



DIVERSITY, EQUITY AND INCLUSION POLICY

SAHARA GROUP DIVERSITY, EQUITY AND INCLUSION POLICY	Policy Ref. No:
	Effective Date: 8 th April 2025
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1. Introduction

Sahara Group Limited and its affiliates (“Sahara Group” or “the Company”) believe that the strength of the organization lies in the diverse backgrounds, perspectives and experiences of its people. The Diversity, Equity and Inclusion (DEI) policy is a key driver for building a diverse and inclusive workforce. Our focus is on building the best team of diverse and cohesive talents across board. As such, the Company is committed to fostering a workplace culture that celebrates diversity, champions equity, and promotes inclusion for all.

The Company’s policy is to establish a fair, safe and respectful environment that embraces the principles of equity and inclusion, while aligning with the Company’s operational objectives for compliance and accountability.

2. Purpose

The purpose of this policy is to establish a clear framework that supports our commitment to fostering a diverse, equitable and inclusive work environment. We recognize that a diverse, equitable, and inclusive environment is essential to driving innovation, fostering creativity, and promoting excellence in all aspects of our work. This Diversity, Equity, and Inclusion policy therefore aims to:

- Foster a culture of belonging and respect where everyone feels valued, supported, and empowered to contribute their best work.
- Promote diversity in all its forms, including but not limited to age, disability, gender, race (including colour, nationality, and ethnic or national origin), religion or belief, socio-economic background, marital status and or/pregnancy.
- Address and eliminate systemic barriers, biases, and inequities that may exist within the Company, ensuring equal access to opportunities, resources, and benefits.
- Encourage open communication, active listening, and constructive feedback, creating a safe and inclusive space for all employees, customers, and stakeholders.
- Embed diversity, equity, and inclusion into the Company’s DNA informing our decision-making, policies, and practices.
- Provide equality, fairness and respect for all in the Company’s employment, whether temporary, part-time or full-time.
- Resist where politics or discrimination introduces toxicity into our productive working environment.

- Positively Influence personal behaviour in ways that eliminates unconscious bias and promotes psychological safety in the workplace.
- Cultivate a culture that embodies our core values of safety, professionalism, integrity, and discipline, along with a steadfast commitment to stakeholders, exceptional service delivery, and sustainability.

3. Definition of Terms

3.1 Diversity: Diversity is the range of human differences, including but not limited to race, ethnicity, gender, gender identity, sexual orientation, marital status, age, social class, physical ability or attributes, religious or ethical values system, national origin, and political beliefs.

3.2 Equity: Equity refers to fair and just practices that ensure access, resources, and opportunities are provided for all for growth and success.

3.3 Inclusion: Creating an environment where everyone feels a sense of connection and acceptance within the workplace.

4. Scope & Applicability

This policy applies to all employees and directors of Sahara Group. It also extends to the entirety of the majority owned business dealings in the countries which the Company operates. Where the Company has only a minority interest, the application of this policy amongst business partners including contractors and suppliers will be encouraged.

The policy is also applicable –but not limited to our practices and policies on recruitment and selection; compensation and benefits; professional development and training; promotions; transfers; social programs; termination; and the ongoing development of a work environment built on the premise of diversity, equality and inclusion.

5. Sahara Group's Commitment to Diversity, Equity and Inclusion

In pursuit of our vision “**to be the Responsible Provider of Choice wherever Energy is consumed,**” Sahara Group is deeply committed to cultivating a diverse, equitable, and inclusive workplace that mirrors the global reach of our operations and the communities in which we operate.

The Company commits to:

5.1 Promote diversity, equity and inclusion in the workplace, recognizing them as best practices that contribute to the overall success of the business.

5.2 Create a work environment free of bullying, harassment, victimization, and unlawful discrimination, promoting dignity and respect for all, and where individual differences and the contributions of all staff are recognized and valued.

5.3 Training employees about their rights and responsibilities under the diversity, equity and inclusion policy. Responsibilities include staff conducting themselves in a manner that supports the organization's efforts to provide equal employment opportunities, and prevent bullying, harassment, victimization and unlawful discrimination. Employees and leadership will also be trained periodically on unconscious bias in order to better recognize and address biases that not be immediately obvious but can impact decision making.

All employees should understand that they, in addition to the Company, can be held liable for acts of bullying, harassment, victimization and unlawful discrimination.

5.4 Take complaints of bullying, harassment, victimization, and unlawful discrimination seriously, whether they involve employees, customers, suppliers, visitors, the public, or any other individuals in the course of the Company's activities.

Such incidents will be treated as misconduct in accordance with the organization's grievance and/or disciplinary procedures, with appropriate action taken. Additionally, sexual harassment may be considered both an employment issue and a criminal matter, particularly in cases involving allegations of sexual assault.

5.5 Provide all employees with access to training, development, and advancement opportunities, offering support and encouragement to help them reach their full potential. This will enable their skills and abilities to be fully harnessed, contributing to the overall efficiency of the Company.

5.6 Regularly assess employment practices and procedures to ensure fairness.

5.7 Implement unbiased recruitment strategies, diverse candidate sourcing and diverse hiring panels, and inclusive hiring practices to attract and retain talent from varied backgrounds.

5.8 Implement measures to track diversity metrics and hold leadership accountable for meeting DEI goals and objectives.

5.9 Engage with diverse communities through partnerships and initiatives that support and reflect the Company's commitment to DEI.

5.10 Regularly review compensation structures to ensure fairness and equity across all demographics, providing equal pay for equal work.

5.11 Review performance evaluation processes to prevent bias and ensure fair assessments that promote a system of meritocracy.

- 5.12 Implement measures to track diversity metrics and hold leadership accountable for meeting DEI goals and objectives.
- 5.13 Guard employees against retaliation for reporting DEI related concerns, ensuring a safe and supportive environment for raising issues.
- 5.14 Encourage diversity in supplier relationships by partnering with diverse vendors and suppliers, promoting transparency and equal opportunity in business operations.
- 5.15 Maintain transparent communication about DEI efforts, progress and challenges within the Company, fostering accountability and trust among employees.

6. Reporting Channels:

Employees who feel that they are being treated unfairly or in a discriminatory manner are advised to raise their complaints immediately with the **Group Human Resource department** or **Governance & Sustainability Directorate**.

Employees who are not comfortable addressing the issue with the parties involved can report it confidentially through the company's whistleblowing platform:

- **Hotlines:** 0800TIPOFFS (0800 847 6337)
- **Web Portal:** <http://tip-offs.deloitte.com.ng>
- **Email:** tip-offs@deloitte.com.ng
- **Mobile App:** Download **Deloitte Tip-offs Anonymous App** on your Android or iOS devices.

The company will thoroughly investigate any reports or concerns raised through the appropriate channels.

6.1 Assurance Against Retaliation:

The Company strictly prohibits retaliation against any individual who reports concerns or participates in an investigation related to DEI policy violations. Retaliation against employees for reporting concerns or assisting in investigations is a violation of the Company's policy and will result in disciplinary action.

Any disclosure or communication made to management in accordance with this policy **WILL** be treated as Confidential.

7. Monitoring

The Company recognizes the importance of monitoring and evaluating our DEI initiatives to ensure effectiveness and alignment with our organizational goals. To achieve this, we have established the following mechanisms:

7.1 Data Collection and Analysis: The Company uses data-driven methods to collect information on the representation of diverse groups within our workforce, monitoring hiring, retention, promotion rates, and employee feedback related to DEI.

7.2 Employee Surveys and Feedback: The Company regularly conduct surveys and gather feedback to assess employee perceptions, experiences, and satisfaction with our DEI initiatives, helping us identify areas for improvement.

7.3 Performance Metrics and Key Performance Indicators: The Company sets specific KPIs and performance metrics for DEI promotion, allowing progress to be measured against established goals.

Language and Accessibility

This policy is available in multiple languages for the various regions where the Company has operations.

8. Responsibilities

All our operations, activities and relationships shall be guided by this policy and no clause shall be subject to waiver.