



SUPPLIER CODE OF CONDUCT POLICY

Policy No.: AGL-PROC-007 | Version 1.0 | Effective: June 2026



1. Purpose

Akuland Group Limited, its subsidiaries, and affiliates are committed to ethical, lawful, and sustainable business across all operations. This Code sets the minimum standards we expect from all suppliers, contractors, agents, and their subcontractors.

By doing business with Akuland, you agree to comply with this Code and applicable laws in Nigeria and other jurisdictions where you operate.

2. Legal Compliance

Suppliers must comply with all applicable laws and regulations, including those related to labor, health & safety, environment, anti-bribery, sanctions, tax, and competition.

3. Human Rights & Labor Standards

1. No Child or Forced Labor: Do not employ anyone under the legal working age or use forced, bonded, or involuntary labor.
2. Fair Employment: Provide fair wages, working hours, and benefits in line with local law.
3. Non-Discrimination: Treat all workers with dignity. Do not discriminate based on race, gender, religion, ethnicity, disability, or other protected characteristics.
4. Freedom of Association: Respect workers' right to associate and bargain collectively where lawful.

4. Health, Safety & Environment

1. Provide a safe and healthy workplace.
2. Identify and mitigate hazards.
3. Ensure workers have appropriate training and PPE.
4. Comply with environmental permits and manage waste, emissions, and resource use responsibly.
5. Report incidents and near-misses promptly.

5. Anti-Bribery & Corruption

1. Zero tolerance for bribery, kickbacks, facilitation payments, or fraud.
2. Do not offer gifts, hospitality, or payments to Akuland employees to influence business decisions.
3. Maintain accurate books and records: No off-book accounts or falsified documents.

6. Conflicts of Interest & Fair Competition

1. Disclose any relationship with Akuland employees that could create a conflict of interest.
2. Compete fairly. Do not engage in price fixing, bid rigging, or market allocation.
3. Protect confidential information and the intellectual property of Akuland and others.

7. Responsible Sourcing

1. Know your own suppliers and subcontractors.
2. For minerals from conflict-affected areas, provide evidence of responsible sourcing in line with OECD guidance.
3. Avoid sourcing from sanctioned parties or jurisdictions without written approval from Akuland.

8. Data Protection & Confidentiality

Protect personal and business data shared by Akuland. Use it only for the intended purpose and in line with applicable data protection laws.

9. Reporting & Grievance Mechanism

If you become aware of a breach of this Code in Akuland's supply chain or operations, report it confidentially to:

1. Email: procurement.compliance@akulandgroup.com
2. Hotline: +234-8097008500

Akuland prohibits retaliation against anyone who reports in good faith.

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10. Monitoring & Consequences

Akuland reserves the right to audit suppliers for compliance with this Code. Failure to comply may result in corrective action, suspension, or termination of the business relationship.