ANTI-BRIBERY, ANTI-FRAUD & WHISTLEBLOWING POLICY

Supplier integrity, procurement conflict management and protected reporting.

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Prepared for	OceanVision Energy Limited	**Approved by**	Charles Ayedero, MD/CEO

Implementation and awareness: Responsible departments shall communicate this approved policy to relevant staff and contractors, maintain applicable records and review its continuing suitability.

1. Zero-tolerance position

- **Bribery and kickbacks:** Do not offer, request, accept or authorise improper financial or nonfinancial benefits involving client staff, regulators, agents or suppliers.
- **Facilitation payments:** No routine facilitation payment or undisclosed benefit to influence official or commercial action.
- **Books and records:** Maintain true invoices, purchase orders, receipts, payment approvals and supporting work completion evidence.

2. Preventive controls

- **Gift/hospitality:** Gifts must be modest, legitimate, recorded and pre-approved according to an internally approved threshold; no gifts during tender evaluation.
- **Conflicts of interest:** Declare family, ownership or other relationships affecting evaluation or award decisions; conflicted staff must not approve related transactions.
- **Vendor checks:** Before award, confirm legal identity, licenses, competence, sanctions/legal risk as appropriate, bank account change controls and beneficial ownership where practicable.
- **Segregation of duties:** Separate requisition, evaluation, purchase-order approval, receipt confirmation and payment authorisation wherever practical.
- **Reporting:** Provide an accessible confidential reporting route to MD/CEO or independent designated reviewer; prohibit retaliation.
- **Investigation:** Preserve evidence and apply controlled investigations, corrective actions and reporting to authorities when required.

3. Responsibilities

- **MD/CEO:** Set tone, authorise key decisions and appoint an independent escalation route for allegations concerning management.
- **Finance/procurement:** Maintain conflict, gift, supplier due-diligence and approval records.

4. Evidence

- Signed declarations, conflict register, gifts/hospitality register, supplier checks, purchase approval matrix, whistleblower log (restricted), anti-fraud induction.

5. Legal reference

- Corrupt Practices and Other Related Offences Act (2000); applicable financial crime and procurement legislation; client anticorruption requirements.

References and applicable standards

- OceanVision Energy Quality Manual (OVEL-QAC-M-00001) and HSE Management System (OVEL-HSE-M-00001), as applicable.
- Petroleum Industry Act 2021; NUPRC or NMDPRA requirements depending on project scope, permit and operating context.
- Nigerian Oil and Gas Industry Content Development Act 2010; customer contract / site rules.
- ISO 9001:2015 principles; ISO 45001:2018 and ISO 14001:2015 as voluntary guidance only, without claims of certification.

Approval and change control

Reviewed by	T. Abu
Approved by / Signature	 Charles Ayedero | Managing Director / Chief Executive Officer
Approved / Effective date	04 November 2026