



Home Afrika Limited | 5th Floor, Morningside Office Park | Ngong Road, P.O. Box 6254 – 00100, Nairobi. Tel: +254 (0) 20 272000
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**ENVIRONMENTAL, SOCIAL AND GOVERNANCE POLICY
(ESG)
AUGUST 2024**



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1. Policy Statement

Home Afrika Limited (hereinafter referred to as ‘HAL’) recognizes that its employees, clients, service providers and other stake holders that it deals with through its operations can have an impact on the environment and community in which it operates in. It therefore comprehends and endorses the need for adherence to environmental, social, and governance policies consistent with its values by all parties associated with it. This Environmental Social and Governance policy therefore exists to provide a roadmap through which HAL can conduct business in a sustainable manner.

2. Purpose of This Policy

- ❖ The purpose of this policy is to affirm HAL’s significant emphasis on the identification, assessment and management of Environment, Social and Governance (ESG) risks. This policy therefore serves as a memorandum for HAL’s stakeholders to imbibe the sustainable development culture that HAL is determined to build. The policy affirms the commitment of these parties toward healthy ESG practices and serves as a reference point for them to be able to effectively implement the policy within their operational and legal boundaries. The policy will also be used as a tool to communicate to clients and stakeholders on how Home Afrika integrates ESG considerations into investment decision-making processes across all asset classes while also remaining focused on maximizing investment performance and Home Afrika’s fiduciary obligations to its clients by improving social responsibility, therefore meeting stakeholder expectations and in return improve access to capital to HAL.

3. Scope of This Policy/Applicability

This policy applies to all employees, customers, partners, vendors, stakeholders and parties.

4. Policy Principles

- i. Environmental matters: HAL shall conduct its business and operations in compliance with local and national environmental and occupational health and safety statutes and regulatory guidelines of the Republic of Kenya operational in the real estate sector.
- ii. Social Matters: HAL is cognizant of the far-reaching impact of its operations in its employees, stakeholders’ and surrounding communities’ lives. It is committed therefore to always considering the needs of their stakeholders and the impact a project could have in their lives. HAL recognizes the human rights guaranteed by the Constitution of Kenya and is steadfast in its compliance with statutes and regulatory guidelines regarding health and safety at work for its employees, labor rights including equitable pay and non-discrimination. HAL also requires that its service providers are also in compliance with the prevailing labor laws and regulations.
- iii. Governance Matters: HAL shall observe all law and regulations regarding corporate governance. To this end, HAL shall put particular emphasis on its board



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independence, diversity and integrity. In addition, HAL shall provide adequate disclosures in its business operations and, financial reporting, it shall also ensure that it has provided avenues for feedback from stakeholders and ensure prompt action for the same.

5. Policy Implementation

Implementation of this Policy will be guided by the following principles: -

- i. The Board through the respective committees shall through the Managing Director and the management ensure that all business is operated within the parameters of the law;
- ii. **The creation of a work environment which values and respects all employees-** the Company will comply with relevant regulations governing the protection of human rights, occupational health & safety standards and labour., environmental and business practices of the jurisdictions in which we conduct business.
- iii. **Incorporate ESG considerations into investment analysis and decision-making processes-** The analysis of ESG criteria will be embedded into the decision-making processes for all investments made by HAL.
- iv. **Adopt a responsible and ethical approach to governance-** The company will ensure the implementation of compliance policies and procedures, and of on-going monitoring of the group's systems and controls. It will also ensure that rigorous risk assessment and management controls are implemented throughout the business.
- v. The Board shall undertake education among various departments/staff on the importance of ESG in collaboration with other stakeholders;

6. ESG Policy Responsibility

The nomination and governance committee shall be tasked with assessing observance of the provisions herein and shall advise the board accordingly. Committee may consider as part of the company and industry analysis include:

- i. Corporate governance: whose scope shall include but is not limited to board structure (gender balance, qualifications suitability, ethnic diversity, executive remuneration and stakeholder engagement);
- ii. Regulatory amendments affecting land, construction, labor relations, workplace safety, tax remittance and statutes regarding conduct of business i.e. Bribery Act;
- iii. Environmental considerations that include assessment of the effect of any action on the environment that include but are not limited to Greenhouse Gas (GHG) Emissions restrictions and statutory regulations/guidelines on construction;
- iv. Gaining access to raw materials (e.g. security of building materials supplies, conflict minerals, bribery and corruption);
- v. Product evolution (e.g. low energy products, renewable energy); and
- vi. Corporate Social Responsibility activities.



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Employee Responsibility

- vii. All employees shall implement this policy through participation in the ESG sustainability activities;
- viii. Every employee shall, while at the workplace must Comply with the ESG procedures, requirements and instructions given by a person having authority over him;
- ix. An employee who contravenes the provisions of the above section commits an offence and disciplinary action shall be taken against him/her.

7. Benefits of ESG Disclosure & Transparency

- i. Builds brand reputation.
- ii. Builds Investor Confidence- Nowadays most investors inject capital in companies that are ESG Compliant.
- iii. Long-term Viability and Success- Companies that are forward-thinking in their approach to ESG and sustainability are better positioned for long-term success...
- iv. Fosters innovativeness – Companies have to find new ways of addressing global environmental, social and governance issues and trends.
- v. Engaging stakeholders - disclosing relevant information, companies enable stakeholders to understand their impact on the environment, society, and governance practices.

8. Monitoring & Evaluation

8.1. Audit and Investigation

- i. The Board through the external and internal auditors shall at regular intervals evaluate the effectiveness of this policy and make improvements where necessary.

8.2. Consultation and Collaboration

The Board may consult and collaborate with other organizations and stakeholders with a view to improve the provisions of this policy.

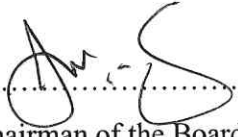
9. Correspondence

Any correspondence relating to implementation of this policy shall be addressed to the Managing Director.




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Approved by the Board of Directors on the31ST..... Day of ..AUGUST.....2024


.....
Chairman of the Board

.....31ST AUGUST 2024.....
Date

Seconded by;


.....
Director

.....31ST AUGUST 2024.....
Date