
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

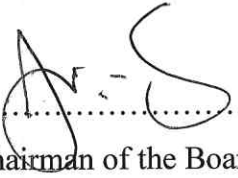
The Legal & Compliance Manager is responsible for training on the provisions of this policy and shall effect modifications in accordance with the applicable regulations as need arising or after every two (2) years.

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


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Chairman of the Board

31st August 2024
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Date

Seconded By:

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Director

31st August 2024
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Date

