



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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HOME AFRIKA LIMITED

BUSINESS CONDUCT MANUAL

INTRODUCTION

This Business Conduct Manual contains HAL's four corporate governance Compliance policies namely: Corporate Citizenship and Sustainability Policy, Stakeholders Engagement Policy, Legal Compliance & Ethics Policy and the Environmental & Social Governance policy.

The Corporate Citizenship and Sustainability Policy advances the need for HAL to conduct its business affairs sustainably: economically, socially, and environmentally and in its best interest of long-term success based on HAL's core values which are in line with the fundamental rights of every individual, such as the protection of privacy, freedom of opinion and expression, freedom of association, non-discrimination, and the right to be heard.

The Stakeholders' Engagement Policy is premised on the fact that Home Afrika Limited is committed to engaging all stakeholders in constructive and meaningful communications as well as ensuring that there are dispute resolution mechanisms are available. This policy has been adopted therefore to promote open, trustworthy and sustained channels of dialogue.

The Environmental and Social Governance policy proceeds on HAL's belief that Environmental, Social and Governance (ESG) factors play an important role in assessing the long-term sustainability and value of its projects and therefore HAL fully integrate the policy into the management of its affairs aligned to the company's investment strategy, values, the interests of clients and stakeholders.

Finally, the Legal Compliance & Ethics policy seeks to assist the Board, Management and Staff in the fulfilment of its legal compliance and ethics responsibilities. The Board may as such modify or make exceptions to the Policy from time to time at its discretion inconsistency with the duties and responsibilities owed to HAL and its shareholders within the applicable legal, regulatory and compliance framework.

CORPORATE SOCIAL RESPONSIBILITY & SUSTAINABILITY POLICY (CSR)

AUGUST 2024

1. Introduction

At Home Afrika Limited (“HAL” OR “the Company”) the way we lead, work and behave is driven by our core values. These values influence the way we meet client needs while respecting the regulatory requirements and the way we promote ethically sound practices within Home Afrika. We are committed to integrating responsible and sustainable business practices across our operations. It is our policy to act responsibly in our day-to-day relationships with our customers, suppliers, employees, and communities.

We have a long history of supporting the public that we serve. Protecting our shared environment is of fundamental importance to Home Afrika, as it is to our employees. We have modeled our policy after some of the provisions of the Constitution of Kenya (2010), United Nations Sustainable Development Goals (SDGs), the UN Declaration of Human Rights and all applicable provisions of Kenyan legislation. These principals are embedded in our business, processes and ways of working.

This Policy is about how Home Afrika takes account of its economic, social and environmental impact in the way we operate as a business. By demonstrating our commitment to Corporate Social Responsibility and Sustainability, we aim to align our business values, purpose and strategy with the needs of our clients, whilst embedding such responsible and ethical principles into everything we do.

The elements of this Policy cover our approach in working with our clients, suppliers and the local communities. These principles include established standards to ensure that working conditions are safe, that employees are treated with respect and dignity, and that business operations are environmentally responsible and conducted ethically.

2. Rationale & Objectives

Our corporate citizenship is not just limited to social responsibility, it forms an intrinsic part of our business strategy.

HAL recognizes that social responsibility is not only a business imperative to create sustainable growth, but an essential component to engage with the communities in which we conduct our day-to-day business operations. Without this engagement, we cannot successfully and wholly attain our business goals. We also recognize that it is not limited to social activities, it also includes sustainable conduct of business. To this end, HAL has developed this policy in alignment with the company’s strategy on sustainability and Staff Code of Conduct.

It therefore pursues the following objectives :

- facilitating non-financial reporting processes;
- increasing the level of awareness and knowledge of policies and expected results with respect to material issues;
- spreading the culture of sustainability;
- fostering the spirit of donation, volunteerism and community engagement; and

- identifying areas of focus to ensure effective coordination of the voluntary activities.

3. Scope

This policy outlines the company approach towards its management of relationships with stakeholders. Its provisions are to be applied in all daily engagements by all staff and directors of the Company and its subsidiaries.

4. Policy Principles

In order to fulfill its obligations as a corporate citizen and adequately comply with regulatory requirements, HAL relies on the principles of compliance for sustainability issues and proactiveness for social responsibility.

- i. Compliance refers to HAL's commitment to strict observance of the law and applicable regulations. It also refers to the respect and willingness to observe community values.
- ii. Proactiveness refers to initiatives undertaken to alleviate suffering, promote human rights and the rule of law and helps the community and/environment in a significant way. It also refers to measures undertaken by the company to ensure that we operate in a less harmful world.

5. Policy Areas

Our Corporate Social & Sustainability framework is built around four critical areas:

- Stakeholders : this refers to all groups of people who are affected directly or indirectly by our company decisions, policies and operations.
They are divided into two distinct groups – primary and secondary stakeholders. Primary stakeholders consist of employees, shareholders, service providers, creditors and competitors. Secondary stakeholders are all the communities that our business has presence in.
- Engagement: HAL is cognizant of the fact that it takes all of us working together to truly have an impact. As such, we partner with organizations in the communities where we live and work to improve lives and society as a whole – by engaging in activities such as community service, philanthropy, and support for small, minority, women, and disadvantaged businesses.
- Ethics : HAL is committed to doing the right thing, conducting ourselves in a legal, ethical, and trustworthy manner, upholding our regulatory obligations, and complying with both the letter and spirit of our business policies.
- Environment: HAL respects the environment and recognizes a shared responsibility to protect our planet. Although our facilities and operations have a small ecological footprint, we reduce the environmental impact of our business through preservation, conservation, and waste reduction practices.

6. Core Policies

These refer to the reliance placed on the policy principles while applying the Corporate Social & Sustainability framework. In this regard, the core guiding policies are:

- 6.1 Compliance :this refers to our proactive activities that ensure that we incorporate sustainable business methods in the ordinary course of business. As a listed company, HAL is bound by all laws and regulations legislated in within the territorial borders of Kenya. We are also subject to various regulatory checks like financial and annual reporting requirements as well as financial and governance audits.

HAL by this policy also submits its adherence to international law supporting sustainable businesses. In particular HAL commits to the following basic minimums in its conduct of sustainable business:

- 6.1.1 Support for 2030 Agenda for Sustainable Development – whereas HAL as a corporate citizen of Kenya is bound to support all Sustainable Development Goals (SDGs), we have also identified specific goals that are integral to our core business. These are :

6.1.1.1 SDG 6 on access to water requires that there be access to water and sanitation for all. To fulfill this, HAL has ensured that in all areas it has a presence in , it has provided access to water for surrounding communities and commits to continue doing so;

6.1.1.2 SDG 11 on building of sustainable communities places a responsibility on HAL to use building materials that have been sourced in a sustainable manner. In line with the government’s agenda regarding affordable housing, HAL commits to willfully be bound by lawful regulation that guides affordable housing construction and in so doing pledges to provide affordable housing for all.

- 6.1.2 Protection of labor rights and equal opportunity – HAL believes that its success is based on professional qualities and moral integrity, as well as the capacity for collaboration and innovation of all of its employees. HAL therefore undertakes to create a working environment in which all of these characteristics are present and to support the development of each individual, irrespective of gender, age, sexual orientation, geographical origin or religious beliefs, so that people can find adequate conditions of respect and well-being.

HAL also endorses the provisions of the Universal Declaration of Human Rights (UDHR) and national legislation that prohibits all forms of forced labor , child labor and slavery as more illustrated in the Human Resources Policy and Staff Code of Conduct & Ethics

- 6.1.3 Customer protection – in order to guarantee the proper treatment of customers, in particular avoiding the adoption of product marketing and development

practices not oriented towards meeting the needs of people and the use of communication instruments that are not very transparent, over time the Company has spread a culture of accessibility and transparency throughout all levels of the company and has defined stringent control procedures involving the various company departments.

HAL commits to transparency in communication with its customers as well as pledges to use materials that are safe for consumers use and are procured in a sustainable manner.

6.1.4 Ethical business – HAL is committed to observing the highest standards of professional and business conduct. We observe all the provisions in the Anti-Bribery Act 2017 and prohibits corruption in all its forms. In order to cultivate the culture of legality and prevent fraudulent conduct, episodes of corruption and money-laundering phenomena, HAL through its Legal and Finance departments shall undertake quarterly internal sensitization for its staff. Our support for ethical business is further strengthened by our Staff Code of Conduct & Ethics as well as Whistle Blowing policy . These prohibit unethical conduct as well as provide avenues for resolving unethical conduct issues.

6.1.5 Environment protection – care for the environment is one of our key responsibilities and an important part of the way in which we do business. We strive to reduce our energy use, manage our carbon footprint and decrease our overall environmental impact. We commit our company to:

- Comply with all relevant environmental legislation, regulations and International laws
- Protect the environment by striving to prevent and minimize our contribution to pollution of land, air, and water;
- Seek to keep waste to a minimum and maximize the efficient use of materials and resources;
- Manage and dispose of all waste in a responsible manner;
- Provide training for our staff so that we all work in accordance with this policy and within an environmentally aware culture;
- Regularly communicate our environmental performance to our employees and other significant Stakeholders; and
- monitor and continuously improve our environmental performance.

6.2 Proactiveness: refers to initiatives undertaken to alleviate suffering, promote human rights and the rule of law and helps the community and/environment in a significant way. It also refers to measures undertaken to ensure that we operate in less harmful world and is manifested in the Company's not-for-profit activities.

Social Responsibility is supported in our operations and administrative matters and are consistent with the company's stakeholders' best interests. HAL is committed to positively impacting lives and remaining a beacon of hope and restoration in its Corporate Social Responsibility activities. HAL recognizes that in doing so, we will add significant value to our stakeholders.

7. Responsibility

This policy creates two distinct responsibilities, these are those that arise from the corporate social responsibility and those that arise from the sustainability responsibility.

7.1 Corporate Social Responsibility

- 7.1.1 The Marketing, Branding & PR department shall have responsibility to organize all CSR activities. These shall be themed appropriately and shall generally support the provision of decent living to all and provision of clean water and reliable sanitation systems
- 7.1.2 The funding for all CSR activities shall be raised by the Marketing Branding & PR department in liaison with the finance department.
- 7.1.3 There shall be activities organized quarterly, semiannually and annually that shall be planned as per the events calendar approved by company management.

7.2 Sustainability Responsibility

- 7.2.1 the legal department is tasked with the formulation of training material regarding the company's sustainable initiatives. The areas of focus shall be centered around the Policy Areas herein;
- 7.2.2 all staff are also bound by the terms of this policy and company guidelines regarding sustainable business practices.

8. Implementation

Responsibility for the implementation of the Code ultimately rests with the Marketing Branding & PR Manager and the Legal & Compliance Manager under supervision of the Managing Director and the Board of Directors.

9. Policy Owner

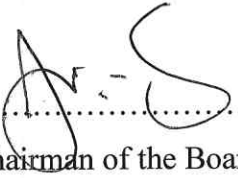
The Legal & Compliance Manager is responsible for training on the provisions of this policy and shall effect modifications in accordance with the applicable regulations as need arising or after every two (2) years.

10. Revision of Policy

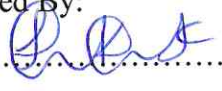
Management reserves the right to revise this policy at any time and in any manner without notice. Any amendment to the Policy shall take effect from the date when it is approved by

the Board of Directors of the Company. Any change or revision will be communicated appropriately and in writing.

APPROVED by the Board of Directors on the [31st] day of August.....2024


.....
Chairman of the Board

31st August 2024
.....
Date

Seconded By:

.....
Director

31st August 2024
.....
Date

STAKEHOLDERS' ENGAGEMENT & MANAGEMENT POLICY

1. INTRODUCTION

Home Afrika Limited (the Company) is committed to engaging all shareholders in constructive and meaningful communications as well as ensuring that there are dispute resolution mechanisms available. This policy has been adopted therefore to promote open, trustworthy and sustained channels of dialogue. A Nairobi Securities Exchange (NSE) listed company established under the Companies Act, CAP 486 of the Laws of Kenya whose main service offering is to address the housing need in Africa.

2. POLICY SCOPE

The Policy provides guidelines to the Board and company employees on how to interact with its stakeholders who are identified as:

- ✓ Shareholders & Customers /Clients;
- ✓ Business Partners and Service suppliers;
- ✓ Employees & Communities living near/in project areas; and
- ✓ Government Agencies and Regulatory Authorities.
- ✓ Institutional investors.

It focuses on the following issues:

- i. Communication; and
- ii. Dispute resolution.

3. POLICY GUIDING PRINCIPLES

- i. Transparency: Respect the diversity of views and values that shareholders present, and work to engage openly providing with the information that they need to make a meaningful contribution to our decision-making processes and activities;
- ii. Inclusivity: Include all classes of shareholders - minority and majority;
- iii. Consistency: Maintain regular and consistent communication to ensure continuity and meaningful engagement; and
- iv. Accountability: Inform shareholders of how their feedback influenced the outcome of a decision or business strategy.

4. PURPOSE OF THE STAKEHOLDERS' ENGAGEMENT POLICY

The Board of Directors of Home Afrika Limited (the "Board of Directors") and Management welcome interaction with stakeholders and believe that it is important to have direct regular and constructive engagement with them to allow and encourage open dialogue and the exchange of ideas. To facilitate such engagement, this policy outlines how the Board of Directors through company management communicates with stakeholders and arising disputes are resolved.

5. COMMUNICATION

The Company is committed to having continuous and constructive engagement directly with its stakeholders to facilitate continuous communication. To this end, the company maintains phone numbers and email addresses for every department.

These are **Telephone numbers**: 0716802070 or 0769279175.

Email Addresses: For ethical concerns or any form of whistleblowing, the email address: ombudsperson@homeafrika.co.ke

- ✓ For general inquiries: info@homeafrika.com;
- ✓ For inquiries regarding company products:
info@homeafrika.com/maketing@homeafrika.com
- ✓ For inquiries regard company financial statements and audit reports:
finanace@homeafrika.com
- ✓ For inquiries regarding legal matters or shareholder information:
legal@homeafrika.com.

These communication lines are for everyday interactions and have personnel dedicated to the consistent and transparent response. The company approaches communication per stakeholder's needs.

5.1. Shareholders & Customers

Shareholders' as stakeholders are particularly important to the company because all business activities exist to generate value increase for the shareholders. Their engagement is therefore continuous and mandatory.

To this end, shareholders are encouraged shareholders to express their views on governance matters to the management of the company outside of the annual general meeting using the above channels. The Board of Directors will annually communicate information about the Board of Directors and individual directors, the Company's corporate governance and executive compensation practices through the Company's annual integrated report and on its corporate website www.homeafrika.com.

The Board of Directors encourages shareholder participation at the Company's annual general meeting as well as through informal meetings throughout the year as necessary. At least twenty- one (21) calendar days before the annual general meeting shareholders will receive relevant sufficient and timely information concerning the date, location and agenda of the Annual General Meeting as set out under section 232 of the Companies Act, 2015. Each director/ nominee will attend the annual meeting, absent a compelling reason. At each annual meeting, the chairs of each board committee will be available to respond to shareholder questions. The Board of Directors encourages shareholders to attend the Company's annual general meeting as it provides a valuable opportunity to discuss the Company, its corporate governance, strategy, financials, and other important matters. At the annual general meeting, every shareholder shall be entitled to ask questions, seek clarification on the company's performance as reflected in the annual reports and accounts or on any matter that may be relevant to the company's performance or promotion of the shareholder's interests and to receive an explanation from the Board of Director.

Our corporate website also provides extensive information about the Board of Directors, its mandate, the board committees, and their mandates.

The Board through the Management communicates with shareholders in many ways. The primary form of communication is through the Managing Director's office, which communicates with shareholders on a need-based frequency.

Other means of communication with the shareholders include the Company's Integrated annual report, published quarterly financial reports, news releases, website, presentations at investor and industry conferences and other

meetings. Also, we hold our annual general meeting of shareholders in Kenya so that all our shareholders have the opportunity to participate.

As guided by the Corporate Disclosure Policy, the following are permitted, company spokespersons:

Primary Spokespersons

- ✓ Chairman
- ✓ Managing Director
- ✓ Executive Directors

Secondary Spokespersons

- ✓ Chief Finance Officer

In between annual general meetings, the Company supports an open and transparent process for shareholders to contact the Board of Directors, including the chairs of our board committees, through the office of the Managing Directors of the Company. This applies to the resolution of disputes.

Shareholders are encouraged to address any queries to the Board of Directors in writing through the office of the Managing Director. Besides, the company has designated specific email addresses to tackle various arising issues that the Shareholders or any other stakeholders may wish to highlight or bring to light. These are:

- ✓ For ethical concerns or any form of whistleblowing, the email address is:
ombudsperson@homeafrika.com
- ✓ For general inquiries: info@homeafrika.com;
- ✓ For inquiries regarding company products:
info@homeafrika.com/marketing@homeafrika.com;
- ✓ For inquiries regarding legal matters or shareholder information:
legal@homeafrika.com.

The Managing Director has been designated by the Board of Directors as its agent to receive and review communications and meeting requests addressed to directors. The Managing Director will determine whether the communication received is proper communication to the Board of Directors or should be addressed by Management.

Questions or concerns regarding the Company's general business operations, financial results, strategic direction, and similar matters are most appropriately addressed by Management.

Shareholders may also make their views known through individual voting for directors, and other matters submitted to shareholders for approval. Also, shareholders may put forward shareholder proposals under applicable rules and procedures. Management will endeavour to respond to all appropriate correspondence promptly.

Shareholders or other stakeholders of the Company may communicate with Management by mail, e-mail or telephone by contacting the Company's Investor Relations department.

Contact details:

Home Afrika Limited
Morningside Office Park,
Ngong Road
P.O. Box 6254-00100
Nairobi
E-mail: info@homeafrika.com
Phone: 0716802070

For Purchasers of the company products, the commitment is to provide prompt updates and to conduct transparent and above-board transactions that eventually deliver sanctified titles.

5.2. Business Partners & Suppliers

Our suppliers and business partners constitute a huge part of business support without which activities would be crippled. The Company aims to engage suppliers and business partners in a transparent manner in which terms agreed upon shall be binding. These engagements are collaborative aimed at the achievement of common goals in service to increasing shareholder value.

5.3. Employees & Communities

Company employees are the lifeblood of all company activities and without them, company operations would be impossible. Home Afrika is committed to ensuring that the workplace is a safe environment. The Board and the Management place reliance on the Human Resources Policy as well as the Staff Code of Conduct & Ethics Manual to establish and formalize its employees' rights and obligations. It also provides structures for the protection of their rights and lays down avenues for redress and resolution of arising staffing issues.

The Communities in which the company has operations are an integral part of the company's business environment. Home Afrika endeavors to respect cultural sites and shall communicate to the surrounding communities of any negative impact that its projects may have on them.

5.4. Regulators & Government Agencies

As a listed company, Home Afrika is subject to various standards of compliance that require continuous engagements with regulators and the fulfillment of a set of actions. The Board has set the opportunity for compliance by establishing a Legal & Compliance Policy that mandates the Legal Manager in liaison with the Company Secretary and the Chief Finance Officer to ensure that all requirements for compliance are fulfilled. It is emphasized that all communication from Regulators and Government agencies shall be promptly responded to as required.

6. DISPUTE RESOLUTION

Home Afrika is cognizant of the group dynamics that underpin the Company's ability to effectively achieve its business goals. The Board and management are committed to the creation of business relationships that are transparent and inclusive, this means the resolution of disputes with speed and confidentiality. Department heads

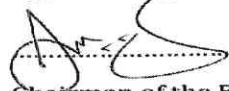
shall be the first point of contact for the resolution of all disputes, this shall be determined by the recipient of the complaint. Complaints shall be resolved within thirty (30) days of receipt.

The Board of Directors and Management recognize that shareholder engagement is an evolving practice in Kenya and globally, and will review this policy periodically to ensure that it is effective in achieving its objectives. The Company will endeavor to employ alternative dispute resolution mechanisms such as negotiation, mediation, and arbitration in the resolution of disputes between the different policy owners and shareholders.


7. REVISION

Management reserves the right to revise this policy at any time and in any manner without notice. Any amendment to the Policy shall take effect from the date when it is approved by the Board of Directors of the Company. Any change or revision will be communicated appropriately and in writing.

Approved by the Board of Directors on the 31st Day of AUGUST 2024


Chairman of the Board

31st AUGUST 2024
Date

Seconded by;

Director

31st AUGUST 2024
Date



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LEGAL COMPLIANCE & ETHICS POLICY

AUGUST 2024



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1. INTRODUCTION

The Board of Directors of HAL has adopted this Legal Compliance and Ethics Policy (“the Policy”) to assist the Management and Staff in the fulfillment of its compliance and ethical responsibilities. The Board may modify or make exceptions to the Policy from time to time at its discretion inconsistency with the applicable regulatory frameworks and obligations implemented by the government.

1.1. Policy Statement

In the fulfillment of its compliance responsibilities, HAL shall conduct its business affairs in full compliance with all applicable international and national laws, rules, and regulations. Specifically, HAL shall comply with the disclosure and listing requirements of the Nairobi Securities Exchange (the “NSE”) and with all applicable Kenyan legislation and related statutory requirements such as the Companies Act 2015, the Capital Markets Act (Cap 485A) and the Capital Markets Authority guidelines on Corporate Governance, as prescribed under the Capital Markets (Public Offers, Listing and Disclosures) Regulations, 2015.

1.2. Purpose of the Policy

The purpose of the Legal Compliance and Ethics Policy (“the Policy”) is to define the Management’s roles and responsibilities as well as functions and structures in a manner that facilitates a companywide compliance and ethics culture. The Board holds the ultimate responsibility for compliance management while Management is responsible for guidance and advice on the broader compliance management processes. The Policy outlines the overall compliance management framework of HAL in its capacity as a publicly listed company on the Nairobi Securities Exchange. It also aims to confirm companywide submission to ethical standards hereinafter appearing as well as those spelled out in other company policies.

1.3. Application of the Policy

This Policy applies to the Board, Management and staff of HAL and each member assumes the responsibility of complying with its content. It is designed to guide HAL’s standards of self-regulation and to adopt internationally accepted best practices concerning legal and compliance. This Policy can be amended from time to time. Any amendments to the Policy will take effect from the date of the Board Resolution.

1.4. Legal Compliance Defined

Compliance means the adherence to all applicable laws and regulations and in line with accepted national and international standards, as well as, the internal policies of HAL. Legal compliance in the context of this policy is defined as HAL’s continuous commitment to



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complying with all of these standards. Legal Compliance management is important since compliance obligations keep changing. A consistent and effective approach to compliance management is essential to mitigate risks that are driven by non-compliance, hence this policy.

1.5. Ethics Defined

Ethics can be defined as the embodiment of moral values, which describes what, is ‘right’ and what is ‘wrong’ in human behaviour and what ‘ought to be’. It can also be defined to be the consideration and application of frameworks, values and principles for developing moral awareness and guiding behaviour and action¹.

This policy shall provide guidance to all stakeholders² regarding company ethical standards and provide the appropriate course of action in the event of infractions.

2. THE LEGAL COMPLIANCE FRAMEWORK

The legal compliance framework consists of a series of deliberate reporting acts in compliance with regulatory requirements through instruments like the corporate governance performance self-assessment matrix; it also consists of the company’s commitment to conduct all company activities in compliance with the laws of the Republic of Kenya.

The legal compliance framework includes the following elements;

- i. ensuring that the company conducts legal business at all times and operates within the confines of the law applicable within the territory of the Republic of Kenya;
- ii. continuous staff training on ethical conduct through the legal department;
- iii. the provision of communication channels for discrete reporting of unethical conduct by all stakeholders;
- iv. an obligation register with a summary of key obligations, legislation and regulation and key legal compliance risks relating to the business activities of the company;
- v. a description of legal compliance roles and responsibilities and information on key specialists within the Company;
- vi. tools and systems facilitated or managed by the legal ethics and compliance manager to support business awareness, understanding, and compliance;
- vii. identification of training requirements and training program to build the capacity of the Company on ethics and compliance;
- viii. alignment with the Company’s risk management policy;



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- ix. information on the key mechanisms for the early reporting and escalation of alleged breaches of core policies or obligations; and
- x. a process setting out how to identify and respond to compliance risks, incidents and issues.

In particular, HAL shall ensure full compliance with the following laws and regulations:

2.1 The Constitution of Kenya

HAL shall ensure that all its operations are bound by both the letter and the spirit of the Constitution of Kenya. All the policies, institutional frameworks and administrative procedures of HAL shall effectively support the implementation of the Constitution.

2.2 Companies Act, 2015, Laws of Kenya

HAL shall at all times deliver its mandate and execute its powers within the boundaries of the Companies Act, and any related subsidiary legislation.

2.3 Capital Markets Act, Chapter 485A of the Laws of Kenya

As a company listed on the Nairobi Securities Exchange, HAL shall comply with the Capital Markets Act and any related subsidiary legislation.

2.4 Code of Corporate Governance Practices for Issuers of Securities to the Public, 2015

HAL shall adhere to the good governance principles stipulated under the Code, continuously optimize its processes to ensure compliance and make disclosures to the Regulators and the public as required.

2.5 Capital Markets (Securities) (Public Offers, Listing and Disclosures), Regulations 2002

HAL shall ensure that its operations are aligned to the Regulations which are the national benchmark for best practice in regulation and supervising public companies listed on the Nairobi Securities Exchange.

2.6 The Data Protection Act 2019

HAL shall ensure that personal data received from all stakeholders shall be processed and protected in accordance to the Act and the Company's Privacy Policy.

2.7 Proceeds of Crime and Anti-Money Laundering Act, 2009, Proceeds of Crime and Anti-Money Laundering Regulations, 2013 and Prevention of Terrorism Act 2012

HAL shall implement internal controls and other procedures that will deter criminals from using its facilities for money laundering and terrorist financing and ensure that business is conducted in conformity with the law and high ethical standards and that



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service is not provided where there is good reason to suppose that transactions are associated with money laundering activities or terrorist financing.

2.7 Government of Kenya's Vision 2030

HAL shall align all its strategies to the Government long term development blueprint – Vision 2030 concerning the provision of housing in Kenya.

2.8. All other applicable Laws of Kenya

HAL shall adhere to all laws of Kenya including all international laws ratified in Kenya and specifically those that govern corporate governance and leadership. Laws, rules, regulations, codes, circulars, guidelines and standards which apply to publicly listed companies shall be identified, documented and observed.

3. LEGAL COMPLIANCE PROCEDURE

3.1 Development of Compliance Registers:

HAL shall identify its legal compliance obligations and the respective compliance obligation owners who have overall responsibility for managing compliance. The compliance registers shall be continually reviewed and updated to ensure that appropriate and current obligations are recorded. This may include controls and the progress of action plans where appropriate.

3.2 Incorporation of Legislative Changes

HAL will adopt a proactive approach to ensure that changes in the legal and regulatory landscape are quickly integrated for purposes of compliance. This will be done through the presentation of timely legislative updates to the Board, Managing Director, Management and staff of HAL followed by updates, where applicable, on HAL's compliance registers by the Legal Compliance & Ethics Manager.

3.3 Verification of Compliance:

This refers to the monitoring, inspection and audit activities that are used to determine HAL's compliance status.

This will be done through:

- i. An internal legal audit to be conducted on an annual basis to determine compliance with annual reporting statutory requirements;
- ii. a comprehensive and independent legal audit to be conducted once every two (2) years to establish the level of adherence to applicable laws, rules, regulations, and standards;
- iii. a Governance Audit to be conducted to ensure HAL operates under codified governance practices;



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- iv. Ensuring that the findings from the audits are acted upon and any non-compliance issues arising corrected as necessary.

3.4 Compliance Reporting:

The compliance procedure enables regular efficient and effective reporting to the Managing Director, the Nominations & Governance Committee and the Board regarding Home Afrika's compliance obligations. The reporting includes information on compliance with the organization's regulatory obligations, compliance issues, compliance breaches, and compliance breach mitigation strategies. Reports on compliance breaches outline the breach and the corrective actions planned or undertaken to ensure that the possibility of re-occurring or systemic breaches is reduced.

- i. Management will receive updates on the compliance obligations and/or compliance risks relevant to their area as well as any compliance breaches that may have occurred.
- ii. The Managing Director will also receive regular compliance reports for endorsement before the Nominations & Governance Committee.
- iii. The compliance report will include information on the key compliance priorities, emerging compliance requirements and any significant compliance breaches.
- iv. The Board Nominations & Governance Committee will assist the Board in overseeing compliance by HAL with legal and regulatory requirements. The Committee will receive regular reports on compliance priorities, emerging compliance requirements and any significant compliance breaches.

3.5 Monitor Compliance Improvement

The compliance program and compliance performance are regularly monitored, measured and reported. The program is periodically reviewed by the Legal Compliance & Ethics Manager, in consultation with the Management to ensure that the program remains efficient and effective and is appropriate to our needs. This will provide the Board with a level of comfort that the Legal Compliance & Ethics Policy is effective and will highlight areas within the process that can be improved. These reviews shall be carried out in the various forms of internal and external audits. As part of continuous improvement, this policy may be amended by Management for approval by the Board

Recommendations from the compliance reports should be implemented by the compliance obligation owners and the improvement should be monitored and reviewed by the Board Nominations & Governance Committee.



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4. COMPLIANCE BREACHES

A breach may result from a failure to comply with regulatory requirements or from acts that are contrary to existing Kenya Law which may be deliberate or unintended. Compliance breaches shall be reported, particularly those that are recurring and systemic. All employees are encouraged to report any compliance breaches through their respective line managers.

Compliance breaches also include, but are not limited to, fraud, corruption, unauthorized access and use of information, environmental protection, occupational health and safety breaches, confidentiality and privacy breaches among others. The other Company Policies shall be read together with this one to provide guidelines on staff triggered compliance issues.

A compliance breach will be investigated upon reporting, assessed for appropriate categorization and appropriate remedial action taken to correct the breach as guided by the Human Resources Policy & Staff Code of Conduct & Ethics Manual.

5. COMPLIANCE TRAINING

The compliance program promotes awareness of compliance through the facilitation of training and education of our people regarding the compliance program and compliance obligations. Where appropriate, training may be tailored by or for individual business units and individuals.

HAL will facilitate the training of Management, Compliance Obligation Owners and staff as follows:

- i. Legislative updates provided to and discussed with Management at management meetings;
- ii. Policy training sessions conducted for staff and management by the Legal Department; and
- iii. Training sessions on emerging compliance obligations to be conducted for Compliance Obligation Owners. Training may be provided by the Legal Department or by an outsourced provider with expertise on the specific subject matter.

6. LEGAL COMPLIANCE RESPONSIBILITIES & AUTHORITIES

6.1 The Board

The Board retains the ultimate responsibility for legal and regulatory compliance and is charged with overseeing, reviewing and ensuring the effectiveness of Home Afrika's compliance systems. The Board is responsible for determining the appropriate level of compliance that the Board is willing to accept in the conduct of Home Afrika's business activities by approving the

necessary policies. The Board is advised regularly on compliance-related issues including any compliance breaches in the audits as well as special departmental reports.

6.1.1 Nominations & Governance Committee: The Board has established this committee to, amongst other things:

- ✓ review and oversee systems of risk management, internal control, and legal compliance;
- ✓ review the effectiveness of Home Afrika's Legal Compliance procedure for identifying, monitoring and managing compliance with relevant laws, regulations and associated government policies; and
- ✓ review and if necessary, make recommendations to the Board on the outcomes of investigations into 'Reportable Conduct' and Home Afrika's compliance with its regulatory obligations in respect of these.

6.1.2 The Managing Director: The Managing Director is accountable to the Board for ensuring the implementation and management of the compliance program. Specifically, this includes ensuring a compliance culture is promoted within the organization and our people adhere to this Compliance Policy.

6.2 Chief Financial Officer

The Chief Financial Officer (CFO) is responsible for the oversight of Home Afrika's compliance system implementation and operation. The CFO is accountable to the Managing Director for overseeing the compliance program to ensure: The ongoing effectiveness, integrity, and relevance of the compliance program to Home Afrika's operations;

- ✓ The compliance program accords with the requirements of Home Afrika's Board; and
- ✓ To the extent relevant, the compliance program complies with principles of good corporate governance and achieves applicable standards.
- ✓ It is the responsibility of the CFO (with the support of Legal, and the Audit, Risk and Compliance Function) to ensure that non-compliance issues are adequately investigated and all issues are reported to appropriate parties on time.

6.3 Legal & Compliance Manager

The Legal Manager is accountable to the Managing Director for the implementation, review, and management of Home Afrika's compliance program, including associated reporting to the Board.

The Legal & Compliance Manager is also accountable for:

- ✓ Ensuring that awareness of compliance is promoted within the organization;



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- ✓ Ensuring that Home Afrika has appropriate systems to identify, record and communicate its compliance obligations;
- ✓ Ensuring that compliance obligations contained within the Home Afrika Compliance Obligations Register are accurate and current;
- ✓ The active management of those compliance obligations agreed by the Board, including ensuring that appropriate controls are implemented;
- ✓ Delivering training and presentations to staff about compliance issues; and
- ✓ Providing effective advice to our people on compliance matters, including how to best comply with the compliance systems.

6.4 MANAGERS AND SUPERVISORS

Managers and Supervisors are responsible for ensuring effective implementation and maintenance of this Compliance Policy and that all our people adhere to the associated systems and guidelines. They are responsible for ensuring that all daily business activities are undertaken within the confines of Kenyan laws. All staff, volunteers and contractors, at all levels, will:

- ✓ have a responsibility to ensure that their activities on behalf of Home Afrika comply with all applicable legal and external obligations and Home Afrika procedures. To fulfil this obligation, they shall:
 - familiarize themselves with Home Afrika's Compliance Policy and other policies concerning compliance with specific areas of legislation that affect their work activities as defined by this and other company policies;
 - ensure that they adhere to relevant legislation and their compliance obligations;
 - perform their duties in an ethical, lawful and safe manner;
 - report and escalate all compliance concerns, issues and breaches as required by the compliance program; and
 - implement the practices learned in training provided by Home Afrika.

7. NON-COMPLIANCE

There is no circumstance under which it is acceptable for Home Afrika or any of its employees or contractors to knowingly and deliberately not comply with the law or to act unethically in the course of performing or advancing Home Afrika's business.

Non-compliance could expose Home Afrika to:

- ✓ risk of a financial penalty;
- ✓ loss of income;
- ✓ an inability to fulfil administrative, or business goals;
- ✓ negative publicity or reduced public regard; and
- ✓ legal action arising from non-compliance.



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8. RESPONDING TO NON-COMPLIANCE

Home Afrika assigns ownership and accountability for any non-compliance, thus ensuring action is taken. Should non-compliance be identified:

- ✓ Non-compliance is brought to 'owner's' attention (a manager);
- ✓ the root cause of non-compliance is analysed;
- ✓ rectification through system changes or training;
- ✓ annual reporting to the Managing Director of steps taken to address any instances of non-compliance;
- ✓ these activities are intended to provide reasonable assurance to Management that Home Afrika is complying with relevant legislation.

9. COMPLIANCE RESPONSIBILITY

- ✓ **Staff:** ensures all their activities conducted on behalf of HAL are in line with all applicable laws, rules, and regulations. Reports any compliance breaches they encounter in the course of duty.
- ✓ **Legal & Compliance Manager:** updates the compliance register with emerging compliance obligations regularly. Monitors the correction of compliance breaches and coordinates the compliance management process.
- ✓ **Management/Compliance Obligation Owners:** keeps abreast of emerging compliance obligations, ensures HAL complies with obligations under their role and that compliance breaches are remedied.
- ✓ **Board Nominations & Governance Committee** provides oversight on behalf of the Board to ensure that HAL complies with all legal and regulatory requirements.
- ✓ **Board of Directors:** ensures that HAL fulfils its legal compliance obligations and effectively manages any risk exposure resulting from any compliance breaches.

10. ETHICS MANAGEMENT

10.1 Ethics management Framework

Stakeholders are encouraged to observe the highest standards of ethical behavior i.e. to conduct themselves and company business in a manner that goes beyond what is legally required and at all times maintain integrity.

HAL approaches ethical management in a three-fold approach, these are:

i. Prevention

To prevent the occurrence of unethical conduct at the office, the Board has approved various company policies, the Staff Code of Conduct and Ethics Manual alongside the Human Resources Policy and this Conduct of Business Manual to



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guide what is ethical behavior and what is not. Whereas it is not possible to identify all instances of unethical behavior, all Stakeholders are encouraged to go beyond just obeying the law. The Policies read together with this one aim to promote a culture of ethical conduct that shall complement the compliance with all law applicable in Kenya.

ii. *Detection*

Ethical standards apply uniformly to all Stakeholders as well as the Board of Directors. It is the responsibility of all Stakeholders to report all instances of unethical behaviour using anonymous channels provided for by the Whistle Blowing Policy i.e. ombudsperson@homeafrika.com. Direct reports or observations of unethical conduct are the primary form of detection, this way HAL spreads the culture of ethics monitoring to its Stakeholders. The Legal Department is tasked with providing suggestions for optimization of the detection processes in liaison with the Human Resources Department and shall maintain a register of ethical infractions to be shared with the Nominations and Governance Committee quarterly.

iii. *Remediation*

HAL through the Legal Department and the Human Resources Department shall identify the root causes of unethical behavior and shall continuously optimize processes and training resources to ensure that the standards of integrity are upheld. In the event any staff member is found to have conducted themselves in an unethical manner, the conduct is classified as gross misconduct and shall be dealt with as set out in staff contracts and the Human Resources Policy. Secondary Stakeholders shall be dealt with on a case by case basis but on the premise that unethical behavior is not acceptable.

10.2 Commitment to Ethics

Management's Commitment to Ethics

- 10.2.1 Managers at HAL must set a prime example. In any business practice, honesty and integrity must be the top priority for them.
- 10.2.2 Managers must have an open-door policy and welcome suggestions and concerns from employees. This will allow employees to feel comfortable discussing any issues and will alert executives to concerns within the workforce.
- 10.2.3 Managers must disclose any conflict of interests or related party transactions regard their position within HAL.
- 10.2.4 Managers shall make truthful and timely declarations regarding their shareholding and share trading activities when required to do so.



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Employee Commitment to Ethics

- 10.2.5 HAL employees will treat everyone fairly, have mutual respect, promote a team environment and avoid the intent and appearance of unethical or compromising practices.
- 10.2.6 Every employee needs to apply effort and intelligence in maintaining ethics value.
- 10.2.7 Employees must disclose any conflict of interests or related party transactions regard their position within HAL.
- 10.2.8 Employees will help HAL to increase Shareholder and customer satisfaction by providing quality products and timely response to inquiries.
- 10.2.9 Employees shall make truthful and timely declarations regarding their shareholding and share trading activities when required to do so ³;
- 10.2.10 *Employees should consider the following questions to themselves to determine whether an action or inaction is ethical or questionable:*
 - ✓ Is the behavior legal?
 - ✓ Does the behavior comply with all appropriate HAL policies?
 - ✓ Does the behavior reflect HAL values and culture?
 - ✓ Could the behavior adversely affect company stakeholders?
 - ✓ Would you feel personally concerned if the behavior appeared in a news headline?
 - ✓ Could the behavior adversely affect HAL if all employees did it?

10.3 Maintaining Ethical Practices

- 10.3.1 HAL will reinforce the importance of the integrity message and the tone will start at the top. Every employee, manager or director needs to consistently maintain an ethical stance and support ethical behavior.
- 10.3.2 Employees at HAL should encourage open dialogue, get honest feedback and treat everyone fairly, with honesty and objectivity.
- 10.3.3 HAL has tasked the Human Resources Manager and the Legal Compliance & Ethics Manager to make sure this Policy alongside the Staff Code of Conduct is delivered to all employees and that concerns regarding both can be addressed.
- 10.3.4 Employees are required to recertify their compliance to Ethics Policy on an annual basis.

³ As guided by the Insider Trading Policy and Declaration forms



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10.4 Arising Ethical Issues

- 10.4.1 Data Accuracy: Financial information, employee files, and other corporate data should meet the single standard of complete integrity. Employees tasked with preparing any form of financial data for approval by the Board for dissemination to the public shall ensure that it is accurate and truthful.
- 10.4.2 Insider Trading: In the course of ordinary business, the Board and staff shall have access to material non-public inside information regarding company strategy, financial information, products that may influence the price of shares traded. HAL prohibits the disclosure of such information to third parties or the use of such information to gain an unfair advantage over members of the public - would be prospective shareholders.
- 10.4.3 Political activities and affiliations: HAL will not seek improper advantage through contributions of its funds, equipment, facilities or services or the provision of other gifts or benefits to public officials or political organizations.
- 10.4.4 Relationship with employees: HAL is committed to operating under fair and equitable personnel practices and to providing a safe and healthy work environment.
This includes:
- ✓ Selection and placement of employees based on their qualifications and without discrimination in terms of race, religion, national, origin, sex, age, disability, or other categories protected by law;
 - ✓ Fairly compensating employees and taking into account prevailing practices;
 - ✓ Provision of trusted protection spaces for employees where unethical issues can be reported without fear of reprisal;
- 10.4.5 Protection of company assets and information:
- ✓ The Company's assets are to be used for their intended purposes and not for personal advantage. This applies to funds, facilities, equipment, motor vehicles, supplies, customer lists, and computer software.
 - ✓ Employees responsible for acquiring or disposing of assets or are authorized to incur liabilities or expenses on behalf of the Company are encouraged to stay within the limits of their authority and are at all times required to act in the best interests of the company



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- ✓ HAL's confidential and proprietary information shall be protected from improper disclosure by Directors or Staff. Information about a supplier or a customer's business is confidential. Disclosure of this information within the Company should be strictly on a need-to-know basis. Disclosure to outsiders, except to comply with legal requirements, is not only unethical but may be illegal.
 - ✓ Information in employees' personnel and benefits records is confidential. Employees who have access to this information, shall treat it as confidential and do not disclose it except on a strictly need-to-know basis. Medical records are never to be disclosed without the individual's written permission, unless necessary to comply with the law.
- 10.4.6 Conflicts of Interest: outside the business and personal interests should not lessen Employees and Directors' commitment to the Company by either dividing loyalties. Directors and Employees shall avoid situations that could compromise independent judgment; but if a situation arises, handle it forthrightly and honorably. The first step should be to report any potential conflict of interest as required to the Human Resources Manager or the Legal Compliance & Ethics Manager or anonymously to the ombudsperson@homeafrika.co.ke In all business relationships with outside individuals, companies, and organizations, and all business dealings, Directors and Employees should:
- ✓ Act per the law established HAL policies and procedures, and rely on good conscience and judgment.
 - ✓ Avoid personal transactions or situations in which personal interests' conflict, or might be construed as conflicting with, those of the Company.
 - ✓ Avoid business arrangements or personal investments that could lead to direct conflict with the company business interest
 - ✓ Avoid business arrangements involving the company that accrues a financial benefit to an employee or director in the form of kickbacks.
- 10.4.7 Conflict of Interest – Directors: in many situations, disclosure may cure a conflict of interest or allow the Company to appropriately avoid a potential conflict of interest. If the Board is making decisions that may provide a benefit to a director's private interests, the director shall fully disclose such interest and abstain from any vote on such matter and/or withdraw from the deliberations altogether. In certain situations, a conflict



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may be so severe as to only be resolved by the director's resignation from one or both of the conflicting positions. This shall be guided by the provisions of the Board Charter regarding conflict of interest.

10.5 Reporting Ethical Issues

This policy alongside all other company policies to be read with it is a general standard of conduct. It cannot be a substitute for personal integrity and good judgment. It cannot spell out the appropriate response to every type of situation, nor can it cover all the laws and regulations applicable to HAL. It can only suggest prudent courses of action. Some situations, however, are clear. Whether the motives are to improve corporate performance or personal enrichment, any Stakeholder with knowledge of any breach of this Policy shall report it immediately, including without limitation any:

- ✓ Violations of law, such as misrepresentations of products, misuse of inside information fraud, or other irregularities;
- ✓ Financial irregularities (e.g. intentional misrepresentation of financial information or misappropriation of assets.
- ✓ criminal action or inaction prohibited by Kenya laws including environmental and labour infractions;
- ✓ form of harassment, discrimination or Anyone in good faith reporting such infractions will be protected

Any breach of this policy should be reported immediately to your supervisor, a member of management, the Human Resources Manager, the Legal Compliance & Ethics Manager or confidentially through the Whistleblowing email.

HAL encourages all Stakeholders⁴ to report all ethical issues. Shareholders, Business Partners and members of the public are advised to report ethical concerns or any form of whistleblowing to the email address: ombudsperson@homeafrika.com or write a letter addressed to the Ombudsperson at P.O Box 6254-00100 Nairobi.

HAL Employees and Directors are advised to report ethical concerns or any form of whistleblowing to the Ombudsperson noted above or deposit a letter addressed to the Ombudsperson in the suggestion box present at the office premises.



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Ethical issues shall be investigated discreetly using the Whistleblowing processes and structure that shall afford protection from reprisal or retaliation to all persons who report incidences.


10.6 Policy Compliance

The Legal Compliance & Ethics Department shall maintain a record of reported ethical issues and shall make quarterly disclosures to the Nominations and Governance Committee and annual disclosures in the Integrated Report.

11. REVISION

Management reserves the right to revise this policy at any time and in any manner without notice. Any amendment to the Policy shall take effect from the date when it is approved by the Board of Directors of the Company. Any change or revision will be communicated appropriately and in writing.

APPROVED by the Board of Directors on the 31ST Day of AUGUST 2024

Chairman of the Board.  Date 31ST AUGUST 2024

Seconded By:  Date 31ST AUGUST 2024



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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 ofAUGUST.....2024

.....
Chairman of the Board

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

Seconded by;

.....
Director

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