

## POLICY DOCUMENT: LOCAL CONTENT POLICY

### Odun Environmental Limited (ODUN)

**Document Title:** Nigerian Local Content Development Policy  
**Version:** 3.0 | **Effective Date:** 05/05/2026 | **Review Cycle:** Annual  
**Policy Owner:** Head of Administration  
**Approval Authority:** Managing Director  
**Applicability:** All ODUN Offices, Employees, and Operations

#### 1. Purpose

The purpose of this policy is to define Odun Environmental Limited's (ODUN) strategy for maximizing the participation of Nigerian individuals and businesses in our operations, in strict compliance with the Nigerian Oil and Gas Industry Content Development (NOGICD) Act 2010 and the NCDMB (Nigerian Content Development and Monitoring Board) directives. ODUN is committed to deepening local value retention. We subscribe to the Nigerian Oil and Gas Industry Content Development (NOGICD) Act 2010 as a benchmark, even for non-oil sector operations, to maximize Nigerian participation.

#### 2. Policy Statement

ODUN is committed to the growth of the Nigerian economy. We shall prioritize Nigerian ownership, Nigerian-manufactured goods, and Nigerian personnel in the execution of all projects.

#### 3. Strategic Objectives

- **Human Capital Development:** Achieve a minimum of [e.g., 80%] Nigerian workforce composition across all cadres.
- **Vendor Development:** Award a minimum percentage of procurement contracts (by value) to indigenous Nigerian companies.
- **In-Country Value Addition:** Utilize Nigerian facilities for fabrication, logistics, and services where capacity exists, rather than importing these services.

#### 4. Implementation Guidelines

##### A. Procurement (The "Nigerian First" Rule)

- **Tender Evaluation:** All tenders must be evaluated to give preference to Nigerian bidders provided they meet technical and commercial criteria.
- **Vendor Registration:** New vendors must provide evidence of Nigerian incorporation and registration with NCDMD (Nigerian Content Monitoring and Development Directorate).

##### B. Employment and Training

- **Expatriate Quota:** Expatriates will only be employed where specific expertise is not available in Nigeria.
- **Succession Planning:** For every expatriate position filled, ODUN mandates a structured training program for a Nigerian understudy to assume the role within a maximum of [e.g., 2 years].
- **Research:** Collaboration with Nigerian tertiary institutions on environmental research and development.

#### 5. Targets (For all Odun Projects)

Indicator	Minimum Target	Verification Method
Local Workforce (Junior Staff)	100%	Payroll & National ID verification

Indicator	Minimum Target	Verification Method
Local Workforce (Management)	80%	Employment contracts
Local Goods & Services	70% of procurement spend	Invoices & WHT receipts
Local Equity Ownership	25% (for JV partners)	CAC documents

#### 6. Definition of "Local"

For the purpose of this policy, "Local" means:

- **Individual:** Nigerian citizen by birth or naturalization residing in the state of operation.
- **Company:** Registered with CAC with >51% Nigerian shareholding and primary operational HQ in Nigeria.

#### 7. Community Labor

For unskilled labor (clearing, digging, security), ODUN will prioritize the Community Contractors Association over external agencies, provided they meet minimum safety standards.

#### 8. Reporting

ODUN shall submit accurate monthly and quarterly Nigerian Content performance reports to the NCDMB as required by law. Internal audits will be conducted quarterly to ensure compliance with this policy.

Approved By:



Ayo Abiodun,

**Managing Director**

Odun Environmental Limited

Date: 5<sup>th</sup> May 2026