

Ethical Code of Conduct for Samdenkens Nigeria Limited

Introduction

Samdenkens Nigeria Limited is committed to maintaining the highest standards of ethics and integrity in all aspects of its business. This Ethical Code of Conduct outlines the principles and expectations for ethical behavior within the organization.

Principles

- 1. Honesty and Integrity: Conduct business with honesty, transparency, and integrity.
- 2. Respect: Treat colleagues, customers, and stakeholders with respect and dignity.
- 3. Fairness: Ensure fair and equal treatment in all business dealings.
- 4. Compliance: Comply with all applicable laws, regulations, and industry standards.
- 5. Confidentiality: Protect confidential information and maintain confidentiality.

Expectations

- 1. Employees:
 - Uphold the principles of this Code
 - Report unethical behavior or concerns
 - Cooperate with investigations and audits
- 2. Management:
 - Lead by example and promote ethical behavior
 - Ensure compliance with this Code
 - Address and resolve ethical concerns
- 3. Business Partners:
 - Adhere to this Code in all dealings with Samdenkens Nigeria Limited

Prohibited Conduct

- 1. Bribery and Corruption
- 2. Fraud and Deception
- 3. Harassment and Discrimination
- 4. Conflict of Interest
- 5. Unauthorized Disclosure of Confidential Information

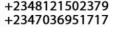
Reporting and Enforcement

- 1. Reporting: Report unethical behavior or concerns to management or the Ethics Committee.
- 2. Investigation: Investigations will be conducted promptly and fairly.
- 3. Enforcement: Disciplinary action will be taken for non-compliance.

Amendments and Updates

This Code will be reviewed and updated annually to ensure relevance and effectiveness.









Acknowledgement

All employees, contractors, and stakeholders must acknowledge and comply with this Ethical Code of Conduct.

By upholding this Ethical Code of Conduct, Samdenkens Nigeria Limited demonstrates its commitment to integrity, transparency, and responsible business practices, ensuring a positive impact on its stakeholders and the community.

OR DENIRAN MANAGING DIRECTOR