

ANTI-BRIBERY and CORRUPTION (ABC) POLICY

Context

Enforcement of anti-bribery and corruption laws has stepped up significantly in the last decade in Nigeria and across the world. Aside from the penalties, the taint of bribery and corruption could significantly tarnish the reputation of an organisation. Our reputation and success as a company is built upon a foundation of integrity, a commitment to act within the highest ethical standards and to conduct business honestly and legally. Our code of conduct reflects this commitment.

Purpose

The purpose of this policy is to reinforce NSML's business principle of zero tolerance to bribery and corruption by providing a framework to guard and promote the Company's reputation for integrity and responsibility. The policy will support the implementation of the NSML Anti Bribery and corruption programme underpinned by robust policies and transparent process.

Scope

It is NSML's policy to comply with all Nigerian laws, rules and regulations governing anti bribery and corruption. As a company, NSML and its employees and contractors are also bound by the anti-corruption laws of countries where we do business. This policy therefore applies to all directors, employees, agents, intermediaries, consultants or other business partners, and any other persons, organisations or bodies doing business with NSML or any of its subsidiaries and employees.

Bribery

The direct or indirect offer, payment, soliciting or acceptance of bribes in any form (including favours) is not allowed. No bribes of any sort may be solicited from, paid to or accepted from customer, suppliers, agent, consultant, intermediaries, other business partners, stakeholders, politicians and/or government officials.

It is not permitted to establish accounts or internal budgets for the purpose of facilitating bribes or influencing transactions or decisions. NSML will promote its policy on bribery and corruption amongst its directors, employees, business partners, stakeholders, contractors and suppliers.

Facilitation Payments

Recognising that facilitation payments are bribes, NSML expressly prohibits such payments. Thus all employees, contractors and other business partners are not allowed to solicit, make or receive facilitation payments on behalf of NSML. They are also not allowed to solicit, make or receive such payments for themselves or any other person whomsoever in the course of NSML business.

Gifts, Hospitality & Expenses

NSML prohibits the solicitation, offer or receipt of gifts and hospitality whenever they could affect or be perceived to affect the outcome of business transactions or decisions and are not reasonable and bonafide or consistent with the criteria in the NSML statement of Business Principle, Gift and Hospitality Standard, Code of Conduct and Anti Bribery and Corruption (ABC) manual. Seasonal Gifts should be NSML branded items of nominal value.

Gifts and Hospitality must be disclosed, declared and recorded fairly and accurately in NSML books and records.

No expenditure of gifts, travel, lodging or entertainment for any Government Officials may be made for the purpose of influencing any official action or to procure any improper advantage.

Donations & Sponsorships

Charitable donations and sponsorships must not be used as a subterfuge for bribery and must be consistent with NSML Business Principles and Code of Conduct.

Charitable donations and sponsorships shall not be provided to any organisation upon the suggestions or request of a public (government) official or for the purpose of influencing a public official.

NSML shall not make payments and/or donations to political parties, organisations or their representatives.

Contractors & Suppliers

NSML Shall

Conduct its contracts and procurement practices in a fair and transparent manner

Avoid dealing with contractors and suppliers known or reasonably suspected to be paying bribes

Undertake due diligence in evaluating prospective contractors and suppliers to ensure that they have effective anti-bribery and corruption programmes.

Make known its ABC Policy and Business Principles to contractors and business partners and expect compliance from them..

Ensure compliance with NSML ABC Policy and take reasonable steps to monitor for and prevent misconduct.

Sanctions

Breach of the provisions of the ABC Policy constitutes serious misconduct and will be subject to appropriate disciplinary measures including, but not limited to, termination of employment or appointment of the affected employee

Breach of ABC Policy by contractors or other business partners may lead to the termination of such business relationships.

Breach of the ABC Policy may also result in civil or criminal proceedings against defaulters.



ABDULKADIR K. AHMED

MD/CEO

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