DADAAB ROYAL COMPANY
INVESTMENT LIMITED

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CORPORATE SOCIAL RESPONSIBILITY (CSR) POLICY

1. Policy Statement

The Dadaab Royal Company is committed to conducting its operations in a socially responsible, ethical, and sustainable manner that contributes to national development while minimizing environmental impact. This policy provides a framework for integrating Corporate Social Responsibility (CSR) into Dadaab Royal Company's core operations and stakeholder engagements.

2. Purpose

The purpose of this policy is to:

- Define Dadaab Royal Company's CSR vision, objectives, and guiding principles
- Establish structures for planning, implementing, and monitoring CSR initiatives
- Align CSR activities with national priorities, aviation standards, and stakeholder expectations
- Promote sustainable development across all areas of Dadaab Royal Company's operations

3. Scope

This policy applies to:

- All Dadaab Royal Company Board Members, Management, and Employees
- Subsidiaries, contractors, and partners engaged by Dadaab Royal Company
- All CSR initiatives implemented across Dadaab Royal Company-managed branches and surrounding communities

4. Guiding Principles

Dadaab Royal Company's CSR approach is guided by the following principles:

1. **Sustainability:** Ensuring long-term environmental, social, and economic benefits
2. **Accountability:** Transparent reporting and responsible use of resources
3. **Inclusivity:** Engaging local communities and stakeholders in CSR initiatives

4. **Compliance:** Adherence to Kenyan laws, international aviation standards, and ESG frameworks
5. **Impact Orientation:** Delivering measurable and meaningful outcomes

5. Strategic CSR Pillars

5.1 Environmental Sustainability

1. Reduction of carbon emissions and energy consumption
2. Waste management and recycling initiatives
3. Conservation of biodiversity around airport zones
4. Promotion of green infrastructure and renewable energy

5.2 Community Development

- Support for education, skills development and youth empowerment
- Health initiatives and community outreach programs
- Infrastructure support for communities near airports
- Disaster response and humanitarian support

5.3 Economic Empowerment

- Promotion of local content and supplier diversity
- Support for other SMEs and youth enterprises
- Job creation through airport-related activities

5.4 Corporate Governance & Ethics

- Promotion of ethical conduct and anti-corruption practices
- Compliance with procurement and governance standards
- Stakeholder engagement and transparency

6. CSR Governance Structure

1. **Board of Directors:** Provides oversight and approves CSR strategy
2. **CSR/ESG Committee:** Guides implementation and monitors performance
3. **Management:** Responsible for execution and reporting
4. **CSR Unit/Coordinator:** Day-to-day management of CSR programs

7. Planning & Implementation

- Annual CSR plans shall be developed in alignment with Dadaab Royal Company's Strategic Plan
- CSR initiatives shall be needs-based and informed by stakeholder consultations
- Partnerships with government, NGOs, and private sector shall be encouraged
- All projects shall include clear objectives, timelines, and performance indicators

8. Funding

- CSR activities shall be funded through an approved annual CSR budget
- Allocation shall be based on strategic priorities and impact potential
- Additional funding may be mobilized through partnerships and grants

9. Monitoring, Evaluation & Reporting

- All CSR initiatives shall be monitored using defined KPIs
- Annual CSR reports shall be prepared and presented to the Board
- Impact assessments shall be conducted periodically
- CSR performance shall be disclosed in Dadaab Royal Company's Annual Report

10. Risk Management

- Identification and mitigation of risks associated with CSR initiatives
- Compliance with environmental and social safeguards
- Due diligence on partners and beneficiaries

11. Stakeholder Engagement

Dadaab Royal Company shall actively engage:

- Local communities around its construction sites
- Government agencies and regulators
- Civil society organizations

Feedback mechanisms shall be established to ensure continuous improvement.

12. Compliance & Review

- This policy shall comply with all relevant Kenyan laws and international standards
- It shall be reviewed every three (3) years or as necessary
- Non-compliance shall be addressed through disciplinary and corrective measures

13. Approval

This CSR Policy is approved by the Board of Directors of Dadaab Royal Company and is effective from the date of adoption. Through this CSR Policy, Dadaab Royal Company commits to being a responsible corporate citizen, fostering sustainable development, and creating shared value for all stakeholders while supporting Kenya's socio-economic growth.