

Company Policies

Modern Slavery Statement 2021

This statement relates to actions and activities of CP Holdings Limited (CP) and its legal entities during the financial year 1 January 2020 to 31 December 2020.

CP recognizes that it has a responsibility to take a robust approach to slavery and human trafficking and has an Anti-Slavery Policy, included within the Employee handbook, which reflects this. CP is committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

CP is the family owned holding company of the CP Group, comprising a number of companies involved in a wide range of activities across a number of territories – including in the UK, Central and Western Europe and sub-Saharan Africa. The principal sectors in which the Group operates include hotels and hospitality, flexible workspace, heavy equipment, warehousing, agro-chemicals and telecommunications.

Policies on Slavery and Human Trafficking

CP is committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. The Anti-Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our business and in our supply chains.

Training

A comprehensive programme of staff compliance training throughout the CP Group is in the process of being rolled out. Following the launch of the online training platform in 2019, a vast number of CP employees have received online training. In 2020 the level of training was substantially reduced due to the Covid-19 pandemic. As the business starts to recover in 2021 a training plan will be put together for the Group. Courses on offer on the training platform include learning points on:

- How to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- How to identify the signs of slavery and human trafficking;
- What initial steps should be taken if slavery or human trafficking is suspected; and
- How to escalate potential slavery or human trafficking issues to the relevant parties within the organization.

Board approval

This statement was approved on 29th July 2021 by the organization's board of directors, who review and update it annually.

Environmental Health and Safety (EHS) Policy

"We do everything we can to ensure that our impact on the environment is positive and effective and benefits the wider community as well as the business environment in which we operate."

Our mission is to bring the highest quality products and state-of-the-art technology from world-class suppliers to develop new services in the growing, but challenging markets of Africa.

Motivated by a passion for empowering the people of Africa and coupled with a pioneering spirit for introducing new technologies and knowledge, Balton CP (BCP) strives to achieve commercially sustainable development in all its fields of expertise. In support of this, we are committed to high standards of environmental health and safety.

We are committed to environmental health and safety and our policy is:

- To ensure compliance with all applicable environmental health and safety (EHS) laws, regulations and requirements across our business activities in all countries in which we operate.
- To allocate the necessary resources to fulfill our strategies, training and program that brings added value, awareness, responsibility and accountability to the entire organizations.
- To provide a safe and healthy work environment through ensuring personnel are trained, informed and motivated to act safely and in respect to the environment.

- To manage EHS risk effectively, actively seeking and acting upon material opportunities to reduce risk and improve EHS standards.
- To participate and consult with all stakeholders, both internal and external, regarding all EHS matters.
- To assess activities carefully, taking into consideration human health and the environment by integrating principles of risk control in each stage of Balton's operations. (Value Chain)
- To select suppliers, business partners and contractors with consideration of their ability to run safe and environmentally responsible operations.
- To constantly monitor and review our EHS Policy and its implementation to ensure continuous improvement in our performance

ALL BCP Group employees are expected to carry out business activities in accordance with this EHS Policy and act responsibly.

Emergency Preparedness and Response (EP&R) Policy

Balton CP (BCP) is committed to the safety and well being of its staff, customers, contractors, and all stakeholders. This policy outlines the steps to be taken to prepare for and respond to an emergency affecting BCP and its operations. These requirements are met through the implementation of Major Incident and/or Business Continuity plans, which will enable BCP to respond effectively in an emergency situation. BCP will swiftly and effectively respond to emergency situations with the foremost goals of preserving life, protecting the organization's property and restoring day to day operations as quickly as possible.

The aim and objective of this policy are to ensure that BCP has effective arrangements in place to enable it to:

- Carry out regular risk assessments in order to identify and subsequently manage obstacles to effective emergency management.
- Train all staff in disaster and emergency response procedures.
- Ensure all staff is fully aware of the personal responsibility to behave in such a way as to minimize the risk of emergencies occurring.
- React effectively to a major incident within/directly affecting the business so that it can, as is reasonably practicable, continue to provide essential services in the event of an emergency.
- Minimize disruption when unplanned events have the potential to significantly interrupt normal business.

- React effectively to a situation where there is a significant loss of staff, e.g. due to industrial action.
- Mitigate any financial impact of such events.
- Ensure that all departments are involved in the preparation of the plans so that there is an effective and consistent response to emergencies and/or service disruptions.
- Manage and contain major chemical spillage or leakage.
- Respond to flooding or other unexpected weather conditions.
- Ensure that all plans are reviewed and improved on a regular basis.
- Support effective communications during an emergency or interruption.

BCP through the continuous review will ensure that the plans and procedures in each operation are coordinated and adhered to:

ALL BCP Group employees are expected to carry out business activities in accordance with this EP&R Policy and act responsibly.

Occupational Health and Safety Policy

This policy outlines Balton CP's (BCP) commitment to achieve the highest attainable level of occupational health and safety for our staff, contractors, and visitors throughout all areas of business activity.

BCP is committed to creating a safe work environment that promotes awareness, responsibility, and accountability in all matters related to the health and safety of our employees, contractors, and visitors. We seek to prevent the occurrence of hazards associated with work and the work environment through established risk management procedures.

Our statement of general policy is:

- To provide the best reasonable control of health and safety risks arising from our business activities.
- To integrate health and safety into our business strategy and activity planning.
- To consult with our employees, contractors, and visitors on matters affecting their health and safety.
- To provide adequate resources to ensure that our OH&S policy is applied throughout our business.
- To provide, maintain and ensure the safe use of plant machinery and equipment.
- To ensure a safe environment for handling any hazardous substance.

- To provide appropriate and targeted health and safety training, information and supervision for our employees, contractors, and visitors across our business activities and sites.
- To establish measurable objectives for health and safety activity across our business activities aimed at driving continuous improvement towards the elimination of work-related illness and injury, so far as is reasonably practicable.
- To ensure that all health and safety hazards and incidents are promptly reported and investigated and that appropriate control measures are implemented to eliminate or minimize the risk of recurrence.
- To review and revise the company's occupational health and safety management systems and monitor the effective implementation of this policy at regular intervals.

ALL BCP Group employees are expected to carry out business activities in accordance with this OH&S Policy and act responsibly.