

TOM CHESS T GROUP OF COMPANIES LIMITED

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OPENING STATEMENT

At **Tom Chess T Group of Companies Limited**, we are deeply committed to the growth and development of Nigeria's oil and gas industry, and our adherence to the Nigerian Oil and Gas Industry Content Development Act is a testament to this dedication. Since our founding on August 2, 2010, we have remained focused on playing a key role in Nigeria's economic transformation by prioritizing local content and fostering Nigerian talent, resources, and expertise in all our operations.

The Nigerian Content Act, enacted in 2010, serves as a vital framework for the promotion of local participation in the oil and gas sector, ensuring that Nigerian companies and individuals benefit from the country's vast resources. This legislation aligns perfectly with our mission, which is to provide top-tier services, including the rehabilitation, upgrade, fabrication, and calibration of underground and surface storage tanks, while contributing to the development of local capacity and expertise.

Our vision is not only to comply with the Act but to exceed its expectations by continuously engaging in initiatives that promote the transfer of technology and innovation, create employment opportunities, and uplift the Nigerian workforce. We believe in the transformative power of local content and understand its importance in enhancing the competitive advantage of Nigerian companies, ensuring that they can thrive on both local and global stages.

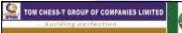
As a fully Nigerian-owned company, we remain committed to advancing these goals through collaboration with government regulatory bodies, local communities, and industry associations. We actively participate in industry initiatives that promote local content, thereby ensuring that we stay ahead in a competitive and dynamic sector. Our commitment extends beyond our immediate operations to the broader objectives of sustainable development, economic empowerment, and the promotion of indigenous knowledge and skills.

Tom Chess T Group of Companies Limited will continue to invest in the growth and development of Nigeria's oil and gas industry, recognizing that the future of this sector depends on the active involvement and development of local stakeholders. We remain steadfast in our dedication to creating long-lasting value for the Nigerian people, promoting self-reliance, and contributing to the nation's overall prosperity.

Together, we look forward to a future where Nigerian content is the driving force behind our country's continued success.

Yours faithfully

For: TOM CHESS T GROUP OF COMPANIES LIMITED



AUC. THOMPSON O.S. DOUGLAS FIMC, ARPM, MCPN, MNCS, MCAI, MISPON, MITAN, MNIG Executive Group Chairman/CEO Lead Management Consultant



1. INTRODUCTION

1.1 Purpose of the NCDP

The primary purpose of the Nigerian Content Development Plan (NCDP) for Tom Chess T Group of Companies Limited is to strategically align the company's operations with the objectives outlined in the Nigerian Content Act, also known as the Nigerian Oil and Gas Industry Content Development Act. This alignment is crucial for fostering a sustainable and inclusive growth environment within Nigeria's oil and gas sector.

By adhering to the principles of the Nigerian Content Act, Tom Chess T Group aims to:

- 1. **Enhance Local Participation:** We are committed to increasing the involvement of Nigerian citizens and businesses in our operations. By prioritizing local talent and suppliers, we strive to ensure that the benefits of our projects are maximally realized within the communities where we operate.
- 2. **Develop Local Capacity and Expertise:** The NCDP emphasizes our responsibility to cultivate local expertise through targeted training and capacity-building initiatives. This commitment will not only enhance the skill sets of the local workforce but will also improve overall industry standards.
- 3. **Promote Technology Transfer and Innovation**: To thrive in a competitive global market, we recognize the importance of technology transfer and innovation. Our NCDP seeks to facilitate the sharing of knowledge and technologies with local firms, thereby enhancing their capabilities and fostering innovation.
- 4. **Create Employment Opportunities for Nigerians:** One of the core objectives of the NCDP is to generate sustainable job opportunities for Nigerians. We are dedicated to employing local talent and contributing to the socio-economic development of the communities we serve.

Through this NCDP, Tom Chess T Group of Companies Limited will actively participate in shaping a robust oil and gas industry in Nigeria that is characterized by local empowerment and sustainable growth.

1.2 Background

The Nigerian Content Act was signed into law on April 22, 2010, by President Goodluck Jonathan, marking a pivotal moment in the nation's efforts to enhance local participation in its oil and gas sector. This Act aims to ensure that Nigerian companies and individuals derive maximum benefit from the nation's abundant oil and gas resources.

Key Objectives of the Nigerian Content Act:

- **Increase Nigerian Participation**: The Act sets forth guidelines to ensure that a significant portion of contracts and business opportunities in the oil and gas sector is reserved for Nigerian firms and personnel.
- **Develop Local Capacity and Expertise**: By fostering local capabilities, the Act aims to create a self-sufficient oil and gas sector that can meet its operational demands without relying heavily on foreign expertise and resources.
- **Promote Technology Transfer and Innovation**: The Act encourages foreign companies operating in Nigeria to partner with local firms, facilitating the transfer of technology and innovative practices.

• Create Employment Opportunities for Nigerians: The overarching aim of the Act is to reduce unemployment rates by creating sustainable job opportunities through increased local participation in the oil and gas industry.

Significance of Local Content in the Oil and Gas Industry:

Local content is vital for the sustainable development of Nigeria's oil and gas sector. By prioritizing local businesses and personnel, the country can leverage its human and natural resources to build a more resilient economy. Additionally, local content initiatives can drive technological advancements and innovations tailored to local challenges, resulting in improved efficiency and productivity.

Furthermore, the Nigerian Content Act applies to all operations within the oil and gas industry, encompassing upstream, downstream, and midstream activities. This comprehensive scope ensures that every facet of the industry, from exploration and production to refining and petrochemicals, is oriented towards maximizing local benefits.

1.3 Company Overview

Brief History of Tom Chess T Group of Companies Limited

Founded on August 2, 2010, Tom Chess T Group of Companies Limited emerged with a vision to revolutionize multiple sectors through innovation, quality, and unparalleled service delivery. Our journey began with a commitment to setting new standards in every service domain we engage in, with a specific focus on the oil and gas industry.

From our initial project undertakings, we have rapidly expanded our operations and capabilities, securing a strong foothold in the market. Over the years, we have achieved significant milestones, including the successful execution of complex construction projects, the development of cutting-edge architectural animations, and the establishment of a comprehensive compliance certification process.

Core Services Offered in the Oil and Gas Sector

Tom Chess T Group of Companies Limited is a premier provider of comprehensive services in the oil and gas industry, including:

- Rehabilitation, Upgrade, and Fabrication Works for Underground Tanks and Surface Storage Tanks: Our expertise in tank rehabilitation and upgrades ensures that our clients' storage facilities meet the highest standards of safety and efficiency.
- Calibration Services for Petroleum Storage Tanks: We offer calibration services for a range of storage tanks, including above-ground tanks, underground tanks, and surface storage tanks. Our calibration processes ensure accurate measurements and compliance with industry regulations.
- Calibration of Tanker Trucks: We also provide calibration services for tanker trucks, ensuring that they meet the necessary specifications for transporting petroleum products safely and efficiently.
- Oil and Gas Measuring Equipment and Instruments: Our company is involved in the procurement and calibration of measuring equipment and instruments that are essential for accurate monitoring and management in the oil and gas sector.

Vision and Commitment to Local Content Development

At Tom Chess T Group of Companies Limited, our vision is to be a leading provider of innovative and high-quality services in the oil and gas sector while making a meaningful contribution to local content development. We are committed to implementing practices that align with the Nigerian Content Act, ensuring that our operations not only benefit our company but also positively impact the local communities and economies in which we operate.

Our commitment to local content development is reflected in our strategies to engage local talent, source materials from local suppliers, and invest in capacity-building initiatives that empower Nigerian businesses and individuals. We recognize that our success is intricately linked to the development of a robust local industry that can thrive alongside us, and we are dedicated to being a catalyst for this transformation.

2. OBJECTIVES OF THE NIGERIAN CONTENT DEVELOPMENT PLAN (NCDP)

The Nigerian Content Development Plan (NCDP) serves as a strategic framework for Tom Chess T Group of Companies Limited to enhance local participation, develop local capacity and expertise, promote technology transfer and innovation, and create employment opportunities. The following objectives outline how the company aligns its operations with the Nigerian Content Act to ensure compliance and contribute to the growth of the local oil and gas industry.

2.1 Increase Local Participation

The NCDP aims to significantly enhance the involvement of Nigerian companies in all aspects of Tom Chess T Group of Companies Limited's operations. This objective is rooted in the recognition that local participation is essential for maximizing the benefits of the country's vast oil and gas resources.

Strategies to Enhance Involvement of Nigerian Companies in Operations:

- Strategic Partnerships and Alliances: Tom Chess T Group of Companies Limited will actively seek partnerships with local firms in the oil and gas sector. These partnerships will leverage local expertise and resources, ensuring that more Nigerian companies are involved in service delivery and project execution.
- **Subcontracting Policies:** The Company will adopt a subcontracting policy that prioritizes local contractors for various services, including rehabilitation, upgrade, and fabrication works for underground and surface storage tanks. This policy will not only create business opportunities for local firms but also foster a culture of collaboration within the industry.
- Capacity Building for Local Firms: Recognizing that many local companies may require assistance to meet industry standards, Tom Chess T Group of Companies Limited will implement capacity-building programs. These initiatives will include workshops, seminars, and mentorship programs aimed at equipping local businesses with the necessary skills and knowledge to compete effectively in the oil and gas sector.
- Promotion of Local Content in Procurement: The procurement processes of Tom Chess
 T Group of Companies Limited will emphasize the importance of local sourcing. By prioritizing local products and services, the company aims to stimulate local

economies and ensure that a significant portion of its expenditures supports Nigerian businesses.

2.2 Develop Local Capacity and Expertise

Developing local capacity and expertise is vital for the sustainability of the Nigerian oil and gas industry. Tom Chess T Group of Companies Limited is committed to fostering an environment where local talent can thrive.

Training Programs and Partnerships with Educational Institutions:

- Collaborative Training Initiatives: The Company will forge partnerships with local
 universities, technical colleges, and vocational training centres to develop
 specialized training programs. These initiatives will focus on skills directly applicable to
 the oil and gas industry, such as safety management, equipment calibration, and
 environmental compliance.
- Internship and Apprenticeship Programs: Tom Chess T Group of Companies Limited will implement internship and apprenticeship programs to provide hands-on experience for students and recent graduates. These programs will not only enhance the employability of participants but also contribute to building a skilled workforce that meets the industry's demands.
- Continuous Professional Development: The Company will encourage on-going education and training for its employees. By providing access to advanced training and certifications, Tom Chess T Group of Companies Limited aims to ensure that its workforce remains competitive and knowledgeable about the latest industry practices and technologies.

Initiatives for Skill Development and Knowledge Transfer:

- Workshops and Seminars: Regular workshops and seminars will be organized to
 facilitate knowledge sharing and skill development. These events will feature industry
 experts and thought leaders who can provide insights into emerging trends,
 technologies, and best practices in the oil and gas sector.
- Mentorship Programs: The establishment of mentorship programs within the company
 will promote knowledge transfer between experienced professionals and younger
 employees. By fostering a culture of mentorship, Tom Chess T Group of Companies
 Limited aims to enhance the capabilities of its workforce while instilling a sense of
 ownership and responsibility.

2.3 Promote Technology Transfer and Innovation

In an era of rapid technological advancement, promoting technology transfer and innovation is essential for the growth and competitiveness of the Nigerian oil and gas industry. Tom Chess T Group of Companies Limited is committed to fostering innovation through collaboration and research.

Collaborations with Local Firms and Technology Providers:

- Joint Ventures with Local Technology Providers: The Company will actively seek joint
 venture opportunities with local technology providers. By leveraging the innovative
 capabilities of local firms, Tom Chess T Group of Companies Limited aims to introduce
 new technologies and solutions that can enhance operational efficiency and safety
 in the oil and gas sector.
- Investment in Research and Development: A portion of the company's budget will be allocated to research and development initiatives tailored to local needs. This investment will focus on developing solutions that address specific challenges faced by the Nigerian oil and gas industry, such as equipment calibration, storage tank safety, and environmental sustainability.

Research and Development Initiatives Tailored to Local Needs:

- Innovation Hubs and Incubators: Tom Chess T Group of Companies Limited will establish innovation hubs and incubators to foster creativity and entrepreneurship within the local oil and gas community. These hubs will provide resources and support for start-ups and entrepreneurs looking to develop innovative solutions that meet industry demands.
- Collaborative Research Projects: The Company will engage in collaborative research
 projects with academic institutions and research organizations. By partnering with
 experts in various fields, Tom Chess T Group of Companies Limited aims to develop
 cutting-edge technologies and practices that align with local needs and industry
 standards.

2.4 Create Employment Opportunities

Creating employment opportunities for Nigerians is a central goal of the NCDP. Tom Chess T Group of Companies Limited recognizes the importance of providing meaningful job opportunities to contribute to local economic development.

Employment Strategies Targeting Local Talent:

- Local Recruitment Policies: The Company will implement recruitment policies that
 prioritize local talent. By focusing on hiring from the communities where it operates,
 Tom Chess T Group of Companies Limited aims to reduce unemployment rates and
 stimulate local economies.
- **Diversity and Inclusion Initiatives:** Recognizing the value of diverse perspectives, the company will promote diversity and inclusion in its workforce. This initiative will involve targeted recruitment efforts aimed at attracting individuals from various backgrounds, ensuring that the workforce reflects the communities it serves.

Initiatives for Workforce Diversity and Inclusion:

• Community Engagement Programs: Tom Chess T Group of Companies Limited will engage with local communities to understand their needs and preferences. By

- fostering strong relationships with local stakeholders, the company aims to create job opportunities that align with community expectations and requirements.
- Support for Women and Marginalized Groups: The company will implement initiatives specifically aimed at empowering women and marginalized groups in the workforce. These initiatives may include targeted training programs, scholarships for education, and mentorship opportunities to support career advancement.

The Nigerian Content Development Plan (NCDP) serves as a strategic framework for Tom Chess T Group of Companies Limited, aligning its operations with the Nigerian Content Act. By focusing on increasing local participation, developing local capacity and expertise, promoting technology transfer and innovation, and creating employment opportunities, the company aims to contribute to the growth of the local oil and gas industry. Through these objectives, Tom Chess T Group of Companies Limited seeks to enhance its competitive advantage while driving economic development in Nigeria.

3. SCOPE OF THE NIGERIAN CONTENT DEVELOPMENT PLAN (NCDP)

Tom Chess T Group of Companies Limited

3.1 Application to Operations

The scope of the Nigerian Content Development Plan (NCDP) for Tom Chess T Group of Companies Limited aligns with the provisions of the Nigerian Content Act, focusing on increasing Nigerian participation and expertise in the oil and gas industry. This section outlines the key operational areas where the NCDP is applied, covering the upstream, midstream, and downstream activities of the oil and gas sector.

3.1.1 Upstream Operations

Upstream operations encompass the exploration, extraction, and production of oil and gas resources. Tom Chess T Group actively contributes to this sector by offering services such as the fabrication, rehabilitation, and upgrade of essential oil and gas infrastructure. By integrating Nigerian companies into these services, the company ensures the application of local content policies in upstream activities. The goal is to increase the involvement of Nigerian contractors and suppliers in the procurement and execution of projects, promoting the participation of indigenous enterprises in key phases of exploration and production.

The rehabilitation and fabrication of storage tanks, calibration of measuring instruments, and the upgrade of essential equipment provide opportunities to deploy Nigerian expertise and technology in the upstream operations. Partnerships with local firms ensure that Nigerian professionals are involved in the lifecycle of upstream projects, thereby fostering capacity development and technology transfer. The company also collaborates with local educational institutions to engage students and graduates in apprenticeship programs, providing them with hands-on experience in upstream operations.

3.1.2 Midstream Operations

Midstream operations refer to the processing, transportation, and storage of oil and gas resources. These activities are critical for ensuring the efficient distribution of oil and gas products across the value chain. Tom Chess T Group's midstream activities involve the calibration and maintenance of storage tanks, including both underground and aboveground storage units. This ensures the integrity and safety of the infrastructure used for storing and transmitting oil and gas.

In alignment with the Nigerian Content Act, the company prioritizes local engagement in the provision of midstream services. Through collaborations with Nigerian vendors and service providers, Tom Chess T Group ensures that local suppliers are involved in the calibration, upgrade, and maintenance of oil and gas infrastructure. Moreover, the company utilizes Nigerian-made materials and equipment wherever feasible, adhering to the local content policy's stipulation to source goods and services from indigenous suppliers.

By enhancing the local content in midstream operations, Tom Chess T Group contributes to the technological advancement of Nigerian companies and provides employment opportunities for Nigerians. The company also plays an active role in promoting innovation within the sector by encouraging the development of indigenous technologies for midstream activities, such as the processing and transmission of gas.

3.1.3 Downstream Operations

Downstream operations focus on refining, marketing, and distribution of oil and gas products to consumers. Tom Chess T Group provides vital services in this area, including the calibration and maintenance of storage tanks used for petroleum products. Additionally, the company plays a key role in the fabrication and upgrade of surface tanks, ensuring compliance with regulatory standards and enhancing operational efficiency.

In accordance with the Nigerian Content Act, Tom Chess T Group emphasizes the involvement of Nigerian enterprises in downstream activities. Local contractors are engaged in the installation, repair, and upgrade of critical infrastructure, ensuring that Nigerian companies play an integral role in the downstream sector. Furthermore, the company supports knowledge transfer by providing training and mentorship programs for Nigerian workers and subcontractors engaged in downstream operations.

Tom Chess T Group also partners with Nigerian institutions to foster innovation in the downstream sector, ensuring that local firms have access to cutting-edge technologies and methodologies for refining, distribution, and storage. The company's efforts in downstream operations contribute to the broader goal of increasing local content in the oil and gas industry, helping to promote economic growth and development in Nigeria.

3.2 Specific Services Covered

Tom Chess T Group of Companies Limited offers a comprehensive range of services tailored to the oil and gas sector. These services are structured to ensure compliance with the Nigerian Content Act, promoting local expertise, technology transfer, and employment. The following sections outline the specific services covered by the NCDP and the measures taken to enhance local content in each area.

3.2.1 Rehabilitation, Upgrade, and Fabrication Works for Tanks

One of the core services offered by Tom Chess T Group is the rehabilitation, upgrade, and fabrication of underground and surface storage tanks. These tanks are essential components of the oil and gas industry, providing storage solutions for crude oil, petroleum products, and gas. The company's operations in this area are focused on ensuring the safety, durability, and compliance of storage tanks with industry standards and regulatory requirements.

In line with the Nigerian Content Act, Tom Chess T Group ensures that Nigerian companies are fully integrated into the supply chain for tank rehabilitation and fabrication projects. Local contractors are engaged in the fabrication of components, while Nigerian engineers and technicians are employed to carry out rehabilitation and upgrade works. The company also sources materials locally, contributing to the development of the Nigerian manufacturing sector.

Furthermore, Tom Chess T Group collaborates with Nigerian educational institutions to provide training and internships for students interested in pursuing careers in tank fabrication and rehabilitation. This initiative ensures that the next generation of Nigerian engineers and technicians are equipped with the skills and knowledge necessary to contribute to the industry's growth.

3.2.2 Calibration Services for Storage Tanks and Tanker Trucks

Tom Chess T Group offers calibration services for both underground and above-ground storage tanks, as well as for tanker trucks. Calibration is a critical aspect of ensuring the accurate measurement of oil and gas products, and it plays a vital role in maintaining the integrity of storage and distribution systems. The company provides comprehensive calibration services that adhere to industry standards, ensuring that clients receive accurate measurements for their petroleum products.

As part of its commitment to local content, Tom Chess T Group engages Nigerian companies in the calibration process, ensuring that local vendors are involved in providing equipment, software, and expertise. The company also offers training programs for Nigerian technicians, enabling them to develop the skills required for tank calibration. These programs contribute to the development of a skilled workforce capable of supporting Nigeria's oil and gas sector.

In addition, Tom Chess T Group partners with local technology providers to develop indigenous solutions for calibration services. This collaboration fosters innovation in the oil and gas industry and ensures that Nigeria remains at the forefront of technological advancements in calibration and measurement.

3.2.3 Oil and Gas Measuring Equipment and Instruments

Tom Chess T Group is also involved in the provision of oil and gas measuring equipment and instruments, which are essential for ensuring accurate data collection and monitoring in the oil and gas industry. The company supplies a wide range of measuring devices, including flow meters, pressure gauges, and temperature sensors. These instruments are used in upstream, midstream, and downstream operations to monitor the flow, pressure, and temperature of oil and gas products.

In compliance with the Nigerian Content Act, Tom Chess T Group prioritizes the procurement of measuring equipment from Nigerian manufacturers and suppliers. By working closely with local vendors, the company ensures that Nigerian companies are able to participate in the supply chain for measuring equipment. This approach supports the development of Nigeria's manufacturing sector and promotes the use of indigenous technology in the oil and gas industry.

Additionally, Tom Chess T Group provides training programs for Nigerian engineers and technicians on the use and maintenance of oil and gas measuring equipment. These programs ensure that local professionals have the expertise needed to operate and maintain critical equipment, furthering the company's commitment to knowledge transfer and skill development.

3.3 Compliance with the Nigerian Content Act

Tom Chess T Group of Companies Limited is fully committed to complying with the provisions of the Nigerian Content Act in all its operations. The company has implemented a comprehensive Nigerian Content Development Plan (NCDP) that addresses the key objectives of the Act, including increasing Nigerian participation in the oil and gas industry, developing local capacity and expertise, promoting technology transfer and innovation, and creating employment opportunities for Nigerians.

Through its focus on local content, Tom Chess T Group ensures that Nigerian companies and individuals are fully integrated into its operations, contributing to the growth and development of the oil and gas sector in Nigeria. The company also collaborates with local educational institutions, technology providers, and vendors to ensure that Nigeria remains at the forefront of innovation and technological advancement in the oil and gas industry.

By adhering to the Nigerian Content Act, Tom Chess T Group is not only promoting economic growth in Nigeria but also contributing to the long-term sustainability and competitiveness of the country's oil and gas sector. The company's commitment to local content is evident in its operations, services, and partnerships, all of which are designed to support the development of Nigeria's oil and gas industry while fostering local expertise and innovation.

4. IMPLEMENTATION STRATEGIES

4.1 Local Sourcing and Procurement

Policies for Sourcing Materials and Services from Local Suppliers

The Nigerian Content Development and Monitoring Board (NCDMB), in compliance with the Nigerian Oil and Gas Industry Content Development Act, strongly encourages companies operating in the oil and gas industry to adopt local sourcing and procurement strategies. Tom Chess T Group of Companies Limited is committed to supporting local businesses and strengthening the Nigerian economy by prioritizing the procurement of goods and services from local suppliers. This policy ensures that a substantial percentage of all materials, equipment, and services required for operations are sourced from indigenous Nigerian companies. This aligns with the Nigerian Content Act, which mandates a minimum of 70% of materials and services in the oil and gas sector to be sourced locally, as part of efforts to increase Nigerian participation in the industry.

Our local sourcing policy is structured to not only comply with the Nigerian Content Act but also to foster the growth of Nigerian suppliers and service providers, encouraging competition and innovation. By promoting local procurement, Tom Chess T Group of Companies Limited will contribute to the development of the domestic oil and gas supply chain, ensure timely delivery of goods and services, reduce operational costs, and help to generate employment for Nigerian citizens.

Criteria for Vendor Selection Emphasizing Local Content

In line with the Nigerian Content Act, Tom Chess T Group of Companies Limited have established stringent criteria for selecting vendors. The key criterion for vendor selection is the adherence to local content requirements, ensuring that suppliers or service providers are Nigerian-owned, managed, or partnered. To qualify as a vendor, companies must demonstrate their commitment to the development of local capacity and their ability to deliver high-quality goods or services within Nigeria.

Tom Chess T Group of Companies Limited evaluates potential vendors based on the following criteria:

- Nigerian ownership and management structure.
- Use of local materials and workforce.
- Compliance with the Nigerian Content Act and other relevant local regulations.
- Ability to provide competitive pricing, timely delivery, and quality services.
- Track record of previous projects successfully executed within Nigeria.

These selection criteria ensure that our procurement strategy directly contributes to the growth of the Nigerian oil and gas industry, enhancing the technical and operational capabilities of local businesses and promoting economic development.

4.2 Training and Capacity Building

Development of Training Modules for Employees and Contractors

To support the objectives of the Nigerian Content Act, Tom Chess T Group of Companies Limited is dedicated to providing continuous training and capacity-building opportunities for both employees and contractors. Our training initiatives are designed to develop the technical skills and expertise necessary for the efficient operation of oil and gas projects in Nigeria. This ensures that our workforce, both local and international, remains at the forefront of industry best practices, technology, and innovation.

Our training modules are developed in collaboration with subject-matter experts, ensuring that they cover a wide range of areas critical to the oil and gas industry. These areas include:

- Advanced safety protocols in oil and gas operations.
- Technical skills in tank rehabilitation, upgrades, and fabrication.
- Calibration services for petroleum storage tanks and measuring equipment.
- Understanding and applying the Nigerian Content Act to ensure compliance.
- Environmental management and sustainability practices in oil and gas operations.

By investing in the continuous professional development of our employees and contractors, Tom Chess T Group of Companies Limited ensures that we remain compliant with the Nigerian Content Act, while also promoting the transfer of knowledge and expertise within the Nigerian workforce.

Collaborations with Technical Schools and Universities

To further enhance the capacity of the local workforce, Tom Chess T Group of Companies Limited actively collaborates with Nigerian technical schools, universities, and training institutions. These collaborations focus on the development of specialized training programs that address the skills gap in the oil and gas industry. Through partnerships with educational institutions, we aim to:

- Provide internship and apprenticeship programs that give students hands-on experience in oil and gas operations.
- Facilitate research and development projects that address local challenges in the industry.
- Offer scholarships and sponsorships to students pursuing careers in engineering, geosciences, and other relevant fields.
- Organize seminars, workshops, and industry conferences to promote knowledgesharing and innovation in the Nigerian oil and gas sector.

These initiatives will ensure a steady pipeline of qualified and skilled Nigerian professionals who can contribute to the growth of the local oil and gas industry.

4.3 Monitoring and Evaluation

Establishing Performance Indicators for Local Content Engagement

To ensure compliance with the Nigerian Content Act, Tom Chess T Group of Companies Limited has developed a robust monitoring and evaluation (M&E) framework. This framework includes the establishment of key performance indicators (KPIs) to track the level of local content engagement in all aspects of our operations. The KPIs focus on the following areas:

- Percentage of goods and services procured from Nigerian suppliers.
- Number of local employees and contractors hired for each project.
- Investment in training and capacity-building programs for Nigerian employees.
- Contributions to community development projects in local areas.
- Compliance with Nigerian Content Plan (NCDP) and other regulatory requirements.

The performance indicators will be regularly reviewed and updated to reflect changes in local content requirements and industry best practices. By closely monitoring our performance in these areas, Tom Chess T Group of Companies Limited ensures that we remain aligned with the objectives of the Nigerian Content Act.

Regular Assessments and Reports on Compliance with the NCDP

As part of our M&E framework, Tom Chess T Group of Companies Limited conducts regular assessments and audits of our local content practices. These assessments are carried out in collaboration with internal teams and external consultants to ensure objectivity and accuracy. The findings from these assessments are compiled into detailed reports that are submitted to the Nigerian Content Development and Monitoring Board (NCDMB) as part of our compliance obligations.

These reports include:

- A breakdown of local content achievements in each project.
- Challenges encountered in meeting local content requirements and proposed solutions.

- Progress updates on training and capacity-building initiatives.
- Data on employment generation, procurement from local suppliers, and other relevant metrics.

Through these regular assessments and reports, we ensure transparency and accountability in our local content practices, contributing to the overall success of the Nigerian Content Development initiative.

4.4 Collaboration with Stakeholders

Engagement with Government Agencies, Industry Bodies, and Local Communities Tom Chess T Group of Companies Limited recognizes the importance of collaborating with various stakeholders to ensure the successful implementation of our local content policy. We actively engage with government agencies, industry bodies, and local communities to foster strong relationships and create a supportive environment for local content development.

Key stakeholder engagements include:

- Regular consultations with the Nigerian Content Development and Monitoring Board (NCDMB) to ensure compliance with local content requirements.
- Membership in industry associations, such as the Petroleum Technology Association of Nigeria (PETAN), to stay informed about local content initiatives and trends.
- Collaboration with local communities in project areas to promote community development, job creation, and social responsibility.
- Engagement with local government authorities to ensure that our projects align with regional development goals.

By maintaining open lines of communication with stakeholders, Tom Chess T Group of Companies Limited ensures that our local content strategy is responsive to the needs and expectations of all parties involved.

Partnerships with Local Companies for Mutual Benefit

As part of our commitment to local content development, Tom Chess T Group of Companies Limited seeks to establish strategic partnerships with local companies in the oil and gas industry. These partnerships are designed to leverage the strengths of both parties, promoting mutual growth and success.

Our partnerships with local companies focus on:

- Joint ventures for the execution of complex projects, ensuring that local companies have the opportunity to participate in large-scale oil and gas operations.
- Technology transfer initiatives that allow local companies to gain access to advanced equipment and processes, enhancing their capabilities.
- Knowledge-sharing programs that promote innovation and best practices in oil and gas operations.
- Collaborative research and development projects aimed at addressing local challenges in the industry.

By forming strong partnerships with local companies, Tom Chess T Group of Companies Limited contributes to the overall growth and sustainability of the Nigerian oil and gas industry.

Tom Chess T Group of Companies Limited is fully committed to the principles and objectives of the Nigerian Content Development and Monitoring Board (NCDMB) as outlined in the Nigerian Oil and Gas Industry Content Development Act. Through our local sourcing, training, monitoring, and stakeholder collaboration efforts, we are dedicated to building capacity, creating jobs, and promoting technology transfer within Nigeria's oil and gas sector. Our local content policy is not only a legal obligation but also a core component of our business strategy, ensuring that we contribute to the long-term growth and success of Nigeria's economy.

We look forward to continuing our work in partnership with local communities, businesses, and government agencies to further the development of the Nigerian oil and gas industry for the benefit of all stakeholders.

5. COMPLIANCE WITH THE NIGERIAN CONTENT ACT

The Nigerian Oil and Gas Industry Content Development Act, often referred to as the Nigerian Content Act, was enacted in 2010 to address the challenges of limited local participation in the oil and gas industry. Tom Chess T Group of Companies Limited recognizes the significance of this landmark legislation and remains fully committed to ensuring that all its operations comply with the law, fostering local content development. This section outlines the company's strategies and policies aimed at complying with the provisions of the Nigerian Content Act, demonstrating its commitment to promoting local capacity, expertise, and job creation while maintaining high-quality service delivery.

5.1 Commitment to Regulatory Compliance

Outline of Compliance Mechanisms and Processes

At Tom Chess T Group of Companies Limited, our commitment to regulatory compliance is unwavering, particularly concerning the Nigerian Content Act. The company has instituted a comprehensive framework to ensure compliance with the Act's provisions across all our operations, including procurement, staffing, and technology transfer. Key mechanisms include:

- Local Content Integration Plan: This document, which is regularly updated, outlines the company's commitment to increasing the participation of Nigerian personnel and businesses in its operations. The plan specifies timelines, targets, and action points for achieving compliance with the local content requirements stipulated by the Act.
- Internal Compliance Audits: The Company conducts quarterly audits to assess its adherence to the Nigerian Content Act. These audits cover several areas, including procurement processes, the employment of Nigerian workers, and the utilization of local goods and services. Any gaps identified are addressed through corrective action plans, ensuring continuous improvement and adherence to local content regulations.
- Appointment of a Compliance Officer: A dedicated Local Content Compliance
 Officer has been appointed to oversee and manage all aspects related to
 compliance with the Nigerian Content Act. This officer works closely with project
 managers, procurement teams, and human resource departments to ensure that all
 operations meet the required standards for local content participation.
- Contractor and Supplier Assessments: In line with our commitment to ensuring that local suppliers and contractors are integral to our operations, the company has

- implemented a stringent evaluation process to assess potential contractors and suppliers for their adherence to local content requirements. Only suppliers and contractors that meet or exceed these standards are engaged.
- Legal and Regulatory Counsel: Tom Chess T Group of Companies Limited retains the services of an external legal and regulatory firm that provides on-going advice on compliance with the Nigerian Content Act. This partnership ensures that the company stays informed about updates to the Act and any changes in the regulatory landscape, allowing it to proactively adjust its compliance strategies.

Training and Awareness Programs

The company recognizes that compliance with the Nigerian Content Act goes beyond policy frameworks and involves ensuring that all employees and contractors are fully aware of their obligations under the law. To this end, regular training programs are held for staff members, contractors, and suppliers, with a focus on:

- The core objectives and requirements of the Nigerian Content Act.
- The importance of integrating local content into daily operations.
- The penalties for non-compliance and the benefits of adhering to the Act.

These training programs are designed to foster a culture of compliance within the company, ensuring that all stakeholders are aligned with the company's goals of promoting local participation and capacity building.

5.2 Reporting and Documentation

Procedures for Documenting Local Content Contributions

Tom Chess T Group of Companies Limited understands the importance of transparency and accountability in its compliance with the Nigerian Content Act. As part of its commitment to regulatory adherence, the company has established rigorous procedures for documenting its local content contributions. These procedures are designed to provide clear, verifiable records of the company's efforts to promote local participation and capacity building, ensuring that all stakeholders—including regulatory bodies, clients, and the public—can assess the company's performance in this area.

- Local Content Contribution Reports: For every project undertaken, Tom Chess T Group
 of Companies Limited prepares detailed reports that document the extent of local
 content engagement. These reports include the percentage of Nigerian personnel
 employed on the project, the value of contracts awarded to local suppliers and
 contractors, and any technology transfer initiatives that have been implemented.
- Vendor and Supplier Databases: The Company maintains a comprehensive database of all suppliers and contractors, with specific emphasis on local content. This database includes details of each vendor's compliance with the Nigerian Content Act, including certifications, licenses, and other relevant documentation. This ensures that the company consistently engages with suppliers who meet or exceed local content requirements.
- **Employee Records:** All employees are classified according to their nationality, role, and level of expertise. This data is used to track the company's progress in meeting its local employment targets and ensuring that Nigerians are adequately represented at all levels of the company's operations.

• **Technology Transfer Documentation:** As part of its commitment to promoting technology transfer, the company documents all initiatives designed to foster the development of local expertise. This includes records of training programs, mentorship schemes, and collaborations with local research institutions. These records are shared with regulatory authorities as part of the company's on-going efforts to support local capacity building.

Regular Reporting to Regulatory Authorities

Tom Chess T Group of Companies Limited is fully aware of its obligations to report on its local content contributions to the relevant regulatory authorities, particularly the Nigerian Content Development and Monitoring Board (NCDMB). To this end, the company has instituted a robust reporting system that ensures that all necessary reports are submitted on time and in accordance with the requirements of the Nigerian Content Act.

- Quarterly Local Content Reports: These reports are submitted to the NCDMB and other relevant regulatory bodies, providing detailed information on the company's local content achievements. The reports include data on the employment of Nigerian personnel, the use of local goods and services, and any partnerships with local companies.
- Annual Compliance Review: In addition to the quarterly reports, the company conducts an annual review of its compliance with the Nigerian Content Act. This review is used to assess the company's overall performance and identify areas for improvement. The findings of the review are submitted to the NCDMB as part of the company's commitment to transparency and accountability.
- Audit Reports: As part of its commitment to ensuring that local content regulations are
 met, the company submits the findings of its internal compliance audits to the
 NCDMB. These audit reports provide an independent assessment of the company's
 adherence to the Nigerian Content Act, ensuring that any non-compliance issues are
 identified and addressed in a timely manner.
- Engagement with Regulatory Bodies: In addition to submitting regular reports, Tom Chess T Group of Companies Limited actively engages with regulatory bodies to ensure that it remains compliant with the Nigerian Content Act. This includes attending industry conferences, participating in workshops, and engaging in consultations with the NCDMB. Through these engagements, the company ensures that it remains at the forefront of local content development in Nigeria's oil and gas industry.

Tom Chess T Group of Companies Limited is proud of its commitment to complying with the Nigerian Content Act and supporting the development of local capacity in the oil and gas industry. By implementing a comprehensive set of policies and procedures for sourcing materials, training employees, monitoring compliance, and collaborating with stakeholders, the company is well-positioned to meet the objectives of the Act. Through its focus on regulatory compliance, reporting, and documentation, the company ensures that its contributions to local content development are transparent, measurable, and sustainable.

As Tom Chess T Group of Companies Limited continues to grow and expand its operations, its commitment to local content development will remain a core element of its business strategy. By adhering to the provisions of the Nigerian Content Act, the company not only supports the growth of the Nigerian economy but also strengthens its position as a leading provider of high-quality services in the oil and gas industry.

6. ROLES AND RESPONSIBILITIES

6.1 Executive Group Chairman

• Leadership and Strategic Direction: The Executive Group Chairman is responsible for providing leadership and strategic direction for the Nigerian Content Development Program (NCDP) within the organization. This includes ensuring that the company's policies and operations align with the objectives of the Nigerian Content Act.

6.2 Executive Director, Finance

• **Financial Oversight:** The Executive Director, Finance, will oversee the financial resources allocated to local content initiatives, ensuring proper utilization of funds for training, partnerships, and other local content development activities.

6.3 Group General Manager

• **Implementation of the NCDP**: The Group General Manager is responsible for implementing the NCDP across all operational levels, ensuring compliance with local content requirements in all aspects of the company's projects.

6.4 Project Manager

• Local Content Compliance: The Project Manager will ensure that all projects comply with the Nigerian Content Act. This involves overseeing project-specific Nigerian Content Plans and coordinating with local partners and suppliers.

6.5 Head, Business Development

• **Identification of Opportunities**: The Head of Business Development will identify local partners and opportunities for collaboration, enhancing the company's capacity to deliver on local content requirements while expanding business opportunities.

6.6 Admin Officer

 Administrative Support: The Admin Officer will provide administrative support for training and capacity-building activities, ensuring that these programs are wellcoordinated and efficiently executed.

7. STAKEHOLDER ENGAGEMENT

7.1 Local Communities

• Community Engagement Strategies: Tom Chess T Group of Companies Limited is committed to fostering positive relationships with the communities where we operate. We will implement strategies for community engagement and development, including providing employment opportunities and supporting local infrastructure projects.

7.2 Government and Regulatory Bodies

 Collaboration with Regulatory Agencies: We will maintain strong relationships with government agencies such as the Nigerian Content Development and Monitoring Board (NCDMB) and other regulatory bodies to ensure compliance with local content laws and obtain the necessary support for our initiatives.

7.3 Industry Associations

Participation in Industry Initiatives: Tom Chess T Group of Companies Limited will
actively participate in industry forums and initiatives that promote local content. We
will collaborate with other industry players to share knowledge, best practices, and
resources to enhance local content development.

8. CHALLENGES AND MITIGATION STRATEGIES

8.1 Identification of Potential Barriers

• Challenges in Implementing Local Content: Potential barriers to achieving local content goals include a lack of qualified local personnel, limited availability of local materials and services, and financial constraints in supporting extensive local content programs.

8.2 Strategies for Overcoming Challenges

- **Mitigation Plans**: To address these challenges, Tom Chess T Group of Companies Limited will:
 - Invest in training and capacity building to bridge skills gaps.
 - Collaborate with local suppliers and contractors to build their capacity and ensure the availability of required materials and services.
 - Work with financial institutions and government bodies to secure funding and support for local content initiatives.

9. CONCLUSION

The Nigerian Content Development Policy (NCDP) is critical to the advancement of Nigeria's oil and gas industry, as it ensures that local participation is at the forefront of operations. It not only seeks to develop local capacity but also aims to foster technology transfer, innovation, and job creation for Nigerian citizens. The Nigerian Content Act, signed into law in 2010, serves as a guiding framework for increasing Nigerian involvement across upstream, midstream, and downstream activities within the oil and gas sector.

For Tom Chess T Group of Companies Limited, the NCDP is a core element in the way we approach our operations, especially in our key service offerings of tank rehabilitation, upgrade, and fabrication, as well as calibration of storage tanks. By aligning with the Nigerian Content Act, Tom Chess T Group of Companies Limited ensures that we maximize local expertise and resources, contributing to the overall national economic development.

Our commitment to local content is demonstrated through our adherence to regulatory requirements, our engagement with local communities, and our participation in industry forums that champion the cause of Nigerian content development. Through partnerships with regulatory bodies and a focus on developing local expertise, we continue to play a vital role in driving the objectives of the Nigerian Content Act. As a Nigerian-owned company, we take pride in our contributions toward fulfilling the act's objectives, which include increasing Nigerian participation, promoting sustainable development, and enhancing local capacity in oil and gas operations.

9.2 Commitment to Continuous Improvement

At Tom Chess T Group of Companies Limited, we are committed to ensuring that our Nigerian Content Development Policy remains dynamic and responsive to the ever-evolving needs of the oil and gas industry. As part of our strategic approach, we have built systems that allow us to continually assess, review, and enhance our local content initiatives in line with global best practices and the requirements of the Nigerian Content Act.

Our commitment to continuous improvement involves setting benchmarks for local participation, regularly updating our policies to reflect new technologies, and ensuring compliance with evolving regulatory standards. By fostering a culture of innovation and excellence, we seek to identify areas for growth and improvement, ensuring that our operations not only meet but exceed the expectations set forth by the Nigerian Content Development Act.

We also remain open to collaboration with key stakeholders, including local communities, government agencies, and industry associations, to ensure that our contributions to Nigeria's oil and gas sector align with the broader objectives of national development. By prioritizing the recruitment and training of Nigerian professionals, we ensure that our workforce is equipped with the skills necessary to compete in a global industry, thereby boosting Nigeria's standing in the global market.

In conclusion, Tom Chess T Group of Companies Limited is deeply committed to supporting the Nigerian Content Development Act's mission. Our on-going efforts to enhance local content, develop capacity, and promote sustainable development remain central to our strategy. We recognize that the oil and gas industry is a cornerstone of Nigeria's economy, and through our steadfast commitment to the Nigerian Content Act, we contribute to its growth and long-term success.

CLOSING STATEMENT

As we reflect on the incredible journey of **Tom Chess T Group of Companies Limited**, we are proud of the strides we have made in promoting local content and enhancing Nigeria's oil and gas industry. Our unwavering commitment to the Nigerian Oil and Gas Industry Content Development Act continues to drive our operations, enabling us to build a stronger, more resilient sector that benefits from the immense potential of our local resources, talent, and expertise.

The Nigerian Content Act is not just a regulatory framework for us; it is the cornerstone of our mission to champion the development of Nigerian enterprises and professionals. By embracing local content, we contribute directly to the growth of the Nigerian economy, create valuable employment opportunities, and foster innovation within the industry. Our dedication to these principles ensures that we remain a leader in the sector, providing world-class services and setting new standards for excellence.

Our vision for the future is clear: we aim to further solidify our position as a major player in Nigeria's oil and gas industry while continuing to empower local communities, build capacity, and invest in technology transfer. We are committed to nurturing a skilled workforce, strengthening our partnerships with local businesses, and advancing the overall objectives of the Nigerian Content Act.

As we look ahead, Tom Chess T Group of Companies Limited will continue to prioritize local content in all our projects, ensuring that our operations serve as a model for sustainable growth and development. We are confident that by staying true to our core values, we will continue to make significant contributions to the industry, paving the way for future generations of Nigerian professionals to excel in the global marketplace.

In conclusion, our commitment to local content remains stronger than ever, and we will keep striving to enhance the economic and social fabric of Nigeria. We are grateful for the trust and support of our partners, clients, and stakeholders, and we look forward to even greater achievements in the years to come.

Sincerely,

For: TOM CHESS T GROUP OF COMPANIES LIMITED



AUC. THOMPSON O.S. DOUGLAS FIMC, ARPM, MCPN, MNCS, MCAI, MISPON, MITAN, MNIG Executive Group Chairman/CEO Lead Management Consultant

