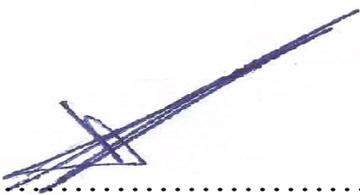


CEO's Message

As we strive to improve our performance in a fast-changing, competitive world, we should always remain true to our core values and the PVL. They are a bed rock of our success, through tough times and good times. The Code of Conduct will help you live by them. The Code acts as a compass, helping you navigate the sometimes difficult choices you face in your work at Shell. It provides solid principles for you to follow. And it shows you what to do when a situation is complex and the way forward is hard to find.

Many of us face legal and ethical dilemmas in our work and must find an appropriate solution or decide how to act. Simply put, in such situations you must follow applicable laws, follow Shell's rules and apply basic common sense and high ethical standards. By doing so you will help ensure that together we do the right thing and that you are never embarrassed to tell your family, colleagues, the media and the public what we have done. If you are ever in doubt, seek advice as set out in the following pages.

Good relations with our partners, customers, governments and other stakeholders are one of the keys to our success. You can help build healthy relationships by behaving honestly, with integrity and with respect for people. Failure to do so erodes trust and undermines the foundations on which we build our lives and our business.

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Date: 08/02/2017.

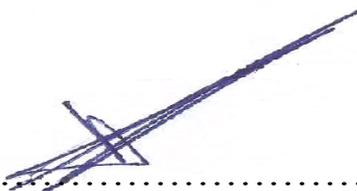
Policy Statement

HSE Policy Statement

It is the policy of **Petmam Ventures Limited** to conduct its activities in a manner which assures:

- Optimum protection of the environment.
- Compliance with statutory laws and regulations, efficient use of natural resources and waste reduction.
- With regards to occupational health, the policy promotes a work – place which protects the health of employees, sub-contractors and the **PETMAM VENTURES** surrounding community.
- We emphasize accident prevention, education, voluntary participation, personal responsibility and cost effectiveness by:
 - Periodic environmental assessments to ensure compliance and continuous improvements of operational standards.
 - Practice ergonomics to increase at the same time health protection and work efficiency.

Line Management is responsible with the support of the employees, the safety and legal section to implement the policy.

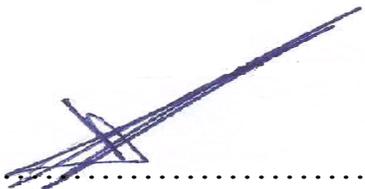
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Date: 08/02/2017.

ENVIRONMENTAL POLICY

It is **PETMAM VENTURES LIMITED's** policy to:

- Carry out Environmental Impact Assessments and Environmental Evaluation Reviews in relation to all aspects of the natural social environment that may affect, or may be affected by its activities.
- Identify any such interface for the complete life cycle of both new and existing facilities and operations.
- Enhance positive effects and prevent intolerable impacts from occurring.
- Limit the nature and extent of any residual negative impacts, however caused, such that they are as low as practicable.
- Consult relevant stakeholders.
- Leave the environment at the end of the useful life of any operation in a condition suitable for future use.
- Routinely monitor the environment status of each operation and take corrective action as necessary.

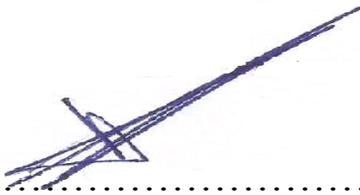
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Date: 08/02/2017.

Occupational Health Policy

It is **PETMAM VENTURES LIMITED**'s policy to:

- Identify and make an inventory of the potential physical, chemical, biological, ergonomic and psychological health hazards associated with work and the working environment.
- Evaluate the risk to health associated with exposures to these hazards and take action to remove or adequately reduce them.

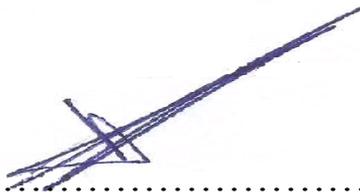
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Security Policy

Due to high rate of insecurity at worksite, **PETMAM VENTURES LIMITED** has a policy that:

- Work shall not commence any day unless site is certified SAFE and any risk associated with work taken care of.
- All workers shall be provided with identity cards
- Only visitors with proper identification shall be allowed entry to the work site.
- Visitors register shall be maintained at worksites.
- All vehicles' entry and departure from site shall be inspected by security men to ensure that materials / equipments movements in and out of site is authorized.
- All personnel are advised to be alert to their movement at all times and report all suspicious acts and movement to the security department.



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Date: 08/02/2017.

Safety Policy

Safety Road Signs, PPE's must be in place before commencement of any operation. It is the policy of **PETMAM VENTURES LIMITED** to use objective and tested methods to prevent accidents in and out of our projects all the time as we believe that all accidents are preventable.

It is the policy provision of **PETMAM VENTURES LIMITED** to ensure that her entire employees, Sub-Contractors and all those involved in her operations are always healthy, secured and protected from hazards associated with the work and environment.

For effective prevention of accidents, Job Safety Analysis must be carried out as per each operation and be effectively communicated to the workers before and during the tool box meetings.

Full accident / incident investigations and reviews must be carried out and learning points made known to all the workforce to avoid re-occurrence.

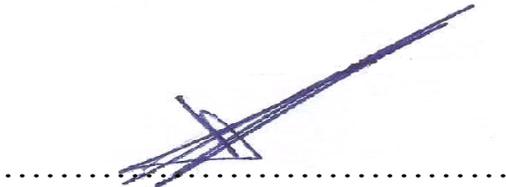
Safety is of mutual interest and requires co-operation of the management and entire staff both of who are equally accountable for the attainment of this policy provision.

The management reserves the right to revoke the services of any of her Employees who is considered to be a violator of this policy provisions.

PETMAM VENTURES LIMITED must ensure that competent persons are put in place to man areas that are critical and prone to accidents.

Periodic Safety audits must be instituted to ensure compliance to safety rules and regulations.

The safety coordinator shall be accountable to the implementation of all the safety policies of the company.

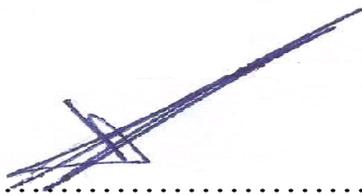
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Date: 08/02/2017.

Anti – Bribery Policy

As a company, we are committed to observing the laws and regulations which govern our operations in every country where we do business. This policy explains our individual responsibility in complying with anti-bribery or anti-corruption laws around the world and ensuring that any third parties that we engage to act on our behalf, do the same.

The management of Petmam Ventures Ltd is committed to complying with all Government applicable laws and regulation of Nigeria. Any employee who violates the rules in this policy or who permits anyone to violate those rules may be subject to appropriate disciplinary action, up to and including dismissal, and may be subject to personal civil or criminal prosecution.

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Date: 08/02/2017.

Code of Conduct and Ethic Affirmation

PETMAM VENTURES LTD code of conduct is the company's primary ethical and legal Behavioural Guide for all Her Employees/Consultants. Petmam Ventures Ltd being Responsible Corporate Citizen will always comply with the Laws of Federal Republic of Nigeria and Maintain High Ethical standards. Our Ethical Behaviour is based on Fairness, Honesty, Respect and Trust. It is a basic requirement that every Employee / Consultant should conduct themselves in a Responsible Manner in areas including but not limited to the following:

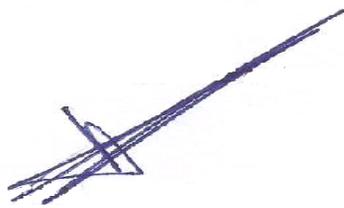
- i) **EMPLOYMENT – PETMAM VENTURES LTD** is an equal opportunity Employer. This is applicable to all recruitment, hiring, training, promotion and compensation. Petmam Ventures Ltd does not discriminate based on gender, national origin, bribe or religion. Sexual harassment or any type of harassment is prohibited.
- ii) **Conflict of Interest/ Misuse of Company Asset - Employees / Consultants** are not allowed to engage in any activity that bring conflict between personal interest and those of the company or Client. The usage of company time to conduct personal business or the usage of facilities and equipments for personal interest is prohibited. It is a joint responsibility of Petmam Ventures Ltd Employees/Consultants to help in protecting her assets and resources, and cost of doing business. Company assets include but not limited to computer systems, documents, equipments, facilities, cars and information. The usage of these assets for purpose other than the discharge of the company's business is prohibited. The

use of company's assets and resources for personal use requires express written authority from the Manager or Managing Director.

- iii) Communication / Information- All communication must be accurate, whether in house or with Client. Communication with our Client shall be on job related matters only AND NOT ON INDIVIDUAL OR COLLECTIVE PERSONNEL CONTRACTOR OR WELFARE. All communication (by email, letter or discussion) related to personnel's contract and welfare shall strictly be between the personnel and PETMAM VENTURES LTD (his / her employer) only.
COMMUNICATION OF THE LATER TO OUR CLIENT TERMINATION OFFENCE. False or misleading information or record is not acceptable, uncomplimentary and malicious statement against any person, the company or our competitors are not acceptable.
- iv) HEALTH, SAFETY AND ENVIRONMENT - PETMAM VENTURES LTD will conduct its business such as to avoid harm to people and respect to the environment. PETMAM VENTURES LTD is committed to an improvement towards a zero incident through a health, safety and environment management system. Petmam Ventures Ltd and Her Employees / Consultants are under obligation to comply with all application safety, health and environment laws and regulation.
- v) SUBSTANCE/ABUSE (ALCOHOL AND DRUG) – The possession, purchase, sale, transfer, use or present in ones of any illegal drugs or controlled substances by any Employee / Consultants while in the company premises, engaged in

company business or while operating company vehicle or equipment is a termination offence.

- vi) **COMPETITION AND ANTI-TRUST LAWS (NATIONAL EXTRACTIVE LAWS)** – Petmam Ventures Ltd will run her business in an open and competitive fashion, any activity that is contrary to that is unacceptable and may also be illegal, hence all purchase and sales must be based on price, quality, service and suitability. Anti – trust (aka Economic and Financial Crime Law) are applicable.
- vii) **CONCLUSION** – this code of conduct is effective from the day an employee / consultant is engaged with the company, Petmam Ventures Ltd expects everyone to observe to the letter and spirit of the code of conduct. Violations may result to physical injuries, monetary loses, violation of law, penalties up to termination of employment. Employees are therefore obligated to report any concerns or problems or suspected violation of the code of conduct.



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Managing Director

Date: 08/02/2017.