



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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LEGAL COMPLIANCE & ETHICS POLICY

AUGUST 2024



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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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



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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