AKULAND

"Innovate. Invest. Grow."

ESG RISK MANAGEMENT POLICY

1.0 Purpose

Akuland Group Limited, its subsidiaries, and affiliates integrate Environmental, Social, and Governance risks into business decision-making to protect people, assets, reputation, and long-term value. This policy sets the framework for identifying, assessing, managing, and reporting ESG risks across our operations.

2.0 Scope

Applies to all Akuland Group Limited operations, projects, subsidiaries, employees, contractors, and third parties acting on our behalf.

3.0 Policy Statement

We commit to proactive management of ESG risks in line with Nigerian regulations, IFC Performance Standards, and industry best practice. ESG risk management is not separate from business risk management—it's embedded in it.

4.0 ESG Risk Categories

Environmental: Emissions, spills, water use, biodiversity impact, waste, climate-related physical and transition risks.

Social: Community relations, health and safety, labor rights, human rights, security, stakeholder engagement.

Governance: Ethics, anti-corruption, tax compliance, board oversight, supply chain governance, data integrity.

5.0 Risk Management Process

1. Identify: Screen all new projects, contracts, and operations for material ESG risks using a risk checklist.

2. Assess: Evaluate likelihood and impact using a 5x5 risk matrix. Material risks are those rated High or Extreme.
3. Mitigate: Apply the hierarchy: Avoid > Reduce > Transfer > Accept. Assign owners and deadlines for mitigation actions.
4. Monitor: Track key risk indicators monthly. Review high-risk items in monthly HSE and Operations meetings.
5. Report: Report material ESG risks and mitigation status quarterly to the Board HSE Committee.

6.0 Responsibilities

Board: Oversight of ESG risk appetite and performance.

Executive Management: Ensure resources, integration into business planning, and accountability.

HSE & ESG Team: Coordinate risk assessments, maintain the risk register, provide technical support.

Line Managers: Implement controls, report incidents, and embed ESG risk management in daily work.

Procurement: Apply ESG due diligence in supplier selection and contract management.

7.0 Key Controls & Standards

1. Environmental Impact Assessments and Social Impact Assessments for all new projects.
2. Stakeholder Engagement Plan for every operational site.
3. Incident reporting and investigation process for ESG-related events.
4. Supply chain due diligence on labor, human rights, and environmental practices.
5. Climate risk screening for assets in flood-prone, coastal, or high-temperature zones

8.0 Training & Awareness

All employees and contractors receive induction on ESG risks relevant to their role. Functional leads receive annual training on risk assessment and mitigation.

9.0 Reporting & Transparency

We disclose material ESG risks, performance data, and progress on mitigation in our annual Sustainability Report. Material incidents are reported to regulators and affected stakeholders within regulatory timelines.

10.0 Breach & Review

Non-compliance with this policy is subject to disciplinary action. The policy is reviewed every 2 years or after major incidents, regulatory changes, or business changes.

Dr Chukwuemeka Ogah
President/Chief Executive
June, 2026