

Human Rights Policy Statement

At SAMNOMI Oil and Gas Global Limited, we are committed to respecting and promoting human rights in all our operations and activities due to our profound appreciation of the inherent dignity and worth of every individual.

We have a vision of building a fairer, more socially inclusive world and determined to propel that vision into action. That means everything we do through our business; our values and our brands must be underpinned by an absolute commitment to respect human rights in and throughout our operations. We believe that businesses can only be sustainable in societies and environments where human rights are respected and protected. We recognise that business has the responsibility to respect internationally recognised human rights and the ability to contribute to positive human rights outcomes. Our efforts are grounded in the United Nations Guiding Principles on Business and Human Rights which we are committed to implementation and are compliant with Nigeria's Human Rights policies. We believe that respecting human rights also helps our business to grow responsibly. This Human Rights Policy Statement is also echoed in other company statements. Steps have been taken to actively embed this commitment and its overarching principles into the polices and processes throughout our business.

Objectives

This Human Rights Policy Statement outlines our commitment to upholding human rights and ensuring that our operations are conducted in a manner that respects the rights and dignity of all personnel/individuals within and outside our operations.

Scope

This policy applies to all SAMNOMI Oil and Gas Global Limited employees, contractors, and third-party vendors. It also applies to all our operations and activities in Nigeria and any other part of the world where we do business.

Our Vision

Samnomi Oil and Gas Global Limited vision is to deliver sustainable development by serving the society in the course of our business. Our Code of Business Principles makes clear that we "conduct our operations with honesty, integrity and openness, and with respect for the human rights and interests of our employees and that we shall similarly respect the legitimate interests of those with whom we have relationships" including host communities. We expect and will ensure that all our partners and third parties adhere to business principles consistent with our own, including respecting all internationally recognised human rights.

Our Policy

In line with the United Nations Guiding Principles on Business and Human Rights, we base our human rights policy commitment on the International Bill of Human Rights (consisting of the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights) and the principles concerning fundamental rights set out in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. We follow The Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises to ensure our compliance with international and national human rights principle. We are committed to respecting all internationally recognised human rights throughout our operations, while placing specific efforts on those rights that are at risk of the most severe negative impact through our activities and business relationships – our salient human rights issues. Where national law and international human rights standards differ, we will follow the higher standard; when faced with conflicting requirements, we will adhere to national law, while seeking ways to honour the principles of internationally recognised human rights.

Human Rights Principles

We are committed to respecting and promoting the following human rights principles which form the basis upon which our human rights principles are consistently implemented:

- * Respect for Human Life: We respect the right to life and will not engage in any activity that compromises the safety and well-being of individuals.
- ❖ Non-Discrimination: We will not discriminate against any individual based on their race, ethnicity, nationality, gender, age, disability, or any other status.
- ❖ Freedom from Forced Labor: We will not engage in or support forced labor, including child labor, and will ensure that all employees and contractors are employed voluntarily.
- ❖ Freedom of Association: We respect the right to freedom of association and collective bargaining, and will not interfere with the rights of employees to join or form trade unions.
- * Respect for Indigenous Rights: We recognize the rights of indigenous peoples to their lands, territories, and resources, and will engage with them in a respectful and inclusive manner.
- ❖ **Protection of Vulnerable Groups:** We will take steps to protect vulnerable groups, including children, women, and individuals with disabilities, from exploitation and abuse.

Implementation - The following measures will be applied to implement this policy:

- ❖ Training and Awareness: We will provide training and awareness programs for employees and contractors on human rights principles and this policy.
- * Risk Assessment: We will conduct regular risk assessments to identify potential human rights impacts and take steps to mitigate them.
- ❖ **Grievance Mechanism:** We will establish a grievance mechanism for individuals to report concerns or complaints related to human rights.
- Monitoring and Reporting: We will monitor and report on our human rights performance and progress.

Accountability - We are committed to being accountable for our human rights performance, consequently we will:

- ❖ Investigate and Address Complaints: We recognise that we must take steps to identify and address any actual or potential adverse impacts which we may cause or contribute to through our own activities or which may be directly linked to our operations, services or by our business relationships. We will investigate and address complaints related to human rights in a fair and transparent manner.
- Provide Remediation: We will provide remediation to individuals who have been affected by our operations or activities.

Responsible Business

We have a large and diverse value chain and we recognise the critical role our business partners play in helping us to do business responsibly and sustainably. Our Responsible Partner Policy embodies our commitment to conduct business with integrity and openness whilst embedding human rights, fighting corruption and protecting and preserving our environment. This includes appropriate Fundamental Principles setting out mandatory requirements that business partners must achieve to do business with Samnomi Oil and Gas Global Limited; future mandatory requirements and examples of leading practices. Business partners are expected to cascade requirements through their supply chains including clear requirements and guidance relating to grievance mechanisms. For use of large volume of petroleum products that could possibly spill and devastate the environment, our People and Nature Policy sets out clear requirements for our own business, equipment operators, suppliers and partners, including respecting and promoting human rights and protecting natural ecosystems from substantial impact and conversion. We will only work with business partners who are committed to meet the requirements of our Policies and mandatory requirements to do business with us. They must agree to ensure transparency, to remedy any shortcomings, and to drive continuous improvement. We also understand that in order to continue to drive systemic solutions, we need to address our own purchasing

practices and pricing models. Governments also have an important role in creating an enabling environment to address supply chain impacts.

Conclusion

At SAMNOMI Oil and Gas Global Limited, we are committed to respecting and promoting human rights in all our operations and activities. We believe that this policy will help us to uphold our values and principles and to contribute to the well-being of individuals and communities in Nigeria.

Review and Revision

This policy will be reviewed and revised as necessary to ensure that it remains effective and relevant.

Date: January 4, 2024

Signed:

Chief, Engr Samson Kevwe Anomi Chief Executive Officer

SAMNOMI Oil and Gas Global Limited