

CORPORATE GOVERNANCE REPORTING TEMPLATE FOR ISSUES OF SECURITIES TO THE PUBLIC
 TO BE FILLED IN LINE WITH THE REQUIREMENTS OF THE CODE OF CORPORATE GOVERNANCE PRACTICES FOR ISSUERS OF SECURITIES TO THE PUBLIC, 2015

Company Name (in full)
 CENTIUM INVESTMENT COMPANY PLC

Company Details to be Provided:

Company market to book ratio at end of financial year
 0.45868

Dividend per share at end of financial year
 666,441,714

Dividend cover at end of financial year
 8.96

Net sales at end of financial year
 2,131,800,000

Net profit as per Income Statement at end of financial year
 4,929,963,000

Total debt (short and long term) as per Balance Sheet at end of financial year
 2,474,137,000

Total equity as per Balance Sheet at end of financial year
 3,698,126,000

Total no. of Board members at end of financial year
 10

Chairman Signature
 CEO Signature
 Company Secretary Signature

No. of independent directors at end of financial year
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No. of non-executive directors at end of financial year
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Mandatory or 'apply or explain'	Part No.	Question	Kenya Code Reference	Application - FA, PA or NA - See Notes 1, 2, 3&4	Application of Explanation - Note 3 & 4	Source of Information
M	A	INTRODUCTION				
M	A.1	Has the company developed and published a Board Charter which is periodically reviewed and which sets out the Board responsibility for internal control?	1.1.2, 2.6.2, 6.3.2	FA	The Company has a Board Charter which is periodically reviewed by the Board and the latest edition being the July 2018 Board Charter that has been published on the Company's website. The Board Charter sets out the responsibility of the Board for internal control among other matters.	The Board Charter and the Company Website
M	A.2	Do the Board Charter or company documents distinguish the responsibilities of the Board from management in line with Code requirements?	1.1.2, 2.3.1, 2.3.2, 2.6.2	FA	The Company Board Charter clearly lays out the duties and responsibilities of directors and distinguishes it from Management.	The Board Charter
A or E	A.3	Is there a statement indicating the responsibility of Board members for the application of corporate governance policies and procedures of the company?	1.1.6	FA	The Board Charter in its preamble recognizes that good corporate governance is critical to ensure the Company's success. The Board Charter applies the corporate governance principles.	The Board Charter
M	A.4	How has the Board ensured all directors, CEOs and management are fully aware of the requirements of this Code?	1.1.6	FA	The Board through its Company ensures that all Directors, Management and CEO are informed about the provisions of the Code through trainings, both internal and external, on the provisions of the Code. The trainings also ensure that the Directors are fully aware of the requirements of the Code and the minimum standards set out therein. The Company Secretary also reports to the Nominations and Governance Committee and the Board on the provisions of the Code as well as the status of compliance with the provisions of the Code. The Company also ensures that the Board and Management are fully aware of the requirements of the Code through the results of both the governance audit and the Board evaluations are tabled to the Board for their knowledge and Management implements the recommendations made from evaluations.	The Board Charter
M	A.5	Do company documents indicate the role of the Board in developing and monitoring the company strategy?	Part II - Overview, 2.1	FA	The Board Charter clearly states that the Board must determine the business strategies, communicate strategy issues with senior management and plans that underpin the corporate strategy.	The Board Charter and Annual Report
A or E	A.6	Does the company strategy promote sustainability of the company?	2.3.6	FA	Yes. The Company's strategy is crafted to deliver the best and sustainable return to all its stakeholders with particular focus on its shareholders. The strategy is designed to ensure that the Board and Management are fully aware of the requirements of the Code and the minimum standards set out therein. The Company also ensures that the Board and Management are fully aware of the requirements of the Code through the results of both the governance audit and the Board evaluations are tabled to the Board for their knowledge and Management implements the recommendations made from evaluations.	The Company Website
M	A.7	Are all board committees governed by a written charter/terms of reference, disclosing its mandate, authority, duties, composition, leadership and working processes?	2.2.2	FA	The Company has in place Charters for all the Committees that govern all the affairs of the respective committees.	The respective committees charters and the Company Website
M	B	BOARD OPERATIONS and CONTROL				
M	B.1	Has the Board established a Nominations Committee comprised mainly of independent and non-executive Board members?	2.1.1, 2.2.2	FA	The Company has a Nominations and Governance Committee in place that is currently comprised of three independent Directors with three out of the five Directors also being independent Directors.	The Company Website, the Annual Report
M	B.2	Is the chairperson of the Nominations Committee an independent director?	2.2.3	FA	The Chairperson of the Nominations and Governance Committee is Mr. Susan Gitau who is an Independent Non Executive Director.	The Annual Report
M	B.3	Has the board adopted and published procedures for nomination and appointment of new Board members?	2.1.1, 2.1.7	FA	The Nominations and Governance Committee Charter and the Board Charter outline the process and procedure for appointment of new Board members.	The Nominations and Governance Committee Charter and the Board Charter.

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M	B.4	Is the board size adequate for the exercise of the company business?	2.1.4	FA	The Board is currently comprised of Ten Members possessing diverse skills and expertise to ensure that the best interest of the Company prevail in every decision of the Board. The Board Charter provides that the Board shall be comprised of persons possessing various skills, experience and educational background required for proper oversight of the Company's operations by the Board. The Board Charter also provides that the composition of the Board should diverse in terms of nationality, age, race and gender. The Board is currently comprised of persons with expertise in various fields such as finance, investment, legal, risk management, economics, audit, insurance, human resource, internal control, information technology and other related fields. The Board members are in different age groups. Of the Ten Directors, Six are independent non-Executive Directors.	The Company Website and the Annual Report.
A or E	B.5	Has the board adopted a policy to ensure the achievement of diversity (including age, race and gender) in its composition?	2.1.2, 2.1.3, 2.1.5, 2.5.1	FA	The Board Charter provides that the Board shall be comprised of persons possessing various skills, experience and educational background required for proper oversight of the Company's operations by the Board. The Board Charter also provides that the composition of the Board should diverse in terms of nationality, age, race and gender. The Board is currently comprised of persons with expertise in various fields such as finance, investment, legal, risk management, economics, audit, insurance, human resource, internal control, information technology and other related fields. The Board members are in different age groups. Of the Ten Directors, Six are independent non-Executive Directors.	The Board Charter.
M	B.6	Do the Board members represent a mix of skills, experience, business knowledge and independence to enable the discharge of their duties?	2.1.1	FA	The Board Charter provides that the Board shall be comprised of persons possessing various skills, experience and educational background required for proper oversight of the Company's operations by the Board. The Board Charter also provides that the composition of the Board should diverse in terms of nationality, age, race and gender. The Board is currently comprised of persons with expertise in various fields such as finance, investment, legal, risk management, economics, audit, insurance, human resource, internal control, information technology and other related fields. The Board members are in different age groups. Of the Ten Directors, Six are independent non-Executive Directors.	The Annual Report.
M	B.7	Has the board adopted and applied a policy limiting the number of board positions each board member may hold at any one time?	2.1.6	FA	The Board Charter provides for a limit to the number of directorships that a Director may hold at any given time in accordance with the limits set out in the Code.	The Board Charter.
M	B.8	Have any Alternate Board members been appointed? If so, have the Alternate Director/s been appointed according to regulations and Code requirements?	2.1.6, 2.1.7	FA	Yes, Mr. North B. Rubero is the board representative of KDC. We confirm that the alternate Directors have been appointed according to the regulation and Code requirements.	The Annual Report.
M	B.9	Are independent directors at least one-third of the total number of Board members?	1.1.2, 2.1.1, 2.4.1	FA	Five out of the Ten Directors are independent directors.	The Annual Report.
A or E	B.10	Does the Board have policies and procedures to annually assess the independence of independent Board members?	2.4.1	FA	The Board Charter has listed the independence requirements and has a requirement for assessment of independence of the Board annually. The Non-Executive Director's Governance Committee regularly assesses the status of independence of Board members.	The Board Charter, the Nominations and Governance Committee Charter and Board minutes.
M	B.11	Do all independent Board members have a tenure of less than 9 years?	2.4.2	FA	The Board Charter provides that a Director loses independent status after 9 years in line with the provisions of the Code. All Directors retire by rotation after three years and are eligible for re-election. Independent and non-independent directors are given equal consideration for re-election of directors entitling by rotation.	The Board Charter.
M	B.12	Is the board comprised of a majority of non-executive board members?	2.1.3	FA	Yes, Nine out of Ten board members are Non-Executive Board members.	The Board Charter and the Annual Report.
M	B.13	How does the Board ensure a smooth transition of Board members?	2.1.8	FA	The Board Charter has provisions on succession planning that provide that the terms of directors shall end at different times and not more than one third of the directors retire at the same time. This ensures there is a smooth transition of Board members and that institutional memory is preserved.	The Board Charter and Articles of Association.
M	B.14	Has the Board established an effective Audit Committee according to Code requirements?	2.2.4, 5.5.1, 2.1.7	FA	Yes, It has. The Company has an Audit Committee comprised of Five directors, four of whom are independent with at least one of them holding a professional qualification in accounting and in good standing with the relevant professional body.	The Annual Report.
M	B.15	Are the functions of the Chairperson and the Chief Executive Officer exercised by different individuals?	2.3.3	FA	Yes. The Board Charter differentiates the roles of CEO and Chairman and states that the Board is committed to uphold the Board Charter. The Chairperson of the Board is Dr. Donald Kibukaia and the CEO is Dr. James Mworia.	The Board Charter and the Annual Report.
M	B.16	Is the Chairman of the Board a non-executive board member?	2.3.4	FA	The current Chairperson Dr. Donald Kibukaia is a non-executive board member.	The Company Website and the Annual Report.
A or E	B.17	Has the Board established procedures to allow its members access to relevant, accurate and complete information and professional advice?	2.3.5	FA	The Board Charter provides that directors can seek independent professional advice where the need arises at the expense of the Company.	The Board Charter.
M	B.18	Has the Board adopted a policy on managing conflict of interest?	2.3.8	FA	The Board has a conflict of interest policy and maintains a conflict of interest register where all conflicts declared by Board members are recorded. The Board Charter also has a conflict of interest provision so as to guide directors on how to deal with conflicts and potential conflicts.	The Board Charter, the Conflict of Interest Policy and Conflict of Interest Register.
M	B.19	Has the Board adopted a policy on related party transactions to protect the interests of the company and all its shareholders and which meet the requirements of the Code?	2.2.7	FA	The Board has adopted a Stakeholder Engagement policy that protects the interests of the company as well as its shareholders and it meets the requirements of the Code.	The Procurement Policy.
M	B.20	Has the company appointed a qualified and competent company secretary who is a member in good standing of KESK?	2.3.9	FA	The current Company Secretary, Mical Agins, is an advocate of the High Court, that is in good standing with the CPK and is also a member of the Law Society of Kenya.	The Annual Report.
A or E	B.21	Has the Board adopted policies and processes to ensure oversight of sustainability, environmental and social risks and issues?	2.3.2, 2.3.6	FA	The Company has an ESG Policy which has been governing our projects in the various sectors and is in compliance with the standards of ESG. The Company also conducts ESG reports to regulatory authorities.	The Annual Report.
A or E	B.22	Has the Board developed an annual work plan to guide its activities?	2.6.3	FA	The Board has in place an annual work plan to guide its activities. This is embedded in the Board Charter which provides that the Board must have an annual work plan setting out activities to be covered in every financial year. The Board develops an annual calendar for the activities of the Board and the committees before the end of each calendar year for the next year.	The Board Charter.
M	B.23	Has the Board determined, agreed on, its annual evaluation process and undertaken the evaluation of the performance of the Board, the Board Committees, the CEO and the company secretary?	2.6.4, 2.8	FA	The Board Charter provides for annual Board evaluation of the performance of the Board Committees, the CEO and the Company Secretary.	The Board Charter.
A or E	B.24	Has the Board established and applied a formal induction program for incoming members?	2.7.1	FA	The Board has established a formal induction program and training for new incoming directors. Newly appointed directors receive comprehensive, formal and tailored induction program covering the Company's business and strategy and industry effectively contribute to the Board activities.	The Board Charter.

A or E	B.25	Do Board members participate in on-going corporate governance training to the extent of 12 hours per year?	2.7.3	FA	The Board Charter provides that board members should attend at least twelve hours of corporate governance training every year. The Company confirms that its directors shall receive the recommended 12 hour training during the course of the current year.	The Board Charter
A or E	B.30	Has the Board set up an independent Remuneration Committee or assigned to another Board committee the responsibility for determination of remuneration of directors?	2.9.2	FA	The Board Charter provides that the Remuneration and Governance Committee shall be established and its terms of reference shall be approved by shareholders at the AGM.	The Board Charter and the Nominations and Governance Committee Charter
M	B.27	Has the Board established and approved formal and transparent remuneration policies and procedures that attract and retain Board members?	2.9.1	FA	The Board Charter provides that the Remuneration and Governance Committee shall be established and its terms of reference shall be approved by shareholders at the AGM.	The Board Charter
M	B.28	How does the Board ensure compliance with all applicable laws, regulations and standards, including the Constitution and Internal Policies?	2.10, 2.10.1, 2.10.2	FA	The company has a very competent legal team and a compliance function which develops a compliance matrix for all applicable laws and regulations. This team conducts regular compliance assessments to ensure that the company remains	The Annual Report
M	B.29	In the past year, has the Board organized a legal and compliance audit to be carried out on a periodic basis?	2.10.3	FA	The Board Charter has listed the independence requirements and has a requirement for assessment of independence of the Board annually. The Nominations and Governance Committee regularly assesses the status of independence of Board members.	Legal and Compliance Report
A or E	B.30	Has the Board subjected the company to an annual governance audit?	2.11.1	FA	The Corporate Governance Code provides that the governance audit for listed companies be carried out bi-annually. However, Management has in place a framework for internal legal and compliance checks annually and the report is tabled before the Nominations and Governance Committee. The Company conducted an internal governance audit for the financial year ended 31st March 2023.	The Annual Report
C. RIGHTS OF SHAREHOLDERS						
M	C.1	Does the governance framework recognize the need to equitably treat all shareholders, including the minority and foreign shareholders?	3.0 Overview, 3.2.1	FA	The company's articles of association provides for equal treatment of all shareholders including minority and foreign shareholders. This is demonstrated through the widespread publication of material information of the company in widely read national and regional newspapers as well as publication of material information on the Company Website. Furthermore, the Annual Report provides for the equal treatment of minority shareholders.	The Company Articles of Association, Newspaper Announcements, the Company Website and the Annual Report.
M	C.2	Other than at the AGM, how does the Board facilitate the effective exercise of shareholders' rights?	3.1.1	FA	Management regularly engages the shareholders through various media. Its website and social media to disseminate important company information and governance issues.	Newspaper Announcements, the Company Website, the Annual Report and the Company social media pages.
M	C.3	How does the Board facilitate shareholders participation at the AGM?	3.1.1	FA	The Board facilitates shareholder participation at the AGM by sending out notices and the company's website provides information regarding the AGM. Management also regularly uses the media and sends SMS reminders the week of the AGM to ensure every shareholder as possible attend the AGM. At the AGM, the board gives the shareholders the opportunity to raise queries they may have and also gives the opportunity for all shareholders to vote and pass resolutions.	The Annual Report and AGM Notices
A or E	C.4	Are minority and foreign shareholders holding the same class of shares treated equitably?	3.2.1	FA	All shareholders of the company are treated equally regardless of shareholding or their domicile. The company pays the same amount of dividends per share regardless of the number of shares held.	The Company Articles of Association and the Annual Report.
A or E	C.5	Is there evidence that the Board proactively provides information to shareholders and the media, (and in a timely basis) on corporate affairs and corporate governance?	3.1.1, 3.4.1	FA	As required by the Capital Markets (Securities) (Public Offer, Listing and Disclosure) Regulations, 2002, the Company promptly notifies shareholders and the media of matters which are material to its corporate affairs and corporate governance. The Company's website is regularly updated with information material to shareholders on corporate governance.	Newspaper Announcements, the Company Website and the Company social media pages.
D. STAKEHOLDER RELATIONS						
A or E	D.1	Does the Board have a stakeholder-relative approach in its practice of corporate governance and which identifies its various stakeholders?	4.1.1	FA	The Company has developed a Stakeholder Engagement Policy that was adopted on 27th November 2018. The Policy identifies key stakeholders, prescribes the processes for stakeholder engagement and govern the Company's relationship with its stakeholders.	The Stakeholder Engagement Policy
A or E	D.2	Has the Board developed policies, procedures and strategies to manage relations with different/key stakeholder groups?	4.1.2, 4.1.3, 4.1.5, 4.2.1	FA	The company has a Stakeholder Engagement Policy which governs the company's interactions with various stakeholders.	The Stakeholder Engagement Policy
A or E	D.3	How does the Board take into account the interests of key stakeholder groups prior to making decisions?	4.1.4	FA	The company maintains communications channels with the various stakeholders and receives feedback from stakeholders in the course of making decisions.	The Stakeholder Engagement Policy
M	D.4	How does the Board ensure effective communications with stakeholders?	4.2, 4.2.1	FA	The Board through the Company website and through Management ensures that sufficient information is provided to the shareholders in the print media, on the company's website and social media platforms.	Newspaper Announcements, the Company Website and the Company social media pages.
M	D.5	Has the Board established a formal dispute resolution process to address internal and external disputes?	4.3.1	FA	The Stakeholder Engagement Policy provides for a dispute resolution clause that caters for disputes with stakeholders, both internally and externally.	The Stakeholder Engagement Policy
E. ETHICS AND SOCIAL RESPONSIBILITY						
A or E	E.1	Does the Board ensure that all deliberations, decisions and actions are founded on the core values (responsibility, accountability, integrity and transparency) underpinning good governance and sustainability?	5.1.1	FA	The Board Charter and the Company's Code of Ethics and Business Standards provide a standard for which all actions and decisions of the Board and members of the Company shall follow. All Board Directors and staff are bound to adhere to the terms of the Code of Ethics and Business Standards.	The Board Charter and the Company Code of Ethics and Business Standards.

M	E.2	Has the Board developed a Code of Ethics and Conduct (which includes sustainability) and has it worked to ensure its application by all directors, management and employees?		FA	The Board has in place a Code of Ethics and Business Standards that is mandatory for all employees and directors.	The Company Code of Ethics and Business Standards.
A or E	E.3	How does the Board ensure that compliance with the Ethics Code and Conduct is integrated into company operations?	5.2.3	FA	The Company ensures that the Code of Ethics and Business Standards is read and signed by all employees and directors who are bound by its terms.	The Company Code of Ethics and Business Standards.
A or E	E.4	Does the Board incorporate ethical and sustainability risks and opportunities in the risk management process?	5.2.1	FA	The Company has incorporated ethical risks in its policies i.e. Conflict of Interest Policy, Whistleblowing Policy, Anti-Bribery Policy, Anti-Money Laundering and Counter Financing of Terrorism Policy. The sustainability risks have also been captured in the Risk Management Framework.	The Conflict of Interest Policy, Whistleblowing Policy, Anti-Bribery Policy, Anti-Money Laundering and Counter Financing of Terrorism Policy.
A or E	E.5	How is the company performance on ethics assessed, monitored and disclosed to internal and external stakeholders?	5.2.4, 5.2.5	FA	The Company ensures employees and directors are trained on the various ethical issues such as anti-bribery, conflict of interest and whistleblowing. The risk department monitors the Company's performance and reports to the Audit Committee and Risk Committee.	Conflict of Interest Policy and Whistleblowing Policy, Whistleblowing Policy and The Company Website.
A or E	E.6	Has the company established and implemented a whistle blowing policy?	5.2.5	FA	The Company has a whistle blowing policy and has a whistle blowing portal on its website.	The Company Code of Ethics and Business Standards.
A or E	E.7	Has the Board/ or management developed policies on corporate citizenship and sustainability and strategies for company use?	5.3.1, 5.4	FA	The Company's Board Charter and Code of Ethics emphasize on the impact of corporate citizenship and sustainability in all its operations.	The Board Charter, the Company Code of Ethics and Business Standards and the Annual Report.
M	E.8	Does the Board consider not only the financial performance but also the impact of the company's operations on society and the environment?	5.3.2, 5.3.3	FA	The Board Charter and code of ethics provide that the company operations shall be carried out diligently and shall promote the good of the society and environment. The Company adopted integrating reporting from the year 2015.	The Board Charter, the Company Code of Ethics and Business Standards and the Annual Report.
A or E	E.9	Does the Board monitor and report activities leading to good corporate citizenship and sustainability to demonstrate they are well coordinated?	5.4.1	FA	The Board monitors and reports all activities of good corporate citizenship and sustainability such as Corporate Social Responsibility projects and ensures the report is available on the company's website for the public and shareholders.	The Annual Report
F ACCOUNTABILITY, RISK MANAGEMENT AND INTERNAL CONTROL						
M	F.1	Does the Audit Committee and the Board consider and review the financial statements for integrity of the process and for truthful and factual presentation?	6.1, 6.1.1a	FA	The Audit Committee reviews Financial Statements and makes recommendations on the same to the Auditors, Management and the Board. Based on the advice of the Audit Committee, the Board approves Financial Statements and takes responsibility for factual presentation.	The Annual Report and Audit Committee Minutes
M	F.2	Does the Annual Report contain a statement from the Board explaining its responsibility for preparing the accounts and is there a statement by the external auditors about their reporting responsibilities?	6.1.2	FA	The Board table in the Annual Reports its responsibility for preparation of financial statements. The Annual Report also contains a statement by the External Auditor of their responsibilities for the audit of the financial statements.	The Annual Report
A or E	F.3	Does the board or audit committee have a process in place to ensure the independence and competence of the Company's external auditors?	6.1.1b	FA	The Board ensures that the external auditors report directly to the Audit Committee of the Board as opposed to reporting to Management of the Board. The Company changes the external auditor every 6-9 years. There is also regular rotation of the audit partner.	The Audit Committee Charter
M	F.4	Do the shareholders formally appoint the external auditor at the AGM through a formal and transparent process?	6.1.3	FA	The shareholders appoint the company's external auditors at the AGM through a voting process.	The Annual Report, the AGM Notice and Poll Results
A or E	F.5	Is the Company working towards the introduction of integrated reporting (incorporating financial and non-financial information) or is the company's Annual Report prepared on an integrated basis using a framework available from the Integrated Reporting Council, The Global Reporting Initiative, G4 Sustainability Guidelines and/or Sustainability Accounting Standards Board standards?	6.1.5	FA	Yes, the company has published integrated reports since the year 2019 and shall continue to continue publishing the same moving forward.	The Annual Report
A or E	F.6	Has the Board established an effective risk management framework which is inclusive of key risks as well as foreseeable risks, environmental and social risks and issues?	6.2.1	FA	The Board has in place a robust and inclusive risk management framework which is managed by the risk department.	The Risk Management Framework
M	F.7	Has the Board established and reviewed on a regular basis the adequacy, integrity and management of internal controls and information systems (including for compliance with all applicable laws, regulations, rules and guidelines)?	6.3.1, 6.3.2, 6.3.3	FA	The Board through the Audit Committee and the Risk Committee receive quarterly risk reports from the risk department. These reports assess the adequacy, integrity and management of internal control systems and information systems.	The Risk Management Framework
M	F.8	Does the Board annually conduct a review on the effectiveness of the company's risk management practices and internal control systems and report this to shareholders?	6.4.1	FA	The Board through the Risk Committee regularly receives reports of the effectiveness of the Company's risk management practices and internal control systems. This is reported to the Board and recorded in the Annual Report for shareholders.	The Annual Report
M	F.9	Has the Board established an effective internal audit function according to Code requirements and which reports directly to the Audit Committee?	6.5.7	FA	Yes, the Board appointed Ernst & Young LLP to undertake risk and assessment and internal audit. Ernst & Young LLP reports directly to the Audit Committee.	The Annual Report
A or E	F.10	Does the Board disclose details of Audit Committee activities?	6.5.2	FA	Yes, this is disclosed in the Annual Report	The Annual Report
G TRANSPARENCY AND DISCLOSURE						
M	G.1	Does the company have policies and processes to ensure timely and balanced disclosure of all material information as required by all laws, regulations and standards and this Code.	7.0 Overview, 7.1.1	FA	Yes, the company has policies and procedures in place to ensure timely disclosure of all material information. The company is also guided by the various laws and legislations such as the Capital Markets (Securities) (Public Offers, Listings and Disclosures) Regulations, 2002. Annual Guide the Company on the disclosure to be made.	Legal Requirement
A or E	G.2	Does the Annual Report cover, as a minimum, disclosures as prescribed in 7.1.1 relating to the company's governance, the Board and the Audit Committee?	7.1.1	FA	Yes, the Annual Report disclose the Company's governance structures, adherence to good corporate governance, risk report, composition of the Board and Board remuneration, corporate and risk audit reports for the year.	The Annual Report
A or E	G.3	Does the Annual Report cover, as a minimum, disclosures as prescribed in 7.1.1 relating to the company's mission, vision and strategic objectives?	7.1.1	FA	Yes, the Annual Report also covers statements from the Chairman and CEO on the Company's efforts to attain its mission, vision and strategic objectives.	The Annual Report

A or E	G.4	Does the Annual Report cover, as a minimum, disclosures as prescribed in 7.1.1 relating to remuneration and whistleblowing?	7.1.1	FA	Yes. The Annual Report covers disclosures on directors' remuneration. The company has in place a whistleblowing platform or the website and shall report on the same in the Annual Report.	The Annual Report
A or E	G.5	As a minimum, does the company website disclose current information on all areas prescribed in 7.1.1 (Board Charter, Whistleblowing Policy, Code of Ethics and information on resignation of directors)?	7.1.1	FA	The Company provides all the relevant information on its website, such as changes to the Board, Investor Information, whistleblowing policy, code of ethics etc.	The Company Website
A or E	G.6	Does the Board disclose the management discussion and analysis as required in 7.1.1?	7.1.1	FA	The Company through its website provides for various up to date information on the Board of Directors, that is: who they are, what they do and their background and the Company website also provides information on the Company's projects, etc. This information is available to shareholders and the general public.	The Company Website
A or E	G.7	Has the Board provided disclosures as required in 7.1.1 on compliance with laws, regulations and standards; ethical leadership; conflict of interest; corporate social responsibility and citizenship?	7.1.1	FA	The Company undertakes various trainings internally to ensure compliance and to inform staff on new laws and regulations. The Company through its website provides information of corporate social responsibility and citizenship. The Annual Report also discusses any compliance issues during the year.	The Company Website and The Annual Report
A or E	G.8	Has the Board made all required disclosures, including confirming requirements of 7.1.1 which include that a governance audit was carried out and that there are no known insider dealings?	7.1.1	FA	The Company conducted a governance audit for the financial year ended 31st March 2023. Mr. Sun LP was contracted to conduct the audit.	The Annual Report
A or E	G.9	Has the Board disclosed the company's risk management policy, company procurement policy, policy on information technology as per 7.1.1?	7.1.1	FA	The company conducts mandatory trainings for staff on all new policies and upon joining of new employees an induction is done that states employees on all of the company's policies. The Company Code of Ethics obligates employees to comply with the Company's policies and procedures and is signed by an employee upon joining the Company.	The Company Code of Ethics
M	G.10	Has the Board disclosed information on shareholders, including the key shareholders, including shareholding by directors and senior management and the extent of their shareholdings as required in 7.1.1 and on stakeholder who influence company performance and sustainability?	7.1.1	FA	The Company in its Annual Report discloses for the top 10 shareholders, the number of shares they hold, the shareholding of directors and senior management and various information in respect to top stakeholders as at the close of each financial year.	The Annual Report
M	G.11	Has the Board disclosed all related-party transactions?	7.1.1	FA	The company discloses all related-party transactions for the year in the Annual Report.	The Annual Report
M	G.12	Does the Board include in its Annual Report a statement of policy on good governance and the status of the application of this Code?	7.1.3, 7.1.1f	FA	Yes. The Board always includes a statement on corporate governance.	The Annual Report

Note 1 The Reporting Template shall be used by companies to report on their application of the provisions of the Code of Corporate Governance Practices for Issuers of Securities to the public-2015 (the Code). The completion of the Reporting Template and its filing with the Capital Markets Authority (CMA) will fulfill the reporting requirements of the Code at 11.3 paragraph 2. All elements marked in green are mandatory and MUST be completed with. Failure to fully apply will result in regulatory sanctions. When completing column 'f' for MANDATORY ITEMS, 'FA' will mean 'Fully Complied With', 'PA' will mean 'Partially Complied With' and 'NA' will mean 'Not Complied With'.

Note 2 Column 'f' should be marked as follows: 'FA' - Full Application, 'PA' - Partially Applied or 'NA' - Not Applied. Full application of this Code is required by the Code. Therefore anything less than 'full application' is considered 'non-compliance or non-application' of the Code. A response of 'PA' or 'NA' is non-compliance and requires an explanation to be provided with a firm commitment to moving towards full compliance. See also Note 4.

Note 3 An explanation of how the Code provision is applied is required in column 'g' and shall be supported by evidence of how application has been achieved. If the provision is NOT applied, an explanation for why it is not applied or only partially applied is required in column 'g'. For each question, column 'g' must be completed.

Note 4 If an explanation is required because of non-application of any element of the Code, the explanation must be satisfactory, must be provided to relevant stakeholders including the Capital Markets Authority and shall include:

- a) reasons for non-application
- b) the measures taken to address each application requirement
- c) the strategies to be put in place to progress to full application.