

SUSTAINABILITY POLICY

Version 1.0

Adopted by the Board on October 26, 2023

VERSION HISTORY

Version Number	Purpose of Revision	Review Date	Board Approval
V 1.0	First Draft	July 2023	October 26, 2023

POLICY STATEMENT

NASD PLC (the “Company” or “NASD”) believes that by integrating environmental, social, and governance considerations into all aspects of our business, we protect our employees, our communities, and the environment, achieve sustainable growth and accelerated productivity, drive compliance with all applicable regulations and develop practices that expand the sustainable capacity of our world.

The Company aspires to minimise its impact on our environment and maximise the effective use of resources. We strive to achieve this by increasing communication and awareness of our efforts in accordance with this policy and fostering responsible environmental behaviour amongst members of staff and other stakeholders at all levels.

We are committed to complying with applicable laws in all of its operations and to minimise risks and impacts through the development of robust and documented systems to implement, measure, monitor, and disseminate excellent environmental performance both within its operations and to the broader community.

OBJECTIVES

This Sustainability Policy (this “Policy”) outlines NASD’s Environmental Sustainability, Social Responsibility, and Governance (or “ESG”) policies and objectives. The Company’s objectives are to own and manage environmentally sustainable and resilient assets; minimize our environmental footprint; be active, socially responsible members of our communities; comply with governance policies and Laws (as defined below) applicable to ESG; and be transparent in our ESG actions (collectively, the “ESG Objectives”).

POLICY & PROCEDURE

The Company is committed to minimising its impact on the environment through:

- **Environmental Sustainability**
 - Integrate green practices to further mitigate climate change issues- The Company is committed to using its best practices towards minimizing waste in the use of paper and other office consumables, replacing paper-based processes with digital processes which ultimately helps to significantly reduce paper usage, and cutting the energy used in printing. NASD shall ensure that the implementation of this process is in line with the NASD M-File User Guide, NASD Data Protection Impact Assessment Procedure, and NASD Data Backup Policy.
 - As far as possible arrange for the reuse or recycling of all waste, including paper, computer supplies, and redundant equipment.
 - Reduce the energy consumption of office equipment by purchasing energy-efficient equipment and employing good housekeeping (switching off equipment that is not in use).
 - Being an environmentally responsible neighbour in our community
 - utilising, in our operations, processes that do not adversely affect the environment;
 - Ensuring the responsible use of energy throughout the organisation;
 - Participating in efforts to improve environmental protection and understanding and taking steps to improve environmental performance continually;
 - Working with suppliers who promote sound environmental practices;

- Having an environmentally sustainable aware culture, where responsibility is assigned and understood; and
- Ensuring that efforts to reduce noise and light pollution shall be taken to minimize the detrimental effects on the surrounding biodiversity.
- **Social Responsibility-** as part of its commitment to social responsibility, the Company shall: ensure that measures are put in place towards:
 - Enhancing awareness among our employees, volunteers, and users – educating and motivating them to act in an environmentally responsible manner.
 - Providing a safe, healthy, and conducive workplace and ensuring that the provisions of the Company’s Handbook in relation to racial and gender diversity, employee health, safety, and financial well-being, are adhered to.
 - Providing employees with the support and tools they need in order to succeed within the Company.
 - Ensuring that employees undergo professional training in line with their interest, to help acquire new skills or fine-tune existing skills.
 - Continuing to make available ESG training to better align its employees with the ESG Objectives.
 - Ensuring that each employee and their manager participate in an annual performance assessment to discuss career development and create a roadmap for further development. The annual assessment provides an opportunity for employees to openly discuss their job satisfaction and their job performance. Employees may vocalize any issues or concerns they have without fear of retaliation.
 - Knowledge Share Session (KSS)- The Company regularly holds companywide KSS during which the executive and senior management team provide detailed updates on the Company’s operations, corporate developments, and future plans. Employees are encouraged to participate by asking questions or providing comments. In addition, the Company engages external consultants from various professional sectors to educate all members of staff in such areas as may be deemed necessary by the Management of the Company.
 - NASD is committed to “giving back” to its communities and shall continue to make monetary and in-kind donations and volunteer at charitable organizations that benefit our neighborhoods. It is also our commitment to participate in outreach programs that serve to improve the health, well-being, and education of the members of our community.
 - In addition, NASD shall continue to pay adequate attention to the interests of its stakeholders such as its employees, host community, the consumers, and to Nigeria’s social and cultural diversity and will as much as possible promote strategic national interests as well as national ethos and values without compromising global aspirations where applicable.
- **Governance**

- NASD's Board will commit themselves to transparent dealings and the establishment of a culture of integrity and zero tolerance for corruption and corrupt practices.
- The Company's operations shall continually be reviewed by internal and external audits in line with the NCCG, the Rules & Regulations of the Securities and Exchange Commission, and extant laws in Nigeria.
- NASD shall continually adhere to and comply with all Corporate Governance rules, procedures, and best practices.
- In line with the Company's core values of Transparency and Integrity, NASD shall ensure that its business practices are ethical and in compliance with applicable Laws.
- All employees, executive officers, and members of the Board of Directors are required to annually review and recertify their commitment to the Company's Code of Professional Conduct, Corporate Communication Policy, Board Charter, and Corporate Governance Policy and ensure adherence to the various Standards of Operations of each department.

COMMUNICATION AND REPORTING

The Company believes it is important to be transparent with respect to its ESG performance. A description of NASD's ESG performance is to be made publicly available in the Company's Annual Reports, which are available on NASD's website www.nasdng.com, and in the Company's annual Sustainability Report, which will be posted on our website. The Report is to provide an overview of the Company's ESG projects, information about all sustainability-related risks and opportunities that could reasonably be expected to affect the company's cash flows, the company's access to finance or cost of capital over the short, medium or long term (collectively referred to as 'sustainability-related risks and opportunities that could reasonably be expected to affect its prospects'), and such other disclosures as may be required by IFRS Sustainability Reporting Standards S1 & S2, the Nigerian Code of Corporate Governance, and applicable extant laws in Nigeria.

COUNTERPARTY ACTIVITIES

NASD will not knowingly be involved with counterparties engaged in activities or materials deemed illegal under Nigerian laws or regulations or international conventions and agreements, or subject to international phase-outs or bans, forced labour or child labour, radioactive materials, and unbonded asbestos fibers, pornography, and/or prostitution, and racist and/or anti-democratic content.

REVIEW, AMENDMENT AND APPROVAL

The Board shall review this Policy regularly and amend same to reflect current best practices. This policy was recommended to the Board following review by the Governance & General-Purpose Committee and Audit & Risk Committee.

		Date of Approval	Signature
Drafted By:	Head, Legal and Compliance	July 2023	
Reviewed By:	Managing Director/CEO	July 2023	
Approved By:	Chairman, Governance and General Purposes Committee	October 12, 2023	
	Chairman, Audit and Risk Committee	October 18, 2023	
	Chairman, Board of Directors	October 26, 2023	