



Stakeholder Relations Policy

This Stakeholder Relations Policy is approved on the 1st day of January, 2023

Between FTG Holdings Limited and Stake Holders of FTG Holdings Limited

Background

(A) Commitment to stakeholders

FTG Holdings Ltd is committed to conducting its business operations in a responsible and sustainable manner. It recognizes the importance of engaging with its stakeholders and considering their interests in its decision-making.

(B) Regulatory requirements

The development of this Stakeholder Relations Policy is also guided by the requirements under Kenyan law for companies to maintain transparent communication with stakeholders and consider their welfare.

(C) Benefits of engagement

Regular engagement with stakeholders helps FTG Holdings Ltd gain valuable insights from diverse perspectives, identify and mitigate potential risks and opportunities arising from its activities, build trust in its operations and demonstrate accountability.

(D) Scope and objectives

This Policy governs FTG Holdings Ltd's relations with its stakeholders and aims to enhance relationships through open communication channels, disclosing appropriate information and handling any grievances in a fair manner.

(E) Alignment with standards

This Policy has been developed in alignment with the Global Reporting Initiative standards and the United Nations Guiding Principles on Business and Human Rights for stakeholder engagement.

1. Definitions

1.1. **Stakeholders** means shareholders, employees, customers, suppliers, government and regulatory bodies, local communities and any other groups that are materially impacted by or can materially impact the operations of FTG Holdings Ltd.

1.2. **Engagement** means active two-way communication and consultation processes between FTG Holdings Ltd and its Stakeholders, including meetings, social media, community forums and other methods of interaction.

1.3. **Material issues** means significant environmental, social and governance factors that can substantially impact FTG Holdings Ltd and its Stakeholders such as health and safety, business ethics and anti-corruption.

1.4. **Grievances** means specific complaints or feedback received from Stakeholders through established grievance redressal processes which require investigation and a formal response or redressal.

1.5. **Feedback** means general opinions, suggestions or perspectives received from Stakeholders through Engagement that do not require a formal response or redressal process.

1.6. **Company** means FTG Holdings Ltd and all its subsidiaries.

2. Purpose and Scope

2.1. The objectives of stakeholder engagement under this Policy are:

(a) To understand stakeholders' views and priorities regarding the Company's activities and impacts.

- (b) To address stakeholders' concerns through transparent communication and engagement.
- (c) To enable two-way feedback between stakeholders and the Company.

2.2. For the purposes of this Policy, the Company's stakeholders include:

- (a) Communities near the Company's operations.
- (b) Employees.
- (c) Customers and clients.
- (d) Government and regulators.
- (e) Business partners.
- (f) Civil society groups.
- (g) Media.

2.3. The scope of engagement under this Policy shall cover environmental, social and governance issues material to the Company's business and of interest to stakeholders, including but not limited to:

- (a) The Company's strategic direction and policies.
- (b) The performance, impacts and risks of the Company's operations.
- (c) Grievance redressal.

2.4. Engagement under this Policy shall be limited to issues relevant to stakeholders' roles and the Company's operations, and shall not extend to personal matters.

3. Stakeholder Identification

3.1. FTG Holdings Ltd shall conduct a comprehensive stakeholder mapping and analysis exercise to identify its key stakeholder groups on an ongoing basis.

(a) Both direct and indirect stakeholders that are impacted by FTG Holdings Ltd's operations shall be identified through this process.

3.2. The following stakeholder groups have been identified as key stakeholders of FTG Holdings Ltd:

(a) Employees of FTG Holdings Ltd

(b) Shareholders and investors in FTG Holdings Ltd

(c) Customers and consumers of FTG Holdings Ltd's products and services

(d) Suppliers and business partners engaged by FTG Holdings Ltd

(e) Local communities in areas around FTG Holdings Ltd's operations

(f) Government authorities and regulators FTG Holdings Ltd interacts with

(g) Non-governmental organizations focused on FTG Holdings Ltd's areas of operations

(h) Media that reports on FTG Holdings Ltd and its industry

3.3. The level of influence over FTG Holdings Ltd, dependence of FTG Holdings Ltd on the stakeholder, nature and significance of impact of FTG Holdings Ltd's activities, vulnerability/marginalization of the stakeholder group and regulatory requirements shall determine the prioritization of stakeholder groups.

4. Methods of Engagement

4.1. Identification of stakeholders

- (a) FTG Holdings Ltd will identify its key stakeholder groups on an ongoing basis through a structured process.
- (b) Factors such as impact, representation, dependence and responsibility towards stakeholders will be considered for prioritizing engagement.

4.2. Communication channels

- (a) FTG Holdings Ltd will engage with stakeholders through multiple channels such as meetings, social media, community programs and disclosure on its website.
- (b) Stakeholders can provide feedback, queries or grievances to FTG Holdings Ltd through email, post, telephone hotlines or in-person at designated offices.

4.3. Information disclosure

- (a) FTG Holdings Ltd will publicly disclose appropriate information relating to its operations, activities, financial and non-financial performance on annual basis.
- (b) Material environmental, social or governance issues that may affect stakeholders will be proactively communicated.
- (c) Such information will be provided in english.

4.4. Handling of grievances

- (a) FTG Holdings Ltd will maintain a grievance redressal mechanism for receiving and addressing stakeholder grievances.
- (b) Dedicated contact points will be established at each site/office for lodging grievances.

- (c) Timelines not exceeding 30 days will be specified for response and resolution of grievances received.

4.5. Reporting and monitoring

- (a) FTG Holdings Ltd will track and analyze details of engagement activities and feedback received from stakeholders.
- (b) An annual report on stakeholder relations will be prepared and shared publicly on the company website.

5. Information Disclosure

5.1. Types of information to be disclosed

- (a) FTG Holdings Ltd will disclose material information on its operations, performance, risks and opportunities to stakeholders. This will include financial and non-financial information such as strategies, policies, processes, reports, performance data, incidents and actions taken.

5.2. Methods of disclosure

- (a) Information will be disclosed through FTG Holdings Ltd's website and regular stakeholder engagement sessions.
- (b) Important disclosures will also be published in national newspapers.
- (c) The website will have a dedicated section for stakeholders with all relevant information.

5.3. Frequency of disclosure

- (a) Financial and performance related information will be disclosed at least annually.
- (b) Material updates on strategies, risks or incidents will be disclosed on a real-time basis.

5.4. Stakeholders' right to information

- (a) Stakeholders will have the right to request information from FTG Holdings Ltd and the company will respond to such requests within 30 days, subject to exceptions under the law
- (b) FTG Holdings Ltd may charge reasonable fees to cover administrative costs of providing information.

5.5. Exceptions to disclosure

- (a) FTG Holdings Ltd may not disclose information due to confidentiality, legal or regulatory restrictions e.g. personal data, trade secrets, ongoing investigations etc.

6. Handling Complaints and Grievances

6.1. Mechanism for lodging complaints/grievances

- (a) Stakeholders may lodge any complaints or grievances regarding the Company's activities through designated contact points including the Company's website, registered mail or email.
- (b) Stakeholders have the option to lodge complaints anonymously.

6.2. Acknowledging receipt of complaints/grievances

- (a) The Company shall issue an acknowledgment within five (5) business days of receipt.

6.3. Assessing and investigating complaints/grievances

- (a) The Company shall initially screen all complaints to determine admissibility and priority for investigation.
- (b) An objective and impartial investigation shall be conducted, which may involve seeking a response from the other party concerned.

6.4. Providing response and feedback

- (a) The Company shall inform the complainant of the outcome of its assessment/investigation within four (4) weeks of receipt of the complaint.
- (b) The Company's response shall provide reasons for its decision and details of any corrective actions/remedies.

6.5. Maintaining confidentiality and protecting complainants

- (a) The Company shall ensure confidentiality of details of complaints and grievances, subject to requirements of law.
- (b) The Company shall refrain from any retaliatory actions against complainants.

6.6. Monitoring and reporting

- (a) The Company shall track the status and resolution of all complaints.
- (b) It shall analyse trends in complaints and grievances and report the same to senior management.

6.7. Review of grievance redressal mechanism

- (a) The Company shall periodically review the effectiveness of its grievance redressal mechanism and implement improvements as needed.

7. Reporting and Monitoring

7.1. FTG Holdings shall include in the annual report its key engagement activities with stakeholders, material issues identified, and actions taken.

7.2. The Annual Report shall be made available on the company's website and shared with the relevant regulators in Kenya.

- 7.3. The Stakeholder Relations department shall monitor the implementation of this Policy and track stakeholder feedback and grievances received on a regular basis.
- 7.4. An evaluation shall be conducted periodically, at least once every two years, to assess the effectiveness of the engagement processes defined in this Policy.
- 7.5. Feedback received through engagements and surveys with stakeholders shall be considered to identify areas of improvement for enhancing stakeholder relations.
- 7.6. Based on the learnings from the monitoring, evaluation and changes in the business/regulatory environment, this Policy shall be reviewed and updated every 2 years.
- 7.7. Any amendments to this Policy shall be approved by the Board of Directors of FTG Holdings Ltd.

Flametree Group Stakeholder Relations Policy	Version	FTG.V001	Effective date	01.01.2023
	Authority	FTG Holdings Group Board	Policy owner	Group Chief Executive Officer