
**TERMS OF REFERENCE FOR THE INVESTIGATION OF THE ALLEGATIONS LEVELLED
AGAINST THE CHIEF EXECUTIVE OFFICER (CEO) OF THE MDB**

The following terms of reference are proposed for the investigation: -

1. To investigate whether the letter of complaint is authentic and authorship is acknowledged.
 - 1.1. In the event that your finding is in the negative, i.e., authorship is denied and complaint does not exist, you are required to determine whether in the light thereof, the so-called complaint will be worth pursuing any further.
 - 1.2. In the event however, the complaint is found to be valid and grounded, you are required to investigate and establish the following:
 - If it was correct for both the Chairperson and the CEO to contact the alleged complainant against the backdrop of the Extraordinary Board Meeting decision to investigate the allegations;
 - In an event of the authenticity being proven, to investigate if the actions by both the Chairperson and the CEO do not amount to intimidation; and
 - To investigate if the sudden placement of the Company Secretary on Special Leave was not a ploy to either delay or subvert the implementation of the Extraordinary Board Meeting decision to appoint a service provider that investigate the veracity of the allegations levelled against the CEO.

2. To investigate whether the officials {mentioned in the complaint letter}—had or conducted a love relationship with the CEO, in the event it is found that there was such a relationship, whether such employees entered into such relationship, voluntarily or as a result of promises offered in exchange for work promotional opportunities or any other undue benefit.
3. To investigate whether, at any stage of such alleged relationship between the CEO and complainant, did the parties have sexual intercourse in the office of the CEO (work premises) and in return offered a promise for promotion.
4. To investigate whether the CEO had sexual intercourse with the Board Committee Officers.
5. To investigate whether the CEO solicited sexual favors from the Board Committee Officer and officials.
6. To investigate whether the CEO impregnated both his former and current personal assistants.
7. To investigate whether the CEO has sired a child with the “cleaning lady” at the second floor of the MDB.
8. To investigate whether the CEO made a promise of permanent appointment to the cleaning lady.
9. To investigate whether the CEO had made sexual advances or solicited sexual favors from any other employee/s with a promise of promotion.
10. To investigate whether the CEO has made any contact with the alleged complainant and other alleged victims after he was advised by the Board not to make any contact with them.

11. To investigate whether the CEO facilitated kickbacks (bribery) from the service provider of the leased building to pay for the lifestyle of the Chairperson of the MDB.
12. To investigate whether the CEO acted in a manner that prejudiced the integrity or reputation of the Board.
13. To make findings, and recommend the most appropriate, just and equitable action/s [recommendations] for the Board.