

Dadaba Group – ESG Policy Pack

This ESG Policy Pack sets out the expectations, responsibilities and standards that guide Dadaba Group's people, operations and relationships. It is to be read and applied across all subsidiaries, projects and joint ventures where Dadaba Group exercises control or significant influence.

1. Code of Conduct

1.1 Purpose and Scope

The Dadaba Group Code of Conduct sets the minimum standards of behaviour expected of all employees, directors, consultants, interns and temporary staff ("employees"), as well as representatives acting on behalf of Dadaba Group. It also serves as a reference for partners, suppliers and contractors who engage with us.

The Code supports Dadaba Group's mission to build sustainable value across real estate, agritech, energy, infrastructure, entertainment and other strategic investments in Ghana, Africa and globally. It reflects our commitment to ethical leadership, respect for people, environmental stewardship and sound governance.

1.2 Our Values

All conduct at Dadaba Group should demonstrate and reinforce the following values:

- Integrity – We act honestly, keep our promises and take responsibility for our decisions and actions.
- Respect – We treat everyone with dignity, fairness and cultural sensitivity, regardless of background.
- Impact – We pursue investments and projects that create positive economic, social and environmental outcomes.
- Excellence – We maintain high professional standards and continuously improve our performance.
- Stewardship – We manage resources responsibly for current and future generations.

1.3 Compliance with Laws and Regulations

All employees must comply with applicable laws, regulations and industry standards in the countries where Dadaba Group operates. Ignorance of the law is not a defence. Where local laws are less stringent than this Code, employees must still follow the higher standard set by Dadaba Group policies.

1.4 Human Rights and Labour Standards

Dadaba Group respects internationally recognised human rights, including those in the Universal Declaration of Human Rights and the ILO Core Conventions. We do not tolerate any form of forced labour, child labour, human trafficking or inhumane working conditions in our operations or supply chains.

We support fair wages, reasonable working hours, freedom of association, and a workplace free from harassment, abuse and discrimination.

1.5 Anti-Discrimination, Diversity and Inclusion

We are committed to providing equal opportunities and an inclusive work environment. Decisions relating to recruitment, promotion, compensation, training and termination must be based on merit, qualifications and business needs, and not on race, colour, gender, age, religion, disability, nationality, ethnic origin, marital status, sexual orientation or any other protected characteristic.

Harassment, bullying, intimidation or any form of abusive conduct is strictly prohibited.

1.6 Anti-Bribery and Corruption

Dadaba Group has zero tolerance for bribery and corruption. Employees and representatives must not, directly or indirectly, offer, give, request or accept any bribe, facilitation payment or improper advantage, whether in dealings with public officials or private parties.

Gifts, hospitality and entertainment must be modest, infrequent, transparent and never intended to influence a business decision improperly. Any such items must comply with local laws and internal approval procedures.

1.7 Conflicts of Interest

A conflict of interest arises when personal interests interfere, or appear to interfere, with the best interests of Dadaba Group. Employees must avoid situations where their objectivity could be compromised, including financial interests in suppliers, customers or competitors, or personal relationships that could influence business decisions.

Any actual or potential conflict of interest must be immediately disclosed to management so that it can be reviewed and managed appropriately.

1.8 Protection of Assets and Confidential Information

Employees are responsible for protecting Dadaba Group's physical, financial and intellectual assets from loss, theft, misuse and damage. Company resources must be used primarily for legitimate business purposes.

Confidential information, including trade secrets, business strategies, financial data and personal data relating to employees or partners, must be safeguarded and only shared on a need-to-know basis and in accordance with applicable data protection laws.

1.9 Data Privacy and Cyber Security

Dadaba Group respects the privacy of employees, clients, partners and communities. We collect, process and store personal data lawfully, fairly and securely. Employees must follow internal data protection procedures and promptly report any suspected data breaches or cyber incidents.

Use of digital systems and devices must be responsible and consistent with information security guidelines.

1.10 Responsible Communications and Social Media Use

Employees must communicate in a professional, truthful and respectful manner. When using social media, employees should not disclose confidential information, misrepresent the company, or make comments that could damage Dadaba Group's reputation or relationships. Only authorised spokespersons may comment on behalf of the company in the media.

1.11 Health, Safety and Environment

All employees share responsibility for maintaining a safe, healthy and environmentally responsible workplace. Everyone must follow HSE procedures, use protective equipment where required, and stop work that appears unsafe. Incidents, hazards and near-misses must be reported immediately so that corrective action can be taken.

1.12 Reporting Concerns and Non-Retaliation

Employees, contractors and stakeholders are encouraged to speak up if they see or suspect any violation of this Code, company policy or the law. Concerns can be raised with line managers, HR, compliance functions or through designated whistleblowing channels where available.

Dadaba Group strictly prohibits retaliation against anyone who, in good faith, reports a concern or participates in an investigation.

1.13 Implementation and Review

The Code of Conduct is approved by the Dadaba Group Board and reviewed periodically to remain aligned with our strategy, regulatory developments and international best practice. Compliance is supported through training, communication, monitoring and disciplinary measures where necessary.

2. Environmental Policy

2.1 Purpose

This Environmental Policy sets out Dadaba Group's commitment to minimising our environmental footprint and maximising positive environmental impact across all operations, investments and partnerships.

2.2 Scope

The policy applies to all subsidiaries and activities of Dadaba Group, including but not limited to real estate development, agritech projects, carbon and ESG initiatives, infrastructure, mining interests, entertainment, logistics and corporate services. It also guides our expectations of partners, contractors and suppliers whose activities may impact the environment on our behalf.

2.3 Environmental Commitments

Dadaba Group commits to:

- Compliance – Meet or exceed all applicable environmental laws, regulations and permit requirements in the jurisdictions where we operate.
- Climate Action – Identify and manage greenhouse gas emissions, support energy efficiency, and explore low-carbon and renewable energy solutions in our operations and projects.
- Resource Efficiency – Use energy, water, raw materials and land efficiently, and promote circular economy principles such as reduction, reuse, repair and recycling.
- Pollution Prevention – Prevent or minimise air, water and soil pollution, noise and waste from our activities, and ensure safe storage, handling and disposal of hazardous materials where they are used.
- Biodiversity and Land Use – Respect local ecosystems, avoid unnecessary habitat destruction and seek opportunities to restore degraded land, particularly in real estate, agribusiness and mining-related projects.
- Sustainable Procurement – Integrate environmental criteria into procurement decisions and encourage suppliers to implement robust environmental management practices.
- ESG Integration – Embed environmental risk and opportunity assessment into investment decisions, due diligence and project design.
- Community Engagement – Engage with local communities to understand environmental concerns, share information and seek collaborative solutions.
- Transparency – Report on material environmental impacts and performance to relevant stakeholders in a clear and balanced manner.

2.4 Environmental Management

Management is responsible for implementing appropriate environmental management systems (EMS) or controls that are proportionate to the risks and impacts of each business unit. These systems should include:

- Identification of significant environmental aspects and impacts;

- Measurable objectives, targets and action plans;
- Allocation of responsibilities and resources;
- Training and awareness for employees and contractors;
- Monitoring, measurement and internal reporting of performance;
- Regular audits and management reviews to drive continual improvement.

2.5 Training and Awareness

Dadaba Group will provide appropriate environmental training and awareness for employees and key contractors. This may include induction programmes, toolbox talks, refresher training and specialised courses for roles with higher environmental impact.

2.6 Partnerships and Innovation

We will seek partnerships with governments, communities, research institutions, investors and civil society to promote nature-positive solutions, climate resilience and sustainable development. Innovation in agritech, green buildings, carbon markets and clean technologies is encouraged.

2.7 Review

This Environmental Policy will be reviewed at least every two years, or sooner if there are significant changes in our business or regulatory environment.

3. Health, Safety & Environment (HSE) Policy

3.1 Purpose

The purpose of this HSE Policy is to provide a framework for protecting the health, safety and wellbeing of everyone impacted by Dadaba Group's activities, while safeguarding the environment. We aim for zero harm to people and continuous reduction of HSE risks.

3.2 Scope

This policy applies to all Dadaba Group employees, directors, contractors, consultants and visitors at all worksites, offices, project locations and events under our control or influence.

3.3 HSE Principles

Dadaba Group's HSE approach is guided by the following principles:

- **Leadership Commitment** – Senior leadership visibly champions HSE and provides the resources needed to implement this policy.
- **Accountability** – HSE responsibilities are clearly defined and integrated into management roles and employee performance expectations.

- Risk Management – We systematically identify, assess and control HSE risks using recognised methodologies.
- Prevention – We prioritise preventive and protective measures over reactive approaches.
- Participation – We encourage active involvement of employees and contractors in HSE programmes and decision-making.
- Continuous Improvement – We monitor performance, investigate incidents diligently and implement corrective and preventive actions.

3.4 Roles and Responsibilities

- Board and Executive Management – Establish HSE strategy, approve this policy, allocate resources, oversee performance and ensure integration of HSE into business planning.
- Managers and Supervisors – Implement HSE standards in their areas, lead by example, ensure risk assessments are conducted, provide training and enforce safe work procedures.
- Employees – Take reasonable care of their own health and safety and that of others, follow HSE procedures, use protective equipment, and report hazards, incidents and near-misses promptly.
- Contractors and Suppliers – Comply with Dadaba Group's HSE requirements and demonstrate robust HSE practices within their own operations.

3.5 Risk Assessment and Safe Work Practices

We will conduct HSE risk assessments for all significant activities, including construction, site visits, field work, travel, events and office operations. Control measures will be implemented according to the hierarchy of controls (elimination, substitution, engineering controls, administrative controls and personal protective equipment).

Safe work procedures, method statements and permits-to-work will be used where appropriate and reviewed regularly.

3.6 Incident Reporting and Investigation

All work-related injuries, illnesses, unsafe conditions, near-misses, property damage and environmental incidents must be reported promptly in accordance with internal procedures. Dadaba Group will investigate incidents to identify root causes and corrective actions, and will share lessons learned across the organisation.

3.7 Emergency Preparedness

Each site and office must have emergency response plans covering scenarios such as fire, medical emergencies, security threats, spills and natural disasters. These plans will be communicated, tested and updated periodically through drills and training.

3.8 Occupational Health and Wellness

We value the physical and mental wellbeing of our people. Dadaba Group will:

- Provide safe and ergonomic workspaces;
- Take steps to prevent occupational illnesses and stress;
- Encourage work-life balance and access to support services where available;
- Promote health awareness programmes and vaccinations where relevant.

3.9 Training and Competence

Employees and contractors will receive appropriate HSE training based on their roles and risk exposure. This includes induction training, job-specific instruction, refresher courses and specialised training for high-risk tasks.

3.10 Monitoring and Performance Metrics

We will track HSE performance using leading and lagging indicators such as training completion, inspections, near-miss reports, incident rates and corrective action closure. HSE performance will be reviewed routinely by management and the Board.

3.11 Review

This HSE Policy will be reviewed periodically to ensure its continued relevance, effectiveness and alignment with Dadaba Group's strategic direction and regulatory requirements.

4. Supplier ESG Standards

4.1 Purpose

The Supplier ESG Standards define the environmental, social and governance requirements that Dadaba Group expects from its suppliers, contractors, consultants and other third-party service providers ("suppliers"). These Standards complement our internal ESG policies and form part of our supplier selection, contracting and performance management processes.

4.2 Scope and Applicability

These Standards apply to all suppliers that provide goods or services to any Dadaba Group entity. We expect suppliers to adopt equivalent standards in their own supply chains and to cascade ESG expectations to their sub-suppliers.

4.3 Governance and Ethics

Suppliers must:

- Conduct business ethically, with integrity and transparency;

- Comply with all applicable laws and regulations, including those relating to anti-corruption, competition, sanctions and trade controls;
- Prohibit bribery, facilitation payments and any form of corrupt practice;
- Avoid conflicts of interest with Dadaba Group employees and representatives;
- Maintain accurate and complete business and financial records;
- Protect confidential information and intellectual property belonging to Dadaba Group and others.

4.4 Human Rights and Labour Practices

Suppliers are expected to uphold internationally recognised human rights and decent work standards. This includes:

- No forced, bonded or involuntary labour;
- No use of child labour in violation of ILO standards or local law;
- Providing safe and healthy working conditions and adequate protective equipment;
- Ensuring working hours, rest periods and overtime comply with legal requirements;
- Paying wages and benefits that meet or exceed applicable legal and industry minimums;
- Respecting freedom of association and the right to collective bargaining where permitted by law;
- Prohibiting discrimination, harassment and abuse based on protected characteristics;
- Providing mechanisms for workers to raise concerns without fear of retaliation.

4.5 Health, Safety and Environment

Suppliers must implement effective HSE management appropriate to the nature and scale of their operations and the risks they present to people and the environment. This includes:

- Identifying and managing HSE risks, including those arising from construction, logistics, manufacturing, mining, agriculture, services or office work;
- Complying with all relevant HSE laws, regulations, permits and standards;
- Providing safe equipment, machinery and work practices;
- Training workers on HSE procedures and emergency response;
- Preventing pollution, minimising waste and responsibly managing emissions, effluents and hazardous materials;

- Responding quickly and effectively to incidents and cooperating with Dadaba Group in investigations and corrective actions.

4.6 Environmental Stewardship and Climate

We encourage suppliers to:

- Measure and manage their greenhouse gas emissions and energy use;
- Improve resource efficiency (energy, water, raw materials) and reduce waste;
- Use environmentally preferable materials and technologies where feasible;
- Protect biodiversity and ecosystems affected by their operations;
- Support sustainable agriculture, forestry, mining and land-use practices where relevant.

4.7 Responsible Sourcing and Traceability

Suppliers involved in commodities, raw materials or products with heightened ESG risk (for example in mining, agriculture or complex global supply chains) must implement due diligence processes to identify, prevent and mitigate environmental and social risks, including those related to conflict minerals, deforestation and land rights.

Dadaba Group may request information on the origin of materials, traceability systems and third-party certifications where appropriate.

4.8 Information, Audits and Corrective Action

Suppliers must maintain documentation demonstrating compliance with these Standards and provide information to Dadaba Group upon reasonable request. Dadaba Group reserves the right to conduct, or commission, assessments or audits of suppliers where warranted by risk or contractual arrangements.

Where non-compliance is identified, suppliers are expected to cooperate in developing and implementing a time-bound corrective action plan. Persistent or severe violations may lead to suspension or termination of the business relationship.

4.9 Continuous Improvement

Dadaba Group views ESG as a journey of continual improvement. We will work collaboratively with suppliers to build capacity, share good practices and identify opportunities for innovation and shared value creation.

4.10 Acceptance

By entering into or continuing a business relationship with Dadaba Group, suppliers acknowledge and accept these Supplier ESG Standards and commit to aligning their policies and practices accordingly.