STANDARD OPERATING PROCEDURES							
1E	Document:		Issue No.:-				
Lagos Free Zone							
Free Zone	Level of Authority (Normal Business)			SOP - LoA v.2			
Prepared By: FC		Reviewed By: CFO		Approved By: CEO/MD			
Effective Date: January 1, 2023			Supersedes: SOP - Lo	A v.1.pdf			
Amendments:-							

First Amendment

To lay down level/limit of authority of each department and position to approve the commercial terms & conditions for any transaction and to approve the invoice for processing and payments

Level of Authority							
No.	Nature of Transactions		pprovals		provals (Invoice)		Approvals (Finance)
		Condition	Responsibility	Condition	Responsibility	Condition	Responsibility
<u>1</u>	Capital Expenditure (Capital Primary EPC contracts	EPC Contract value > USD 100,000	CEO, CFO, TD & HoL	More than 10% of the Contract value	TD	More than 10% of the Contract value	CFO
				<= 10% of the Contract value	GMC & GMP	<= 10% of the Contract value	FC
1	(within budget)	EPC Contract Value		> USD 25,000	TD	> USD 25,000	CFO
		<= USD 100,000	TD & CFO	<= USD 25,000 & > USD 5,000 <= USD 5,000	GMC & GMP	<= USD 25,000	FC
		Contract value > USD 75,000	CEO, TD & CFO	> USD 25,000	TD	> USD 25,000	CFO
1.2	Other Contracts (within budget)	Contract Value <= USD 75,000 & > 50,000	TD & CFO	<= USD 25,000 & > USD 5,000	GMC & GMP	<= USD 25,000	FC
		Contract Value <= USD 50,000	GMP, GMC & PSCM	<= USD 5,000	GMC & PM		
13	Internal construction (within budget)	PO value > USD 75,000	CEO, TD & CFO	> USD 25,000	TD	> USD 25,000	CFO
		PO value <= USD 75,000 & > 50,000	TD & CFO	<= USD 25,000 & > USD 5,000	GMIC & GMP	<= USD 25,000	FC
		PO Value <= USD 50,000	GMP, GMIC & PSCM	<= USD 5,000	GMIC & PM	,	
	MEP Related (within budget)	PO value > USD 75,000	CEO, TD & CFO	> USD 25,000	TD	> USD 25,000	CFO
.4		PO value <= USD 75,000 & > 50,000	TD & CFO	<= USD 25,000 & > USD 5,000	GMP	<= USD 25,000	FC
		PO Value <= USD 50,000	GMP/SM-MEP & PSCM	<= USD 5,000	SM-MEP & PM		
	Supply of materials	Total value > USD 75,000	CEO, TD & CFO	> USD 25,000	TD	> USD 25,000	CFO
5		Total value <= USD 75,000 & > 50,000	TD & CFO	<= USD 25,000 & > USD 5,000	GMP	<= USD 25,000	FC
		Total Value <= USD 50,000	GMP & PSCM	<= USD 5,000	PM		
6	Supply of materials	Total value > USD 50,000	CEO, CFO & TD	> USD 10,000	TD	> USD 25,000	CFO
_	(imported) - within budget	50,000	TD & CFO	<= USD 10,000	GMP	<= USD 25,000	FC
		> 10% of the approved budget	BoD				
1 /	level)	> USD 2,500 and <10% of the approved budget	CEO	Same as 1.1 - 1.6 (Based on the category in which payment falls)			
		<= USD 2,500 and <10% of the approved budget	CFO				
		New Project	BoD				

N -	N-t	PO/SO a	pprovals	Transaction Ap	provals (Invoice)	Payment/Receipt	Approvals (Finance)	
No.	Nature of Transactions	Condition	Responsibility	Condition	Responsibility	Condition	Responsibility	
<u>2</u>	Capital Expenditure (Interi						1	
2.1	Work Contracts (within budget)	Contract value > USD 50,000	CEO, TD & CFO	> USD 25,000	TD	> USD 25,000	CFO	
		Total value <= USD 50,000 & > USD 10,000	GMC, GMIC & PSCM	<= USD 25,000 & > USD 5,000	GMIC	<= USD 25,000	FC	
		Contract Value <= USD 10,000	GMC, PMs & PSCM	<= USD 5,000	PMs			
		PO value > USD 50,000	CEO, TD & CFO	> USD 25,000	TD	> USD 25,000	CFO	
2.2	MEP Related (within budget)	PO value <= USD 50,000 & > 25,000	TD & CFO	<= USD 25,000 & > USD 5,000	GMIC & GMP	<= USD 25,000	FC	
		PO Value <= USD 25,000	SM-MEP, GMIC & PSCM	<= USD 5,000	PM & SM-MEP			
	Supply of materials	PO value > USD 50,000	CEO, TD & CFO	> USD 25,000	TD	> USD 25,000	CFO	
2.3	(domestic) - Supply from one supplier - within	PO value <= USD 50,000 & > 25,000	TD & CFO	<= USD 25,000 & > USD 5,000	GMIC	<= USD 25,000	FC	
	budget	PO Value <= USD 25,000	GMIC & PSCM	<= USD 5,000	PM	,		
7 Δ	Supply of materials (imported) - within budget	Total value > USD 50,000	CEO, CFO & TD	> USD 10,000	TD	> USD 25,000	CFO	
	(imported) within budget	Total value <= USD 50,000	TD & CFO	<= USD 10,000	GMP	<= USD 25,000	FC	
		> 10% of the approved budget	BoD					
	Exceeds budget (Project level)	> USD 2,500 and < 10% of the approved budget	CEO	Same as 2.1 - 2.4 (Based on the category in which payment falls)				
		<= USD 2,500 and <10% of the approved budget	CFO					
		New Project	BoD					
<u>3</u>	Capital Expenditure (Other							
	Site capex (Other than Projects and IC) - Within budget	Total value > USD 75,000	CEO, HoD & CFO	> USD 25,000	HoD	> USD 25,000	CFO	
3.1		Total value <= USD 75,000 & > USD 50,000	HoD & CFO	<=USD 25,000 GM/DMs	<= USD 25,000	FC		
		Total value <= USD 50,000	GM/DMs & PSCM	200 25,000	GIVI/ DIVIS	25,000		
3 /	Land Re-settlements expenditure / compensation - Within budget	> USD 3,000	CEO & CFO	> USD 3,000	HoD/CFO	> USD 50,000	CFO	
		< USD 3,000	HoD	< USD 3,000	HoD	<= USD 50,000	FC	
	Power & Gas Related - Within budget	Total value > USD 100,000	CEO, HoD & CFO	> USD 50,000	HoD	> USD 25,000	CFO	
3 3		Total Value <= USD 100,000 & > USD 50,000	DMs & CFO	<= USD 50,000 & > USD 25,000	DMs	<= USD 25,000	FC	
		Total value <= USD 50,000	PMs & PSCM	<= USD 25,000	PMs			
	Other department capex - Within budget	Total value > USD 20,000	CEO, CFO & HoD	> USD 1,000	HoD	> USD 10,000	CFO	
		Total value <= USD 20,000 & > USD 5,000	HoD	<= USD 1,000 DMs	DMs	<= USD 10,000	FC	
		Total value <= USD 5,000	DMs					
	Contractual expense (Within Budget)	Contract Amount > USD 50,000	CEO, HoD, HoL & CFO	> USD 5,000	HoD	> USD 10,000	CFO	
5.5		Contract Amount <= USD 50,000	HoD & CFO	<= USD 5,000	DMs	<= USD 10,000	FC	
	activity level)	> 10% of the approved budget	BoD					
		> USD 2,500 and < 10% of the approved	CEO	Same as 3.1 - 3.5 (Based on the category in which payment falls)			ment falls)	
		budget <= USD 2,500 and <	CEO				nent ransj	
		10% of the approved						
		budget	CFO	_				
		New Project	BoD					

No	Nature of Transaction-	PO/SO a	pprovals	Transaction App	provals (Invoice)	Payment/Receipt	Approvals (Finance)	
No.	Nature of Transactions	Condition	Responsibility	Condition	Responsibility	Condition	Responsibility	
<u>4</u>	Operational expenditure	Annual CTC of		l .	T .	T.	l .	
		employees	CEO	Monthly Payroll	FC	Monthly Payroll	FC	
		Casual labors	HoDs	Processing Approval	FC	Payment	FC	
	Employee related	Other expense payments within HR	HoD / DMs	Processing Approval	FC	Payment	FC	
4.1	' '	policy	1105 / 51115	r rocessing ripproval	. 0	- dymene		
		Advance & Ioan	HoD / DMs	Processing Approval	FC	Payment	FC	
		within HR Policy Any other payment		o pp		.,		
		outside HR Policy	CEO & HoD	Processing Approval	CFO	Payment	FC	
		Amount / year > USD	CEO, HoD, HoL & CFO	> USD 1,000	HoD	> USD 10,000	CFO	
4.2	Contractual / Recurring expense (Within Budget)	10,000 Amount / year <=		·		-		
	expense (within Budget)	USD 10,000	HoD & CFO	<= USD 1,000	DMs	<= USD 10,000	FC	
	Operational expense (Item	> 25,000 USD	CEO, CFO & HoD	>USD 10,000	TD / HoD	> USD 10,000	CFO	
4.3	/ activity level) - within	>USD 2,500 &	HoD & CFO	<= USD 10,000 & >USD 1,000	GMs / HoD	2 03D 10,000	CFO	
	budget	<= USD 2,500	DMs	<= USD 1,000	DMs / PMs	<= USD 10,000	FC	
		> 50,000 USD	CEO,CFO & HoD	>USD 10,000	TD / HoD	1 000 10,000		
	Inventory procurement -	<= USD 50,000 &	HoD & PSCM	<= USD 10,000 &		> USD 10,000	CFO	
4.4	Domestic (Item / activity	>USD 25,000	HOD & PSCIVI	>USD 1,000	GMs / HoD			
	level) - within budget	<= USD 25,000	PSCM	<= USD 1,000	PSCM	<= USD 10,000	FC	
		> 10,000 USD	CEO, CFO & HoD	>USD 5,000	TD / HoD			
	Operational expense		223, 610 & 1100		107 1100	> USD 10,000	CFO	
4.5	(imported) (Item / activity	<= USD 10,000 & >USD 1,000	HoD & CFO	<= USD 5,000 & >USD 1,000	GMs / HoD			
	level) - within budget	<= USD 1,000	DMs	<= USD 1,000	DMs / PMs	<= USD 10,000	FC	
		1- 035 1,000	5.11.5	(= 03D 1,000	51413 / 1 1413	~ 03D 10,000		
		> 5% of departmental	BoD					
		budget						
4.6	Exceeds budget (Item /	< 5% and > USD		Same as A	nent falls)			
	activity level)	10,000 of	CEO	Same as	Same as 4.1 - 4.5 (Based on the category in which paymen			
		departmental budget						
		<= 5% and <=USD 10,000 of budget	CFO					
<u>5</u>	Intercompany Funding / lo							
		> USD 5 Mn	BoD	> USD 5 Mn	CEO	-> USD 1 Mn	CFO	
		<= USD 5 Mn & >	050	<= USD 5 Mn & >	650			
5.1	Loans/Advance to/from	USD 1 Mn	CEO	USD 1 Mn	CFO			
	intercompany	<= USD 1 Mn & > USD 100 K	CFO					
		<= USD 100 K	FC	<= USD 1 Mn	FC	< USD 1 Mn	FC	
_	C-l l tti	<= 03D 100 K	rc .					
<u>6</u>	Sale or lease transactions	Contract Value > USD						
	Lease of Land (in normal course of business within pricing policy)	2 Mn	CEO, CFO, HoL & HoD	> USD 100 K	CFO	n/a		
6.1		Contract Value <= USD 2 Mn & > USD	HoD & HoL				n/a	
0.1		200 K	HOD & HOL					
		Contract Value <=	DMs & HoL	< USD 100 K	FC			
		USD 200 K > 10% of the						
6.2	Discounts on lease of land	sale/lease	BoD	> USD 10,000	CFO	n/a	n/a	
J.E	(including commission)	<= 10% of the	CEO	<= USD 10,000	FC	, ~		
		sale/lease Contract Value > USD						
	Lease of other	500 K	CEO, CFO, HoL & HoD			n/a		
6.3	assets/property excluding	Contract Value <= USD 500 K & > USD	HoD & HoL	> USD 100 K	CFO		n/a	
0.5	land (in normal course of business within pricing policy)	100 K	THOO & HUL			n/a	11, a	
		Contract Value <=	DMs & HoL	< USD 100 K	FC			
		USD 100 K > 10% of the						
	assets/property excluding	sale/lease	BoD	> USD 10,000 CFO <= USD 10,000 FC				
6.4		>= 5% and <= 10% of	CEO			n/a	n/a	
		the lease			FC			
	,	< 5% of the lease	HoD					
	Other Sales -	> USD 25,000	HoD & CFO	-Any Amount FC	FC	n/a	n/a	
6.5		<= USD 25 000	DMs & FC/CM					
		<= USD 25,000	DIVIS & PC/CIVI					
		> 10% of the sale/lease	BoD		FC	n/a	n/a	
6.6	Discount on any other Sales / revenue	>= 5% and <= 10% of	CEO	Any Amount F				
0.0		the lease						
			i e					
		< 5% of the lease	HoD					

No.	Nature of Transactions	PO/SO approvals		Transaction Approvals (Invoice)		Payment/Receipt Approvals (Finance)		
		Condition	Responsibility	Condition	Responsibility	Condition	Responsibility	
<u>7</u>	Term loans / debt funding or other financing transaction							
7 1	Loans from Banks/financial institutions (Domestic) - Within Budget	> NGN 5 Bn	BoD & Legal	> NGN 5 Bn	CEO	> NGN 1 Bn	CFO	
		<= NGN 5 Bn & > NGN 1 Bn	CEO & Legal	<= NGN 5 Bn & > NGN 1 Bn	CFO			
		<= NGN 1 Bn & > NGN 100 Mn	CFO & Legal	<= NGN 1 Bn	FC	<= NGN 1 Bn	FC	
		<= NGN 100 Mn	FC & Legal					
7.2	Loans from Banks/financial institutions (Foreign) -	> USD 5 Mn	BoD, CEO & CFO & Legal	> USD 5 Mn	CEO	Any Value	CFO	
	Within Budget	<= USD 5 Mn	CEO & CFO & Legal	<= USD 5 Mn	CFO			
7.3	Exceeds Budget	Any value	BoD	Same as 7.1 - 7.2 (Based on the category in which it falls)				
7.4	Joint venture & other partnerships (which impacts Equity)	Any value	BoD	Any value	CEO & Legal	Any value	CFO	
7.5	Fund raise from listing (or any other source)	Any value	BoD	Any value	CEO & Legal	Any value	CFO	
<u>8</u>	Disposal of fixed assets							
8.1	Land (Not in ordinary course of business)	Any Value	BoD	Any value	CEO	Any value	CFO	
	Assets other than land	> 5% of total gross value of FA	BoD	Any value	CEO	Any value	CFO	
8.2		> USD 1,000 & <= 5% of total gross value of FA	CEO & CFO	Any value	СМ	Any value	FC	
		GB <= USD 1,000	HoD	Any value	СМ	Any value	FC	

9) Definitions/Notes:-

- a) Primary EPC Contracts Means main construction contract i.e. EPC contract given to contractor as part of the project. For e.g. In SIF 2&3 project, contract for Civil & erection is given to SANA is primary contract
- b) Sub-Contracts Means contracts to complete the projects other than EPC contract or as a scope of EPC contract to get sub-contract for specific kind of work.
- c) Exchange Rate NGN 700/USD to be used for all conversion and to be modified based on market
- d) BoD BoD approval here means transaction will taken to CEO Infra for approval and on case to case to basis, he/she might take it to board of directors for their approval
- e) PSCM/CM Role of PSCM amd CM will be performed by either of them or may be supported by FC or CFO
- f) Legal Role of legal head is to ensure that the Company's and the Group's interest is protected in each contract entered by the Company or Group. Therefore, legal approval might need on case to case basis with regards to transaction where legal is not mentioned.
- g) Clause No 6.1, 6.3 and 6.5 should always be read with the conjunction of 6.2, 6.4 and 6.6 respectively
- h) GB GB stands for Gross Block which means original procurement cost and before disposal of any fixed asset, it needs to be confirmed by Finance Department
- i) All bank payments to be approved by 2 signatories.

10) Abbreviations:-

BoD - Board of Directors
CEO - Chief Executive Officer
CEO - Chief Einancial Officer

CFO - Chief Financial Officer
CTC - Cost to Company
DMs - Departmental Managers
EPC - Engineering, Procurement and Construction

FA - Fixed Assets

FC - Financial Controller GB - Gross Block

GMC - General Manager - Contracts
GMIC - General Manager - Internal Construction

GMP - General Manager - Projects HoD - Head of Department HoL - Head of Legal

HR - Human Resource HSC - Head Security and Community IC - Internal Construction

K - Thousand MD - Managing Director Mn - Million

NGN - Nigerian Naira PMs - Project Managers PO - Purchase/Procurement Order

PSCM/CM - Procurement and Supply Chain/Commercial Manager

RT - Residential Tower SIF - Standard Industrial Facility

 $\label{eq:SM-MEP-Senior Manager - Mechanical, Electrical \& Plumbing \\ SMs - Site Managers$

SO - Service or Sales Order SOP - Standard Operating Procedures TD - Technical Director

USD - United States Dollars WH - Warehouse