head of Human Resource Department as provided in Section 11-1-5 of the Human Resource Manual on Outside Business/Employment.

13. BEHAVIOUR IN PUBLIC

FFOU expects its employees to behave with integrity and act lawfully on or off duty, and at social or private occasions. Employees must be careful when expressing views and opinions about the operations of FFOU. They should refrain from commenting on individual cases and from disclosing or discussing information which may be market sensitive.

14. ATTIRE

Employees should dress in an appropriate and presentable way while discharging duties inside or outside the FFOU's premises. Except for those who are required to wear uniforms, employees may wear business casual attire to work; however, full business attire, i.e. business suits, shirts and ties for male employees and dresses, skirts or trousers suits for female employees, is required when interacting with external parties or attending formal meetings or events. Following is the business casual attire guideline which is subject to review from time to time:

- ❖ For male employees, short or long sleeved shirts with collar, full length trousers, shoes with socks; and

- ❖ For female employees, shirts, blouses, tops with sleeves, business style skirts, pants and dresses.
- ❖ House
- ❖ The wearing of casual wear such as jeans, T-shirts, and sports shoes etc. is not permissible except on Saturdays and Sundays if employees are required to report for duty or in special circumstances as approved by their Heads of Department. At all times, tank tops, low cut shirts, mini shirts, miniskirts, hot pants, slippers, and other inappropriate items should not be worn in the workplace.
- ❖ Heads of Department should ensure that their subordinates are dressed in an appropriate manner when discharging duties. This would help create a positive and professional image for FFOU.

15. PUNCTUALITY

All employees must be punctual for work every morning and after lunch. Employees who attend office late without justifiable reasons or have a poor attendance record will be subject to disciplinary action.

16. ABSENCE

- Employees must strictly observe their working hours and should not be absent from work, even for a short while, without the prior approval of their supervisors -or above.
- Employees who cannot attend office for any reason without prior approval should notify their supervisors -or above: before 8:30 a.m. if absent in the morning or throughout the whole day; and
- Before 2:30 p.m. if absent in the afternoon.
- Employees should submit a Leave Application Form upon return to work.
- Absence not approved or without justifiable reasons will be considered unauthorized absence for which salary may be withheld or employees may be subject to disciplinary action.

17. CODE OF CONDUCT

1. PURPOSE

1. Professionalism, high ethical standards, integrity and honesty of employees are crucial for FFOU in pursuing and maintaining its regulatory role in the securities market.
2. The purpose of this Code is to set down the employees' legal obligations while under the employment of FFOU and which they are required to comply.
3. This Code also provides guidelines to assist employees in understanding and complying with such legal obligations.

1. COMPLIANCE

- All employees must comply with all the requirements set out in this Code in addition to the terms and conditions of employment set out in their contracts of employment.

- They include permanent, contract and temporary employees of FFOUEmployees, including FFOU. If any inconsistency exists, this Code shall prevail.
- **Those who are in breach of any provision of this Code may be subject to summary dismissal.** Employees are required to comply with the latest policies which will be amended from time to time as appropriate.
- If you have any questions, please consult with Compliance or Human Resource Departments of FFOU.

2. ETHICS AT WORK

Employees must devote to their work a high degree of dedication, enthusiasm and professionalism. It is important that employees:

- ✓ Accomplish and discharge their duties and responsibilities prudently and diligently to the best of their professional knowledge, skills and abilities in order to meet the time, quality and productivity standards of work;
- ✓ Engage faithfully only in activities that are consistent with their official responsibilities and authority and which do not damage the business interests of FFOU;
- ✓ Utilize time, supplies, equipment and office facilities with due caution solely for the benefit of FFOU;
- ✓ Behave properly at all times with integrity and courtesy to upkeep the FFOU's public image as a respectable high performance organization; and
- ✓ Co-operate with fellow employees and work as a team for the benefit of FFOU.

3. ANTI-BRIBERY AND ANTI-CORRUPTION

- At FFOU and its subsidiaries (together, the “Employees”), management supports a culture of integrity, ethical conduct, fairness, honesty and openness when doing business, and zero tolerance of bribery. The business benefits of rejecting bribery are manifold and include reputational, customer, and business partner confidence.
- The Employees is committed to ensuring that no bribes, kickbacks or similar gifts, payments or advantages are solicited from or given or offered to any person, whether in the public or private sector, for any purpose.
- All employees (including temporary, contract, seconded or work experience staff) and consultants of the Employees, directors of FFOU and its subsidiaries and Employees of committees of the Employees are required to adhere to high standards of business and professional and ethical conduct.
- This Policy is intended to set out minimum standards to assist such persons in recognising circumstances which may lead to or give the appearance of involving corruption or unethical business conduct, to avoid conduct which is clearly prohibited, and promptly to seek guidance where it is not.
- Persons should adhere to all applicable anti-bribery legislation.

2.1. LOANS TO & FROM MEMBER ORGANISATIONS

Except for normal banking facilities, employees and their immediate family Employees (spouse and children) are not allowed to accept loans from or provide or guarantee loans to any individual or organization that has official dealings with FFOU.

2.2. GAMBLING

Employees are advised not to engage in frequent and excessive gambling of any kind, with persons having business dealings or a business relationship with FFOU. In social games with customers, contractors or suppliers, employees must exercise judgement and withdraw from any high stake games.

4. CONFLICT OF INTERESTS

4.1 SITUATIONS OF CONFLICT OF INTERESTS

4.1.1 Conflict of interest situations arise when the personal interests of employees compete or conflict with the interests of FFOU.

4.1.2 Employees can be regarded as having a conflict of interests where the organisations or firms they are associated with derive a financial benefit from their association, by competing or conflicting with the interests of FFOU.

4.2 POLICY

4.2.1 Employees should avoid conflict of interests, whether direct or indirect, or whether actual or potential, which may compromise their integrity and put the FFOU's interests and reputation at stake.

4.2.2 Employees are required at all times to declare conflict of interests, whether it is direct or indirect, or whether it is actual or potential and, if so required by FFOU, withdraw from any consideration or decision of a matter in which the employees may have an interest, or any consideration or decision on entry into any dealing with FFOU.

4.2.3 Employees shall not hold a financial interest, direct or indirect, in any a member organisation.

4.3 DECLARATION

Employees must declare to FFOU:

- ❖ All directorships held by them in companies which have dealings with FFOU;
- ❖ Their interests in any Organization when such interests are 10% or more of that Organization's issued share capital. Where the Organization is an organization listed FFOU Member, a declaration should be made when their interests are 5% or more of that Organization's issued share capital. Where there is a change in circumstances, a revised declaration must be submitted within 14 days of such change;
- ❖ When they are in their professional capacity, advise an organization, firm or individual on any dealing with FFOU, including but without limitation to the award, by tender or otherwise, of a contract or concession;
- ❖ When they are a director or employee of an organization, or a partner in or proprietor of a firm, which propose to have any dealing with FFOU including but without limitation tendering for any contract or concession;

- ❖ All directorships which their immediate family Employees (spouse, any person with whom the employee is living in a regular union as if husband and wife, child, parent, brother and sister), hold in the business of dealing in securities and derivatives; and
- ❖ If to their knowledge, a member of their immediate family has any financial interest in any matter being considered by FFOU.
- ❖ For London based staff of FFOU and FFOUC, employees must also comply with all declaration requirements contained in their individual contracts of employment to comply with all UK contractual declaration requirements.
- ❖ Employees who fail to make declaration of a conflict of interests required under this Code shall be liable to account to FFOU for any profit made or benefit received from or in respect of the failure or violation.
- ❖ All declarations should be made in the Declaration of Conflict of Interests Form to their FFOU Heads of Department or FFOU Chief Executive Officer and sent to the Human Resource Department for record.

5. CONFIDENTIALITY OF INFORMATION

- Employees have a contractual responsibility to safeguard any confidential or sensitive information to which they have had access during their employment.
- Employees should not, during or after termination of their employment, disclose such information to the media or to any person within or outside FFOU without the approval of their FFOU Head of Department except to colleagues who require such information in the proper course of their duties.
- In addition, employees who need access to confidential files and records of another Department must obtain prior written approval from that FFOU Head of Department or in his/her absence, the designated officer.
- Employees should not make personal use of any confidential information which they have acquired in the course of their duties relating to listed member organizations' or Participants' businesses, or operations or affairs of FFOU.
- They should not use any confidential information for the benefits of themselves or any other person.
- Employees should take special precaution in complying with the provisions of the Manual.
- The above two paragraphs set out the general obligation on confidentiality with which employees must comply. The guidelines on confidentiality of Strategic Initiatives and Related Information set out practical steps which are considered good practices in handling confidential information, and to help employees working on sensitive strategic initiatives to fulfill such obligation.

6. EMPLOYEES WHISTLEBLOWING POLICY

The FFOU Employees are committed to achieving and maintaining the highest standards of openness, probity and accountability. Employees are expected to conduct themselves with integrity, impartiality and honesty. Employees shall not engage in any inappropriate behavior or organizational malpractice that compromises the reputation and standing of FFOU or any of its Employees.

This policy is designed to provide guidance to Employees and encourage them to raise genuine concerns about any of the events specified in the policy internally and as soon as possible. FFOU give all Employees a commitment that it will:

- take each disclosure seriously and investigate as appropriate;
- make every effort to keep the identity of each whistleblower confidential; and
- protect each whistleblower from reprisal or victimization, even if the disclosure turns out to be unfounded.

7.3 FFOU's Commitment

7.3.1 FFOU is committed to:

- (a) Complying with the disclosure requirements, as set out in the applicable laws and rules, and prevailing best practices;
- (b) Preventing inadvertent or selective disclosure of Inside Information and/or potential Inside Information; and
- (c) Ensuring shareholders and the public being provided with full, accurate and timely information about the Employees' activities and its financial condition.

7.4 Roles and Responsibilities

7.4.1 The parties responsible for administering the Policy are:

1. **The Board** is responsible for approving the Policy, and any revision thereof. The Board decides whether or not a transaction, development or event constitutes Inside Information and disclosure of which shall be made immediately, and when a trading halt is required. FFOU's Chairman shall be the authorized spokesperson for the Board and FFOU unless resolved otherwise by the Board.
2. **FFOU's Chief Executive Officer ("CEO")** is responsible for assessing materiality and advising the Board on whether or not a transaction, development or event constitutes Inside Information. The CEO together with the President shall be the authorized spokespersons for FFOU unless resolved otherwise by the Board.
3. The following persons shall provide a critical insight into the likely operational performance (i) **FFOU's Heads of Department etc.** or any of their delegates during their absence. Failing the CEO, the above persons shall be the authorized spokespersons for FFOU as regards their respective areas of operation unless resolved otherwise by the Board.
4. **Chief Financial Officer ("CFO")** is responsible for establishing and maintaining the financial reporting framework and procedures to ensure a structured flow of financial and operational data required for appraising the financial position, and monitoring any material changes in the financial performance which are required to be brought promptly to the Board's and/or the CEO's attention. The CFO shall be the authorized spokesperson in respect of its financial information unless resolved otherwise by the Board.
5. **FFOU's Chief Executive Officer (CEO) and Chief Communications Officer** are the authorized spokespersons for FFOU to communicate with the media, analysts and are responsible for ensuring that there is balanced and timely disclosure of the relevant information to them. They shall coordinate closely with FFOU President in the release of Inside Information.
6. **FFOU's Organization Legal Secretary** is the authorized spokesperson for FFOU to communicate with the regulators in respect of matters related to FFOU as a listed issuer and is responsible for ensuring that there is full, accurate and timely

release of Inside Information in Ethical & Legal Responsibilities accordance with the disclosure requirements. FFOU's organization Legal Secretary is also responsible for conducting periodic reviews of the Policy and making recommendations on amendments thereto, if necessary, in order to ensure strict compliance with the changing regulatory requirements.

7. **FFOU's Department Heads** are responsible for establishing effective systems, controls, and procedures within their Departments as appropriate to (i) enable them to monitor continuously any changes in their respective areas of operation that would result in potential Inside Information which is required to be brought to the attention of the CEO in a timely manner, and (ii) ensure that there are proper safeguards to preserve the confidentiality of any unpublished or potential Inside Information. They are the authorized spokespersons to communicate with its stakeholders in respect of their respective areas of operations.

7.5 Materiality Guidelines

7.5.1 The Materiality Guidelines as set out in Appendix 13-3a serve to assist employees in identifying potential Inside Information which shall be escalated and reported to the relevant senior executives for them to assess whether or not the relevant information constitutes Inside Information. It is important to note that the examples of material information given in the Guidelines are not exhaustive, and employees shall exercise their own judgment in determining materiality. The overriding principle is that information which is expected to be Inside Information shall be escalated to senior executives immediately.

7.6 Reporting and Dissemination of Material Information

7.6.1 Regular reports

Regular reports are prepared by employees for a variety of functional reasons, which help identify material information. The regular reports include

1. monthly management reports, if any, provided by each of FFOU's Departmental Heads and Chief Executive Officer to the FFOU President, which include updates and analyses of the ongoing development and performance of the projects and initiatives being undertaken;
2. Monthly management accounts provided by the CFO to the Board, which include variance analyses of the financial and operational performance against the budget and the results of the corresponding period of the preceding year; and
3. Monthly reports provided by the CE to the Board, which include a review of the major events, projects and initiatives.

7.6.2 Events occur between regular reporting

7.6.2.1 An employee who becomes aware of a matter, development or event that he/she considers it to be material or potentially Inside Information shall report it promptly to his/her Department Head or Head Human Resource Manager as appropriate who will assess the sensitivity of the relevant information and, if considered appropriate, escalate and report it to the CEO.

7.6.2.2 Upon being notified, the CEO shall assess the materiality of the relevant information, determine the appropriate course of actions and, if considered appropriate, consult FFOU President who may convene a Board meeting to consider and decide whether or not the information constitutes Inside Information and disclosure of which shall be made immediately.

7.6.2.3 When considering a disclosure, the Board shall decide on the scope of information to be released and the timing of the release. If the matter is being developed, such as, when negotiations are at a stage that makes it impossible to be more

forthcoming, and more precise details could only be released at a later stage, the Board might decide issuing a “holding” announcement or simply issuing a “no comment” statement. Board of Directors may seek independent professional advice, if and when appropriate, to ensure that FFOU can timely comply with the disclosure requirements.

7.11 The FFOU’s websites

7.11.1 To enable stakeholders to appraise the position of the FFOU the following information shall be made available on the FFOU’s website(s) by the responsible parties

- (a) All regulatory announcements;
- (b) Annual Reports, Financial statements and financial results announcements;
- (c) News releases;
- (d) Fact books and other publications; and
- (e) FFOU’s profile and contact details.

7.11.2 The FFOU’s website(s) shall not reproduce or link to any analysts’ reports.

7.11.3 Publications shall not include unpublished or potential Inside Information.

7.12 Review of the Policy

The Policy shall be reviewed periodically by FFOU’s organization Legal Secretary who will make recommendations on amendments thereto, if necessary.

7.13 Queries

If, at any time, directors or employees of have any queries regarding their reporting obligations, they shall contact FFOU’s organization Legal Secretary as appropriate immediately.

EQUAL OPPORTUNITIES POLICY

1. PURPOSE

The application of the Equal Opportunities Policy aims to eliminate discrimination, harassment and vilification in employment on the grounds of age, sex, marital status, pregnancy, family status, disability, race, colour, descent, national or ethnic origins, nationality or religion. It also aims to comply with equal opportunities Act and other laws in place from time to time, to promote equal employment opportunities and to follow good management practices.

2. DISCRIMINATION IN EMPLOYMENT

Under this Policy, there are two types of discrimination: Direct and indirect discrimination.

- **Direct Discrimination** means treating a person less favorably than another person in comparable circumstances because of age, sex, marital status, pregnancy, family status, disability, race, color, descent, national or ethnic origins, nationality or religion.
- **Indirect Discrimination** consists of applying the same treatment as between the sexes, persons with different age, marital status, family status, race, color, descent, national or ethnic origin, nationality, religion and persons who are pregnant or with a disability, but is in practice discriminatory in its effect.

It is unlawful to discriminate in employment on the grounds of the employee's age, sex, marital status, pregnancy, family status, disability, race, color, descent, national or ethnic origins, nationality or religion. Discrimination in employment includes the following situations:

- ✓ Treating an applicant or an employee less favorably;
- ✓ Discriminating against a person seeking or undergoing training which would help the person to fit for that employment;
- ✓ Discriminating against a person in relation to services offered by an employment agency; and
- ✓ Discriminating against a person who is a contract worker or a commission agent.

Acting upon stereotypical assumptions based on age, sex, marital status, pregnancy, family status or disability, race, colour, descent, national or ethnic origins, nationality or religion could lead to discrimination.

3. SEXUAL, DISABILITY, FAMILY STATUS AND RACIAL HARASSMENT IN EMPLOYMENT

Sexual, disability, family status and racial harassment is unlawful. Without limiting the meaning of harassment defined, the following behavior can be regarded as harassment:

3.1. Sexual Harassment

- ❖ Unwelcome sexual advances -- leering and lewd gestures, touching, grabbing or deliberately brushing up against another person;
- ❖ Unwelcome requests for sexual favors -- suggestions that sexual cooperation or the toleration of sexual advances may further a person's career;
- ❖ Unwelcome verbal, non-verbal or physical conduct of a sexual nature -- sexually derogatory or stereotypical remarks; persistent questioning about a person's sex life; or
- ❖ Conduct of a sexual nature that creates a hostile or intimidating work environment -- sexual or obscene jokes around the workplace, displaying sexist or other sexually offensive pictures or posters.

3.2. Disability Harassment

- Insulting comments;
- Offensive jokes;

- Unnecessary gestures mimicking someone's disability; or
- Intentionally disclosing or threatening to disclose information on disability or medical history in circumstances that would offend, humiliate, or intimidate the employees with a disability.

3.3. Family Status Harassment

- ✓ Assumption of persons with family status would not commit their work;
- ✓ Directly or indirectly discriminate against persons who have the responsibility for the care of an immediate family member; or
- ✓ Refusing to offer a job, or stipulating restrictive terms in a job offered or restrictive conditions on existing employment.

3.4. Racial Harassment

- ❖ Racially derogatory remarks or insults; for example, name calling which people of certain racial Employees s may find offensive or impolite should be avoided;
- ❖ Display of graffiti or slogans or other objects offensive to certain racial Employees;
- ❖ Racist jokes, banter, ridicule or taunts;
- ❖ Using a disparaging or offensive tone when communicating with people on the ground that they belonging to certain racial Employees s;
- ❖ People on the ground that they belong to certain racial Employees;
- ❖ Imposing excessive workloads or unrealistic performance targets on people on the ground of their race, colour, descent, national or ethnic origins;
- ❖ Unnecessarily picking on individuals from particular racial Employees s.

4. DISCRIMINATION IN EMPLOYMENT BY WAY OF VICTIMIZATION

It is unlawful to discriminate in employment by way of victimization. Victimization in employment may occur where a person:

- ✓ Makes a complaint of discrimination under this Policy against the discriminator or another person;
- ✓ Acts as a representative on behalf of a person complaining of discrimination;
- ✓ Gives evidence or information in connection with any proceeding under this Policy;
- ✓ Provides information to the Equal Opportunities Commission for the purposes of investigation by the Equal Opportunities Commission;

- ✓ Provides information to an organization in respect of a complaint of discrimination; or
- ✓ Alleges that someone has committed an act which is unlawful.

5. EXCEPTION

Positive action whereby, an act targeting persons of a particular age, sex, marital status, family status, race, color, descent, national or ethnic origin, nationality or religion, or who are pregnant or with a disability would not be unlawful if it is reasonably intended to ensure that persons have equal opportunities in employment, or to provide them with goods, access to services, facilities, opportunities, grants, benefits or programs to meet their special needs in relation to their employment.

6. GUIDELINES

6.1. Eliminating Discrimination in Employment

- i. In preventing discrimination, employment related decisions such as recruitment, promotion, transfer, training, dismissal and redundancy as well as terms and conditions of employment should be based on consistent selection criteria.
- ii. Individuals should be assessed according to their ability to carry out a given job and should not be judged by irrelevant considerations.
- iii. Employees who make employment related decisions should not assume that persons of a particular age, sex, marital status, family status, race, color, descent, national or ethnic origin, nationality or religion, or who are not pregnant or without a disability are only able to do certain kinds of work, and should ensure that these factors are not used as grounds for making decisions.
- iv. Records of notes of employment related decisions should be made and filed with the Human Resource Department. These notes will serve as a valuable explanation and defense against any unfounded suggestion of discrimination.

6.2. Eliminating Harassment in Employment

- 1) Harassment is not to be tolerated in FFOU. It is every employee's responsibility to recognize and take seriously the need to ensure that the workplace is free from any harassment and that all employees should treat their colleagues with respect.
- 2) All employees have responsibilities as well as rights in the work environment that is created. Harassment, particularly in its less severe forms, may have been part of the usual code of behavior in a workplace.
- 3) To change this may require each employee to reconsider his or her own attitudes and conduct as well as those of his or her colleagues.
- 4) Employees can do much to discourage harassment by making it clear that they find it unacceptable and by supporting colleagues who suffer harassment and are considering making a complaint.

- 5) When telling the harasser that the behavior is unwanted, if the employee does not want to confront the harasser alone, he or she may want to ask a colleague or a friend to be present.
- 6) An alternative to confronting the harasser in person is to write to him or her and keep a copy of the correspondence.
- 7) It is important for an employee subjected to harassment to keep a record of the incident(s) so as to be able to recall exactly what has happened.
- 8) Employees are also encouraged to come forward with complaints as soon as possible after the alleged incidents as a lapse in time may, in certain circumstances, weaken a complainant's case.
- 9) All information and parties relating to the complaint will be kept in strict confidence.

7. GRIEVANCE PROCEDURE

7.1. Employees who are themselves recipients of harassment, where practicable, should tell the harasser that the behavior is clearly unwanted and unacceptable. Once the offender understands clearly that the behavior is unwelcome, this may be enough to put an end to it.

7.2. If the behavior persists, employees should inform their Heads of Department or the Human Resource Department and request assistance in stopping the harassment.

7.3. Employees who encounter direct or indirect discrimination, harassment or victimization, are encouraged to report the case to their Heads of Department and the Human Resource Department immediately.

7.4. Together with the Head of Department concerned, the Human Resource Department will conduct an investigation.

7.5. Filing a complaint in accordance with the internal grievance procedure shall not preclude an employee's right to apply to the Equal Opportunities Commission.

8. DISCIPLINARY ACTION

Depending on the nature of the complaint, disciplinary action will be taken against employees who:

- ❖ Have discriminated, harassed or victimized others;
- ❖ Have instructed, induced, threatened or knowingly helped others to discriminate, harass or victimize others; and
- ❖ Have made allegations which are false or not made in good faith.

The procedures in taking any disciplinary action will follow those stipulated under this Manual.

PERSONAL DATA (PRIVACY) POLICY

1. PURPOSE

The Personal Data (Privacy) Policy aims to protect the privacy of individual in relation to personal data, provides the individual with rights of access to personal data held by others and the opportunity to correct wrong information and safeguard the free flow of personal data to Uganda from countries with data protection legislation.

2. DEFINITION OF PERSONAL DATA

- i. Any data, whether recorded manually or processed electronically, that will lead to the identification of an individual are defined as personal data.
- ii. All personal information including facts and opinions held on past, current and prospective employees by FFOU are classified as personal data.
- iii. FFOU is a data user that controls the use and content of the data. The data subjects refer to past, current or prospective employees.

3. PRINCIPLES

In compliance with the Personal Data (Privacy) Manual, the following data protection principles applicable to employment-related personal data in FFOU will be upheld by the Human Resource Department and all other departments.

3.1. Personal data will only be collected for a necessary purpose by lawful and fair means. Data subjects will be informed on or before the collection whether they are obliged to provide the data; the consequences if they do not do so; the purposes of collection; the classes of persons to whom the data may be disclosed; and of their access and correction rights.

3.2. Steps will be taken to ensure that personal data held are accurate and not kept longer than is necessary.

3.3. Personal data will only be used for the purpose for which they are collected or for a directly related purpose.

3.4. Personal data will be protected against unauthorized or accidental access, processing (including amendment and deletion) or other use.

3.5. Information on policies and practices in relation to personal data and the type of data kept and purpose of use will be made available upon enquiry.

3.6. Access or correction requests from data subjects will be complied with, and reasons for refusal (i.e. on the ground of an applicable exemption) will be given.

4. EXEMPTIONS

In general, employees are entitled to access their personal data. However, the Manual sets out the following exemptions for data in the context of employment.

4.1 Staff Planning:

- Personal data obtained for the purpose of staff planning are exempt from data access requests until the planning process is completed.

- Employment:
- Personal data held by the Human Resource Department immediately before the commencement of the Manual are exempt.

4.2 Staff Evaluation:

Personal data obtained for the purpose of staff evaluation are exempt from data access requests until the evaluation process is completed.

4.3 Personal References:

Personal data provided as personal reference are exempt from data access requests unless the referee consents in writing or the data subject has written notice of the result of the job application.

Data obtained for the following purposes are also exempt from data access requests and the use restrictions:

- security in respect of Uganda;
- crime;
- health;
- legal professional privilege;
- news; and
- Statistics and research.

5. EMPLOYMENT RELATED PERSONAL DATA HELD BY THE EXCHANGE

In order to enable FFOU to process employees' personal data, the following lists how these data are being used by FFOU and employees' rights to these data under the Manual.

5.1. It is necessary for FFOU to obtain and maintain data about individual employees in relation to their employment for various human Resource purposes. These purposes include, but not limit to:

5.1.1 processing employment applications and decisions;

- i. Reviewing salaries, bonuses, job related payments and reimbursements, or other employee benefits;
- ii. Facilitating performance appraisals, promotion, transfer, secondment, dismissal or career development activities;
- iii. Providing employee references (in circumstances where the express consent of the employee concerned has been obtained); and
- iv. Providing information to statutory or regulatory bodies for compliance with all laws, regulations, court orders, or orders of any government or other competent authority.

5.2. Failure to supply the data will result into FFOU being unable to meet its objectives.

5.3. Subject to the terms of the in this manual, data held by FFOU relating to employees will be kept confidential except that FFOU may release information to:

its subsidiary and associate companies, any agent, contractor, or third party service provider who provides administrative, telecommunications, computer or other services to FFOU in connection with the operation of its business; any other person

who is contracted to provide benefits and service for employees, including workers, insurance brokers and underwriters, provident fund trustee and administrator; persons seeking employee references (in circumstances where the express consent of the employee has been obtained); and any person to whom FFOU is obliged to make disclosure under the requirements of any law, regulation, order of any government, court, tribunal, or other competent authority.

5.4. Subject to the terms of the Manual, employees have the right to:

check whether FFOU holds data about them and access to such data;

request FFOU to correct any data relating to them which are inaccurate; and

Ascertain FFOU's policies and practices in relation to data and to be informed of the kind of personal data held by FFOU.

5.5. In accordance with the terms of the Manual, FFOU has the right to charge a reasonable fee for processing any data access or correction request.

5.6. FFOU will delete the data of former employees on expiry of a period of seven years from the effective date of termination of their employment unless this is prohibited by law.

5.7. Requests for access to data, or correction of data, or information regarding policies and practices relating to, and kinds of, data held by FFOU should be addressed to the Head of Human Resource Department.

6. GUIDELINES

The Manual provides specific guidelines in handling personal data. To avoid contravening the Manual, the following guidelines will be observed.

6.1. Protection of Employees' Personal Data

6.1.1. Heads of Department should use standard forms provided by the Human Resource Department when collecting personal information from employees. They should explain the purpose of the data collection clearly at the time of data collection.

6.1.2. When transferring employees' personal data, maximum care should be taken by Heads of Department to ensure data protection. All documents and files containing personal data internally transferred within FFOU by in-house mail service should be by way of internal mail envelopes, sealed and stamped **private and confidential** or **to be opened by addressee only**.

If information is to be transferred urgently, the information should be delivered by hand in a sealed envelope stamped **private and confidential** or **to be opened by addressee only**. If transmission is by email, care should be taken to ensure the outgoing or receiving email is protected from disclosure to a third party. It is advisable to communicate with the sender/receiver prior to email for personal data transfer.

If Heads of Department wish to designate someone in the Department to handle the personal data, they should ensure that the designated officials are fully aware of their responsibility to safeguard the confidentiality of the information.

6.1.3. All personal data should be centralized in the files kept by the Human Resource Department. Heads of Department are not encouraged to retain copies of personal data of employees or job applicants unless required for a specific purpose. The

data should be kept in cabinets and should not be left lying around the office. Cabinets and offices should be locked before leaving the office.

6.1.4. Copies of personal data should be disposed of immediately after use. The files and documents containing personal data or obsolete confidential information should be properly torn or shredded.

6.1.5. Copies of written information about employees sent to the Human Resource Department will be kept in their personal files and subject to their access upon request.

6.2. Access to Own Personal Data

6.2.1. Telephone enquiries about personal data are restricted to non-sensitive information, such as leave balance, status of medical insurance claims, and progress of training sponsorship applications, upon verification of the employee's identity or staff number.

For access to data kept in personal file, employees are required to review the personal data in the Human Resource Department. No file, document or copy of document may be taken out of the Human Resource Department without the permission of the Head of Human Resource Department or his designated officer.

6.2.2. For certification of personal information or release of personal information to a third party, employees are required to fill in a Certification of the Personal Data Requisition Form. The Human Resource Department will issue the certification to the employees as soon as possible in writing, within 40 days after receipt of the employees' request in accordance with the terms of the Manual.

6.2.3. Personal data of employees who have resigned are kept for seven years from the effective date of termination of employment. Former employees requesting access to or release of information to a third party must write to the Head of Human Resource Department specifying details of the request. The Human Resource Department will release the information as soon as possible by post within 40 days after receipt of the request.

6.3. Correction of Own Personal Data

6.3.1. Both employees and FFOU have a shared responsibility to ensure that the personal data kept by the Human Resource Department are accurate.

6.3.2. Employees are required to inform the Human Resource Department immediately of any amendment to their personal data by filling in a Change in Personal Data Form. The Human Resource Department will update the records as soon as possible within 40 days after receipt of the form.

6.3.3. Employees who have resigned within the past seven years, are encouraged to keep FFOU posted of any change in their personal particulars.

GENERAL GUIDELINES ON COMPLIANCE WITH COPYRIGHT MANUAL

1. PURPOSE

FFOU respects intellectual property rights and will not use infringing articles in its business. The General Guidelines on Compliance with Copyright Manual serve to outline the provisions of the Copyright Manual that all employees should pay attention to when discharging their duties.

2. BACKGROUND

2.1. Where an employee knowingly uses an infringing copy of a copyright work in the course of his employment, the employee concerned and/or FFOU could be subject to civil liabilities.

2.2. Where the infringing copy involves a computer program (except in printed form), movie, television drama or musical recording (including a visual or sound recording), an employee who without the copyright owner's authorization possesses such infringing copy for use in the course of his employment could also be subject to criminal liabilities. The position relating to this type of business end-user criminal liability has been in operation since the coming into effect of the Intellectual Property.

3. COMPLIANCE BY EMPLOYEES

To ensure that no employee renders himself and/or the organization and/or any of its directors or other employees criminally or civilly liable for copyright infringement, it is important for employees to comply with the copyright law in the course of their employment. Employees should note in particular the following areas which are relevant in the discharge of their duties.

3.1. Computer software

Employees should comply with the circulars, memoranda, practice notes, guidelines and requirements issued by the IT Division and the management from time to time regarding proper management and use of computer software (including but not limited to the Guidelines on Personal Data, Confidentiality and IT Security Controls, the PC Usage Guide and other policies and guidelines posted by the IT Division on FFOU's intranet, as well as Section 10-2 of this Manual on General Rules and Regulations – Organization Property, Use of Personal Computer and their subsequent updates). In particular, as users of computer software, you should note the following:

- ❖ The use of unlicensed or unauthorized software in the business of the FFOU Employees is strictly prohibited.
- ❖ Do not copy or modify the software installed in the office computers without prior written approval from the respective supporting IT Departments. Copying or adaptation of software programs may result in violation of the license conditions.
- ❖ Do not install in your office computer (whether for office or personal use) any software licensed for your personal use. If you need to bring your own laptop or software for business use, you shall ensure that they are genuine copies and licensed for business use and shall obtain the prior written approval of your respective supporting IT Departments.
- ❖ Do not bring to the office any illegal or unauthorized software.
- ❖ Do not copy for your personal use any software installed in your office computer. Neither should you use your office computer to do any personal work not relevant to your official duties.

- ❖ Do not download any software (including “wall papers”, “sound files” or “screen-savers”) from the Internet and install it in your office computer without prior written approval from your respective supporting IT Departments.

Please contact your respective supporting IT Departments if you require clarification or assistance in relation to the use of computer software in the office.

3.2. Making copies of copyright works

- 1) Employees are not allowed to make copies of copyright works (including books, magazines, newspapers, periodicals or other publications) for use in the course of the business of the FFOU employees unless appropriate licenses have been obtained from the copyright owners.
- 2) Examples include making copies of newspaper articles regularly for distribution to Employees of the staff and making copies of certain chapters of a book as reference materials for your project.
- 3) Moreover, employees are not allowed to bring infringing copies of any works to the office for carrying out their official duties.
- 4) Where a license has been obtained, employees should comply strictly with the terms of the license. Please note in particular the making of copies in the following areas:

3.2.1. Books, newspapers, magazines, periodicals and other publications

It should be noted that even though copying or distributing infringing copies on an ad hoc basis or within the limits of the safe harbor would not attract criminal sanctions, such copying and distribution activities remain actionable in court as civil infringement under the Copyright Manual.

3.2.2. Correspondence from Exchange Participants, Clients,

Unless otherwise stated in the correspondence, it is our understanding that it can generally be implied that there is consent from the Exchange Participants, clients for the copying of such correspondence to other Departments within the Organization if it is necessary for the purpose of providing the service required by the Exchange Participants, clients or business associates. If there is any doubt, consent of the relevant writer of the correspondence should be obtained.

3.2.3. Electronic copies

Copying does not only mean the making of photocopies. It includes scanning, storing information in hard disc or other electronic or optical media (e.g. optical discs, memory cards and memory sticks). Transmission of materials by email is also considered as copying. Authorization from the copyright owner is required for the above copying activities.

3.2.4. Internet information

- a) You are permitted to send URL addresses of Internet Resource to others (e.g. by quoting them in letters, memos or e-mails). You should, however, note that copyright works on the Internet are equally entitled to copyright protection. Printing out such materials without permission of the copyright owner will infringe copyright.

- b) Storing such materials in your hard disc whether permanently or temporarily, other than automatic web-browser caching (e.g. downloading materials from websites for inclusion in your PowerPoint presentations), are acts that infringe the rights of the copyright owner.
- c) Before you do these acts, prior permission from the webmaster of the site concerned is required.
- d) You are permitted to print materials on the FFOU website in the course of your employment if those materials originated from the FFOU Employees, i.e. where the copyright rests with the FFOU Employees.
- e) In respect of materials originated from third parties, you would need to ensure that printing of such materials does not violate the conditions agreed with the third party in relation to the posting of the materials on FFOU's website.

3.2.5. Distribution through the Intranet (LAN) or Internet

- Distribution of a copy of a work includes distribution by electronic mail. Making available unauthorized copies of a copyright work to others through the following facilities is an infringing act: the Intranet (LAN) (e.g. posting scanned copies of newspaper articles on FFOU's Intranet for access by staff Employees); or the Internet (e.g. posting commentaries from a magazine on FFOU's website for promotion purposes).
- Permission from the copyright owner is required if employees want to distribute copies of the works of others through the above channels.

DISCIPLINARY ACTION

1. POLICY

Unsatisfactory job performance, misconduct, habitual lateness, absenteeism, failure to comply with FFOU's policies and procedures or any other breaches of employer/employee relationship may result in disciplinary action.

FFOU's policy is that disciplinary action against employees should:

- ❖ Be undertaken only in cases where good reason and clear evidence exist;
- ❖ Be appropriate to the nature of the offence; be demonstrably fair and consistent with previous action in similar circumstances; take place only when employees are aware of the standards that are expected of them or the rules with which they are required to conform; allow employees the right to be accompanied by a colleague of their own choice; allow employees the right to answer charges against them; and allow employees the right to appeal against any disciplinary action.

2. PROCEDURE

Depending upon the circumstances, employees may be subject to the following reprimand or disciplinary actions:

2.1. Coaching or Counselling

- a) If an employee falls below the normal or acceptable requirements as specified in the Human Resource Manual, coaching and counselling by his supervisor should take place as soon as practicable to prevent the situation from deteriorating to a more serious one, or becoming a habit.
- b) The supervisor or the Head of Department should, first of all, find out what causes such behaviours, and assist the employee to rectify the shortcomings.

2.2. Verbal Warning

- 1) If no improvement is made by the employee after coaching and counseling, a verbal warning must be given to him. The areas for improvement and the consequences of failure to make improvement within a specified period of time should be clearly explained to the employee.
- 2) The warning should be recorded in a memo, acknowledged by the Head of Department and a copy of which should be sent to the Human Resource Department for retention in the employee's personal file.
- 3) A verbal warning should be given to employee in the first instance of a minor offence.

2.3. Written Warning

If there is no improvement after the verbal warning has been given, a written warning must be given to the employee. He may be accompanied by a colleague of his own choice when attending the meeting.

The written warning should state the following:

- The nature of the offence with reference to FFOU' policy, instruction or procedure which prohibits it; any past warning or action taken for similar violations; the details on disciplinary action being taken; the expectations or improvements required of the employee; and the future disciplinary action which will be taken against the employee if the offence is repeated within a specified period of time.
- Depending on the situation, the warning may be given by the Head of Department or his designated officer together with a representative from the Human Resource Department, if required. The warning letter must be explained clearly to the employee.
- He will be requested to acknowledge his understanding of the warning letter should circumstances warrant. A copy of the written warning should be sent to the Human Resource Department for retention in the employee's personal file.
- Improvement by an employee after disciplinary action should be noted in the employee's personal file.
- The Head of Department or supervisor must constantly monitor the performance of the employee to ensure that he maintains a satisfactory performance over a specified period.
- A written warning should be given to the employee in the first instance of a more serious offence or after repeated minor offences.

2.4. Suspension of Employment

- ✓ FFOU may suspend the employment of an employee for a period not exceeding 14 days for investigation of any serious offence that could lead to summary dismissal.
- ✓ However, where the investigation is of a criminal nature and proper criminal proceedings cannot be concluded within 14 days, the suspension may be extended till the conclusion of the criminal proceedings.
- ✓ During the suspension period, the employee will be paid salary as normal and will be given an opportunity to state his case. During the hearing of the case, he may be accompanied by a colleague if he so wishes.
- ✓ In exceptional cases, suspension without pay may be warranted but this decision can only be made with the approval of the Head of Department and Head of Human Resource Department.

2.5. Dismissal

- i. An employee will be dismissed after verbal and written warnings have been given and if no improvement is made. Details of the policy for Dismissal are provided in the Section of Termination.
- ii. The Head of Department should obtain a Personnel Movement/Contract Renewal/Salary Revision Form, complete and forward it to the Human Resource Department.
- iii. The Human Resource Department will confirm the termination of employment whether by notice/payment in lieu or without notice/payment in lieu and work out the required compensation in compliance with the Employment Manual.

3. APPEAL

- 1) An employee may appeal against suspension, dismissal with notice or summary dismissal to the Head of Human Resource Department within seven days after the disciplinary action is taken.
- 2) The meeting to hear the appeal should be attended by a member of the management who is more senior to the one who initiated the disciplinary action, the employee making the appeal and a colleague of his own choice if he so wishes.
- 3) No disciplinary action will be taken until the outcome of the appeal is known. Subsequent meeting(s) with the parties concerned will be held until a decision is reached. The management will deliver the decision to the employee and confirm it in writing.
- 4) This represents the final decision of FFOU.

9. BOOKS AND RECORDS

- ❖ All business receipts and expenditures must be supported by documents that accurately and properly describe the expenses incurred. The falsification of any book, record or account of FFOU and the submission of any false personal expense claim is strictly prohibited.
- ❖ Employees must not pay for gifts or hospitality personally as a means of evading the preclearance and other requirements of this policy.

10. REPORTING OF BRIBERY AND SUSPICIOUS ACTIVITY

- If you have any questions about the interpretation or application of this policy, please contact the Chief Executive Officer or the Deputy Chief Executive Officer or the General Counsel or another member of the Legal Team.
- If you become aware of any of any actual or suspected violation of this Policy, you must report this to the Chief Executive Officer or the Deputy Chief Executive Officer or the General Counsel.
- FFOU will not permit retaliation of any kind by, or on behalf of, the FFOU or any Employee against any individual for making good faith reports about violations of this policy. FFOU takes malpractice seriously, and encourages all Employees to report any suspicion of malpractice.
- Further information on whistle blowing and the protections available to Employees who make good faith disclosures of suspected wrongdoing is set out in the Whistle blowing Policy.
- Employees should also bear in mind any applicable regulatory obligations in relation to the reporting of suspicious transactions under legislation relating to money laundering.
- If Employees are suspicious that the FFOU, other employees or representatives of the FFOU or another party, whether a member or client or third party, have been engaged in corrupt activity, this must be reported to the Money Laundering Reporting Officer in addition to any other reports that are made.
- Employees must cooperate fully and openly with any investigation by the FFOU into alleged or suspected corrupt activity or breach of this policy.

- Failure to cooperate or to provide truthful information may lead to Employees being subject to disciplinary action, up to and including termination of employment.

11. TRAINING

- A. FFOU is committed to training its employees in relation to anti-corruption issues and its procedures and controls. All employees will receive a copy of this Policy.
- B. Appropriate training will be provided to all Employees, and new Employees will receive anti-corruption training on joining the FFOU.
- C. Attendance records will be kept.

12. MONITORING OF COMPLIANCE

- ❖ The Audit & Risk Committee of the Board of Directors of FFOU has overall responsibility and oversight for the implementation and monitoring of this policy.
- ❖ The Audit & Risk Committee may direct the Chief Executive Officer or the Deputy Chief Executive Officer to take any such action as it thinks appropriate to review, audit or monitor compliance with this Policy.
- ❖ Additionally, the Audit & Risk Committee will report to the Board of Directors in relation to any modifications that should be made to this Policy to ensure compliance with applicable legislation.
- ❖ Anti-corruption compliance shall be a regular item on the agenda of the Audit & Risk Committee.
- ❖ On a day-to-day basis, the Chief Executive Officer or the Deputy Chief Executive Officer shall act on behalf of the Audit & Risk Committee.
- ❖ At least once a year, the Chief Executive Officer will provide a report regarding compliance with this policy and the corruption risks to which the FFOU is exposed to the Audit & Risk Committee.
- ❖ The General Counsel or a nominated member of the Legal Team will be involved in any transaction, negotiation of a new agreement or commercial transaction. In particular, the General Counsel or his/her nominee should be made aware of any transactions which involve any "red flags", the provision of gifts and entertainment which require pre-clearance and any payments or gifts which may give rise to bribery concerns.
- ❖ Such transactions will thereby be monitored for corruption and related risks.
- ❖ The FFOU engages an appropriately qualified risk consultant to advise the Audit & Risk Committee and senior officers regarding the FFOU's corporate risk profile. This consultant will provide additional oversight and monitoring, including by appropriate interviews, reviews of records, and reviews of this Policy on an annual basis, to assist the FFOU with complying with all applicable anti-corruption legislation.

Prepared by:

Approved by:

Passed by:

FFOU Legal Department

FFOU NEC

FFOU General Assembly