



Niger Delta Exploration & Production Plc.

**SUPPLIER
CONFLICT OF INTEREST POLICY**

1. Introduction

- 1.1. This policy outlines NDEP Plc's principles on Supplier Conflict of Interest and offers guidance to assist Suppliers so as to avoid allegations of an actual or perceived Conflict of Interest.

2. Definitions

- 2.1 Supplier Conflict of Interest: A Supplier Conflict of Interest is a situation that has the potential to undermine the objective performance of a Supplier because of a clash with the Supplier's self-interest OR a situation in which the Supplier's responsibility to a Third Party limits its ability to discharge its contractual obligations to NDEP Plc.
- 2.2 NDEP Plc means Niger Delta Exploration & Production Plc together with all its Subsidiaries, its Co-Venturers, other contractors and their respective affiliates and their directors, officers and employees (including agency personnel), but shall not include any member of the supplier Group.
- 2.3 Supplier: A Supplier is defined as someone who is currently providing or could potentially provide NDEP with required materials or goods or services.
- 2.4 Third Party – In the context of this policy, a Third Party means any person, company, or community, who does not have any contractual obligation with the company but may be affected thereby.

3. Policy Overview and Scope

- 3.1 The NDEP Plc policy on Supplier Conflict of Interest is applicable to all NDEP Plc Suppliers.
- 3.2 The presence of a Conflict of Interest has the potential of impairing a Supplier's ability to perform objectively and effectively resulting in NDEP's interests being compromised. NDEP Plc has developed a good reputation in the industry and globally. All Suppliers involved in the delivery or operations of NDEP Plc, must strive to avoid even the appearance of impropriety.
- 3.3 As such, with consideration to all Suppliers' responsibility to the business interest of NDEP Plc, all Suppliers of NDEP Plc are expected to declare any Conflict of Interest, perceived or actual to NDEP Plc as soon as it comes to their attention. In addition, all Suppliers of NDEP Plc shall consent to abide by NDEP Plc policy pertaining to Supplier Conflict of Interest at the time of responding to Request for Proposals and Request for Quotations issued by NDEP Plc.

4. Supplier Responsibilities

- 4.1 NDEP Plc expects Suppliers to avoid situations where their existing or potential business relationships may or appear to compromise their responsibilities to deliver their contractual commitments effectively and objectively to NDEP Plc.

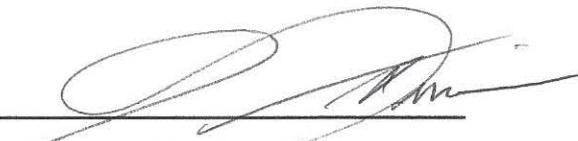
- 4.2 It is the responsibility of the Supplier to contact NDEP Plc if the Supplier is in a position where it has an actual or perceived Conflict of Interest during the relationship with NDEP.
- 4.3 Contractor/Suppliers must disclose any actual or perceived Conflict of Interest to NDEP Plc when it is invited to bid to provide a material, good or service to NDEP Plc.
- 4.4 By signing an Agreement with NDEP Plc, a Supplier guarantees that:
- a. The Supplier has no Conflict of Interest which would prevent it from acting in the best interest of NDEP Plc and that such a situation will not exist during the term of the Agreement.
 - b. The Supplier has not entered into any contract or agreement, or executed any document whatsoever that will, in any way, prevent it from giving NDEP Plc the benefit of services under the contract.
 - c. The Supplier will not enter into any contract or agreement, or execute any document, which will create a Conflict of Interest or which will prevent it from freely performing any provision of the contract signed with NDEP Plc.
 - d. If a Supplier has any doubt as to whether a Conflict of Interest exists, it must disclose the same to NDEP Plc. through cp@ngdelta.com

5. Non-Compliance

If a Supplier is found to be in non-compliance with this document, it may be subject to termination of services and blacklisting.

I am aware that NDEP Plc may collect and process my or my company's personal data for the purposes for which it is collected. I am also aware that NDEP Plc will retain the personal data as long as necessary for the purpose for which it is collected.

In consideration of this, I hereby consent to the collection, processing, use and transfer of my personal data for the purposes of the business.



CHAIRMAN

03 - 03 - 21

DATE

APPENDIX A
CONFLICT OF INTEREST DECLARATION

Name:

Company:

Designation:

I have the following conflict of interest (actual/perceived) to declare on behalf of the company:

1. That.....
- 2 That.....
- 3 That

Please create more lines if you have additional declaration to make.

Signed:_____

Date:_____