



GACN - ABRIDGED CODE OF CONDUCT AND BUSINESS ETHICS POLICY

Strict compliance with GACN's Code of Conduct and Business Ethics Policy (CCBE) is mandatory for all staff and third parties dealing with GACN in order to deliver on its mandate as the Domestic Aggregator and secure the trust of its employees, shareholders, buyers, sellers, and other third parties. To this end, all staff and GACN's third parties are enjoined to adhere to the following:

1. **No Gratification:** Bribes, fees, rebates, kickbacks in exchange for services provided on behalf of GACN is totally prohibited.
2. **Avoid Conflict of Interest:** All are prohibited from indulging in transactions or activities constituting a 'Conflict of Interest'. A Conflict of Interest entails engaging in any transaction or activity which conflicts with GACN's business interest. Where such conflicts may arise, the respective staff should promptly declare such to the Compliance Officer.
3. **Strict HSSE Compliance:** All shall abide by all health, safety, security, and environmental regulations in the conduct of GACN's business and performance of any tasks. For further details, please refer to the GACN HSSE Policy.
4. **Confidentiality:** All staff shall maintain confidentiality of all GACN related information and documents including abiding by the confidentiality obligations in all GACN agreements.
5. **Maintenance of Accurate Records:** All shall ensure that every transaction is adequately and properly documented, correctly recorded, and all information is properly maintained and secured.
6. **No Harassment:** All must maintain a work environment where everyone can perform their roles without any fear of harassment (e.g. bullying, use of offensive language, physical assault, verbal abuse, sexual advances and harassment, etc.).
7. **No Alcohol or Substance Abuse:** No one shall indulge in the consumption of alcohol, illicit or non-prescription drugs or any other prohibited stimulants or substances while carrying out any official activities within any GACN facility.
8. **Efficient Use of Company Assets:** All shall secure assets in their possession against waste, damage, loss, misappropriation and misuse, and the assets shall be solely deployed for GACN business, only.
9. **Adherence to Proper Communication Channel:** Clearance from the MD should be secured for all communications with third parties or the general public.
10. **Compliance with Applicable Law:** All are required to comply with all applicable laws and internal policies.
11. **Non-Participation in Partisan Politics:** All staff shall abstain from political activities or acts that could be deemed partisan. Staff are however encouraged to participate in government and civic processes in their personal capacity.
12. **Respect for the Rights of Individuals:** All must respect the rights of individuals to privacy. Staff shall protect personal and classified information about individuals in their care from misuse.
13. **It's Obligatory to report any CCBE Violations:** Anyone aware of any violation of the GACN CCBE or the foregoing shall immediately report such violation to the Compliance Officer and the Managing Director. Please note that all reports will be treated with utmost confidentiality and subsequently investigated. However, if such submissions are found to be false or malicious, appropriate sanctions will be applied.


Olalekan Ogunleye
Managing Director
September, 2020