

POLICY DOCUMENT: SUPPLIER CODE OF CONDUCT

Odun Environmental Limited (ODUN)

Document Title: Supplier Code of Conduct (SCoC)

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Policy Owner: Head of Administration

Approval Authority: Managing Director

Applicability: All ODUN Offices, Employees, and Operations

1. Introduction

Odun Environmental Limited (ODUN) expects its suppliers, contractors, and vendors (hereinafter referred to as "Suppliers") to adhere to the highest standards of ethical, environmental, and social responsibility. This Code of Conduct outlines the minimum requirements for doing business with ODUN in Nigeria.

2. Compliance with Laws

Suppliers must comply with all applicable federal, state, and local laws, regulations, and industry standards in Nigeria. This includes, but is not limited to:

- The Companies and Allied Matters Act (CAMA).
- The Nigerian Oil and Gas Industry Content Development (NOGICD) Act.
- Tax regulations (NRS).
- Environmental guidelines set by NESREA and FMEnv.
- Nigerian Labour Act (Cap L1 LFN 2004)
- Nigeria Oil and Gas Industry Content Development (NOGICD) Act (where applicable to environmental services)
- EFCC Act (Anti-Corruption)

3. Labor and Human Rights

Suppliers must uphold the human rights of workers. We strictly prohibit:

- **Child Labor:** Employment of persons under the age of 15 or the national minimum age for employment, whichever is higher.
- **Forced Labor:** Any form of forced, bonded, or prison labor.
- **Discrimination:** Discrimination in hiring, compensation, or treatment based on race, religion, gender, ethnicity, disability, or political affiliation.
- **Fair Wages:** Payment of wages that meet or exceed the national minimum wage and comply with local labor laws.

4. Health, Safety, and Environment (HSE)

Suppliers must provide a safe and healthy working environment.

- **Safety Protocols:** Implementation of mandatory PPE usage and safety training for all staff.
- **Environmental Management:** Proper management of hazardous and non-hazardous waste. Dumping of waste in unauthorized locations is grounds for immediate contract termination.
- **Emergency Preparedness:** Suppliers must have documented emergency response plans.

5. Business Ethics and Integrity

- **Anti-Bribery and Corruption:** ODUN operates a Zero-Tolerance policy regarding bribery, kickbacks, or facilitation payments. Suppliers must not offer gifts or monetary inducements to ODUN staff or government officials to secure business.
- **Conflict of Interest:** Suppliers must immediately disclose any potential conflict of interest involving ODUN employees.

- **Gifts and Hospitality:** Modest, non-monetary gifts for promotional purposes are permissible, but they must not influence business decisions.

6. Anti-Corruption & Bribery

- **Zero Tolerance:** No facilitation payments, "dash," or gifts over N25,000 to ODUN employees or government inspectors.
- Suppliers must report any solicitation of a bribe by an ODUN employee to the ODUN Whistleblower line.

7. Subcontracting

Suppliers may not subcontract work to third parties without prior written consent from ODUN's Procurement Manager. The primary supplier remains liable for all sub-supplier violations.

8. Local Content

Suppliers are expected to demonstrate commitment to Nigerian Local Content by:

- Prioritizing the procurement of Nigerian-made goods and services.
- Employing Nigerian citizens in management, technical, and operative roles where capacity exists.

9. Remediation

Breaches will result in:

1. Written warning & corrective action plan (30 days).
2. Suspension from tenders for 12 months.
3. Permanent delisting from the ODUN Vendor Register.

Approved By:



Ayo Abiodun,

Managing Director

Odun Environmental Limited

Date: 5th May 2026