



NNPC LIMITED CODE OF CONDUCT

Objectives

NNPC Limited Employee Code of Conduct is designed to provide a clear, concise, and consistent set of guidelines and principles to guide the actions of the employees and business partners in their day-to-day activities and in the course of their relationship with NNPC Ltd. It sets out the standards of behavior and practices which are considered acceptable and in line with the Company's policies and core values.

Professional Conduct

All employees of NNPC Limited are required to conduct themselves in accordance with the highest standard of behaviour. Professional conduct therefore should not be limited to the office environment but should encompass all aspects of lifestyle.

Anti-Bribery and Corruption

NNPC Limited operates a policy of zero tolerance to bribery and corruption. NNPC Limited strongly prohibits any form of facilitation payment, bribery, and corruption at any level and by any of its employees, business partners, contractors and suppliers.

Anti-Money Laundering, Combating the Financing of Terrorism, and Proliferation Financing

It is the policy of NNPC Limited to prohibit and actively prevent money laundering and any activity that facilitates money laundering or the funding of terrorist or criminal activities.

Counterparties Due Diligence

NNPC Limited shall conduct Due Diligence in compliance with MLPPA 2022, TPPA 2022 and other applicable laws and regulations governing the Company. Such mechanisms and procedures shall be performed to assess, analyse and mitigate the risk involved, if at all, in any business decision to be undertaken by NNPC Limited.

Conflict of Interest

Employees are expected to take steps to avoid conflicts of interest and make conscious effort to identify and declare any circumstance which constitutes or has the likelihood to constitute a conflict of interest.

Gifts and Entertainment

NNPC Limited strictly forbids employees from soliciting gifts or hospitality. As a general principle, the Company discourages employees from accepting gifts or hospitality from business partners and their representatives. Notwithstanding this, NNPC Limited recognises that the occasional acceptance or offer of modest gifts and hospitality may be a legitimate contribution to good business relationships. Hence, it is important that gifts or hospitality never influence business decision-making processes, or cause others to perceive an influence.

Bashir Bayo Ojulari

A handwritten signature in black ink, appearing to read "Bashir", written over a white background.

Group Chief Executive Officer
June 2025

Political Contributions

NNPC Limited does not make donations (neither monetary nor otherwise) to political parties; organizations; causes or their representatives. Also, we will not direct our employees to exercise their constitutional right to vote in favour of any political party or political figure.

People

NNPC Limited expects employees to demonstrate respect and fairness in their interactions with employees and external parties in line with NNPC Limited's core values as well as to create a work environment free from harassment.

Public Communication, Media, and Press

NNPC Limited is committed to communicating to all its stakeholders with integrity and consistency and in compliance with regulatory or statutory requirements and financial reporting standards.

Financial Transactions and Disclosure

NNPC Limited is committed to full and accurate financial disclosure in compliance with applicable laws, rules, and regulations. As well as maintaining its books and records in accordance with applicable accounting policies, laws, rules, and regulations.

Assets Protection

NNPC Limited's assets should be used only to advance NNPC Limited's business purposes and goals. Employees are entrusted with NNPC Limited's assets to do their jobs and are personally responsible for safeguarding and using them appropriately.

Information Management

Every employee is expected to observe standard business communication etiquette when communicating with others. The standard applies to every kind of correspondence including mail, instant messages, telephone, social media tools etc.

National and International Trade

NNPC Limited as a business concern is committed to abiding by all laws that regulate international business practices subsisting in countries where NNPC Limited has investments.

Whistleblowing

If you believe a provision of the Code of Conduct has been or is being violated, you have a responsibility to raise your concerns through the whistleblowing hotline by sending a mail to whistleblowing@nnpccgroup.com.