

## Gifts and Benefits Policy

The Gift and Benefits policy was established to inform all employees, directors, business partners and other stakeholders on the Company's position regarding the giving and acceptance of gifts and benefits from persons or companies that deal directly or indirectly with Oando PLC and its subsidiaries.

Gifts and Benefits include all products or services, business courtesies, gratuities, meals, drinks, fabrics, discounts, hospitality, entertainment, recreation, tickets, transportation and other "things of value" for which the recipient does not pay the fair value and that were received in the course of their duties.

It is the responsibility of all employees to complete and submit to the Governance office the Gifts and Benefits Declaration Form within 24 hours of receiving **any** gift or benefit irrespective of its value. Where the gift falls within the acceptable limit, the Chief Compliance Officer and Company Secretary (CCO&CS) shall approve that the employee retain the gift/benefit. Where the gifts are valued at ₦25,000 or more and cannot be returned to the giver, the employee shall forfeit the gift to the Company. Such gifts are thereafter presented to the Oando foundation for disbursement to charity or auctioned with the proceeds distributed to charitable organizations.

The Governance Office maintains a register of all declared gifts. Any gift that is received and undeclared or under-declared by an employee, director or business partner is considered a kickback and would be sanctioned accordingly.