Oxford Climate Policy Monitor 2024 Survey

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Policy Tool Name: Climate Change Act, 2021

3. Source material link(s):

https://web.archive.org/web/20240815141647/https://faolex.fao.org/docs/pdf/NIG208055.pdf

4. Which of the following governance domains does this policy tool relate to? Select all that apply.

Climate-related disclosure

Transition planning

□ Public procurement

5. If relevant, briefly explain how the policy tool applies or is linked to multiple domains.

The Climate Change Act provides the legal framework for achieving low greenhouse gas emissions and ensuring that public and private entities comply with its strategies and targets. this includes disclosures. The Act also highlights Nigeria's broad aspiration to set annual carbon budgets, regulate and make financial provisions for reducing its GHG emissions.

6. Select the category which best describes the author/issuer of the policy tool.

□ Head of state and/or government

□ Independent regulatory or supervisory body

Legislature

□ Judiciary

□ Ministry/Department/Agency

 \Box Other (Please describe)

7. Status of the policy tool

Approved, in force

Approved, not yet in force

• Other (Please describe)

9. Year of (planned) entry into force or year of publication
2021
10. Does the policy tool have an end date?

No
o Yes

12. Briefly describe the policy tool's goal and/or purpose:

For example: The policy tool requires publicly listed companies to comply with the recommendations of the Task Force for Climate Related Financial Disclosure or to explain the absence of such disclosures.

The Climate Change Act, amongst its other objectives, seeks to provide a framework for achieving low greenhouse gas emission (GHG), inclusive green growth and sustainable economic development by ensuring that Nigeria formulates programmes for achieving its long-term goals on climate change mitigation and adaptation; facilitating the coordination of climate change action needed to achieve long-term climate objectives; and mainstreaming climate change actions m line with national development priorities.

13. Name the authority(ies) responsible for overseeing implementation and/or enforcement. If not applicable, leave blank.

• 1. National Council on Climate Change

2.
3.
4.
5.

15. To provide contextual information, rate the capacity of National Council on Climate Change to undertake the policy tool's implementation and/or enforcement.

0- No Capacity (Please explain)

• 1- Low Capacity (Please explain)

• 2- Medium Capacity (Please explain)

S- High Capacity (Please explain) <u>The National Council on Climate Change is consisting of The President of the Federal Republic of Nigeria as Chairman, the Vice-President of the Federal Republic of Nigeria as Vice Chairman and other ranking Ministers as members, Chairman of Nigerian <u>Governors' forum and other representatives as members of the council. This constitution of the council is of high capacity for the purpose of formulating policies to further the objectives of the Act. However, the Council might not be responsible for ensuring implementation.
</u></u>

• Prefer not to answer

• Not Applicable

25. Which entities are targeted through this policy tool? Select all that apply.

Note: With regard to sectoral actors, in cases where mandatory and voluntary obligations are mixed (e.g., mandatory for one sector, voluntary for another), select "mandatory" as there will be further opportunity to clarify.

	Mandatory	Voluntary	Not targeted
1. Publicly-traded			
entities			
2. Private companies			
3. Financial institutions			
4. Small and medium-			
sized enterprises			
5. State-owned			
companies			
6. Not-for-profit			
organizations			
7. Government			
agencies and/or			
departments			
(supranational)			
8. Government			
agencies and/or			
departments (national)			
9. Government			
agencies and/or			
departments (regional			
- e.g., state, province,			
region, metropolitan			
region)			
10. Government			
agencies and/or			
departments (local -			
e.g., county, district,			
municipality, city) 11. Government			
agencies and/or			
departments			
(unspecified)			
12. Sectoral actors			
(e.g., healthcare,			
defense, utilities,			
education)			
13. Other			
13. Other			

27. Describe the threshold criteria to identify entities for whom or instances in which compliance is mandatory.

	Public ly- trade d entitie s	Private companies	Financi al instituti ons	State- owned compa nies	Governm ent agencies and/or departm ents (national)	Governm ent agencies and/or departm ents (regional - e.g. state, province, region, metropol itan region)	Governm ent agencies and/or departm ents (local - e.g. county, district, municip ality, city)	Governm ent agencies and/or departm ents (unspecif ied)
Minimum number of employee s (Enter min number of full-time employee s - FTEs)	Not specif ied	50	Not Specifi ed	Not specifie d	Not specified	Not specified	Not specified	Not specified
Minimum revenue (Enter minimum revenue)	Not specif ied	Not specified	Not specifie d	Not specifie d	Not specified	Not specified	Not specified	Not specified
Minimum assets (Enter minimum assets)	Not specif ied	Not specified	Not specifie d	Not specifie d	Not specified	Not specified	Not specified	Not specified
Minimum contract value (Enter minimum contract value)	Not specif ied	Not specified	Not specifie d	Not specifie d	Not specified	Not specified	Not specified	Not specified
Entity is headquart ered in the jurisdictio n	Not specif ied	Not specified	Not specifie d	Not specifie d	Not specified	Not specified	Not specified	Not specified
Entities are subjected		Complianc e under the Climate						

		ı
to	Change	
disclosure	Act is	
or	mandatory	
reporting	for	
requireme	Ministries,	
nts	Departmen	
	ts and	
	Agencies	
	(MDAs) of	
	the	
	Applicatio	
	n. Federal	
	Governme	
	nt of	
	Nigeria,	
	and to	
	public and	
	private	
	entities	
	with 50 or	
	more	
	employees	
	within the	
	territorial	
	boundaries	
	of Nigeria	
	for the	
	developme	
	nt and	
	implement	
	ation of	
	mechanis	
	ms geared	
	towards	
	fostering	
	low carbon	
	emission,	
	environme	
	ntally	
	sustainabl	
	e and	
	climate	
	resilient	
	society.	

28. Can entities for whom compliance with the policy tool is mandatory opt out of the obligation (e.g. comply or explain)?

No

 $\circ \, \text{Yes}$

30. Does the policy tool exclusively apply to entities' domestic operations, or does it also apply to entities' operations beyond the jurisdiction?

• Operations within jurisdiction only

• Operations beyond the jurisdiction

• Not applicable

32. What are the sanctions for non-compliance? Select all that apply and describe in the text field.

Monetary fine <u>To be determined by the National Council on Climate Change</u>

□ Restriction on business activities

 \Box Voiding or setting aside of contract

□ Exclusion from government contracts

□ Award of damages or compensation

□ Penalty for senior managers

□ Criminal penalties

 \Box Not specified

□ Not applicable (e.g. in cases of voluntary tools)

□ Other

33. Relative to other compliance activities required of entities in this jurisdiction, is the cost of compliance:

 \circ Below average

Average

 \circ Above average

 \circ Not applicable

• Unknown or prefer not to answer

35. To provide contextual information, give a general assessment of the extent to which regulated entities have made compliance a priority.

 \circ Below average

• Average

 \circ Above average

Not applicable

• Unknown or prefer not to answer

37. Have the climate-specific provisions in this instrument ever been enforced?

No (If relevant, explain) <u>The Council has the obligation of approving and overseeing the</u> <u>implementation of the National Climate Change Action Plan (Action Plan) and administering the</u> <u>Climate Change Fund towards implementing the climate related provisions in the Act. To date, none</u> <u>of the climate related provisions have been implemented.</u>

 \circ Yes

39. Are there monitoring systems in place to oversee the implementation and/or enforcement of the policy tool?

 $\circ \ \text{No}$

Yes

40. Describe the monitoring systems in place. Please reference the relevant section/subsection/paragraph of the policy tool where monitoring systems are set.

Section 20 provides that the Secretariat, in consultation with the Federal Ministries responsible for Environment, and Budget and National Planning, respectively, shall. formulate an Action Plan in every five-year cycle.

Section 22 (5) (6) stipulated that any MDA that fails to meet its carbon emission reduction target shall

be subjected to a review and its principal officers, upon being found liable, sanctioned and where appropriate fined as determined by the Council. Where an evaluation report from an MDA discloses unsatisfactory performance - (a) the Secretariat shall undertake investigations and report its findings to the Council; and (b) the Council acting on that report may recommend appropriate measures and sanctions.

Section 28. (1) stipulates that the Federal Ministry for Environment shall set up a registry with subnational nodes for capturing REDD+ activities in Nigeria, including updates on Forest Reference Emission Level (FREL). In this section, "REDD+" means Reducing Emissions from Deforestation and Forest Degradation and the role of conservation, sustainable management of forests and the enhancement of forest carbon stocks.

Section 32 empowers the Council to make regulations requiring private and public entities, to report annually on GHG reductions and reduction measures, and have corporate climate change responsibilities and supervise market-based mechanisms and instruments relating to climate change.

41. Does the policy tool recommend or require periodic impact assessments?

No

Recommended

 \circ Required

43. Does the policy tool recommend or require periodic reviews?

No

Recommended

Required

45. Does the policy tool include mechanisms for enhancing policy or regulatory coordination with subnational governments (e.g. vertical coordination mechanisms such as appointing coordinating agencies, forming working groups, etc.)?

No

 \circ Yes

47. Are there any government initiatives to enhance the capacity of targeted entities to implement or comply with the policy tool (e.g. industry working groups, outreach campaigns, education and training, etc.)?

 $\circ \operatorname{No}$

Yes

48. Describe initiatives for enhancing the capacity of targeted entities to implement or comply with the policy tool. Reference the relevant section/subsection/paragraph of the policy tool where capacity-building initiatives are established. If referencing new sources (i.e. not referenced in Question 3), provide a web-archived link to the source material.

Section 30 of the Climate Change Act provides that the Secretariat shall, not later than six months to the end of every year prepare and publish its public engagement strategy for the following year. The public engagement strategy shall set out the modalities to be adopted towards achieving the objectives under this Act, such as - (a) informing the public about the Action Plan and; (b) identifying actions and encouraging the public to contribute to the achievement of the objectives of the Action Plan and this Act.

Domain-Specific Questions: Disclosure Questions

What is being disclosed?

52. Are targeted entities recommended or required to disclose any of the following climate-related information? Select all that apply.

	Recommended	Required	Neither recommended nor required
1. Greenhouse gas (GHG) emissions			
2. GHG emissions offsets or removals			
3. GHG emissions reduction targets			
4. Other climate- related targets			
5. Physical climate risk			
6. Transition risk			
7. Transition plan			

Disclosure of Greenhouse Gas (GHG) Emissions

54. Which GHG emissions must be disclosed? Select all that apply.

Carbon dioxide (CO₂)

□ Methane (CH4)

 \Box Nitrous oxide (N₂O)

□ Hydrofluorocarbons (HFCs)

□ Perfluorocarbons (PFCs)

□ Sulphur hexafluoride (SF6)

□ Nitrogen trifluoride (NF3)

 \Box Carbon dioxide equivalent (CO₂e)

55. Are entities recommended or required to disclose gross emissions?

 $\circ \ No$

 \circ Recommended

Required

56. Are entities recommended or required to disclose net emissions?
○ No
• Recommended
Required
57. What Scope of emissions must be disclosed? Select all that apply.
□ Scope 1 emissions
□ Scope 2 emissions
□ Scope 3 emissions, relevant or material
□ Scope 3 emissions, a specified proportion of coverage (Please describe)
□ Scope 3 emissions, all
Not specified
58. Are entities recommended or required to discloseGHG emissionsaccounting methodologies or standards?
GHG emissions
59. Does the policy tool recommend or require the GHG inventory be third-party verified?
No
 Recommended
• Required

60. If necessary, provide additional clarification to the above responses aboutgreenhouse gas (GHG) emissions disclosure.

<u>TheClimate Change Act does not specify GHG emissions disclosures. However, it mandates that</u> <u>Ministries, Departments and Agencies of the Federal Government, as well as public and private</u> <u>entities within Nigeria, should make annual returns to its Secretariat on its carbon emission reduction</u> <u>and climate adaptation plans.</u>

Disclosure of Greenhouse Gas (GHG) Offsets or Removals

62. Does the policy tool recommend or require offsetting purchases be disclosed?

No

 \circ Recommended (Please describe and reference the relevant section/subsection/paragraph of the policy tool)

 \circ Required (Please describe and reference the relevant section/subsection/paragraph of the policy tool)

63. Does the policy tool recommend or require entities disclose whether offsets are verified?

No

 \circ Recommended (Please describe and reference the relevant section/subsection/paragraph of the policy tool)

 \circ Required (Please describe and reference the relevant section/subsection/paragraph of the policy tool)

64. Does the policy tool recommend or require any certification standards for the use of GHG offsetting or removals?

No

 Recommended (Please list the certification standards, describe their use, and reference the relevant section/subsection/paragraph of the policy tool)

 \circ Required (Please describe and reference the relevant section/subsection/paragraph of the policy tool)

65. Does the policy tool include any other recommendations or requirements regarding the appropriate use of offsets?

No

 \circ Recommended (Please describe and reference the relevant section/subsection/paragraph of the policy tool)

 \circ Required (Please describe and reference the relevant section/subsection/paragraph of the policy tool)

Disclosure of Greenhouse Gas (GHG) Emissions Reduction Targets

67. Which of the following targets, or data related to targets, does the policy tool request entities disclose? Select any of the following which apply:

	Recommended	Required	Neither recommended nor required
An absolute emissions reduction target			
An intensity-based emissions reduction target			
A net zero target			
Targets covering non- carbon GHG emissions		\checkmark	
A Scope 3 emissions target			
A target derived using a sectoral decarbonization approach			
Interim targets			
A target timeframe (e.g. by 2040)			
A baseline year from which progress is measured			
A level of ambition for emissions reductions (e.g. 80% reduction)			

68. Does the policy tool recommend or require entities to disclose their progress in achieving their emissions reductions targets?

 $\circ \, \text{No}$

 \circ Recommended

Required

69. What is the recommended or required frequency of progress reports regarding the achievement of emissions reductions targets?

Yearly

 \circ Every two years

• Every three years

• Every four years

- Every five years
- Every ten years or more
- \circ Other
- No prescribed frequency

70. Does the policy tool recommend or require a scope of emissions which should be covered by the absolute emissions reduction target? Select all that apply.

□ Scope 1 emissions

 \Box Scope 2 emissions

□ Scope 3 emissions (relevant or material)

□ Scope 3 emissions (a specified proportion of coverage)

□ Scope 3 emissions (all)

Not specified

71. Does the policy tool recommend or require a scope of emissions which should be covered by the intensity-based emissions reduction target? Select all that apply.

□ Scope 1 emissions

□ Scope 2 emissions

□ Scope 3 emissions (relevant or material)

□ Scope 3 emissions (a specified proportion of coverage)

□ Scope 3 emissions (all)

 \Box Not specified

72. Does the policy tool recommend or require a scope of emissions which should be covered by the net zero target? Select all that apply.

□ Scope 1 emissions

□ Scope 2 emissions

- □ Scope 3 emissions, relevant or material
- □ Scope 3 emissions, a specified proportion of coverage (Please describe)

□ Scope 3 emissions, all

Not specified

73. What is the recommended or required year for the net zero target (e.g. net zero by...)?

 \circ Between 2030 and 2035

 \circ Between 2036 and 2040

 \circ Between 2041 and 2045

 \circ Between 2046 and 2050

 \circ Between 2051 and 2060

 \circ Between 2061 and 2070

• Other <u>The Climate Change Act sets a target for the years 2050-2070 for the attainment of a net</u> <u>zero GHG emission.</u>

• Not specified

74. Which of the following non-carbon GHG emissions reductions targets are entities recommended or required to disclose? Select all that apply.

Methane (CH4)

Nitrous oxide (N₂O)

Hydrofluorocarbons (HFCs)

Perfluorocarbons (PFCs)

Sulphur hexafluoride (SF6)

□ Nitrogen trifluoride (NF3)

Carbon dioxide equivalent (CO2e)

82. What is the recommended or required level of ambition for GHG emissions reductions targets?

• Reduction between 1-25%

Reduction between 26-50%

Reduction between 51-75%

Reduction between 75-85%

Reduction between 85-100%

Reduction of more than 100%

Other <u>Not specified</u>

Disclosure of other climate-related targets

84. Which of the following other climate-related targets does the policy tool recommend or require entities disclose? Select all that apply.

□ Targets for renewable energy procurement (Please reference the section/subsection/paragraph of the policy tool relevant to renewable energy procurement targets)

□ Targets for fossil fuel phase down/phase out (Please reference the section/subsection/paragraph of the policy tool relevant to fossil fuel phase down/phase out)

□ Targets or goals related to climate adaptation (Please reference the section/subsection/paragraph of the policy tool relevant to climate adaptation)

Targets or goals related to nature and/or biodiversity (Please reference the section/subsection/paragraph of the policy tool relevant to nature and/or biodiversity) <u>Section 27 The Climate Change Act provides that the Council shall promote and adopt nature-based solutions to reducing GHG emissions and mitigating climate change issues in Nigeria.</u>

<u>Under Section 28, the Federal Ministry for the Environment shall setup a registry with sub-national</u> <u>nodes for capturing REDD+ (Reducing Emissions from Deforestation and Forest Degradation)</u> <u>activities in Nigeria, including updates on Forest Reference Emission Level (FREL).</u> □ Targets or goals related to just transition (Please reference the section/subsection/paragraph of the policy tool relevant to just transition)

□ Other targets (Please reference the section/subsection/paragraph of the policy tool relevant to other targets)

Disclosure of Physical Risk
86. What types of physical risk must be disclosed?
🗆 To company
□ To society (double materiality)
87. What is the materiality standard for the disclosure of physical risk?
 Self-assessed material risk
 Externally-defined material risk
o Other (Describe)
88. Are entities recommended or required to disclose the results of climate risk-related stress tests that are related to physical climate risk?
No
 Recommended

 $\circ \, \text{Required}$

89. Are entities recommended or required to disclose their methodology for scenario analysis with relation to physical risk?

No

 $\circ \ {\rm Recommended}$

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\cap	Red	uired
~	1100	anca

90. Are risk accessments of physical risk recommended or required to be third party verified?
90. Are risk assessments of physical risk recommended or required to be third-party verified?
No
 Recommended
 Required
Disclosure of Transition Risk
92. What types of transition risk must be disclosed? Select all that apply
\Box Risks that societal transitions may pose to the disclosing entity
\Box Risks that the disclosing entity's transition may pose to society (double materiality)
93. What is the materiality standard for the disclosure of transition risk?
 Self-assessed material risk
 Externally-defined material risk
• Other (Describe)
94. Are entities recommended or required to disclose the results of climate-related risk stress tests that are related to transition risk?
○ No
 Recommended
• Required

95. Are transition risk assessments recommended or required to be third-party verified?

 $\circ \ No$

Recommended

• Required

96. Are entities recommended or required to disclose their methodology for scenario analysis related to transition risk?

 $\circ \mathrm{No}$

 \circ Recommended

• Required

Disclosure of Transition Plans

98. What is the recommended or required frequency of transition plan disclosures?

Yearly

• Every two years

Every three years

• Every four years

• Every five years

• Every ten years or more

 \circ Other

Not specified

99. Does the policy tool recommend or require audited accuracy and/or third-party verification of the transition plan?

No

Recommended

Required

100. Does the policy tool recommend or require entities to disclose progress in implementing transition plans?

 $\circ \ No$

 \circ Recommended

Required

101. What is the recommended or required frequency of disclosures related to transition plan implementation progress?

• Yearly

- Every two years
- Every three years
- Every four years
- Every five years
- Every ten years or more
- \circ Other
- \circ No prescribed frequency

102. Does the policy tool recommend or require targeted entities to disclose their financial plans for implementing transition plans?

 $\circ \operatorname{No}$

- \circ Recommended
- Required

103. Does the policy tool recommend or require targeted entities to disclose their methodology for scenario analysis related to transition planning?

No

 \circ Recommended

Required

Other disclosures

105. Are targeted entities recommended or required to disclose any other climate-related information? Select all that apply.

	Required	Recommended	Neither recommended nor required
1. Climate-related opportunities			
2. Remuneration based on achieving climate-related goals			
3. Taxonomies			
4. Capital allocation and/or expenditure plans (in the context of climate change)			
5. Due diligence			
6. Assumptions and Dependencies			
7. Data limitations of scenario analyses			
8. Financial implications of climate-related matters (e.g., integration of climate- related disclosures into financial accounting standards)			
9. Stewardship (e.g., whether stewardship codes are in place, how entities vote in shareholder meetings, etc.)			
10. ESG methodologies and criteria (in the case of service providers)			
11. Asset planning or ownership in the context of climate change			
12. Sectoral investment policies			
13. Climate-related lobbying and/or policy engagement			
14. Locked-in emissions or information on			

emissive assets with long lifespans		
15. Dirty asset divestiture		
16. Nature-related impacts		
17. Just transition indicators		

106. Is third-party verification of climate-related opportunities recommended or required?

No

 \circ Recommended

Required

Standards, Frameworks, and Guidelines

125. Does the policy tool require the use of or make reference to any of the following standards, frameworks, or guidelines? Select all that apply.

	Required	Referenced	Neither required nor referenced
1. IFRS S1			
2. IFRS S2			
3. Task Force on			
Climate-related			
Financial Disclosures			
(TCFD) 4. GHG Protocol			_
4. GHG Protocol Corporate Accounting			
and Reporting			
Standard			
5. GHG Protocol			
Corporate Value Chain			
(Scope 3) Accounting			
and Reporting			
Standard			
6. CDP (formerly			
known as Climate			
Disclosure Project)			
reporting framework			
7. International			
Integrated Reporting Framework			
8. Global Reporting			
Initiative (GRI)			
9. Sustainability			
Accounting Standards			
Board (SASB)			
10. European			
Sustainability			
Reporting Standards (ESRS)			
11. Taskforce on			
Nature-related			
Financial Disclosures			
(TNFD)			
12. Partnership for			
Carbon Accounting			
Financials (PCAF)			
13. Glasgow Financial			
Alliance for Net Zero			
(GFANZ) 14. Other			

Additional Important Information

128. Note any additional important information about the contribution of the policy tool to net zero alignment not captured in the above questions. If referencing new sources (i.e. not referenced in Question 3), provide a web-archived link to the source material.

Domain-Specific Questions: Transition Planning Questions

Disclosure of Plans and Targets

132. Are targeted entities recommended or required to publicly disclose climate-related targets or transition plans?

 $\circ \, \text{No}$

Recommended

Required

Targets

135. Does the policy tool recommend or require targeted entities to have or develop climate-related targets?

 $\circ \ No$

 \circ Recommended

Required

136. Does the policy tool recommend or require entities to monitor progress in achieving their targets?

 $\circ \ No$

 \circ Recommended

Required

137. Describe and reference the section/subsection/paragraph of the policy tool relevant to monitoring progress in achieving targets.

Section 20 provides that the Secretariat, in consultation with the Federal Ministries responsible for Environment, and Budget and National Planning, respectively, shall. formulate an Action Plan in every five-year cycle.

Section 22 (5) &(6) stipulated that any MDA that fails to meet its carbon emission reduction target shall be subjected to a review and its principal officers, upon being found liable, sanctioned and where appropriate fined as determined by the Council. Where an evaluation report from an MDA discloses unsatisfactory performance - (a) the Secretariat shall undertake investigations and report its findings to the Council; and (b) the Council acting on that report may recommend appropriate measures and sanctions.

Section 28. (1) stipulates that the Federal Ministry for Environment shall set up a registry with subnational nodes for capturing REDD+ activities in Nigeria, including updates on Forest Reference Emission Level (FREL). In this section, "REDD+" means Reducing Emissions from Deforestation and Forest Degradation and the role of conservation, sustainable management of forests and the enhancement of forest carbon stocks.

Section 32 empowers the Council to make regulations requiring private and public entities, to report annually on GHG reductions and reduction measures, and have corporate climate change responsibilities and supervise market-based mechanisms and instruments relating to climate change.

138. Does the policy tool recommend or require targeted entities to publicly report on progress in achieving their targets?

No

Recommended

Required

140. Which of the following targets, or data related to targets, does the policy tool recommend or require entities have or develop? Select all that apply.

	Recommended	Required	No
An absolute emissions			
reduction target			
An intensity-based			
emissions reduction			
target			
A net zero target			
Interim targets (e.g.			
2030, 2050)			
Targets covering non-			
carbon GHG emissions			
A Scope 3 emissions			
target			
A target derived using			
a sectoral			
decarbonization			
approach			
A level of ambition for			
emissions reductions			
(e.g. 80% reduction)			
A baseline year from which progress is			
measured			
A target timeframe			
(e.g. by 2040)			
Targets for renewable			
energy procurement			
Targets for fossil fuel			
phase down/phase up			
Separate targets for			
GHG offsets and/or			
removals			
Targets or goals			
related to climate			
adaptation			
Targets or goals			
related to nature and			
biodiversity			
Other targets related			
to sustainability			

141. What is the recommended or required scope of emissions for absolute emissions reduction targets? Select all that apply.

□ Scope 1 emissions

□ Scope 2 emissions

□ Scope 3 emissions, relevant or material

□ Scope 3 emissions, a specified proportion of coverage (Please describe)

□ Scope 3 emissions, all

Not specified

Transition Plans

164. Does the policy tool recommend or require targeted entities to have or develop a transition plan?

 $\circ \, \text{No}$

 $\circ \ {\rm Recommended}$

Required

165. Does the policy tool recommend or require any of the following elements or criteria for transition plans? Select all that apply.

	Recommended	Required	Neither recommended nor required
A timeframe for the transition plan (e.g. 10 year plan, 20 year plan, etc.)			
Key Performance Indicators (KPIs) for monitoring transition plan implementation			
Updates to the transition plan			
Third-party verification and/or audited accuracy of the transition plan			
Identified methodology for scenario analysis			

Monitoring, Oversight, and Implementation

176. Does the policy tool recommend or require entities undertake any of the following with regard to monitoring, oversight, and implementation? Select all that apply.

	Recommended	Required	No
Monitor progress in			
implementing their			
transition plan			
Develop financial			
plans for the			
implementation of			
their transition plan			
Integrate climate-			\checkmark
related matters into			
their financial			
accounting			
Incorporate climate			
change considerations			
into their investment			
decision making			
and/or asset planning			
Incorporate climate			
change considerations			
into their capital			
allocation and/or			
expenditure plans			
Any other mechanisms			
for enhancing the			
achievement of			
targets and/or the			
implementation of			
transition plans			

177. Describe the obligation to monitor progress in implementing transition plans, referencing the relevant section/subsection/paragraph of the policy tool.

182. Describe the obligations related to other governance mechanisms for enhancing the achievement of targets and/or implementation of transition plans, referencing the relevant section/subsection/paragraph of the policy tool.

Engagement, Lobbying, and Governance

184. Does the policy tool recommend or require targeted entities align any of the following engagement and/or governance practices with their targets and/or transition plans?

	Recommended	Required	No
Value chain			
engagement			
Investor engagement			
Consumer			
engagement			
Policy engagement			
and lobbying practices			
Corporate governance			
structure for transition			
and verification			
Climate-related			
financial incentives for			
employees and board			
members			

185. Does the policy tool recommend or require targeted entities to disclose how they have used due diligence and/or stewardship to achieve their targets and/or implement their transition plans?

No

 \circ Recommended

• Required

Standards, Frameworks, and Guidelines

194. Does the policy tool require the use of or make reference to any of the following standards, frameworks, or guidelines? Select all that apply.

	Required	Referenced	Neither required nor referenced
IFRS S1			
IFRS S2			
Task Force on Climate-related Financial Disclosures (TCFD)			
CDP (formerly known as Climate Disclosure Project) Technical Note: Reporting on Climate Transition Plans			
International Integrated Reporting Framework			
Global Reporting Initiative (GRI)			
Sustainability Accounting Standards Board (SASB)			
Science Based Targets initiative (SBTi)			
Science Based Targets initiative (SBTi) Net Zero Standard			
European Sustainability Reporting Standards (ESRS)			
Other			

Additional Important Information

197. Note any additional important information about the contribution of the policy tool to net zero alignment not captured in the above questions. If referencing new sources (i.e. not referenced in Question 3), provide a web-archived link to the source material.

Policy Tool Name: SEC Guidelines on Sustainable Financial Principles for the Nigerian Capital Market, 2021

3. Source material link(s): https://web.archive.org/web/20240816132412/https://sec.gov.ng/sec-guidelines-on-sustainable-financial-principles-for-the-capital-market/

4. Which of the following governance domains does this policy tool relate to? Select all that apply.

Climate-related disclosure

Transition planning

□ Public procurement

5. If relevant, briefly explain how the policy tool applies or is linked to multiple domains.

<u>The Guideline mandates companies operating in the Nigerian capital market to embed ESG</u> <u>considerations in their operations and also report on the progress and performance regarding their</u> <u>commitment to ESG guidelines.</u>

6. Select the category which best describes the author/issuer of the policy tool.

□ Head of state and/or government

Independent regulatory or supervisory body

□ Legislature

□ Judiciary

Ministry/Department/Agency

 \Box Other (Please describe)

7. Status of the policy tool

Approved, in force

• Approved, not yet in force

• Other (Please describe)

9. Year of (planned) entry into force or year of publication

2021

10. Does the policy tool have an end date?

No

 $\circ \, \text{Yes}$

12. Briefly describe the policy tool's goal and/or purpose:

For example: The policy tool requires publicly listed companies to comply with the recommendations of the Task Force for Climate Related Financial Disclosure or to explain the absence of such disclosures.

The Guideline mandates companies in the Nigerian capital market to embed ESG considerations in their decision-making, management and operations and also to report on the progress and commitment to the ESG guidelines and principles therein.

I. Securities and Exchange Commission

13. Name the authority(ies) responsible for overseeing implementation and/or enforcement. If not applicable, leave blank.

-	-		
o 2 .			
o 3 .			
o 4 .			
o 5 .			

15. To provide contextual information, rate the capacity of Securities and Exchange Commission to undertake the policy tool's implementation and/or enforcement.

 \circ 0- No Capacity (Please explain)

- 1- Low Capacity (Please explain)
- 2- Medium Capacity (Please explain)

• 3- High Capacity (Please explain) <u>The Securities and Exchange Commission is the apex regulator</u> of the capital market in Nigeria.

 \circ Prefer not to answer

• Not Applicable

25. Which entities are targeted through this policy tool? Select all that apply.

Note: With regard to sectoral actors, in cases where mandatory and voluntary obligations are mixed (e.g., mandatory for one sector, voluntary for another), select "mandatory" as there will be further opportunity to clarify.

	Mandatory	Voluntary	Not targeted
1. Publicly-traded			
entities			
2. Private companies			
3. Financial institutions			
4. Small and medium-			
sized enterprises			
5. State-owned			
companies			
6. Not-for-profit			
organizations			
7. Government			
agencies and/or			
departments			
(supranational)			
8. Government			
agencies and/or			
departments (national)			
9. Government			
agencies and/or departments (regional			
- e.g., state, province,			
region, metropolitan			
region)			
10. Government			
agencies and/or			
departments (local -			
e.g., county, district,			
municipality, city)			
11. Government			
agencies and/or			
departments			
(unspecified)			
12. Sectoral actors			
(e.g., healthcare,			
defense, utilities,			
education)			
13. Other			

13. Other Text:Capital market regulated entities, which includes Capital Market Operators (CMOs), Trade Groups, Self-regulated Organisations and Capital TradePoints

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27. Describe the threshold criteria to identify entities for whom or instances in which compliance is mandatory.

	Publicly-traded entities	Other
Minimum number of employees (Enter min number of full-time employees - FTEs)	Not specified	Not specified
Minimum revenue (Enter minimum revenue)	Not specified	Not specified
Minimum assets (Enter minimum assets)	Not specified	Not specified
Minimum contract value (Enter minimum contract value)	Not specified	Not specified
Entity is headquartered in the jurisdiction	Yes	Yes
Entities are subjected to disclosure or reporting requirements	Not applicable	Not applicable

28. Can entities for whom compliance with the policy tool is mandatory opt out of the obligation (e.g. comply or explain)?

No

 \circ Yes

30. Does the policy tool exclusively apply to entities' domestic operations, or does it also apply to entities' operations beyond the jurisdiction?

• Operations within jurisdiction only

• Operations beyond the jurisdiction

• Not applicable

32. What are the sanctions for non-compliance? Select all that apply and describe in the text field.

□ Monetary fine

 \square Restriction on business activities

□ Voiding or setting aside of contract

□ Exclusion from government contracts

□ Award of damages or compensation

□ Penalty for senior managers

□ Criminal penalties

Not specified <u>The SEC Guidelines are principle-based and therefore do not prescribe specific</u> <u>implementation requirements but indicate minimum benchmarks which Regulated Entities must</u> <u>target. However, Regulated Entities are required to apply the principles in line with their values,</u> <u>mandates and risk management frameworks.</u>

□ Not applicable (e.g. in cases of voluntary tools)

□ Other

33. Relative to other compliance activities required of entities in this jurisdiction, is the cost of compliance:

Below average

• Average

• Above average

 \circ Not applicable

• Unknown or prefer not to answer

35. To provide contextual information, give a general assessment of the extent to which regulated entities have made compliance a priority.

Below average

Average

• Above average

Not applicable

• Unknown or prefer not to answer

37. Have the climate-specific provisions in this instrument ever been enforced?

• No (If relevant, explain)

 $\circ \, \text{Yes}$

39. Are there monitoring systems in place to oversee the implementation and/or enforcement of the policy tool?

 $\circ \ No$

Yes

40. Describe the monitoring systems in place. Please reference the relevant section/subsection/paragraph of the policy tool where monitoring systems are set.

Principle 5: Reporting and Disclosures in the Guidelines provides that Regulated Entities are mandated to report their progress in applying the ESG principles. The reporting is to be done on an annual basis either on a stand-alone basis or integrated as part of the entities annual report to its stakeholders. Public companies are required to filea sustainability policy report to the SEC tomake necessary ESG disclosures inline with best practices.

41. Does the policy tool recommend or require periodic impact assessments?

No

Recommended

 \circ Required

43. Does the policy tool recommend or require periodic reviews?

o No

Recommended

 \circ Required

44. Select the option that best describes the frequency of the recommended or required periodic reviews.

 \circ 0-2 years

 \circ 2-5 years

 \circ 5-10 years

 \circ 10 or more years

• Not specified

• Other <u>The SEC Guidelines requires that the report by Regulated Entities must be reliable and</u> <u>shopuld be gathered, recorded, compiled, analysed and disclosed in such a manner asto allow for</u> <u>independent examination to establish the quality and materiality of the information.</u>

45. Does the policy tool include mechanisms for enhancing policy or regulatory coordination with subnational governments (e.g. vertical coordination mechanisms such as appointing coordinating agencies, forming working groups, etc.)?

 $\circ \operatorname{No}$

 \circ Yes

47. Are there any government initiatives to enhance the capacity of targeted entities to implement or comply with the policy tool (e.g. industry working groups, outreach campaigns, education and training, etc.)?

 $\circ \mathrm{No}$

 \circ Yes

Domain-Specific Questions: Disclosure Questions

What is being disclosed?

52. Are targeted entities recommended or required to disclose any of the following climate-related information? Select all that apply.

	Recommended	Required	Neither recommended nor required
1. Greenhouse gas (GHG) emissions			
2. GHG emissions offsets or removals			
3. GHG emissions reduction targets			
4. Other climate- related targets			
5. Physical climate risk			
6. Transition risk			
7. Transition plan			

Disclosure of Greenhouse Gas (GHG) Emissions

54. Which GHG emissions must be disclosed? Select all that apply.

Carbon dioxide (CO₂)

Methane (CH4)

Nitrous oxide (N₂O)

Hydrofluorocarbons (HFCs)

Perfluorocarbons (PFCs)

Sulphur hexafluoride (SF6)

Nitrogen trifluoride (NF3)

Carbon dioxide equivalent (CO2e)

55. Are entities recommended or required to disclose gross emissions?

No

Recommended

• Required

56. Are entities recommended or required to disclose net emissions?
No
 Recommended
• Required
57. What Scope of emissions must be disclosed? Select all that apply.
□ Scope 1 emissions
C Scope 2 emissions
□ Scope 3 emissions, relevant or material
□ Scope 3 emissions, a specified proportion of coverage (Please describe)
□ Scope 3 emissions, all
Not specified
58. Are entities recommended or required to discloseGHG emissionsaccounting methodologies or standards?
GHG emissions
59. Does the policy tool recommend or require the GHG inventory be third-party verified?
○ No
 Recommended
• Required

60. If necessary, provide additional clarification to the above responses aboutgreenhouse gas (GHG) emissions disclosure.

Regulated Entities are advised to adopt the GRI or any other internationally recognized reporting standard in preparing their report. Most reporting standards employ metrics that also measure environmental impacts, including GHG emissions disclosures.

The SEC Guidelines also require that the reporting by Regulated Entities should be disclosed in a manner that allows for independent examination to establish the quality and materiality of the information in the report.

<u>The language of the Guidelines in format of the reporting is recommendatory rather than mandatory.</u> <u>The SEC also has a template report that Regulated Entities can use in making their reports and returns.</u>

Disclosure of Greenhouse Gas (GHG) Offsets or Removals

62. Does the policy tool recommend or require offsetting purchases be disclosed?

No

 \circ Recommended (Please describe and reference the relevant section/subsection/paragraph of the policy tool)

 \circ Required (Please describe and reference the relevant section/subsection/paragraph of the policy tool)

63. Does the policy tool recommend or require entities disclose whether offsets are verified?

No

 \circ Recommended (Please describe and reference the relevant section/subsection/paragraph of the policy tool)

 \circ Required (Please describe and reference the relevant section/subsection/paragraph of the policy tool)

64. Does the policy tool recommend or require any certification standards for the use of GHG offsetting or removals?

No

 \circ Recommended (Please list the certification standards, describe their use, and reference the relevant section/subsection/paragraph of the policy tool)

 \circ Required (Please describe and reference the relevant section/subsection/paragraph of the policy tool)

65. Does the policy tool include any other recommendations or requirements regarding the appropriate use of offsets?

No

 \circ Recommended (Please describe and reference the relevant section/subsection/paragraph of the policy tool)

 \circ Required (Please describe and reference the relevant section/subsection/paragraph of the policy tool)

Other disclosures

105. Are targeted entities recommended or required to disclose any other climate-related information? Select all that apply.

	Required	Recommended	Neither recommended nor required
1. Climate-related opportunities			
2. Remuneration based on achieving climate-related goals			
3. Taxonomies			
4. Capital allocation and/or expenditure plans (in the context of climate change)			
5. Due diligence			
6. Assumptions and Dependencies			
7. Data limitations of scenario analyses			
8. Financial implications of climate-related matters (e.g., integration of climate- related disclosures into financial accounting standards)			
9. Stewardship (e.g., whether stewardship codes are in place, how entities vote in shareholder meetings, etc.)			
10. ESG methodologies and criteria (in the case of service providers)			
11. Asset planning or ownership in the context of climate change			
12. Sectoral investment policies			
13. Climate-related lobbying and/or policy engagement			
14. Locked-in emissions or information on			

emissive assets with long lifespans		
15. Dirty asset		
divestiture		
16. Nature-related		
impacts		
17. Just transition		
indicators		

108. Describe and reference the section/subsection/paragraph of the policy tool relevant to taxonomy disclosures.

<u>The SEC Guidelines provides five broad principles which Regulated Entities must align with in their</u> <u>sustainability reporting –</u>

Principle 1 - Environmental, Social and Governance (ESG) Considerations

Principle 2 - Collaborative Partnership and Capacity Building

Principle 3 – Financing of Priority Sectors of the economy

<u>Principle 4 – Hunman rights, women's economic empowerment, job creation and financial inclusion</u> <u>Principle 5 – Reporting and disclosures</u>

The reports are to be made and with different factors reported on and classified along these principles.

109. Describe and reference the section/subsection/paragraph of the policy tool relevant to capital allocation and/or expenditure plans disclosures.

The SEC Guidelines require that Regulated Entities should identify priority sectors such as Green Financing and report the total monetary value of investments undertaken in products and services in financing priority sectors of the economy.

110. Describe and reference the section/subsection/paragraph of the policy tool relevant to due diligence disclosures.

As part of implementing and reporting on Principle 1 - Environmental, Social and Governance (ESG) Considerations, Regulated Entities are expected to articulate, in their sustainable finance policies and procedures, ESG procurement standards for suppliers, contractors, and other third party service providers. They also should monitor the service providers to ensure compliance with the standards.

114. Describe and reference the section/subsection/paragraph of the policy tool relevant to stewardship-related disclosures.

The SEC Guidelines are to be adopted by public companies in Nigeria to complement existing corporate governance frameworks and requirements under the Nigerian Code of Corporate Governance (NCCG) and the SEEC guidelines on Corporate Governance. It is expected that the board of directors of such public companies will comply with Part E, Principle 26 of the NCCG by "Paying adequate attention to sustainability issues including environment, social, occupational and community health and safety ensures successful long term business performance and projects the Company as a responsible corporate citizen contributing to economic development." The public companies are required to adhere to, monitor and report on the sustainability policies they implement and their level of compliance with them.

115. Describe and reference the section/subsection/paragraph of the policy tool relevant to ESG-related disclosures.

<u>Under Principle 5 of the Guideline, entities operating in the Nigerian capital market are required to</u> report their progress in implementing ESG principles. Additionally, they must ensure that the entities they finance also make appropriate disclosures on ESG issues.

<u>Under Principle 1 - Environmental, Social and Governance (ESG) Considerations, Regulated Entities</u> are expected to implement the principle by developing appropriate ESG policies and procedures; manage their environmental and social footprints, reduce their GHG emissions, promote efficient use of water and energy and have waste and construction, comply with labour standards and practices, implement Corporate Social Responsibility programme and ensure application of ESG standards to third parties they deal with. These are to be part of the sustainability reporting for the Regulated <u>Entities.</u>

117. In which of the following sectors are entities recommended or required to disclose information regarding sectoral investment policies? Select all that apply.

🗆 Coal

 \Box Oil and gas

 \Box Renewable energy

 \Box Land-use and deforestation

Other

□ None specified

122. Describe and reference the section/subsection/paragraph of the policy tool relevant to disclosure of nature-related impacts.

Part of the focus of the SEC Guidelines is to ensure restoring ecological systems and the environment through sustainable financing.

Standards, Frameworks, and Guidelines

125. Does the policy tool require the use of or make reference to any of the following standards, frameworks, or guidelines? Select all that apply.

	Required	Referenced	Neither required nor referenced
1. IFRS S1			
2. IFRS S2			
3. Task Force on			
Climate-related			
Financial Disclosures			
(TCFD)			
4. GHG Protocol			
Corporate Accounting			
and Reporting			
Standard			
5. GHG Protocol			
Corporate Value Chain			
(Scope 3) Accounting			
and Reporting			
Standard			
6. CDP (formerly			
known as Climate			
Disclosure Project)			
reporting framework			
7. International			
Integrated Reporting			
Framework			
8. Global Reporting			
Initiative (GRI)			
9. Sustainability			
Accounting Standards			
Board (SASB)			
10. European			
Sustainability			
Reporting Standards			
(ESRS)			
11. Taskforce on			
Nature-related			
Financial Disclosures			
(TNFD)			
12. Partnership for			
Carbon Accounting			
Financials (PCAF)			_
13. Glasgow Financial			
Alliance for Net Zero			
(GFANZ)			
14. Other			

126. List any other standards, frameworks or guidelines integrated into or referred to within the policy tool. Please provide a web-archived link to each standard/framework/guideline listed.

Additional Important Information

128. Note any additional important information about the contribution of the policy tool to net zero alignment not captured in the above questions. If referencing new sources (i.e. not referenced in Question 3), provide a web-archived link to the source material.

Domain-Specific Questions: Transition Planning Questions

Disclosure of Plans and Targets

132. Are targeted entities recommended or required to publicly disclose climate-related targets or transition plans?

No

Recommended

Required

Targets

135. Does the policy tool recommend or require targeted entities to have or develop climate-related targets?

No

Recommended

 \circ Required

Transition Plans

164. Does the policy tool recommend or require targeted entities to have or develop a transition plan?

No

Recommended

 \circ Required

Monitoring, Oversight, and Implementation

176. Does the policy tool recommend or require entities undertake any of the following with regard to monitoring, oversight, and implementation? Select all that apply.

	Recommended	Required	No
Monitor progress in			
implementing their			
transition plan			
Develop financial			
plans for the			
implementation of			
their transition plan			
Integrate climate-			
related matters into			
their financial			
accounting			
Incorporate climate			
change considerations			
into their investment			
decision making			
and/or asset planning			
Incorporate climate			
change considerations			
into their capital			
allocation and/or			
expenditure plans			
Any other mechanisms			
for enhancing the			
achievement of			
targets and/or the			
implementation of			
transition plans			

177. Describe the obligation to monitor progress in implementing transition plans, referencing the relevant section/subsection/paragraph of the policy tool.

<u>Under Principle 5 of the Guideline, entities operating in the Nigerian capital market are required to</u> report their progress in implementing ESG principles. Additionally, they must ensure that the entities they finance also make appropriate disclosures on ESG issues.

180. Describe the obligation to incorporate climate change considerations into investment decision making and asset planning, referencing the relevant section/subsection/paragraph of the policy tool.

The principle 1 of the Guideline provides that entities operating in the capital market are required to integrate ESG considerations into their operations and decision-making processes to avoid, minimize, or mitigate negative impacts.

<u>Furthermore, principle 3 of the Guideline provides that entities should promote financing of priority</u> <u>sectors of the economy, such as Green Finance, while ensuring balance with ESG considerations.</u>

Engagement, Lobbying, and Governance

184. Does the policy tool recommend or require targeted entities align any of the following engagement and/or governance practices with their targets and/or transition plans?

	Recommended	Required	No
Value chain			
engagement			
Investor engagement			
Consumer			
engagement			
Policy engagement			
and lobbying practices			
Corporate governance			
structure for transition			
and verification			
Climate-related			
financial incentives for			
employees and board			
members			

185. Does the policy tool recommend or require targeted entities to disclose how they have used due diligence and/or stewardship to achieve their targets and/or implement their transition plans?

 $\circ \ \text{No}$

 \circ Recommended

Required

186. Describe the obligation to the align targets and/or transition plans with value chain engagement, referencing the relevant section/subsection/paragraph of the policy tool.

<u>Under Principle 1, Regulated Entities are to articulate in their sustainable finance policies and</u> procedures, ESG procurement standards for suppliers, contractors, and other third party service providers. They are expected to monitor their service providers to ensure compliance with the standards.

187. Describe the obligation to the align targets and/or transition plans with investor engagement, referencing the relevant section/subsection/paragraph of the policy tool.

<u>Under Principle 2, Regulated Entities are to implement the principle in ways that include engaging</u> and obtaining the buy-in of their key stakeholders to support the implementation of their sustainable policies. <u>Under Principle 5, it is expected that Regulated Entities should report on their sustainability practices</u> in a manner that reflects their commitment and level of implementation which may form the basis for stakeholder s informed decision making. These stakeholders include investors and potential investors in the entities and in the Nigerian capital market.

188. Describe the obligation to the align targets and/or transition plans with consumer engagement, referencing the relevant section/subsection/paragraph of the policy tool.

Under Principle 2, Regulated Entities are to implement the principle in ways that include engaging and obtaining the buy-in of their key stakeholders to support the implementation of their sustainable policies. Part of the aims of the Guidelines is to ensure the reduction of environmental footprints of the Entities and their stakeholders. The stakeholders include the consumers and other participants in the capital market.

190. Describe the obligation to the align targets and/or transition plans with corporate governance structures for transition and verification, referencing the relevant section/subsection/paragraph of the policy tool.

<u>Principle 1 of the Guideline mandates entities to put in place effective governance structures and</u> <u>consider the impact of their operations and activities on the environment and society.</u>

192. Describe and reference the section/subsection/paragraph of the policy tool relevant to the use of due diligence and/or stewardship to achieve targets and/or implement transition plans.

Under Principle 1, Regulated Entities are expected to articulate, in their sustainable finance policies and procedures, ESG procurement standards for suppliers, contractors, and other third party service providers. They also should monitor the service providers to ensure compliance with the standards. Under Principle 5, The SEC Guidelines are to be adopted by public companies in Nigeria to complement existing corporate governance frameworks and requirements under the Nigerian Code of Corporate Governance (NCCG) and the SEC Guidelines on Corporate Governance.

Standards, Frameworks, and Guidelines

66

194. Does the policy tool require the use of or make reference to any of the following standards, frameworks, or guidelines? Select all that apply.

	Required	Referenced	Neither required nor referenced
IFRS S1			
IFRS S2			
Task Force on Climate-related Financial Disclosures (TCFD)			
CDP (formerly known as Climate Disclosure Project) Technical Note: Reporting on Climate Transition Plans			
International Integrated Reporting Framework			
Global Reporting Initiative (GRI)			
Sustainability Accounting Standards Board (SASB)			
Science Based Targets initiative (SBTi)			
Science Based Targets initiative (SBTi) Net Zero Standard			
European Sustainability Reporting Standards (ESRS)			
Other			

195. List any other standards, frameworks or guidelines required by or referred to within the policy tool. Please provide a web-archived link to each standard/framework/guideline listed.

Additional Important Information

197. Note any additional important information about the contribution of the policy tool to net zero alignment not captured in the above questions. If referencing new sources (i.e. not referenced in Question 3), provide a web-archived link to the source material.

Policy Tool Name: Nigerian Sustainable Banking Principles, 2012

3. Source material link(s):

https://web.archive.org/web/20240815182804/https://www.cbn.gov.ng/OUT/2012/CIRCULARS/FPR/I mplementation%20of%20Sustainable%20Banking%20Principles.pdf

4. Which of the following governance domains does this policy tool relate to? Select all that apply.

Climate-related disclosure

□ Transition planning

□ Public procurement

6. Select the category which best describes the author/issuer of the policy tool.

 \Box Head of state and/or government

Independent regulatory or supervisory body

□ Legislature

□ Judiciary

□ Ministry/Department/Agency

 \Box Other (Please describe)

7. Status of the policy tool

Approved, in force

• Approved, not yet in force

• Other (Please describe)

9. Year of (planned) entry into force or year of publication

<u>2012</u>

70

10. Does the policy tool have an end date?

● No	
o Yes	

12. Briefly describe the policy tool's goal and/or purpose:

For example: The policy tool requires publicly listed companies to comply with the recommendations of the Task Force for Climate Related Financial Disclosure or to explain the absence of such disclosures.

The Principles have been developed for the banking sector in Nigeria to ensure their commitment to economic growth that is environmentally and socially relevant. It aims to identify the role that banks play to deliver positive development impacts to society whilst protecting the communities and environments in which these banks operate. The Policy requires that banks in Nigeria adhere to sustainability principles in their everyday business activities and operations which can potentially have negative impacts on the environment or local communities within which the banks' clients operate.

13. Name the authority(ies) responsible for overseeing implementation and/or enforcement. If not applicable, leave blank.

• 1. The Central bank of Nigeria

• 2. The Bankers' Sub-Committee on Economic Development and Sustainability

o **3**.

o **4**.

o **5**.

15. To provide contextual information, rate the capacity of The Central bank of Nigeria to undertake the policy tool's implementation and/or enforcement.

• 0- No Capacity (Please explain)

- 1- Low Capacity (Please explain)
- 2- Medium Capacity (Please explain)

• 3- High Capacity (Please explain) <u>The Central Bank of Nigeria (CBN) is the apex regulatory</u> <u>authority overseeing all banks and financial institutions in Nigeria. The Guidelines directed the full</u> <u>adoption and implementation of the principles and guidelines by all banks, discount houses and</u> <u>Development Finance Institutions (DFI) to develop a management approach that balances the</u> <u>environmental and social risks alongside their business opportunities. The CBN also requires banks,</u> <u>discount houses and DFIs to submit regular reports to it in line with reporting requirements to enable</u> <u>the CBN track the progress of the implementation and adherence to the Principles.</u>

• Prefer not to answer

• Not Applicable

16. To provide contextual information, rate the capacity of The Bankers' Sub-Committee on Economic Development and Sustainability to undertake the policy tool's implementation and/or enforcement.

- 0- No Capacity (Please explain)
- 1- Low Capacity (Please explain)
- 2- Medium Capacity (Please explain)
- 3- High Capacity (Please explain)
- \circ Prefer not to answer
- Not Applicable

25. Which entities are targeted through this policy tool? Select all that apply.

Note: With regard to sectoral actors, in cases where mandatory and voluntary obligations are mixed (e.g., mandatory for one sector, voluntary for another), select "mandatory" as there will be further opportunity to clarify.

Mandatory	Voluntary	Not targeted
		\checkmark

27. Describe the threshold criteria to identify entities for whom or instances in which compliance is mandatory.

	Financial institutions
Minimum number of employees (Enter min	Not specified
number of full-time employees - FTEs)	
Minimum revenue (Enter minimum revenue)	Not specified
Minimum assets (Enter minimum assets)	Not specified
Minimum contract value (Enter minimum	Not specified
contract value)	
Entity is headquartered in the jurisdiction	Not specified
Entities are subjected to disclosure or reporting	
requirements	

28. Can entities for whom compliance with the policy tool is mandatory opt out of the obligation (e.g. comply or explain)?

No

 \circ Yes

30. Does the policy tool exclusively apply to entities' domestic operations, or does it also apply to entities' operations beyond the jurisdiction?

• Operations within jurisdiction only

• Operations beyond the jurisdiction

• Not applicable

32. What are the sanctions for non-compliance? Select all that apply and describe in the text field.

□ Monetary fine

□ Restriction on business activities

□ Voiding or setting aside of contract

 $\hfill\square$ Exclusion from government contracts

 \square Award of damages or compensation

 \Box Penalty for senior managers

Criminal penalties

Not specified

□ Not applicable (e.g. in cases of voluntary tools)

 \Box Other

33. Relative to other compliance activities required of entities in this jurisdiction, is the cost of compliance:

 \circ Below average

 \circ Average

• Above average

Not applicable

• Unknown or prefer not to answer

35. To provide contextual information, give a general assessment of the extent to which regulated entities have made compliance a priority.

 \circ Below average

Average

• Above average

• Not applicable

• Unknown or prefer not to answer

37. Have the climate-specific provisions in this instrument ever been enforced?

• No (If relevant, explain)

 \circ Yes

.....

39. Are there monitoring systems in place to oversee the implementation and/or enforcement of the policy tool?

 $\circ \, \text{No}$

Yes

40. Describe the monitoring systems in place. Please reference the relevant section/subsection/paragraph of the policy tool where monitoring systems are set.

The Circular referenced FPR/DIR/CIR/GEN/01/33 embedded in the policy and issued by the Central Bank of Nigeria on the implementation of the policy by banks, discounts houses and development finance institutions in Nigeria: The Central Bank of Nigeria tracks the implementation and adherence to the Policy through the submission of regular reports from these entities in line with the reporting requirements.

41. Does the policy tool recommend or require periodic impact assessments?

No

 \circ Recommended

Required

43. Does the policy tool recommend or require periodic reviews?

No

 \circ Recommended

Required

45. Does the policy tool include mechanisms for enhancing policy or regulatory coordination with subnational governments (e.g. vertical coordination mechanisms such as appointing coordinating agencies, forming working groups, etc.)?

No

 $\circ \, \text{Yes}$

47. Are there any government initiatives to enhance the capacity of targeted entities to implement or comply with the policy tool (e.g. industry working groups, outreach campaigns, education and training, etc.)?

No

 $\circ \, \text{Yes}$

Domain-Specific Questions: Disclosure Questions

What is being disclosed?

52. Are targeted entities recommended or required to disclose any of the following climate-related information? Select all that apply.

	Recommended	Required	Neither recommended nor required
1. Greenhouse gas (GHG) emissions			
2. GHG emissions offsets or removals			
3. GHG emissions reduction targets			
4. Other climate- related targets			
5. Physical climate risk			
6. Transition risk			
7. Transition plan			

Disclosure of Greenhouse Gas (GHG) Emissions Reduction Targets

79

67. Which of the following targets, or data related to targets, does the policy tool request entities disclose? Select any of the following which apply:

	Recommended	Required	Neither recommended nor required
An absolute emissions reduction target			
An intensity-based emissions reduction target			
A net zero target			
Targets covering non- carbon GHG emissions	\mathbf{N}		
A Scope 3 emissions target			
A target derived using a sectoral decarbonization approach			
Interim targets			
A target timeframe (e.g. by 2040)			
A baseline year from which progress is measured			
A level of ambition for emissions reductions (e.g. 80% reduction)			

68. Does the policy tool recommend or require entities to disclose their progress in achieving their emissions reductions targets?

 $\circ \, \text{No}$

Recommended

• Required

69. What is the recommended or required frequency of progress reports regarding the achievement of emissions reductions targets?

Yearly

 \circ Every two years

• Every three years

• Every four years

- Every five years
- Every ten years or more
- $\circ \ \text{Other}$
- No prescribed frequency

74. Which of the following non-carbon GHG emissions reductions targets are entities recommended or required to disclose? Select all that apply.

□ Methane (CH4)

- □ Nitrous oxide (N₂O)
- □ Hydrofluorocarbons (HFCs)
- □ Perfluorocarbons (PFCs)
- □ Sulphur hexafluoride (SF6)
- □ Nitrogen trifluoride (NF3)
- □ Carbon dioxide equivalent (CO2e)

Other disclosures

105. Are targeted entities recommended or required to disclose any other climate-related information? Select all that apply.

	Required	Recommended	Neither recommended nor required
1. Climate-related opportunities			
2. Remuneration based on achieving climate-related goals			
3. Taxonomies			
4. Capital allocation and/or expenditure plans (in the context of climate change)			
5. Due diligence			
6. Assumptions and Dependencies			
7. Data limitations of scenario analyses			
8. Financial implications of climate-related matters (e.g., integration of climate- related disclosures into financial accounting standards)			
9. Stewardship (e.g., whether stewardship codes are in place, how entities vote in shareholder meetings, etc.)			
10. ESG methodologies and criteria (in the case of service providers)			
11. Asset planning or ownership in the context of climate change			
12. Sectoral investment policies			
13. Climate-related lobbying and/or policy engagement			
14. Locked-in emissions or information on			

emissive assets with long lifespans		
15. Dirty asset		
divestiture		
16. Nature-related		
impacts		
17. Just transition		
indicators		

110. Describe and reference the section/subsection/paragraph of the policy tool relevant to due diligence disclosures.

Paragraph 4 of the Nigerian Sustainability Principles for Banking Sector, the Power Sector Guidelines Paragraph 6 of the Nigerian Sustainability Principles for Banking Sector, the Agricultural Sector Guidelines

<u>Paragraph 4 of the Nigerian Sustainability Principles for Banking Sector, the Oil and Gas Sector</u> <u>Guidelines</u>

These provisions require that the financial institution undertake appropriate environmental and social due diligence on oil and gas sector clients and activities to identify and assess the potential environmental and social risks, to effectively determine the client's ability to effectively manage identified risks relating to financing of such client.

Standards, Frameworks, and Guidelines

125. Does the policy tool require the use of or make reference to any of the following standards, frameworks, or guidelines? Select all that apply.

	Required	Referenced	Neither required nor referenced
1. IFRS S1			
2. IFRS S2			
3. Task Force on			
Climate-related			
Financial Disclosures			
(TCFD)			
4. GHG Protocol			
Corporate Accounting			
and Reporting			
Standard			
5. GHG Protocol			
Corporate Value Chain			
(Scope 3) Accounting			
and Reporting			
Standard			
6. CDP (formerly			
known as Climate			
Disclosure Project)			
reporting framework 7. International			
Integrated Reporting			
Framework			
8. Global Reporting			
Initiative (GRI)			
9. Sustainability			
Accounting Standards			
Board (SASB)			
10. European			
Sustainability			
Reporting Standards			
(ESRS)			
11. Taskforce on			
Nature-related			
Financial Disclosures			
(TNFD)			
12. Partnership for Carbon Accounting			
Financials (PCAF)			
13. Glasgow Financial			
Alliance for Net Zero			
(GFANZ)			
14. Other			

126. List any other standards, frameworks or guidelines integrated into or referred to within the policy tool. Please provide a web-archived link to each standard/framework/guideline listed.

https://www.iso.org/standard/60857.html

https://web.archive.org/web/20240815222711/https://www.wri.org/node/37553

https://web.archive.org/web/20240815223538/https://www.globalreporting.org/ReportingFramework /G31Guidelines/

https://web.archive.org/web/20240815223921/https://www.hugedomains.com/domain_profile.cfm?d =carbonprinciples.com

https://web.archive.org/web/20240815224502/https://www.theclimategroup.org/programs/the-

-%E2%80%90climate--%E2%80%90principles

https://web.archive.org/web/20240815225101/https://ohsas.org/

https://web.archive.org/web/20240815225530/https://www.theebi.org/

https://web.archive.org/web/20240815225955/https://jncc.gov.uk/

https://web.archive.org/web/20240815230455/https://eiti.org/

Additional Important Information

128. Note any additional important information about the contribution of the policy tool to net zero alignment not captured in the above questions. If referencing new sources (i.e. not referenced in Question 3), provide a web-archived link to the source material.

Additional Important Information

197. Note any additional important information about the contribution of the policy tool to net zero alignment not captured in the above questions. If referencing new sources (i.e. not referenced in Question 3), provide a web-archived link to the source material.

None

Policy Tool Name: Gas Flaring, Venting and Methane Emissions Regulations, 2023

3. Source material link(s):

https://web.archive.org/web/20240816083609/https://www.nuprc.gov.ng/wp-content/uploads/2023/07/GAS-FLARING-REGULATIONS.pdf

4. Which of the following governance domains does this policy tool relate to? Select all that apply.

Climate-related disclosure

Transition planning

□ Public procurement

5. If relevant, briefly explain how the policy tool applies or is linked to multiple domains.

The Gas Flaring, Venting, and Methane Emissions (Prevention of Waste and Methane Emissions) Regulations (the Upstream Flaring Regulations) is a pivotal instrument aimed at reducing and ultimately eliminating gas flaring in the upstream sector of the Nigerian oil and gas industry, and promoting responsible gas utilization and environmental sustainability.

By requiring upstream entities to collect gas flaring data and report same to the Nigerian Upstream Petroleum Regulatory Commission (the Commission) on a periodic basis, the Upstream Flaring Regulations mandates entities provide information about emissions associated with their activities.

Given that the Upstream Flaring Regulations also aims to (a) reduce and discourage gas flaring (b) reduce environmental impact of gas flaring and venting (c) preserve and protect the environment and (d) enhance energy transition in Nigeria, it serves as a critical policy tool carving a pathway to decarbonization in the oil and gas industry. However, it may be contended that the Upstream Flaring Regulations are simultaneously inadvertently preventing progress towards greenhouse gas mitigation goals as it allows for the grant of a permit to flare gas in certain circumstances including: (x) flaring within a prescribed threshold; (y) in the case of an emergency; and (z) upon payment of a prescribed flaring fee. By allowing entities to opt to flare gas this construct may inadvertently slow the attainment of greenhouse gas mitigation goals.

- □ Head of state and/or government
- □ Independent regulatory or supervisory body

^{6.} Select the category which best describes the author/issuer of the policy tool.

□ Legislature □ Judiciary Ministry/Department/Agency □ Other (Please describe) 7. Status of the policy tool Approved, in force • Approved, not yet in force • Other (Please describe) 9. Year of (planned) entry into force or year of publication 2023 10. Does the policy tool have an end date? No Yes

12. Briefly describe the policy tool's goal and/or purpose:

For example: The policy tool requires publicly listed companies to comply with the recommendations of the Task Force for Climate Related Financial Disclosure or to explain the absence of such disclosures.

The Upstream Flaring Regulations self-professes that it aims to: (a) reduce and discourage gas flaring; (b) reduce environmental impact of gas flaring and venting; (c) preserve and protect the environment; and (d) enhance energy transition in Nigeria.

In furtherance of the foregoing, the Upstream Flaring Regulations, inter alia, requires upstream entities to collect gas flaring data and report same to the Nigerian Upstream Petroleum Regulatory Commission (the Commission) on a periodic basis.

13. Name the authority(ies) responsible for overseeing implementation and/or enforcement. If not applicable, leave blank.

• 1. The Nigerian Upstream Petroleum Regulatory Commission

• 2 .	
o 3.	
• 4 .	
o 5 .	

15. To provide contextual information, rate the capacity of The Nigerian Upstream Petroleum Regulatory Commission to undertake the policy tool's implementation and/or enforcement.

 \circ 0- No Capacity (Please explain)

1- Low Capacity (Please explain)

• 2- Medium Capacity (Please explain)

• 3- High Capacity (Please explain) <u>The Commission is vested under the Petroleum Industry Act with</u> <u>the principal supervisory and regulatory role over the licensees, lessees, and gas producers to which</u> <u>the Regulations apply. The Commission is, therefore, vested with the power to enforce obligations</u> <u>and impose penalties where necessary.</u>

 \circ Prefer not to answer

• Not Applicable

25. Which entities are targeted through this policy tool? Select all that apply.

Note: With regard to sectoral actors, in cases where mandatory and voluntary obligations are mixed (e.g., mandatory for one sector, voluntary for another), select "mandatory" as there will be further opportunity to clarify.

	Mandatory	Voluntary	Not targeted
1. Publicly-traded			
entities			
2. Private companies			
3. Financial institutions			
4. Small and medium-			
sized enterprises			
5. State-owned			
companies			
6. Not-for-profit			
organizations			
7. Government			
agencies and/or			
departments			
(supranational)			
8. Government			
agencies and/or			
departments (national)			
9. Government			
agencies and/or			
departments (regional			
- e.g., state, province,			
region, metropolitan			
region) 10. Government			
agencies and/or			9
departments (local -			
e.g., county, district,			
municipality, city)			
11. Government			
agencies and/or			
departments			
(unspecified)			
12. Sectoral actors		Π	
(e.g., healthcare,		-	-
defense, utilities,			
education)			
13. Other			
		—	

26. In cases where entities are targeted by sector, identify the sector to which the policy tool applies.

	Mandatory	Voluntary	Not applicable
All sectors			
Agriculture, forestry, and fishing			
Mining and quarrying			
Manufacturing			
Electricity, gas, steam, and air conditioning supply			
Water supply; sewerage; waste management and remediation activities			
Construction			
Wholesale and retail trade: repair of motor vehicles and motorcycles			
Transportation and storage			
Accommodation and food service activities			
Information and communication			
Financial and insurance activities			
Real estate activities			
Professional, scientific and technical activities			
Administrative and support service activities			
Public administration and defense; compulsory social security			
Education			
Human health and social work activities			
Arts, entertainment and recreation			
Other service activities			
Activities of households as employers; undifferentiated goods-and services-			
producing activities of			

households for own		
use		
Activities of extraterritorial organizations and bodies		

27. Describe the threshold criteria to identify entities for whom or instances in which compliance is mandatory.

	Sectoral actors (e.g. healthcare, defense, utilities, education)
Minimum number of employees (Enter min number of full-time employees - FTEs)	
Minimum revenue (Enter minimum revenue) Minimum assets (Enter minimum assets) Minimum contract value (Enter minimum	
contract value) Entity is headquartered in the jurisdiction	
Entities are subjected to disclosure or reporting requirements	Per regulation 2 of the Upstream Flaring Regulations, the obligations under the Upstream Flaring Regulations apply to operations of holders of licences obtained under the Petroleum Industry Act, lessees, as well as producers of gas in the upstream industry.

28. Can entities for whom compliance with the policy tool is mandatory opt out of the obligation (e.g. comply or explain)?

No

 $\circ \, \text{Yes}$

30. Does the policy tool exclusively apply to entities' domestic operations, or does it also apply to

Operations within jurisdiction only

entities' operations beyond the jurisdiction?

• Operations beyond the jurisdiction

• Not applicable

32. What are the sanctions for non-compliance? Select all that apply and describe in the text field.

Monetary fine <u>Reg. 21 of the Regulations sets out a list of penalties that may be imposed on the</u> <u>licensees, lessees, and gas producers where they contravene provisions of the Regulations. For</u> <u>instance, where the licensee, lessee, or gas producer flares gas without authorisation, such an entity</u> <u>shall be liable to a fine of USD\$3.50 per 1000 standard cubic feet of gas. In additional, such an entity</u>, per regulation 21(3), may also be required by the Commission to pay an administrative fine of USD\$1000 upon contravention.

 \Box Restriction on business activities

□ Voiding or setting aside of contract

□ Exclusion from government contracts

 \Box Award of damages or compensation

□ Penalty for senior managers

Criminal penalties

 \Box Not specified

□ Not applicable (e.g. in cases of voluntary tools)

□ Other

33. Relative to other compliance activities required of entities in this jurisdiction, is the cost of compliance:

Below average

Average

 \circ Above average

• Not applicable

• Unknown or prefer not to answer

35. To provide contextual information, give a general assessment of the extent to which regulated entities have made compliance a priority.

• Below average

 \circ Average

 $\circ \ \text{Above average}$

 \circ Not applicable

Our Unknown or prefer not to answer

37. Have the climate-specific provisions in this instrument ever been enforced?

• No (If relevant, explain)

 \circ Yes

39. Are there monitoring systems in place to oversee the implementation and/or enforcement of the policy tool?

 $\circ \, \text{No}$

Yes

40. Describe the monitoring systems in place. Please reference the relevant section/subsection/paragraph of the policy tool where monitoring systems are set.

Regulation 3(4) of the Upstream Flaring Regulations (the Regulations) requires the licensees and producers of gas to prepare a Flare Elimination and Monetisation Plan (FEMP) which shall include an implementation plan which sets out the timeline for execution of the methodology for the elimination or monetization of flaring from a license or lease area. Upon approval of the FEMP. The licensee shall enter into a Milestone Development Agreement with the Nigerian Upstream Petroleum Regulatory further to which the Commission may monitor the implementation of the FEMP.

Reg. 4 of the Regulations further require the licensees, lessees, and gas producers to keep and maintain a record of daily fugitive methane emission from the license area and the Commission may request this data to be submitted. Similarly, reg. 15 requires these entities to maintain a daily log of gas flaring and venting within its facilities, and submit same to the Commission within 21 days following the end of each month. Likewise, reg. 18 requires the entities to submit a monthly report of natural gas produced, utilized and disposed from the licence and lease areas, as well as an annual report for the previous year which is due no later than 31 March of the following year (reg. 19).

<u>Generally, the Commission is also vested with the power to request the licensees to provide</u> <u>information as may be required and within the required timeframe, such as, inter alia: information</u> <u>regarding compliance with the gas flaring threshold (reg. 12); the comprehensive gas data of the</u> <u>licensee (reg. 4(1)); and the daily fugitive methane emission in the licence area (reg. 4(4)).</u>

41. Does the policy tool recommend or require periodic impact assessments?

No
 Recommended
 Required
 Joes the policy tool recommend or require periodic reviews?
 No
 Recommended
 Required

45. Does the policy tool include mechanisms for enhancing policy or regulatory coordination with subnational governments (e.g. vertical coordination mechanisms such as appointing coordinating agencies, forming working groups, etc.)?

No

 $\circ \, \text{Yes}$

47. Are there any government initiatives to enhance the capacity of targeted entities to implement or comply with the policy tool (e.g. industry working groups, outreach campaigns, education and training, etc.)?

No

 \circ Yes

Domain-Specific Questions: Disclosure Questions

What is being disclosed?

52. Are targeted entities recommended or required to disclose any of the following climate-related information? Select all that apply.

	Recommended	Required	Neither recommended nor required
1. Greenhouse gas (GHG) emissions			
2. GHG emissions offsets or removals			
3. GHG emissions reduction targets			
4. Other climate- related targets			
5. Physical climate risk			
6. Transition risk			
7. Transition plan			

Disclosure of Greenhouse Gas (GHG) Emissions

54. Which GHG emissions must be disclosed? Select all that apply.

 \Box Carbon dioxide (CO₂)

Methane (CH4)

 \Box Nitrous oxide (N₂O)

□ Hydrofluorocarbons (HFCs)

□ Perfluorocarbons (PFCs)

□ Sulphur hexafluoride (SF6)

□ Nitrogen trifluoride (NF3)

□ Carbon dioxide equivalent (CO2e)

55. Are entities recommended or required to disclose gross emissions?

 $\circ \ No$

 \circ Recommended

Required

56. Are entities recommended or required to disclose net emissions?
○ No
 Recommended
Required
57. What Scope of emissions must be disclosed? Select all that apply.
Scope 1 emissions
□ Scope 2 emissions
□ Scope 3 emissions, relevant or material
□ Scope 3 emissions, a specified proportion of coverage (Please describe)
□ Scope 3 emissions, all
□ Not specified
58. Are entities recommended or required to discloseGHG emissionsaccounting methodologies or standards?
GHG emissions
59. Does the policy tool recommend or require the GHG inventory be third-party verified?
No
• Recommended
• Required

60. If necessary, provide additional clarification to the above responses aboutgreenhouse gas (GHG) emissions disclosure.

<u>Generally, the Regulation requires the licensee, lessee or producer of gas to provide information</u> <u>relating to their gas flaring and venting activities at the licenced or lease areas as well as a plan for</u> <u>the elimination of flaring activities. These disclosure obligations are as set out in detail below:</u>

• Reg. 4 of the Regulation empowers the Commission to request relevant entities, at any time, to provide the gas data of the facility. This gas data shall include information about gas volumes and flaring. The requested entity shall comply within 30 days of receiving the request, save for any extension of time as may be granted by the Commission. The gas data may also be required to include the daily fugitive methane emission which the entities are required to keep a daily record of.

• Reg. 12 also requires a licensee, lessee or producer of gas to provide such relevant information to the Commission as is necessary for determining the annual flaring threshold of such entities. Failure to submit such information is a contravention of the Regulation.

• Reg. 15 requires a licensee, lessee or producer of gas to maintain a daily log of gas flaring and venting within its facilities and provide such information to the Commission within 21 days following the end of each month. The information is to be derived from the metering equipment installed and maintained at the facilities.

• Reg. 18 requires a licensee, lessee or producer of gas to keep and submit a daily annual record of natural gas data from operations at the facilities which shall include information on natural gas flared and natural gas wasted by deliberate venting, incomplete combustion and fugitive emissions. The information is to be submitted on a monthly basis to the Commission within 21 days to the end of month. A licensee, lessee or producer of gas is also required to submit an annual report to the Commission not later than 31 March of each year. The report is to contain gas data with respect to activities for the preceding year in each flare site.

• Reg. 20 further requires the Commission to publish an annual report on its website, no later than 30 June of each year, describing flaring and venting activities represented as a percentage of total gas volume produced in the preceding year.

Disclosure of Greenhouse Gas (GHG) Emissions Reduction Targets

67. Which of the following targets, or data related to targets, does the policy tool request entities disclose? Select any of the following which apply:

	Recommended	Required	Neither recommended nor required
An absolute emissions reduction target			
An intensity-based emissions reduction target			
A net zero target			
Targets covering non- carbon GHG emissions			
A Scope 3 emissions target			
A target derived using a sectoral decarbonization approach			
Interim targets			
A target timeframe (e.g. by 2040)			
A baseline year from which progress is measured			
A level of ambition for emissions reductions (e.g. 80% reduction)			

68. Does the policy tool recommend or require entities to disclose their progress in achieving their emissions reductions targets?

No

 \circ Recommended

• Required

79. What is the recommended or required timeframe for long-term targets (e.g. by 2050, 2060)?

 \circ Between 2030 and 2035

 \circ Between 2036 and 2040

 \circ Between 2041 and 2045

 \circ Between 2046 and 2050

 \circ Between 2051 and 2060

 \circ Between 2061 and 2070

• Other <u>Per reg. 3(2)-(4) of the Regulation, the Flare Elimination and Monetisation Plan (FEMP) shall</u> include an implementation plan which sets out the timeline for execution of the methodology for the elimination or monetization of flaring from a license or lease area.

• None specified

82. What is the recommended or required level of ambition for GHG emissions reductions targets?

 \circ Reduction between 1-25%

Reduction between 26-50%

 \circ Reduction between 51-75%

Reduction between 75-85%

Reduction between 85-100%

 \circ Reduction of more than 100%

• Other <u>Regulation 3(2)-(4) of the Regulation requires the licensees and producers of gas to prepare</u> <u>a Flare Elimination and Monetisation Plan (FEMP), within 6 months from the Commencement of the</u> <u>Regulation, which shall include an implementation plan which sets out the timeline for execution of</u> <u>the methodology for the elimination or monetization of flaring from a license or lease area.</u>

Disclosure of Transition Plans

98. What is the recommended or required frequency of transition plan disclosures?

• Yearly

• Every two years

 \circ Every three years

• Every four years

 \circ Every five years

 \circ Every ten years or more

• Other <u>The FEMP is to be developed and presented to the Commission within six months from the</u> <u>date the Regulation came into force.</u>

Not specified

99. Does the policy tool recommend or require audited accuracy and/or third-party verification of the transition plan?

No

 \circ Recommended

 \circ Required

100. Does the policy tool recommend or require entities to disclose progress in implementing transition plans?

No

Recommended

 \circ Required

102. Does the policy tool recommend or require targeted entities to disclose their financial plans for implementing transition plans?

No

Recommended

Required

103. Does the policy tool recommend or require targeted entities to disclose their methodology for scenario analysis related to transition planning?

No

Recommended

\circ Required

Other disclosures

105. Are targeted entities recommended or required to disclose any other climate-related information? Select all that apply.

	Required	Recommended	Neither recommended
1. Climate-related			nor required
opportunities			
2. Remuneration			
based on achieving			_
climate-related goals			
3. Taxonomies			
4. Capital allocation			
and/or expenditure			
plans (in the context of			
climate change)			
5. Due diligence			
6. Assumptions and Dependencies			
7. Data limitations of			
scenario analyses			
8. Financial			
implications of			
climate-related			
matters (e.g.,			
integration of climate-			
related disclosures into financial			
accounting standards)			
9. Stewardship (e.g.,			
whether stewardship			
codes are in place,			
how entities vote in			
shareholder meetings,			
etc.)		_	
10. ESG			
methodologies and criteria (in the case of			
service providers)			
11. Asset planning or			
ownership in the			
context of climate			
change			
12. Sectoral			
investment policies			
13. Climate-related			
lobbying and/or policy			
engagement 14. Locked-in			
emissions or			
information on			

emissive assets with long lifespans		
15. Dirty asset divestiture		
16. Nature-related		
impacts		
17. Just transition indicators		

Standards, Frameworks, and Guidelines

125. Does the policy tool require the use of or make reference to any of the following standards, frameworks, or guidelines? Select all that apply.

	Required	Referenced	Neither required nor referenced
1. IFRS S1			
2. IFRS S2			
3. Task Force on Climate-related Financial Disclosures (TCFD)			
4. GHG Protocol Corporate Accounting and Reporting Standard			
5. GHG Protocol Corporate Value Chain (Scope 3) Accounting and Reporting Standard			
6. CDP (formerly known as Climate Disclosure Project) reporting framework			
7. International Integrated Reporting Framework			
8. Global Reporting Initiative (GRI)			
9. Sustainability Accounting Standards Board (SASB)			
10. European Sustainability Reporting Standards (ESRS)			
11. Taskforce on Nature-related Financial Disclosures (TNFD)			
12. Partnership for Carbon Accounting Financials (PCAF)			
13. Glasgow Financial Alliance for Net Zero (GFANZ)			
14. Other			

Additional Important Information

128. Note any additional important information about the contribution of the policy tool to net zero alignment not captured in the above questions. If referencing new sources (i.e. not referenced in Question 3), provide a web-archived link to the source material.

Domain-Specific Questions: Transition Planning Questions

Disclosure of Plans and Targets

132. Are targeted entities recommended or required to publicly disclose climate-related targets or transition plans?

No

 \circ Recommended

 \circ Required

Targets

135. Does the policy tool recommend or require targeted entities to have or develop climate-related targets?

 $\circ \ No$

 \circ Recommended

Required

136. Does the policy tool recommend or require entities to monitor progress in achieving their targets?

No

 \circ Recommended

Required

138. Does the policy tool recommend or require targeted entities to publicly report on progress in achieving their targets?

No

• Recommended

Required

140. Which of the following targets, or data related to targets, does the policy tool recommend or require entities have or develop? Select all that apply.

	Recommended	Required	No
An absolute emissions			
reduction target			
An intensity-based			
emissions reduction			
target			
A net zero target			
Interim targets (e.g.			
2030, 2050)			
Targets covering non-			
carbon GHG emissions			
A Scope 3 emissions			
target			
A target derived using			
a sectoral			
decarbonization			
approach			
A level of ambition for			
emissions reductions			
(e.g. 80% reduction)			
A baseline year from			
which progress is			
measured			
A target timeframe			
(e.g. by 2040)			
Targets for renewable			
energy procurement			
Targets for fossil fuel			
phase down/phase up			
Separate targets for GHG offsets and/or			
removals			
Targets or goals			
related to climate			
adaptation			
Targets or goals			
related to nature and			
biodiversity			
Other targets related			
to sustainability			_

150. What is the recommended or required level of ambition for GHG emissions reductions targets?

 \circ Reduction between 1-25%

Reduction between 26-50%

 \circ Reduction between 51-75%

 \circ Reduction between 75-85%

 \circ Reduction between 85-100%

 \circ Reduction of more than 100%

• Other <u>Regulation 3(2)-(4) of the Upstream Flaring Regulations (the Regulations) requires the</u> <u>licensees and producers of gas to prepare a Flare Elimination and Monetisation Plan (FEMP), within 6</u> <u>months from the Commencement of the Regulation, which shall include an implementation plan</u> <u>which sets out the timeline for execution of the methodology for the elimination or monetization of</u> <u>flaring from a license or lease area.</u>

153. What is the recommended or required timeframe for targets (e.g. by 2050, 2060)?

 \circ Between 2030 and 2035

 \circ Between 2036 and 2040

 \circ Between 2041 and 2045

 \circ Between 2046 and 2050

 \circ Between 2051 and 2060

 \circ Between 2061 and 2070

• Other<u>The timeline for execution of the plan for the elimination of gas flaring is to be stipulated in</u> <u>the FEMP</u>.

• Not specified

Transition Plans

164. Does the policy tool recommend or require targeted entities to have or develop a transition plan?

 $\circ No$

 \circ Recommended

Required

165. Does the policy tool recommend or require any of the following elements or criteria for transition plans? Select all that apply.

	Recommended	Required	Neither recommended nor required
A timeframe for the transition plan (e.g. 10 year plan, 20 year plan, etc.)			
Key Performance Indicators (KPIs) for monitoring transition plan implementation			
Updates to the transition plan			
Third-party verification and/or audited accuracy of the transition plan			
Identified methodology for scenario analysis			

166. Describe the recommended or required timeframe for the transition plan.

 \circ 1-10 years

 \circ 11-20 years

 \circ 21-30 years

 \circ 31-40 years

 \circ 41-50 years

• Other <u>The timeline for execution of the plan for the elimination (or monetisation) of gas flaring is to</u> <u>be stipulated in the FEMP.</u>

Monitoring, Oversight, and Implementation

176. Does the policy tool recommend or require entities undertake any of the following with regard to monitoring, oversight, and implementation? Select all that apply.

	Recommended	Required	No
Monitor progress in			
implementing their			
transition plan			
Develop financial			
plans for the			
implementation of			
their transition plan			
Integrate climate-			
related matters into			
their financial			
accounting			
Incorporate climate			
change considerations			
into their investment			
decision making			
and/or asset planning			
Incorporate climate			
change considerations			
into their capital			
allocation and/or			
expenditure plans			
Any other mechanisms			
for enhancing the			
achievement of			
targets and/or the			
implementation of			
transition plans			

182. Describe the obligations related to other governance mechanisms for enhancing the achievement of targets and/or implementation of transition plans, referencing the relevant section/subsection/paragraph of the policy tool.

Regulation 3(2)-(4) of the Upstream Flaring Regulations (the Regulations) requires the licensees and producers of gas to prepare a Flare Elimination and Monetisation Plan (FEMP), within 6 months from the Commencement of the Regulation, which shall include an implementation plan which sets out the timeline for execution of the methodology for the elimination or monetization of flaring from a license or lease area. Upon approval of the FEMP by the Commission, the licensee shall enter into a Milestone Development Agreement with the Nigerian Upstream Petroleum Regulatory further to which the Commission may monitor the implementation of the FEMP.

To monitor the compliance with obligations under the Regulation, the Commission is also generally vested with the power to request the licensees to provide information as may be required and within the required timeframe, such as, inter alia: information regarding compliance with the gas flaring

threshold (reg. 12); the comprehensive gas data of the licensee (reg. 4(1)); and the daily fugitive methane emission in the licence area (reg. 4(4)).

Engagement, Lobbying, and Governance

184. Does the policy tool recommend or require targeted entities align any of the following engagement and/or governance practices with their targets and/or transition plans?

	Recommended	Required	No
Value chain			
engagement			
Investor engagement			
Consumer			
engagement			
Policy engagement			
and lobbying practices			
Corporate governance			
structure for transition			
and verification			
Climate-related			
financial incentives for			
employees and board			
members			

185. Does the policy tool recommend or require targeted entities to disclose how they have used due diligence and/or stewardship to achieve their targets and/or implement their transition plans?

No

 $\circ \, \text{Recommended}$

• Required

Standards, Frameworks, and Guidelines

194. Does the policy tool require the use of or make reference to any of the following standards, frameworks, or guidelines? Select all that apply.

	Required	Referenced	Neither required nor referenced
IFRS S1			
IFRS S2			
Task Force on Climate-related Financial Disclosures (TCFD)			
CDP (formerly known as Climate Disclosure Project) Technical Note: Reporting on Climate Transition Plans			
International Integrated Reporting Framework			
Global Reporting Initiative (GRI)			
Sustainability Accounting Standards Board (SASB)			
Science Based Targets initiative (SBTi)			
Science Based Targets initiative (SBTi) Net Zero Standard			
European Sustainability Reporting Standards (ESRS)			
Other			

Additional Important Information

197. Note any additional important information about the contribution of the policy tool to net zero alignment not captured in the above questions. If referencing new sources (i.e. not referenced in Question 3), provide a web-archived link to the source material.

Policy Tool Name: Energy Transition Plan

3. Source material link(s): https://web.archive.org/web/20240817185613/https://rean.org.ng/nigeria-energy-transition-plan/

4. Which of the following governance domains does this policy tool relate to? Select all that apply.

□ Climate-related disclosure

Transition planning

□ Public procurement

6. Select the category which best describes the author/issuer of the policy tool.

Head of state and/or government

□ Independent regulatory or supervisory body

□ Legislature

□ Judiciary

□ Ministry/Department/Agency

 \Box Other (Please describe)

7. Status of the policy tool

Approved, in force

• Approved, not yet in force

• Other (Please describe)

9. Year of (planned) entry into force or year of publication

<u>2022</u>

10. Does the policy tool have an end date?

• No	
○ Yes	

12. Briefly describe the policy tool's goal and/or purpose:

For example: The policy tool requires publicly listed companies to comply with the recommendations of the Task Force for Climate Related Financial Disclosure or to explain the absence of such disclosures.

The Energy Transition Plan(ETP) is a home-grown, data-backed, multipronged strategy developed for the achievement of net-zero emissions in terms of the Nigeria's energy consumption. The ETP outlines a set of crucial strategies and timelines for reducing emissions across five key sectors: oil and gas, power, transport, cooking, and industry.

The ETP was designed to tackle the dual crises of energy poverty and climate change and deliver SDG7 by 2030 and net-zero by 2060, while also providing energy for development, industrialization, and economic growth

13. Name the authority(ies) responsible for overseeing implementation and/or enforcement. If not applicable, leave blank.

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1. The Nigerian Energy Transition Office	
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15. To provide contextual information, rate the capacity of The Nigerian Energy Transition Office to undertake the policy tool's implementation and/or enforcement.

• 0- No Capacity (Please explain)

1- Low Capacity (Please explain)

- 2- Medium Capacity (Please explain)
- 3- High Capacity (Please explain)

• Prefer not to answer

 \circ Not Applicable

25. Which entities are targeted through this policy tool? Select all that apply.

Note: With regard to sectoral actors, in cases where mandatory and voluntary obligations are mixed (e.g., mandatory for one sector, voluntary for another), select "mandatory" as there will be further opportunity to clarify.

	Mandatory	Voluntary	Not targeted
1. Publicly-traded entities			
2. Private companies			
3. Financial institutions			
4. Small and medium-			
sized enterprises			
5. State-owned			
companies			
6. Not-for-profit			
organizations			
7. Government			
agencies and/or			
departments			
(supranational)			
8. Government			
agencies and/or			
departments (national)			
9. Government			
agencies and/or			
departments (regional			
- e.g., state, province,			
region, metropolitan			
region)			
10. Government			
agencies and/or departments (local -			
e.g., county, district,			
municipality, city)			
11. Government			
agencies and/or			
departments			
(unspecified)			
12. Sectoral actors			
(e.g., healthcare,			
defense, utilities,			
education)			
13. Other			

26. In cases where entities are targeted by sector, identify the sector to which the policy tool applies.

	Mandatory	Voluntary	Not applicable
All sectors			
Agriculture, forestry, and fishing			
Mining and quarrying			
Manufacturing			
Electricity, gas, steam, and air conditioning supply			
Water supply; sewerage; waste management and remediation activities			
Construction			
Wholesale and retail trade: repair of motor vehicles and motorcycles			
Transportation and storage			
Accommodation and food service activities			
Information and communication			
Financial and insurance activities			
Real estate activities			
Professional, scientific and technical activities			
Administrative and support service activities			
Public administration and defense; compulsory social security			
Education			
Human health and social work activities			
Arts, entertainment and recreation			
Other service activities			
Activities of households as employers; undifferentiated goods-and services-			
producing activities of			

households for own		
use		
Activities of extraterritorial organizations and bodies		

27. Describe the threshold criteria to identify entities for whom or instances in which compliance is mandatory.

	Private companies	Small and medium-sized enterprises	State-owned companies	Government agencies and/or departments (unspecified)	Sectoral actors (e.g. healthcare, defense, utilities, education)
Minimum number of employees (Enter min number of full- time employees - FTEs)	Not specified	Not specified	Not specified	Not specified	Not specified
Minimum revenue (Enter minimum revenue)	Not specified	Not specified	Not specified	Not specified	Not specified
Minimum assets (Enter minimum assets)	Not specified	Not specified	Not specified	Not specified	Not specified
Minimum contract value (Enter minimum contract value)	Not specified	Not specified	Not specified	Not specified	Not specified
Entity is headquartered in the jurisdiction	Not specified	Not specified	Not specified	Not specified	Not specified
Entities are subjected to disclosure or reporting requirements					

28. Can entities for whom compliance with the policy tool is mandatory opt out of the obligation (e.g. comply or explain)?

No

 $\circ \, \text{Yes}$

30. Does the policy tool exclusively apply to entities' domestic operations, or does it also apply to entities' operations beyond the jurisdiction?

- Operations within jurisdiction only
- Operations beyond the jurisdiction
- Not applicable

32. What are the sanctions for non-compliance? Select all that apply and describe in the text field.

- □ Monetary fine
- □ Restriction on business activities
- □ Voiding or setting aside of contract
- □ Exclusion from government contracts
- □ Award of damages or compensation
- □ Penalty for senior managers
- □ Criminal penalties
- \Box Not specified
- □ Not applicable (e.g. in cases of voluntary tools)
- □ Other

33. Relative to other compliance activities required of entities in this jurisdiction, is the cost of compliance:

- Below average
- Average
- \circ Above average
- Not applicable
- Unknown or prefer not to answer

35. To provide contextual information, give a general assessment of the extent to which regulated entities have made compliance a priority. Below average \circ Average \circ Above average \circ Not applicable • Unknown or prefer not to answer 37. Have the climate-specific provisions in this instrument ever been enforced? • No (If relevant, explain) \circ Yes 39. Are there monitoring systems in place to oversee the implementation and/or enforcement of the policy tool? No \circ Yes 41. Does the policy tool recommend or require periodic impact assessments? No Recommended • Required

43. Does the policy tool recommend or require periodic reviews?

No

Recommended

Required

45. Does the policy tool include mechanisms for enhancing policy or regulatory coordination with subnational governments (e.g. vertical coordination mechanisms such as appointing coordinating agencies, forming working groups, etc.)?

No

 $\circ \, \text{Yes}$

47. Are there any government initiatives to enhance the capacity of targeted entities to implement or comply with the policy tool (e.g. industry working groups, outreach campaigns, education and training, etc.)?

No

 \circ Yes

Domain-Specific Questions: Transition Planning Questions

Disclosure of Plans and Targets

132. Are targeted entities recommended or required to publicly disclose climate-related targets or transition plans?

No

Recommended

Required

Targets

135. Does the policy tool recommend or require targeted entities to have or develop climate-related targets?

No

Recommended

• Required

Transition Plans

164. Does the policy tool recommend or require targeted entities to have or develop a transition plan?

 $\circ \operatorname{No}$

Recommended

 \circ Required

165. Does the policy tool recommend or require any of the following elements or criteria for transition plans? Select all that apply.

	Recommended	Required	Neither recommended nor required
A timeframe for the transition plan (e.g. 10 year plan, 20 year plan, etc.)			
Key Performance Indicators (KPIs) for monitoring transition plan implementation			
Updates to the transition plan			
Third-party verification and/or audited accuracy of the transition plan			
Identified methodology for scenario analysis			

166. Describe the recommended or required timeframe for the transition plan.

 \circ 1-10 years

 \circ 11-20 years

 \circ 31-40 years

 \circ 41-50 years

 \circ Other

167. Describe the recommended or required Key Performance Indicators (KPIs) and reference the relevant section/subsection/paragraph of the policy tool.

KPI by 2050 (1) Power Sector –(a) Expand grid capacity while maximising renewable energy share in centralised energy mix : (i) Nationally Determination Contribution (NDC)-guided : 44GW of solar to be built (ii) Net Zero : ~200GW of solar + 90GW of storage to be built and(b) Deploy decentralised renewable energy (i) 25 TWh of decentralized RE generation, fully replacing diesel generators and ensuring universal energy access

(2) Transport - (a) Alter fleet mix to lower carbon alternatives e.g. natural gas/EV: (i) NDC-guided: 80% shift to CNG by 2030 with ~27% of gasoline stations having natural gas

<u>re-fueling facilities (ii) Net Zero: ~60% passenger cars transitioned to EV with remainder modal</u> <u>shifted to buses/2 and 3 wheelers (b) Mode shift passengers from passenger cars to 2-3 wheelers or</u> <u>public transport : (i) Net Zero: ~20% reduction in passenger cars from Business As Usual (BAU)</u> <u>through mode shift to 2-3 wheelers and public transport.</u>

(3) Buildings (a) Switch to clean cooking technologies: NDC-guided: 75% LPG/ 25% electric in urban centers, 40% biogas/ 35% efficient firewood in rural areas and (ii) Net Zero: 100% electric in urban centers, 50% biogas/50% efficient firewood in rural areas(b) (c) Replace diesel generators: (i) 100% of diesel generators replaced by centralized of decentralized electricity by 2030.
(4) Industry (i) _ Increase feedstock substitute in cement (ii) Implement low carbon heating alternatives in industry (iii) Utilise hydrogen in ammonia production (iv) Deploy BECCS in cement.
(5) Oil and Gas (i) _ Reduce fugitive emissions in Oil (ii) Reduce fugitive emissions in Oil (iii) Reduce fugitive emissions in Oil (ii) not center in Oil

Monitoring, Oversight, and Implementation

176. Does the policy tool recommend or require entities undertake any of the following with regard to monitoring, oversight, and implementation? Select all that apply.

	Recommended	Required	No
Monitor progress in implementing their transition plan			
Develop financial plans for the implementation of their transition plan			
Integrate climate- related matters into their financial accounting			
Incorporate climate change considerations into their investment decision making and/or asset planning			
Incorporate climate change considerations into their capital allocation and/or expenditure plans			
Any other mechanisms for enhancing the achievement of targets and/or the implementation of transition plans			

Engagement, Lobbying, and Governance

184. Does the policy tool recommend or require targeted entities align any of the following engagement and/or governance practices with their targets and/or transition plans?

	Recommended	Required	No
Value chain			
engagement			
Investor engagement			
Consumer			
engagement			
Policy engagement			
and lobbying practices			
Corporate governance			
structure for transition			
and verification			
Climate-related			
financial incentives for			
employees and board			
members			

185. Does the policy tool recommend or require targeted entities to disclose how they have used due diligence and/or stewardship to achieve their targets and/or implement their transition plans?

No

 \circ Recommended

• Required

Standards, Frameworks, and Guidelines

194. Does the policy tool require the use of or make reference to any of the following standards, frameworks, or guidelines? Select all that apply.

	Required	Referenced	Neither required nor referenced
IFRS S1			
IFRS S2			
Task Force on Climate-related Financial Disclosures (TCFD)			
CDP (formerly known as Climate Disclosure Project) Technical Note: Reporting on Climate Transition Plans			
International Integrated Reporting Framework			
Global Reporting Initiative (GRI)			 Image: A start of the start of
Sustainability Accounting Standards Board (SASB)			
Science Based Targets initiative (SBTi)			
Science Based Targets initiative (SBTi) Net Zero Standard			
European Sustainability Reporting Standards (ESRS)			
Other			

Additional Important Information

197. Note any additional important information about the contribution of the policy tool to net zero alignment not captured in the above questions. If referencing new sources (i.e. not referenced in Question 3), provide a web-archived link to the source material.

The ETP serves as an ambitious, general and strategic roadmap of how Nigeria intends to achieve net-zero emissions. The ETP highlights the required strategies for decarbonization across sectors concerned with oil and gas, power, transport, building and industry.

In line with the ETP, Multiple programs relevant for decarbonization have been developed across ministries and sectors in Nigeria;

(1) Power Sector: (a) Federal Ministry of Power: Presidential Power Initiative; (b) Mambilla Hydropower Project; (c) Federal Ministry of the Environment: creation of a renewable energy market; (d) Energy Commission of Nigeria - Nigeria 2050 Calculator; (e) Nigerian Atomic Energy Commission -Nigerian nuclear Power program.

(2) Industry: (a) Office of the Vice President - National Gas Expansion Program (NGEP) - track 2 (LPG); (b) Federal Ministry of Petroleum Resources - National Gas Expansion Program (NGEP) - track 1 Nigeria Gas flare Commercialization program (NGFCP) ____

(3) Buildings: (a) Office of the Vice President: National Gas Expansion Program (NGEP) - track 2 (LPG); (b) Federal Ministry of the Environment: Pre-Urban/Rural Cooking Energy Scheme (PRCES), Infrastructure clean energy scheme (ICES), Urban Residential Housing Scheme (URHS); and (c) Rural Electrification Agency : Solar Power Naija, Nigeria Electrification Project (NEP), Energizing Education Program (EEP).

(4) Transport: (a) Office of the Vice President: National Gas Expansion Program (NGEP) - track 2;
 (b) Federal Ministry of Petroleum Resources: National Gas Expansion Program (NGEP) - track 1 (c)
 Federal Ministry of the Environment.

Policy Tool Name: National Policy on Plastic Waste Management, 2020

3. Source material link(s):

https://web.archive.org/web/20240817222424/https://environment.gov.ng/download/national-policy-on-plastic-waste-management/

4. Which of the following governance domains does this policy tool relate to? Select all that apply.

□ Climate-related disclosure

Transition planning

□ Public procurement

6. Select the category which best describes the author/issuer of the policy tool.

 \Box Head of state and/or government

□ Independent regulatory or supervisory body

□ Legislature

□ Judiciary

Ministry/Department/Agency

 \Box Other (Please describe)

7. Status of the policy tool

Approved, in force

• Approved, not yet in force

• Other (Please describe)

9. Year of (planned) entry into force or year of publication

<u>2020</u>

10. Does the policy tool have an end date?

No
Yes
11. What is the anticipated end year of the policy tool?
2025

12. Briefly describe the policy tool's goal and/or purpose:

For example: The policy tool requires publicly listed companies to comply with the recommendations of the Task Force for Climate Related Financial Disclosure or to explain the absence of such disclosures.

The Policy seeks to promote sustainable use of plastics through the development of legislative instruments, standards, trade measures, models and systems that shall support plastic waste management taking cognisance of the lifecycle in an environmentally sustainable and socially safe manner in the country while boosting economic growth by year 2025.

13. Name the authority(ies) responsible for overseeing implementation and/or enforcement. If not applicable, leave blank.

• 1. Federal Ministry of Environment

- 2. State Ministry of Environment
- 3. State Environmental Protection Agencies
- 4. <u>State Waste Management Authorities</u>
- 5. National Environmental Standards and Regulations Enforcement Agency

15. To provide contextual information, rate the capacity of Federal Ministry of Environment to undertake the policy tool's implementation and/or enforcement.

 \circ 0- No Capacity (Please explain)

- \circ 1- Low Capacity (Please explain)
- 2- Medium Capacity (Please explain)
- 3- High Capacity (Please explain)
- Prefer not to answer
- Not Applicable

16. To provide contextual information, rate the capacity of State Ministry of Environment to undertake the policy tool's implementation and/or enforcement.

- 0- No Capacity (Please explain)
- 1- Low Capacity (Please explain)
- 2- Medium Capacity (Please explain)
- 3- High Capacity (Please explain)
- Prefer not to answer
- Not Applicable

17. To provide contextual information, rate the capacity of State Environmental Protection Agencies to undertake the policy tool's implementation and/or enforcement.

0- No Capacity (Please explain)

- 1- Low Capacity (Please explain)
- 2- Medium Capacity (Please explain)
- 3- High Capacity (Please explain)
- Prefer not to answer
- Not Applicable

18. To provide contextual information, rate the capacity of State Waste Management Authorities to undertake the policy tool's implementation and/or enforcement.

0- No Capacity (Please explain)

- 1- Low Capacity (Please explain)
- 2- Medium Capacity (Please explain)
- 3- High Capacity (Please explain)
- Prefer not to answer
- Not Applicable

19. To provide contextual information, rate the capacity of National Environmental Standards and Regulations Enforcement Agency to undertake the policy tool's implementation and/or enforcement.

0- No Capacity (Please explain)

• 1- Low Capacity (Please explain)

• 2- Medium Capacity (Please explain)

• 3- High Capacity (Please explain) <u>NESREA is the apex regulatory body in Nigeria for environmental</u> related matters. They have the sufficient powers and capacity to enforce the implementation of this <u>Policy</u>

 \circ Prefer not to answer

• Not Applicable

25. Which entities are targeted through this policy tool? Select all that apply.

Note: With regard to sectoral actors, in cases where mandatory and voluntary obligations are mixed (e.g., mandatory for one sector, voluntary for another), select "mandatory" as there will be further opportunity to clarify.

Mandatory	Voluntary	Not targeted
-		
\checkmark		
_		

26. In cases where entities are targeted by sector, identify the sector to which the policy tool applies.

	Mandatory	Voluntary	Not applicable
All sectors			
Agriculture, forestry, and fishing			
Mining and quarrying			
Manufacturing			
Electricity, gas, steam, and air conditioning supply			
Water supply; sewerage; waste management and remediation activities			
Construction			
Wholesale and retail trade: repair of motor vehicles and motorcycles			
Transportation and storage			
Accommodation and food service activities			
Information and communication			
Financial and insurance activities			
Real estate activities			
Professional, scientific and technical activities			
Administrative and support service activities			
Public administration and defense; compulsory social security			
Education			
Human health and social work activities			
Arts, entertainment and recreation			
Other service activities			
Activities of households as employers; undifferentiated goods-and services- producing activities of			

households for own		
use		
Activities of extraterritorial organizations and bodies		

27. Describe the threshold criteria to identify entities for whom or instances in which compliance is mandatory.

Minimum number of employees (Enter min number of full-time employees - FTEs)	
Minimum revenue (Enter minimum revenue)	
Minimum assets (Enter minimum assets)	
Minimum contract value (Enter minimum contract value)	
Entity is headquartered in the jurisdiction	
Entities are subjected to disclosure or reporting requirements	

28. Can entities for whom compliance with the policy tool is mandatory opt out of the obligation (e.g. comply or explain)?

No

 \circ Yes

30. Does the policy tool exclusively apply to entities' domestic operations, or does it also apply to entities' operations beyond the jurisdiction?

• Operations within jurisdiction only

• Operations beyond the jurisdiction

 \circ Not applicable

32. What are the sanctions for non-compliance? Select all that apply and describe in the text field.

Monetary fine

□ Restriction on business activities

 \Box Voiding or setting aside of contract

□ Exclusion from government contracts

 $\hfill\square$ Award of damages or compensation

- \Box Penalty for senior managers
- \Box Criminal penalties
- \Box Not specified

□ Not applicable (e.g. in cases of voluntary tools)

□ Other

33. Relative to other compliance activities required of entities in this jurisdiction, is the cost of compliance:

• Below average

• Average

 \circ Above average

• Not applicable

• Unknown or prefer not to answer

35. To provide contextual information, give a general assessment of the extent to which regulated entities have made compliance a priority.

• Below average

• Average

 \circ Above average

Not applicable

• Unknown or prefer not to answer

37. Have the climate-specific provisions in this instrument ever been enforced?

• No (If relevant, explain)

 \circ Yes

39. Are there monitoring systems in place to oversee the implementation and/or enforcement of the policy tool?

 $\circ \mathrm{No}$

Yes

40. Describe the monitoring systems in place. Please reference the relevant section/subsection/paragraph of the policy tool where monitoring systems are set.

<u>Under Paragraph 4.2.3, the Federal Ministry of Environment is mandated to conduct regular technical</u> <u>and environmental assessments and monitoring are carried out to ensure that the facilities function in</u> <u>optimal efficiency as not to cause environmental and health pollution throughout the entire life cycle</u> <u>of the facility.</u>

<u>Under Paragraph 6.0, relevant agencies shall plan and carry out audits, monitoring, evaluation and enforcement of plastic waste management taking cognizance of lifecycle approach in relation to standards and specifications.</u>

41. Does the policy tool recommend or require periodic impact assessments?

 $\circ \ \text{No}$

Recommended

 \circ Required

42. Select the option that best describes the frequency of periodic impact assessments recommended or required by the policy tool.

 \circ 0-2 years

 \circ 2-5 years

 \circ 5-10 years

 \circ 10 or more years

Not specified

 \circ Other

43. Does the policy tool recommend or require periodic reviews?

 $\circ \ \text{No}$

Recommended

Required

44. Select the option that best describes the frequency of the recommended or required periodic reviews.

 \circ 0-2 years

• 2-5 years

 \circ 5-10 years

 \circ 10 or more years

 \circ Not specified

 \circ Other

45. Does the policy tool include mechanisms for enhancing policy or regulatory coordination with subnational governments (e.g. vertical coordination mechanisms such as appointing coordinating agencies, forming working groups, etc.)?

 $\circ \operatorname{No}$

Yes

46. Describe the mechanisms for enhancing regulatory coordination with subnational governments. Reference the relevant section/subsection/paragraph of the policy tool where mechanisms for coordination with subnational governments are set.

Paragraph 4.3 of the policy established a National Steering Committee on Plastics Waste Management. The Committee is comprised of members of both Ministries of Government and Private sector players. The purpose of the Committee is to promote and coordinate a coherent, co-ordinated, continuous and cost-efficient approach to plastic lifecycle management and a plastic economy hinged on circular approach in Nigeria.

47. Are there any government initiatives to enhance the capacity of targeted entities to implement or comply with the policy tool (e.g. industry working groups, outreach campaigns, education and training, etc.)?

 $\circ \, \text{No}$

Yes

48. Describe initiatives for enhancing the capacity of targeted entities to implement or comply with the policy tool. Reference the relevant section/subsection/paragraph of the policy tool where capacity-building initiatives are established. If referencing new sources (i.e. not referenced in Question 3), provide a web-archived link to the source material.

<u>Under Paragraph 4.6.9 of the Policy, State Plastic Waste Management Authorities are mandated to create and support awareness programmes on sustainable plastic waste management.</u>

Domain-Specific Questions: Transition Planning Questions

Disclosure of Plans and Targets

132. Are targeted entities recommended or required to publicly disclose climate-related targets or transition plans?

No

Recommended

 \circ Required

Targets

135. Does the policy tool recommend or require targeted entities to have or develop climate-related targets?

 $\circ \ No$

Recommended

 \circ Required

136. Does the policy tool recommend or require entities to monitor progress in achieving their targets?

 $\circ \ \text{No}$

Recommended

Required

137. Describe and reference the section/subsection/paragraph of the policy tool relevant to monitoring progress in achieving targets.

Paragraph 6.1, of the policy provides that relevant agencies shall plan and carry out audits, monitoring, evaluation and enforcement of plastic waste management taking cognizance of lifecycle approach in relation to standards and specifications.

138. Does the policy tool recommend or require targeted entities to publicly report on progress in achieving their targets?

No

 \circ Recommended

• Required

140. Which of the following targets, or data related to targets, does the policy tool recommend or require entities have or develop? Select all that apply.

	Recommended	Required	No
An absolute emissions			
reduction target			
An intensity-based			
emissions reduction			
target			
A net zero target			
Interim targets (e.g.			
2030, 2050)			
Targets covering non-			
carbon GHG emissions			
A Scope 3 emissions			
target			
A target derived using			
a sectoral			
decarbonization			
approach			
A level of ambition for			
emissions reductions			
(e.g. 80% reduction)		L	
A baseline year from			
which progress is			
measured			
A target timeframe (a, a, b)			
(e.g. by 2040) Targets for renewable			
energy procurement			
Targets for fossil fuel			
phase down/phase up			
Separate targets for			
GHG offsets and/or			
removals			
Targets or goals			
related to climate			
adaptation			
Targets or goals			
related to nature and			
biodiversity			
Other targets related			
to sustainability			

141. What is the recommended or required scope of emissions for absolute emissions reduction targets? Select all that apply.

□ Scope 1 emissions

□ Scope 2 emissions

□ Scope 3 emissions, relevant or material

□ Scope 3 emissions, a specified proportion of coverage (Please describe)

□ Scope 3 emissions, all

Not specified

Transition Plans

164. Does the policy tool recommend or require targeted entities to have or develop a transition plan?

No

Recommended

• Required

Monitoring, Oversight, and Implementation

176. Does the policy tool recommend or require entities undertake any of the following with regard to monitoring, oversight, and implementation? Select all that apply.

	Recommended	Required	No
Monitor progress in implementing their transition plan			
Develop financial plans for the implementation of their transition plan			
Integrate climate- related matters into their financial accounting			
Incorporate climate change considerations into their investment decision making and/or asset planning			
Incorporate climate change considerations into their capital allocation and/or expenditure plans			
Any other mechanisms for enhancing the achievement of targets and/or the implementation of transition plans			

Engagement, Lobbying, and Governance

184. Does the policy tool recommend or require targeted entities align any of the following engagement and/or governance practices with their targets and/or transition plans?

	Recommended	Required	No
Value chain			
engagement			
Investor engagement			
Consumer			
engagement			
Policy engagement			
and lobbying practices			
Corporate governance			
structure for transition			
and verification			
Climate-related			
financial incentives for			
employees and board			
members			

185. Does the policy tool recommend or require targeted entities to disclose how they have used due diligence and/or stewardship to achieve their targets and/or implement their transition plans?

No

 $\circ \, \text{Recommended}$

• Required

Standards, Frameworks, and Guidelines

194. Does the policy tool require the use of or make reference to any of the following standards, frameworks, or guidelines? Select all that apply.

	Required	Referenced	Neither required nor referenced
IFRS S1			
IFRS S2			
Task Force on Climate-related Financial Disclosures (TCFD)			
CDP (formerly known as Climate Disclosure Project) Technical Note: Reporting on Climate Transition Plans			
International Integrated Reporting Framework			
Global Reporting Initiative (GRI)			
Sustainability Accounting Standards Board (SASB)			
Science Based Targets initiative (SBTi)			
Science Based Targets initiative (SBTi) Net Zero Standard			
European Sustainability Reporting Standards (ESRS)			
Other			

Additional Important Information

197. Note any additional important information about the contribution of the policy tool to net zero alignment not captured in the above questions. If referencing new sources (i.e. not referenced in Question 3), provide a web-archived link to the source material.

Policy Tool Name: Electricity Act, 2023

3. Source material link(s): https://web.archive.org/web/20240818143119/https://placng.org/i/wp-content/uploads/2023/06/Electricity-Act-2023.pdf

4. Which of the following governance domains does this policy tool relate to? Select all that apply.

□ Climate-related disclosure

Transition planning

□ Public procurement

6. Select the category which best describes the author/issuer of the policy tool.

□ Head of state and/or government

□ Independent regulatory or supervisory body

Legislature

□ Judiciary

□ Ministry/Department/Agency

□ Other (Please describe)

7. Status of the policy tool

• Approved, in force

• Approved, not yet in force

Other (Please describe)

9. Year of (planned) entry into force or year of publication

<u>2023</u>

10. Does the policy tool have an end date?

No	
Yes	

12. Briefly describe the policy tool's goal and/or purpose:

For example: The policy tool requires publicly listed companies to comply with the recommendations of the Task Force for Climate Related Financial Disclosure or to explain the absence of such disclosures.

The Electricity Act, amongst its other objectives, seeks to provide a framework to stimulate the development and utilization of renewable energy sources and create an enabling environment to attract investment in renewable energy sources in order to increase the contribution of renewable energy to the energy mix in Nigeria. It serves as a legislative underpinning for Nigeria's energy transition goals and imposes obligations on entities in the power sector (generators, distributors, and regulators alike) geared towards encouraging a transition to renewable sources of energy.

13. Name the authority(ies) responsible for overseeing implementation and/or enforcement. If not applicable, leave blank.

● 1. Nigerian Electricity Regulatory Commission

- 2.3.4.
- o **5**.

15. To provide contextual information, rate the capacity of Nigerian Electricity Regulatory Commission to undertake the policy tool's implementation and/or enforcement.

• 0- No Capacity (Please explain)

• 1- Low Capacity (Please explain)

- 2- Medium Capacity (Please explain)
- 3- High Capacity (Please explain)
- Prefer not to answer

Not Applicable

25. Which entities are targeted through this policy tool? Select all that apply.

Note: With regard to sectoral actors, in cases where mandatory and voluntary obligations are mixed (e.g., mandatory for one sector, voluntary for another), select "mandatory" as there will be further opportunity to clarify.

	Mandatory	Voluntary	Not targeted
1. Publicly-traded			
entities			
2. Private companies			
3. Financial institutions			
4. Small and medium-			
sized enterprises			
5. State-owned			
companies			
6. Not-for-profit			
organizations			
7. Government			
agencies and/or			
departments			
(supranational)			
8. Government			
agencies and/or			
departments (national)			
9. Government			
agencies and/or			
departments (regional			
- e.g., state, province,			
region, metropolitan region)			
10. Government			
agencies and/or			
departments (local -			
e.g., county, district,			
municipality, city)			
11. Government			
agencies and/or			
departments			
(unspecified)			
12. Sectoral actors			
(e.g., healthcare,			
defense, utilities,			
education)			
13. Other			

28. Can entities for whom compliance with the policy tool is mandatory opt out of the obligation (e.g. comply or explain)?

No	
Yes	

30. Does the policy tool exclusively apply to entities' domestic operations, or does it also apply to entities' operations beyond the jurisdiction?

• Operations within jurisdiction only

 \circ Operations beyond the jurisdiction

 \circ Not applicable

32. What are the sanctions for non-compliance? Select all that apply and describe in the text field.

 \Box Monetary fine

□ Restriction on business activities

 \Box Voiding or setting aside of contract

□ Exclusion from government contracts

□ Award of damages or compensation

□ Penalty for senior managers

□ Criminal penalties

 \Box Not specified

□ Not applicable (e.g. in cases of voluntary tools)

Other

33. Relative to other compliance activities required of entities in this jurisdiction, is the cost of compliance:

• Below average

 \circ Average

 \circ Above average

Not applicable

• Unknown or prefer not to answer

35. To provide contextual information, give a general assessment of the extent to which regulated entities have made compliance a priority.

• Below average

 \circ Average

 \circ Above average

• Not applicable

• Unknown or prefer not to answer

37. Have the climate-specific provisions in this instrument ever been enforced?

• No (If relevant, explain)

 \circ Yes

39. Are there monitoring systems in place to oversee the implementation and/or enforcement of the policy tool?

No

 \circ Yes

41. Does the policy tool recommend or require periodic impact assessments?

No

 \circ Recommended

• Required

43. Does the policy tool recommend or require periodic reviews?

No

Recommended

 \circ Required

45. Does the policy tool include mechanisms for enhancing policy or regulatory coordination with subnational governments (e.g. vertical coordination mechanisms such as appointing coordinating agencies, forming working groups, etc.)?

No

 $\circ \, {\rm Yes}$

47. Are there any government initiatives to enhance the capacity of targeted entities to implement or comply with the policy tool (e.g. industry working groups, outreach campaigns, education and training, etc.)?

No

 \circ Yes

Domain-Specific Questions: Transition Planning Questions

Disclosure of Plans and Targets

132. Are targeted entities recommended or required to publicly disclose climate-related targets or transition plans?

No

Recommended

 \circ Required

Targets

135. Does the policy tool recommend or require targeted entities to have or develop climate-related targets?

No

Recommended

Required

Transition Plans

164. Does the policy tool recommend or require targeted entities to have or develop a transition plan?

No

 \circ Recommended

 \circ Required

Monitoring, Oversight, and Implementation

176. Does the policy tool recommend or require entities undertake any of the following with regard to monitoring, oversight, and implementation? Select all that apply.

	Recommended	Required	No
Monitor progress in implementing their transition plan			
Develop financial plans for the implementation of their transition plan			
Integrate climate- related matters into their financial accounting			
Incorporate climate change considerations into their investment decision making and/or asset planning			
Incorporate climate change considerations into their capital allocation and/or expenditure plans			
Any other mechanisms for enhancing the achievement of targets and/or the implementation of transition plans			

Engagement, Lobbying, and Governance

184. Does the policy tool recommend or require targeted entities align any of the following engagement and/or governance practices with their targets and/or transition plans?

	Recommended	Required	No
Value chain			
engagement			
Investor engagement			
Consumer			
engagement			
Policy engagement			
and lobbying practices			
Corporate governance			
structure for transition			
and verification			
Climate-related			
financial incentives for			
employees and board			
members			

185. Does the policy tool recommend or require targeted entities to disclose how they have used due diligence and/or stewardship to achieve their targets and/or implement their transition plans?

No

 $\circ \, \text{Recommended}$

• Required

Standards, Frameworks, and Guidelines

194. Does the policy tool require the use of or make reference to any of the following standards, frameworks, or guidelines? Select all that apply.

	Required	Referenced	Neither required nor referenced
IFRS S1			
IFRS S2			
Task Force on Climate-related Financial Disclosures (TCFD)			
CDP (formerly known as Climate Disclosure Project) Technical Note: Reporting on Climate Transition Plans			
International Integrated Reporting Framework			
Global Reporting Initiative (GRI)			
Sustainability Accounting Standards Board (SASB)			
Science Based Targets initiative (SBTi)			
Science Based Targets initiative (SBTi) Net Zero Standard			
European Sustainability Reporting Standards (ESRS)			
Other			

Additional Important Information

197. Note any additional important information about the contribution of the policy tool to net zero alignment not captured in the above questions. If referencing new sources (i.e. not referenced in Question 3), provide a web-archived link to the source material.

Policy Tool Name: Midstream Gas Flare Regulations, 2023

3. Source material link(s):

https://web.archive.org/web/20240815141647/https://faolex.fao.org/docs/pdf/nig219072.pdf

4. Which of the following governance domains does this policy tool relate to? Select all that apply.

Climate-related disclosure

□ Transition planning

□ Public procurement

6. Select the category which best describes the author/issuer of the policy tool.

□ Head of state and/or government

□ Independent regulatory or supervisory body

□ Legislature

□ Judiciary

Ministry/Department/Agency

 \Box Other (Please describe)

7. Status of the policy tool

Approved, in force

Approved, not yet in force

 \circ Other (Please describe)

9. Year of (planned) entry into force or year of publication

<u>2023</u>

10. Does the policy tool have an end date?

No	
Yes	

12. Briefly describe the policy tool's goal and/or purpose:

For example: The policy tool requires publicly listed companies to comply with the recommendations of the Task Force for Climate Related Financial Disclosure or to explain the absence of such disclosures.

The Midstream Gas Flaring Regulations provides for the reduction of the environmental and social impacts caused by excessive flaring and venting of flare gas; the protection of the environment; prevention of waste of natural resources; setting criteria for gas flaring in midstream petroleum operations for safety and emergency purposes.

13. Name the authority(ies) responsible for overseeing implementation and/or enforcement. If not applicable, leave blank.

• 1. The Nigerian Midstream and Downstream Petroleum Regulatory Authority

2.
3.
4.
5.

15. To provide contextual information, rate the capacity of The Nigerian Midstream and Downstream Petroleum Regulatory Authority to undertake the policy tool's implementation and/or enforcement.

- 0- No Capacity (Please explain)
- \circ 1- Low Capacity (Please explain)
- 2- Medium Capacity (Please explain)
- 3- High Capacity (Please explain)
- \circ Prefer not to answer
- Not Applicable

25. Which entities are targeted through this policy tool? Select all that apply.

Note: With regard to sectoral actors, in cases where mandatory and voluntary obligations are mixed (e.g., mandatory for one sector, voluntary for another), select "mandatory" as there will be further opportunity to clarify.

	Mandatory	Voluntary	Not targeted
1. Publicly-traded entities			\checkmark
2. Private companies			
3. Financial institutions			
4. Small and medium-			
sized enterprises			_
5. State-owned			
companies			
6. Not-for-profit			
organizations			
7. Government			
agencies and/or			
departments			
(supranational)			
8. Government			
agencies and/or			
departments (national)			
9. Government			
agencies and/or departments (regional			
- e.g., state, province,			
region, metropolitan			
region)			
10. Government			
agencies and/or			
departments (local -			
e.g., county, district,			
municipality, city)			
11. Government			
agencies and/or			
departments			
(unspecified)			
12. Sectoral actors			
(e.g., healthcare,			
defense, utilities,			
education)			
13. Other			

27. Describe the threshold criteria to identify entities for whom or instances in which compliance is mandatory.

	Private companies	State-owned companies
Minimum number of employees (Enter min number of full-time employees - FTEs)	Not Specified	Not Specified
Minimum revenue (Enter minimum revenue)	Not Specified	Not Specified
Minimum assets (Enter minimum assets)	Not Specified	Not Specified
Minimum contract value (Enter minimum contract value)	Not Specified	Not Specified
Entity is headquartered in the jurisdiction	Not Specified	Not Specified
Entities are subjected to disclosure or reporting requirements		

28. Can entities for whom compliance with the policy tool is mandatory opt out of the obligation (e.g. comply or explain)?

No

 $\circ \, \text{Yes}$

30. Does the policy tool exclusively apply to entities' domestic operations, or does it also apply to entities' operations beyond the jurisdiction?

• Operations within jurisdiction only

• Operations beyond the jurisdiction

• Not applicable

32. What are the sanctions for non-compliance? Select all that apply and describe in the text field.

Monetary fine Section 13 of the policy provides that licensees shall be liable to pay penalties for venting or flaring of gas; (i)USD0.50 per 28.317 standard cubic meters (one thousand standard cubic feet) of flare gas flared or vented beyond the limit set by the Authority by not more than one million standard cubic feet (1MMSCF) (ii)USD1.00 per 28.317 standard cubic metres (one thousand standard cubic feet) of flare gas flared or vented beyond the limit set by the Authority more than one million

standard cubic feet but less than ten million standard cubic feet (between 1-10MMSCF) (iii)f USD1.50 per 28.317 standard cubic metres (one thousand standard cubic feet) of flare gas flared or vented beyond the limit set by the Authority by greater than ten million standard cubic feet (>10MMSCFD).

 \Box Restriction on business activities

□ Voiding or setting aside of contract

□ Exclusion from government contracts

□ Award of damages or compensation

□ Penalty for senior managers

□ Criminal penalties

□ Not specified

□ Not applicable (e.g. in cases of voluntary tools)

Other<u>Revocation of permit to flare gas</u>

33. Relative to other compliance activities required of entities in this jurisdiction, is the cost of compliance:

- Below average
- Average
- Above average
- Not applicable

• Unknown or prefer not to answer

35. To provide contextual information, give a general assessment of the extent to which regulated entities have made compliance a priority.

• Below average

Average

 \circ Above average

• Not applicable

Unknown or prefer not to answer

37. Have the climate-specific provisions in this instrument ever been enforced?

No (If relevant, explain)

 \circ Yes

39. Are there monitoring systems in place to oversee the implementation and/or enforcement of the policy tool?

 $\circ \ \text{No}$

Yes

40. Describe the monitoring systems in place. Please reference the relevant section/subsection/paragraph of the policy tool where monitoring systems are set.

Sections 9 and 10 of the Policy demands that the licensee or permit holder allowed to flare gas withing a specified limit shall submit to the implementing Authority(the Nigerian Midstream and Downstream Petroleum Regulatory Authority) a daily record of the occurrence of the flaring and venting of flare gas within its facilities within 21 days following the end of each month, and an annual and quarterly report including all flare gas data.

41. Does the policy tool recommend or require periodic impact assessments?

No

Recommended

• Required

43. Does the policy tool recommend or require periodic reviews?

 $\circ \ \text{No}$

 \circ Recommended

Required

44. Select the option that best describes the frequency of the recommended or required periodic reviews.

 \circ 0-2 years

 \circ 2-5 years

 \circ 5-10 years

 \circ 10 or more years

 \circ Not specified

• Other <u>Quarterly and Annually, the Authority reconciles the flare gas data_provided by the licensee.</u>

45. Does the policy tool include mechanisms for enhancing policy or regulatory coordination with subnational governments (e.g. vertical coordination mechanisms such as appointing coordinating agencies, forming working groups, etc.)?

No

 $\circ \, \text{Yes}$

47. Are there any government initiatives to enhance the capacity of targeted entities to implement or comply with the policy tool (e.g. industry working groups, outreach campaigns, education and training, etc.)?

No

 $\circ \, \text{Yes}$

Domain-Specific Questions: Disclosure Questions

What is being disclosed?

52. Are targeted entities recommended or required to disclose any of the following climate-related information? Select all that apply.

	Recommended	Required	Neither recommended nor required
1. Greenhouse gas (GHG) emissions			
2. GHG emissions offsets or removals			
3. GHG emissions reduction targets			
4. Other climate- related targets			
5. Physical climate risk			
6. Transition risk			
7. Transition plan			

Disclosure of Greenhouse Gas (GHG) Emissions

54. Which GHG emissions must be disclosed? Select all that apply.

Carbon dioxide (CO₂)

Methane (CH4)

 \Box Nitrous oxide (N₂O)

□ Hydrofluorocarbons (HFCs)

□ Perfluorocarbons (PFCs)

□ Sulphur hexafluoride (SF6)

□ Nitrogen trifluoride (NF3)

 \Box Carbon dioxide equivalent (CO₂e)

55. Are entities recommended or required to disclose gross emissions?

 $\circ \ No$

 \circ Recommended

Required

56. Are entities recommended or required to disclose net emissions?
○ No
• Recommended
Required
57. What Scope of emissions must be disclosed? Select all that apply.
□ Scope 1 emissions
□ Scope 2 emissions
□ Scope 3 emissions, relevant or material
□ Scope 3 emissions, a specified proportion of coverage (Please describe)
□ Scope 3 emissions, all
Not specified
58. Are entities recommended or required to discloseGHG emissionsaccounting methodologies or standards?
GHG emissions
59. Does the policy tool recommend or require the GHG inventory be third-party verified?
No
 Recommended
• Required

60. If necessary, provide additional clarification to the above responses aboutgreenhouse gas (GHG) emissions disclosure.

The Policy permits that flaring in the midstream petroleum operations may occur in the following categories provided a permit is obtained though subject to a limit identified by the Authority: (a) initial start-up flaring during commissioning and start-up phases of a plant or process unit (b) pilot gas

(c) relief devices

(d) continuous flaring when the plant or process unit is in operation

(e) non-continuous operational flaring on a planned or unplanned basis for scheduled maintenance, equipment shutdowns, and mechanical equipment failures.

Accordingly, such entities are required to disclose gas flaring activities related to the above.

Other disclosures

105. Are targeted entities recommended or required to disclose any other climate-related information? Select all that apply.

	Required	Recommended	Neither recommended
1. Climate-related			nor required
opportunities			
2. Remuneration			
based on achieving			_
climate-related goals			
3. Taxonomies			
4. Capital allocation			
and/or expenditure			
plans (in the context of climate change)			
5. Due diligence			
6. Assumptions and			
Dependencies			
7. Data limitations of			
scenario analyses			
8. Financial			
implications of			
climate-related			
matters (e.g., integration of climate-			
related disclosures			
into financial			
accounting standards)			
9. Stewardship (e.g.,			
whether stewardship			
codes are in place,			
how entities vote in			
shareholder meetings, etc.)			
10. ESG			
methodologies and			_
criteria (in the case of			
service providers)			
11. Asset planning or			
ownership in the			
context of climate			
change 12. Sectoral			
investment policies			_
13. Climate-related			
lobbying and/or policy			
engagement			
14. Locked-in			
emissions or			
information on			

emissive assets with long lifespans		
15. Dirty asset divestiture		
16. Nature-related		
impacts		
17. Just transition indicators		

Standards, Frameworks, and Guidelines

125. Does the policy tool require the use of or make reference to any of the following standards, frameworks, or guidelines? Select all that apply.

	Required	Referenced	Neither required nor referenced
1. IFRS S1			
2. IFRS S2			
3. Task Force on Climate-related Financial Disclosures (TCFD)			
4. GHG Protocol Corporate Accounting and Reporting Standard			
5. GHG Protocol Corporate Value Chain (Scope 3) Accounting and Reporting Standard			
6. CDP (formerly known as Climate Disclosure Project) reporting framework			
7. International Integrated Reporting Framework			
8. Global Reporting Initiative (GRI)			
9. Sustainability Accounting Standards Board (SASB)			
10. European Sustainability Reporting Standards (ESRS)			
11. Taskforce on Nature-related Financial Disclosures (TNFD)			
12. Partnership for Carbon Accounting Financials (PCAF)			
13. Glasgow Financial Alliance for Net Zero (GFANZ)			
14. Other			

Additional Important Information

128. Note any additional important information about the contribution of the policy tool to net zero alignment not captured in the above questions. If referencing new sources (i.e. not referenced in Question 3), provide a web-archived link to the source material.

This Policy recognizes a steady process towards implementing energy transitioning plans by limiting the quantity of gas flaring permitted in the Nigerian Petroleum Midstream Sector. Although it is not explicitly stated that the Policy is an energy transition policy, it however regulates the gas flaring activities of entities in this sector, towards promoting green house gas emissions in the long-term.

Additional Important Information

197. Note any additional important information about the contribution of the policy tool to net zero alignment not captured in the above questions. If referencing new sources (i.e. not referenced in Question 3), provide a web-archived link to the source material.

None

Policy Tool Name: National Policy on Solid Waste Management, 2020

3. Source material link(s):

https://web.archive.org/web/20240221000000*/https://environment.gov.ng/download/national-policy-on-solid-waste-management/

4. Which of the following governance domains does this policy tool relate to? Select all that apply.

□ Climate-related disclosure

Transition planning

□ Public procurement

6. Select the category which best describes the author/issuer of the policy tool.

□ Head of state and/or government

□ Independent regulatory or supervisory body

□ Legislature

□ Judiciary

Ministry/Department/Agency

 \Box Other (Please describe)

7. Status of the policy tool

Approved, in force

• Approved, not yet in force

• Other (Please describe)

9. Year of (planned) entry into force or year of publication

<u>2020</u>

10. Does the policy tool have an end date?

12. Briefly describe the policy tool's goal and/or purpose:

For example: The policy tool requires publicly listed companies to comply with the recommendations of the Task Force for Climate Related Financial Disclosure or to explain the absence of such disclosures.

The Policy tool requires persons and organizations to manage waste in a manner that will enhance conservation of natural resources and protect the environment and public health from its harmful impacts.

13. Name the authority(ies) responsible for overseeing implementation and/or enforcement. If not applicable, leave blank.

• 1. <u>Federal Government – the Federal Ministry of Environment and National Environmental</u> <u>Standards and Regulations Enforcement Agency (NESREA)</u>

• 2. <u>State Government – the State Ministry of Environment, State Environmental Protection Agencies,</u> <u>State Waste Management Authorities</u>

Is a constant of the second second

• 4. Private Sector

o **5**.

15. To provide contextual information, rate the capacity of Federal Government – the Federal Ministry of Environment and National Environmental Standards and Regulations Enforcement Agency (NESREA) to undertake the policy tool's implementation and/or enforcement.

 \circ 0- No Capacity (Please explain)

 \circ 1- Low Capacity (Please explain)

 \circ 2- Medium Capacity (Please explain)

• 3- High Capacity (Please explain) <u>The Federal ministry of environment oversees environmental</u> matters in Nigeria and the National Environmental Standards and Regulations Enforcement Agency (NESREA) is a regulatory agency empowered to enforce compliance with laws, guidelines, policies and standards on environmental matters.

 \circ Prefer not to answer

• Not Applicable

16. To provide contextual information, rate the capacity of State Government – the State Ministry of Environment, State Environmental Protection Agencies, State Waste Management Authorities to undertake the policy tool's implementation and/or enforcement.

0- No Capacity (Please explain)

• 1- Low Capacity (Please explain)

• 2- Medium Capacity (Please explain)

• 3- High Capacity (Please explain) <u>the State ministries of environment alongside their respective</u> <u>environmental agencies are empowered to ensure the environmental standards are established and</u> <u>sustained, necessary byelaws are made and full monitoring and compliance of applicable laws and</u> <u>policies is done.</u>

 \circ Prefer not to answer

 \circ Not Applicable

17. To provide contextual information, rate the capacity of Local Government to undertake the policy tool's implementation and/or enforcement.

0- No Capacity (Please explain)

- \circ 1- Low Capacity (Please explain)
- 2- Medium Capacity (Please explain)

• 3- High Capacity (Please explain) the local government authorities ensure compliance with the applicable laws, policies and regulations. They also create awareness of same.

• Prefer not to answer

• Not Applicable

18. To provide contextual information, rate the capacity of Private Sector to undertake the policy tool's implementation and/or enforcement.

0- No Capacity (Please explain)

• 1- Low Capacity (Please explain) <u>Private sector is without the capacity to drive public enforcement</u> of policies. However, they can ensure that within their sphere of operations, the necessary laws, regulations and policies are adhered to

• 2- Medium Capacity (Please explain)

• 3- High Capacity (Please explain)

 \circ Prefer not to answer

• Not Applicable

25. Which entities are targeted through this policy tool? Select all that apply.

Note: With regard to sectoral actors, in cases where mandatory and voluntary obligations are mixed (e.g., mandatory for one sector, voluntary for another), select "mandatory" as there will be further opportunity to clarify.

Mandatory	Voluntary	Not targeted
\checkmark		
_		

26. In cases where entities are targeted by sector, identify the sector to which the policy tool applies.

	Mandatory	Voluntary	Not applicable
All sectors			
Agriculture, forestry, and fishing			
Mining and quarrying			
Manufacturing			
Electricity, gas, steam, and air conditioning supply			
Water supply; sewerage; waste management and remediation activities			
Construction			
Wholesale and retail trade: repair of motor vehicles and motorcycles			
Transportation and storage			
Accommodation and food service activities			
Information and communication			
Financial and insurance activities			
Real estate activities			
Professional, scientific and technical activities			
Administrative and support service activities			
Public administration and defense; compulsory social security			
Education			
Human health and social work activities			
Arts, entertainment and recreation			
Other service activities			
Activities of households as employers; undifferentiated goods-and services-			
producing activities of			

households for own		
use		
Activities of extraterritorial organizations and bodies		

27. Describe the threshold criteria to identify entities for whom or instances in which compliance is mandatory.

Minimum number of employees (Enter min number of full-time employees - FTEs)	
Minimum revenue (Enter minimum revenue)	
Minimum assets (Enter minimum assets)	
Minimum contract value (Enter minimum contract value)	
Entity is headquartered in the jurisdiction	
Entities are subjected to disclosure or reporting requirements	

28. Can entities for whom compliance with the policy tool is mandatory opt out of the obligation (e.g. comply or explain)?

No

 \circ Yes

30. Does the policy tool exclusively apply to entities' domestic operations, or does it also apply to entities' operations beyond the jurisdiction?

• Operations within jurisdiction only

• Operations beyond the jurisdiction

Not applicable

32. What are the sanctions for non-compliance? Select all that apply and describe in the text field.

□ Monetary fine

□ Restriction on business activities

 \Box Voiding or setting aside of contract

□ Exclusion from government contracts

 $\hfill\square$ Award of damages or compensation

 \Box Penalty for senior managers

 \Box Criminal penalties

Not specified

□ Not applicable (e.g. in cases of voluntary tools)

□ Other

33. Relative to other compliance activities required of entities in this jurisdiction, is the cost of compliance:

• Below average

• Average

 \circ Above average

• Not applicable

• Unknown or prefer not to answer

35. To provide contextual information, give a general assessment of the extent to which regulated entities have made compliance a priority.

• Below average

• Average

 \circ Above average

• Not applicable

• Unknown or prefer not to answer

37. Have the climate-specific provisions in this instrument ever been enforced?

• No (If relevant, explain)

 \circ Yes

39. Are there monitoring systems in place to oversee the implementation and/or enforcement of the policy tool?

 $\circ \mathrm{No}$

40. Describe the monitoring systems in place. Please reference the relevant section/subsection/paragraph of the policy tool where monitoring systems are set.

Section 4.3.5. provides that the NESREA will monitor and enforce implementation of the policy and then Section 7.2 went further to specify that monitoring of the policy shall include; research and development, resource mobilization for policy implementation, periodic review of the solid waste management plan, solid waste management institutional, technical and operational policies, monitoring of specialized policies, technology advancement and compliance with international treaties and standards.

41. Does the policy tool recommend or require periodic impact assessments?

 $\circ \ No$

Yes

Recommended

Required

42. Select the option that best describes the frequency of periodic impact assessments recommended or required by the policy tool.

 \circ 0-2 years

 \circ 2-5 years

 \circ 5-10 years

 \circ 10 or more years

Not specified

 \circ Other

43. Does the policy tool recommend or require periodic reviews?

 $\circ \ No$

Recommended

Required

44. Select the option that best describes the frequency of the recommended or required periodic reviews.

 \circ 0-2 years

• 2-5 years

 \circ 5-10 years

 \circ 10 or more years

Not specified

 \circ Other

45. Does the policy tool include mechanisms for enhancing policy or regulatory coordination with subnational governments (e.g. vertical coordination mechanisms such as appointing coordinating agencies, forming working groups, etc.)?

 $\circ \operatorname{No}$

Yes

46. Describe the mechanisms for enhancing regulatory coordination with subnational governments. Reference the relevant section/subsection/paragraph of the policy tool where mechanisms for coordination with subnational governments are set.

The Federal Ministry of Environment and the NESREA are to ensure compliance with the Policy whilst the state governments are to set up waste management agencies and their state ministries of environments/state environmental protection agencies are to ensure that they develop State waste management policy, guidelines and plans using the national instrument as basis and minimum standards. The local government authorities are to implement the Policy as a statutory obligation and ensure compliance. Section 4.3.4 – 4.3.7 is instructive.

47. Are there any government initiatives to enhance the capacity of targeted entities to implement or comply with the policy tool (e.g. industry working groups, outreach campaigns, education and training, etc.)?

No

 $\circ \, \text{Yes}$

Domain-Specific Questions: Transition Planning Questions

Disclosure of Plans and Targets

132. Are targeted entities recommended or required to publicly disclose climate-related targets or transition plans?

No

Recommended

Required

Targets

135. Does the policy tool recommend or require targeted entities to have or develop climate-related targets?

 $\circ \ No$

Recommended

 \circ Required

136. Does the policy tool recommend or require entities to monitor progress in achieving their targets?

No

 \circ Recommended

Required

138. Does the policy tool recommend or require targeted entities to publicly report on progress in achieving their targets?

No

• Recommended

 \circ Required

140. Which of the following targets, or data related to targets, does the policy tool recommend or require entities have or develop? Select all that apply.

	Recommended	Required	No
An absolute emissions			
reduction target			
An intensity-based			
emissions reduction			
target			
A net zero target			
Interim targets (e.g. 2030, 2050)			
Targets covering non- carbon GHG emissions			
A Scope 3 emissions target			
A target derived using a sectoral decarbonization approach			
A level of ambition for emissions reductions (e.g. 80% reduction)			
A baseline year from which progress is measured			
A target timeframe (e.g. by 2040)			
Targets for renewable energy procurement			
Targets for fossil fuel phase down/phase up			
Separate targets for GHG offsets and/or removals			
Targets or goals related to climate adaptation			
Targets or goals related to nature and biodiversity			
Other targets related to sustainability			

Transition Plans

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164. Does the policy tool recommend or require targeted entities to have or develop a transition plan?

No

 $\circ \, \text{Recommended}$

 \circ Required

Monitoring, Oversight, and Implementation

176. Does the policy tool recommend or require entities undertake any of the following with regard to monitoring, oversight, and implementation? Select all that apply.

	Recommended	Required	No
Monitor progress in implementing their transition plan			
Develop financial plans for the implementation of their transition plan			
Integrate climate- related matters into their financial accounting			
Incorporate climate change considerations into their investment decision making and/or asset planning			
Incorporate climate change considerations into their capital allocation and/or expenditure plans			
Any other mechanisms for enhancing the achievement of targets and/or the implementation of transition plans			

Engagement, Lobbying, and Governance

184. Does the policy tool recommend or require targeted entities align any of the following engagement and/or governance practices with their targets and/or transition plans?

	Recommended	Required	No
Value chain			
engagement			
Investor engagement			
Consumer			
engagement			
Policy engagement			
and lobbying practices			
Corporate governance			
structure for transition			
and verification			
Climate-related			
financial incentives for			
employees and board			
members			

185. Does the policy tool recommend or require targeted entities to disclose how they have used due diligence and/or stewardship to achieve their targets and/or implement their transition plans?

No

 $\circ \, \text{Recommended}$

Required

Standards, Frameworks, and Guidelines

194. Does the policy tool require the use of or make reference to any of the following standards, frameworks, or guidelines? Select all that apply.

	Required	Referenced	Neither required nor referenced
IFRS S1			
IFRS S2			
Task Force on Climate-related Financial Disclosures (TCFD)			
CDP (formerly known as Climate Disclosure Project) Technical Note: Reporting on Climate Transition Plans			
International Integrated Reporting Framework			
Global Reporting Initiative (GRI)			
Sustainability Accounting Standards Board (SASB)			
Science Based Targets initiative (SBTi)			
Science Based Targets initiative (SBTi) Net Zero Standard			
European Sustainability Reporting Standards (ESRS)			
Other			

Additional Important Information

197. Note any additional important information about the contribution of the policy tool to net zero alignment not captured in the above questions. If referencing new sources (i.e. not referenced in Question 3), provide a web-archived link to the source material.

Policy Tool Name: Nigeran Stock Exchange (NSE)Sustainability Guidelines

3. Source material link(s):

https://web.archive.org/web/20240819100610/https://doclib.ngxgroup.com/regulationsite/IssuersRules/Sustainability%20Disclosure%20Guidelines.pdf

4. Which of the following governance domains does this policy tool relate to? Select all that apply.

Climate-related disclosure

□ Transition planning

 \Box Public procurement

- 6. Select the category which best describes the author/issuer of the policy tool.
- \Box Head of state and/or government

□ Independent regulatory or supervisory body

□ Legislature

□ Judiciary

□ Ministry/Department/Agency

Other (Please describe) <u>The Nigeria Exchange Group (NGX) formerly known as the Nigerian Stock</u> <u>Exchange (NSE) is a stock exchange that facilitates trading of securities for listed companies on its</u> <u>platform.</u>

7. Status of the policy tool

- Approved, in force
- Approved, not yet in force
- Other (Please describe)

9. Year of (planned) entry into force or year of publication

<u>2018</u>

10. Does the policy tool have an end date?
No
• Yes

12. Briefly describe the policy tool's goal and/or purpose:

For example: The policy tool requires publicly listed companies to comply with the recommendations of the Task Force for Climate Related Financial Disclosure or to explain the absence of such disclosures.

The NGX, through the Guidelines, seeks to ensure integration of sustainability reporting for its listed companies. It aims to ensure there is data on from the disclosure by listed companies on their ESG and sustainability drive to inform the decision-making of investors in the Nigerian capital market.

13. Name the authority(ies) responsible for overseeing implementation and/or enforcement. If not applicable, leave blank.

• 1. Nigeria Exchange Group

o 2.

o **3**.

o **4**.

o 5.

15. To provide contextual information, rate the capacity of Nigeria Exchange Group to undertake the policy tool's implementation and/or enforcement.

• 0- No Capacity (Please explain)

• 1- Low Capacity (Please explain)

• 2- Medium Capacity (Please explain) <u>The NGX is a Self-Regulatory Organisation (SRO) and is a</u> capital market participant under the purview of the Securities and Exchange Commission (SEC).

- \circ 3- High Capacity (Please explain)
- Prefer not to answer
- \circ Not Applicable

25. Which entities are targeted through this policy tool? Select all that apply.

Note: With regard to sectoral actors, in cases where mandatory and voluntary obligations are mixed (e.g., mandatory for one sector, voluntary for another), select "mandatory" as there will be further opportunity to clarify.

	Mandatory	Voluntary	Not targeted
1. Publicly-traded			
entities			
2. Private companies			
3. Financial institutions			
4. Small and medium-			
sized enterprises			
5. State-owned			
companies			
6. Not-for-profit			
organizations			
7. Government			
agencies and/or			
departments			
(supranational)			
8. Government			
agencies and/or			
departments (national) 9. Government			
agencies and/or			
departments (regional			
- e.g., state, province,			
region, metropolitan			
region)			
10. Government			
agencies and/or			
departments (local -			
e.g., county, district,			
municipality, city)			
11. Government			
agencies and/or			
departments			
(unspecified)			
12. Sectoral actors			
(e.g., healthcare,			
defense, utilities,			
education)			
13. Other			

27. Describe the threshold criteria to identify entities for whom or instances in which compliance is mandatory.

	Publicly-traded entities
Minimum number of employees (Enter min number of full-time employees - FTEs)	Not specified
Minimum revenue (Enter minimum revenue)	For companies listed on the NGX's Main Board, part of the requirements for listing for Standard A companies is cumulative pre-tax profits from continuing operations of not less than NGN300 million in the last 3 years, with at least NGN100 million pre-tax profit in 2 of those years. For Standard B companies, they must have cumulative pre-tax profits from continuing operations of not less than NGN600 million in the 1 or 2 years prior to listing.
Minimum assets (Enter minimum assets)	Not specified
Minimum contract value (Enter minimum contract value)	Not specified
Entity is headquartered in the jurisdiction	Yes
Entities are subjected to disclosure or reporting requirements	Not specified

28. Can entities for whom compliance with the policy tool is mandatory opt out of the obligation (e.g. comply or explain)?

No

 \circ Yes

30. Does the policy tool exclusively apply to entities' domestic operations, or does it also apply to entities' operations beyond the jurisdiction?

• Operations within jurisdiction only

• Operations beyond the jurisdiction

Not applicable

32. What are the sanctions for non-compliance? Select all that apply and describe in the text field.

□ Monetary fine

Restriction on business activities

 \Box Voiding or setting aside of contract

 \Box Exclusion from government contracts

□ Award of damages or compensation

□ Penalty for senior managers

□ Criminal penalties

 \Box Not specified

□ Not applicable (e.g. in cases of voluntary tools)

 \Box Other

33. Relative to other compliance activities required of entities in this jurisdiction, is the cost of compliance:

• Below average

 \circ Average

• Above average

Not applicable

• Unknown or prefer not to answer

35. To provide contextual information, give a general assessment of the extent to which regulated entities have made compliance a priority.

• Below average

 \circ Average

• Above average

 \circ Not applicable

• Unknown or prefer not to answer

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37. Have the climate-specific provisions in this instrument ever been enforced?

• No (If relevant, explain)

 \circ Yes

39. Are there monitoring systems in place to oversee the implementation and/or enforcement of the policy tool?

 $\circ \ No$

Yes

40. Describe the monitoring systems in place. Please reference the relevant section/subsection/paragraph of the policy tool where monitoring systems are set.

By section 4.2 of the Guidelines, all Issuers should comply with the NGX's sustainability reporting requirements. the NGX publishes annually the names of Issuers who submit their sustainability reports in accordance with the Guidelines. The Exchange may introduce sustainability ratings and indices, to assess and track the performance of listed companies who make sustainability disclosures.

41. Does the policy tool recommend or require periodic impact assessments?

No

Recommended

• Required

43. Does the policy tool recommend or require periodic reviews?

o No

Recommended

Required

44. Select the option that best describes the frequency of the recommended or required periodic reviews.

0-2 years
2-5 years
5-10 years
10 or more years
Not specified
Other

45. Does the policy tool include mechanisms for enhancing policy or regulatory coordination with subnational governments (e.g. vertical coordination mechanisms such as appointing coordinating agencies, forming working groups, etc.)?

No

 $\circ \, \text{Yes}$

47. Are there any government initiatives to enhance the capacity of targeted entities to implement or comply with the policy tool (e.g. industry working groups, outreach campaigns, education and training, etc.)?

No

 \circ Yes

Domain-Specific Questions: Disclosure Questions

What is being disclosed?

52. Are targeted entities recommended or required to disclose any of the following climate-related information? Select all that apply.

	Recommended	Required	Neither recommended nor required
1. Greenhouse gas (GHG) emissions			
2. GHG emissions offsets or removals			
3. GHG emissions reduction targets			
4. Other climate- related targets			
5. Physical climate risk			
6. Transition risk			
7. Transition plan			

Other disclosures

105. Are targeted entities recommended or required to disclose any other climate-related information? Select all that apply.

	Required	Recommended	Neither recommended nor required
1. Climate-related opportunities			
2. Remuneration based on achieving climate-related goals			
3. Taxonomies			
4. Capital allocation and/or expenditure plans (in the context of climate change)			
5. Due diligence			
6. Assumptions and Dependencies			
7. Data limitations of scenario analyses			
8. Financial implications of climate-related matters (e.g., integration of climate- related disclosures into financial accounting standards)			
9. Stewardship (e.g., whether stewardship codes are in place, how entities vote in shareholder meetings, etc.)			
10. ESG methodologies and criteria (in the case of service providers)			
11. Asset planning or ownership in the context of climate change			
12. Sectoral investment policies			
13. Climate-related lobbying and/or policy engagement			
14. Locked-in emissions or information on			

emissive assets with long lifespans		
15. Dirty asset divestiture		
16. Nature-related		
impacts		
17. Just transition indicators		

Standards, Frameworks, and Guidelines

125. Does the policy tool require the use of or make reference to any of the following standards, frameworks, or guidelines? Select all that apply.

	Required	Referenced	Neither required nor referenced
1. IFRS S1			
2. IFRS S2			
3. Task Force on Climate-related Financial Disclosures (TCFD)			
4. GHG Protocol Corporate Accounting and Reporting Standard			
5. GHG Protocol Corporate Value Chain (Scope 3) Accounting and Reporting Standard			
6. CDP (formerly known as Climate Disclosure Project) reporting framework			
7. International Integrated Reporting Framework			
8. Global Reporting Initiative (GRI)			
9. Sustainability Accounting Standards Board (SASB)			
10. European Sustainability Reporting Standards (ESRS)			
11. Taskforce on Nature-related Financial Disclosures (TNFD)			
12. Partnership for Carbon Accounting Financials (PCAF)			
13. Glasgow Financial Alliance for Net Zero (GFANZ)			
14. Other			

126. List any other standards, frameworks or guidelines integrated into or referred to within the policy tool. Please provide a web-archived link to each standard/framework/guideline listed.

<u>The Guidelines requires listed entities to ensure that their sustainability report contain information</u> <u>that is relevant and meaningful to stakeholders using internationally accepted standards such as the</u> <u>GRI.</u>

Additional Important Information

128. Note any additional important information about the contribution of the policy tool to net zero alignment not captured in the above questions. If referencing new sources (i.e. not referenced in Question 3), provide a web-archived link to the source material.

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<u>None</u>