



Broadband
Communication Networks

SUSTAINABILITY

REPORT

2021

Welcome to our sustainability report

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SUSTAINABLE DEVELOPMENT GOALS



highlights our key material matters under the ten principles of the United Nations Global Compact (UNGC) and provides insight into our approach in addressing these matters. It covers the period July 2020 – June 2021 and forms our fifth Communication on Progress Report to the UN Global Compact.



Message from the CEO

*Bernard G. Wahome (MBA, BSC IT,
DIP Telecom Eng.)*

Organization Founder & CEO



MESSAGE FROM THE CEO

“Our organization’s objective is to provide Products, Services and Solutions that contribute to sustainability for our customers, our Country and the world at large.

Indeed, our sustainability vision is to provide products, services and solutions that contribute to the success of our own customers, and the quality of life of each person affected by our actions.

The foundation of this vision is our continued commitment to managing our operations responsibly and ethically. We are dedicated to add value to our customers’ technology needs.

Welcome to our Communication on Progress Report. “

In this annual sustainability report, we describe our actions to continually improve the integration of the Global Compact and its principles into our business strategy, culture and daily operations. We strive at all times to ensure adherence to these principles. We also commit to sharing this information with our stakeholders using our primary channels of communication.

Our organization mission is, to be the preferred provider of innovative and superior technology solutions and services in East & Central Africa. We continue to deliver Technology Solutions addressing; Telecom, Utilities, Broadcasting, UN bodies and large businesses in the region. Indeed, we are pretty much a one Stop shop for ICT in the region.

In general, last year has not been a good

year for not only Broadband but the world due to Covid 19 pandemic. However, the last five years we faced challenges of substantial scope reduction with our primary customers. The main reason for loss of business is the demand for more discounts and pressure from new entrants to lower prices yet our costs are increasing. In addition, 2021 has been very challenging due to Covid 19 pandemic resulting to delay in delivering substantial equipment on time to our customers

Our organization’s sustainability is hinged on six pillars that include: Customer Focus, Products and Services Excellence, Our human Resource, Innovation, Governance, Health Safety and Environment. These pillars are also aligned with the UNGC requirements. we have policies that cover Human Resource, Health, Safety, Environment and Business Ethics among others.

Human Rights

Our organization is committed to continue respecting the protection of internationally proclaimed human rights and do not tolerate human rights abuse of any form. We are ready to report any person involved in human rights abuses if it ever happens in our operation. In the past four years we had zero human right violation.

Labour Standards

We are committed to ensure that, in our recruitment and work sub-contracting; we do not employ children, discriminate in employment, advocate for forced labour, block employees from having



collective bargaining among other international labour standards.

The Environment

Our activities have the capacity to degrade the environment. We however believe in ensuring we protect the environment so that we leave the earth, if possible, better than we found it. We believe we are among the 1st Telecom Company in Kenya to have an active Health, Safety and Environment (HSE) policy. We are totally compliant as far as HSE is concerned and in accordance with the best practice in environmental conservation requirements.

Our staff must read, understand and sign our HSE handbook before they can be allowed to go to the field. Additionally, before any field task is executed our staff and subcontractors must have signed and approved job hazard analysis (JHA) we also have all required Health and Safety (PPE) tools for our staff

Our organization has invested in energy efficient solutions that enable us and our customers to go green. All these solutions reduce the carbon foot print for our customers. We will continue investing in green energy solutions for telecom, homes and grid connection into the future.

Anti-Corruption

Corruption remains a key challenge in our operation. This is a key issue especially when dealing with government officers and some customers. This is especially true when getting development approvals and licenses in our operations among others. This often causes work to delay resulting in our organization incurring undue losses and poor performance appraisal

by our customers. As the CEO of the company, I have ensured that my management and staff have, zero tolerance to corruption in all forms concerned. We ensure our senior and middle management staff understand well the Code of Ethics for Business in Kenya and above all, all our staff have signed the code of conduct handbook

We require all our employees to adhere to administration requirements, to the letter and spirit, in order to avoid opportunities for corruption. To further eradicate corruption, we have requested our suppliers to register with UNGC and in particular sign the Code of Ethics for business in Kenya. I am pleased to report that 14 suppliers have already registered. Indeed, we look forward to a world where corruption is totally eradicated.

Conclusion

In conclusion, I take this opportunity to thank my team for the effort so far. I believe that there is a lot of room to be covered and we are committed and willing to go that extra mile. I however believe that we need each and every Corporate, Small and Medium Enterprises, Government to follow suit in order to achieve the desired global goals. My commitment is that we will ensure we do our part and look forward to reporting on our progress next year.

“Yes, we can”



Bernard G. Wahome

Founder and Chief Executive Officer

ABOUT BROADBAND COMMUNICATION NETWORK



ABOUT BROADBAND COMMUNICATION NETWORK

Broadband Communication Network is a Technology Organization dedicated to provide end to end Network Products and Solutions for: -

- Network Operators,
- Communication Regulators,
- Broadcasting Houses,
- Internet Service Providers (ISPs)
- Utilities, Governments,
- UN bodies and
- Large business organizations in East & Central Africa.

The company covers the full ICT life cycle through three main business divisions, each headed by a General Manager. These three divisions are: -

- Projects Implementation which includes physical network planning, deployment, and optimization.
- Maintenance and Support (Managed Services) for ICT Network
- Network Solutions includes End to End 2G, 3G and 4G Mobile Broadband Network, Quality of service monitoring system (QSMS), Conformance Testing, Network Monitoring, Performance Management, Telecom Power and Green Energy among others.

We have headquarters in Nairobi, Kenya and have implemented large Telecom Network Projects across East & Central Africa, including Cameroon, Rwanda, Burundi, Ethiopia, Tanzania, Congo B, Gabon, Congo, Zambia, Seychelles and South Sudan besides many in Kenya.

To achieve our objectives, we have partnered with major global tier 1 manufacturers to deliver the desired solutions to our customers. Our partners include Rohde & Schwarz, Nokia, Infinera, Calix, Aviat, Emerson (Vertiv), Viavi and Netscout among others



Core Values

- *Honesty*
- *Integrity*
- *Sincerity*
- *Superior quality*
- *Competence*
- *Timely*
- *Hard work*
- *Maintenance of good health*
- *Safety and wellbeing*
- *Protection of the environment*
- *Respect of our internal and external customers*
- *Superior customer satisfaction*

Country of Origin



Contribution to the (SDGs)

Our work contributes directly to the following SDGs: -



OUR PRODUCTS AND SERVICES



Broadband Communication Network

Dedicated to add value to your technology needs

We Provide ICT, ATM,
Broadcasting & Energy Products
and Services covering:

NETWORK SOLUTIONS

PROJECTS (EPC) SERVICES

MANAGED SERVICES

GOING GREEN SOLUTION



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Our Sustainability Pillars

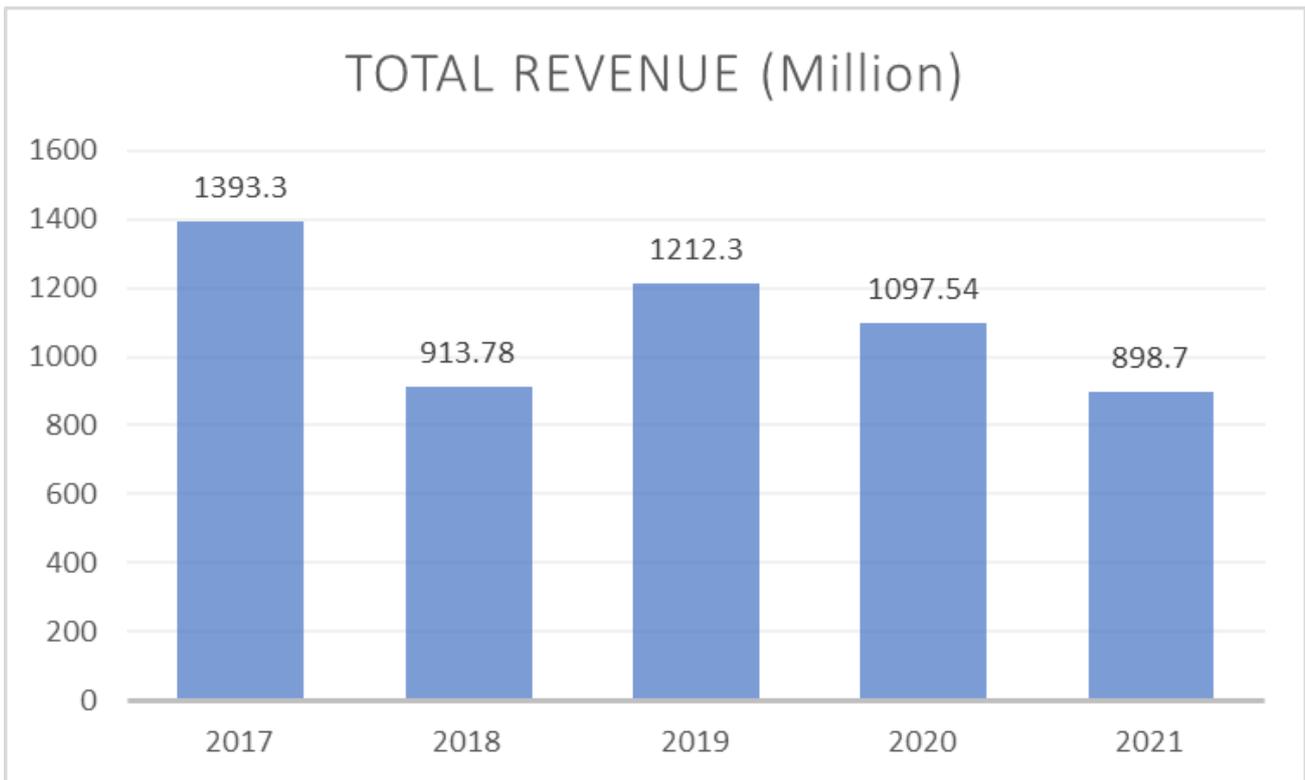




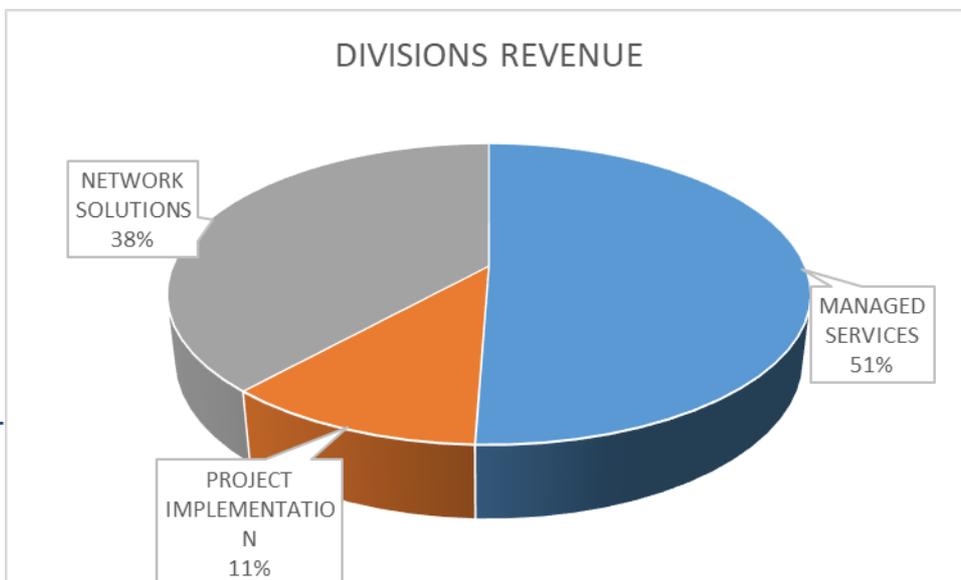
PERFORMANCE HIGHLIGHTS



Performance for The Last Five Years



FY2021 Year Under Review





Our company has recorded increased efficiency in diesel management by lowering the amount diesel consumed per mobile site. Achievement was realized through integration of power hybrid solutions and quality maintenance procedures in line with our ISO quality management system.

The benefit of this is overall improvement in network availability thereby delivering value and overall improved customers experience.

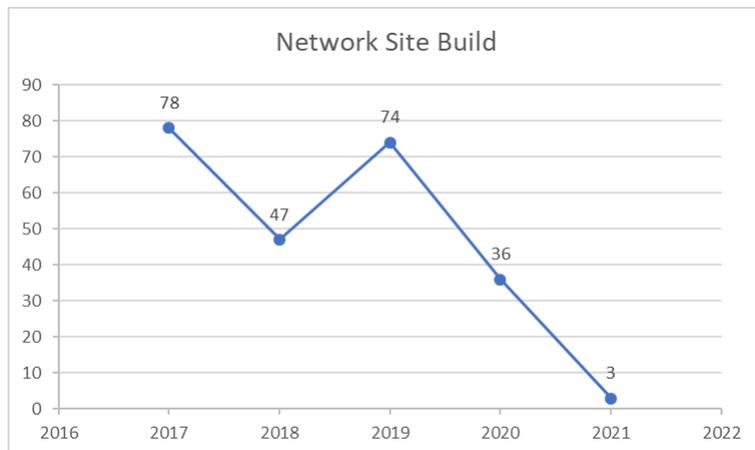
Greener Environment: Efficiency in site maintenance leading to diminished diesel consumption hence reducing carbon footprint..

Scope evolution: MNO KE networks diminishing

The entry into the Kenyan market has seen MNOs sell their Cell site Towers to Tower companies. This has resulted in reduced scope for MNO managed service partners from 2017. The entrance of American Tower and Eaton Towers in 2017 and 2018 has seen a decline in the number of Sites under Broadband maintenance resulting in reduced revenue. 2021, this MNOs intensified site builds for our customers further affecting our maintenance scope.

Network infrastructure construction and Implementation

In regards to the contribution to growth in the Digital Economy, Mobile Telephony & Internet Penetration in Kenya, our organization have built 238 sites for network infrastructure over the last 5 years. This has enabled significant economic growth in rural and remote areas in Kenya. Farmers are now able to access markets in cities for their produce and get payments through the mpesa payment platform.



Environmental

We have installed 2 Hybrid systems for one of our customers whose purpose is to reduce generator running hours on an off-grid site. The result of the deployment was saving 17hrs of generator running daily saving 1000 litres of diesel consumption per month hence reducing carbon footprint.

Green products



Roof/ Solar Products



Data center smart cabinets



LED Lighting
Products 2021 sold 2979 LED bulbs

Products



Social

Number of employees



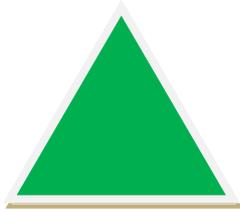
130

Average years of Age

35

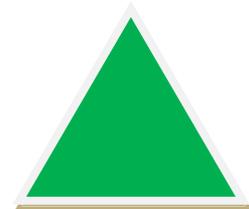
Employee Diversity (M/F)

FEMALE



Total No. 26
**Increased from 18% in FY20
to 20% in FY21**

MALE



Total No.104
**Decreased from 82% in FY20
to 80% in FY21**





OUR MATERIAL MATTERS

A sustainability issue is considered material if it could substantively affect the organization's ability to create value in the short, medium, or long term. Material matters in this report have been developed under the four key themes of the UN Global Compact namely;

1. Human Rights,
2. Labour
3. Environment
4. Anti-corruption.

Material matters are determined by considering the sustainability impacts and opportunities of the company, stakeholder concerns, and assessments of critical issues within the operating environment. These themes reflect key relationships, spheres of influence, footprints or impacts of our operations, stakeholder concerns and our operating context.

Human Rights

Human rights are rights inherent to all human beings, whatever their nationality, place of residence, sex, national or ethnic origin, color, religion, language, or any other status. All human beings are equally entitled to human rights without discrimination. These rights are all interrelated, interdependent and indivisible.

In mid-2021, the authorities ordered the closure of both Daadab and Kakuma refugee camps by June 2022, although conditions in countries of origin, notably Somalia and South Sudan, were not yet conducive for safe returns.

The ongoing Covid-19 crisis has devastated many livelihoods across Kenya. A large number of individuals and families lost some or all of their



sources of income, with business closures and job losses.

Fundamental human rights issues of concern to the company include health and safety of employees, sexual harassment and management of grievances.

Labour

Labour relations and labor rights remain a highly emotive subject in Kenya. In 2018-2019, the national government has faced key labor challenges with major employee segments including teachers, university lecturers, nurses, and doctors. In terms of child labor, A report by the US Department of State last year (2018) classified Kenya as a source, transit and destination country for men, women, and children subjected to labour and sex trafficking.

Freedom of association is enshrined in Bill of Rights under Chapter 4 of the Constitution of Kenya 2010 which states that (1) Every person has the right to freedom of association, which includes the right to form, join or participate in the activities of an association of any kind; and (2) A person shall not be compelled to join an association of any kind. Association through trade unions is also catered for in the Labour Relations Act (2007). Also, the country has several labor-related laws that support freedom of association and prohibit all forms of forced and compulsory labor, infringements of

employee rights, and protection of employees.

As an employer, Broadband considers labor relations as a critical facet of the long-term sustainability. Observance of labor legislation and consistent engagement of employees is regarded as an essential part of sound business practice by the company. Also, the company has identified unique features of its labor performance that require additional attention and management

Environment

Article 42 of the Constitution of Kenya states that every person has the right to a clean and healthy environment. These laws reinforce the provision of the key environmental legislation, the Environmental Management and Coordination Act (EMCA), 1999 which states that every person in Kenya is entitled to a clean and healthy environment and must safeguard and enhance it. Despite these robust provisions, Kenya faces severe environmental challenges, including deforestation, soil erosion, desertification, water shortage, and degraded water quality, flooding, poaching, and domestic and industrial pollution. The country forest cover remains below the constitutional threshold of 10% tree cover while land degradation remains widespread

Given this context, it is imperative for companies in the region to embrace sound environmental practices. Increasingly, stakeholders are demanding that companies be more proactive in their environmental



practices. For example, in early 2018, the national government issued a ban on the use, manufacture, and importation of all plastic bags used for commercial and household packaging on environmental grounds. In 2019, NEMA has shut down 12 companies for directing their untreated industrial discharge into rivers and streams within Nairobi. 24 companies have also been given improvement orders to put their houses in order before their companies are shut.

Broadband, therefore, considers the natural environment as a critical material concern requiring the requisite policies and procedures. We have on board the HSE policy that drives the organization to protect the environment.

Anticorruption

2021 Corruption Perceptions Index (CPI) released by Transparency International, reveals that corruption levels have stagnated worldwide at a time when human rights and democracy are under attack. "Human rights are not simply a nice-to-have in the fight against corruption", Delia Ferreira Rubio, Chair of Transparency International said. "Authoritarianism makes anti-corruption efforts dependent on the whims of an elite. Ensuring that civil society and the media can speak freely and hold power to account is the only sustainable route to a corruption-free society."

Kenya obtained a score of 30 out of 100, a slight drop from a score of 31 in 2020. Kenya's score still falls below the Sub-Saharan average of 33 (a rise of one point from 32 in 2020) and global average of 43 - a score below 50 indicates serious levels of public sector corruption. The CPI 2021 ranked Rwanda the highest in the East African region with 53 points compared to 54 points in 2020, Tanzania with 39 from 38 points in 2020, while Uganda and Burundi stagnated at 27, and 19 points respectively. South Sudan was ranked last both regionally and globally scoring 11 points from 12 points in 2020. African countries that scored above the global average included, Seychelles (66 points), Cabo Verde (58 points), Botswana (55 points) and Mauritius (54 points)

In the Corruption Perceptions Index 2021 Kenya is ranked 128th out of 180 countries for corruption, tied with seven other countries, including Bolivia, Azerbaijan, Laos, and Paraguay

Given this challenging environment for business, anti-corruption measures become a relevant component for companies that seek to operate ethically and responsibly. Also, it's business dealings with the government and participation in competitive bidding creates a facilitative environment for corruption. The company, therefore, considers corruption as a critical challenge.



SUSTAINABLE DEVELOPMENT GOALS

Our Sustainability Performance

This section looks at Broadband Communication Network sustainability performance by focusing on the four core themes (Human Rights, Labour, Environment and Anti-Corruption) and ten principles of the UN Global Compact. We have prepared this information by presenting three key facets of our sustainability performance model. Firstly, we have provided insights on our understanding of the core sustainability issues and why we believe it is important to our business. We realize that different businesses have different explanations of the terms used by the UN Global Compact. We therefore want to highlight our understanding of the core themes and the necessity for our engagement in each of these themes.

Secondly, we have highlighted our policy position on each of the themes. This is in recognition of the need for companies to develop internal policy commitments in respect to each of the core themes of the UN Global Compact. Policy statements and policy highlights are provided to underscore the seriousness with which we take each of the core themes.



Without policies, implementation tends to be ad-hoc and guided by personal vision of those charged with implementing. By developing and publicizing our policies, we intend to ensure that our stakeholders understand our position and approach on diverse issues.

Finally, we have provided insight on some of the activities we have undertaken to implement our policies. We appreciate that policies that are not implemented are simply “wish lists”. Instead, we want to show our commitment through specific and targeted actions that seek to address the sustainability agendas incorporated in the Compact. This provides our core measurement of our sustainability performance in 2021 through qualitative narrative and quantitative data (where applicable). We believe that this three-part design provides holistic and logical insight on our sustainability performance in the course of the year.

Human Rights

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and

Principle 2: Make sure that they are not complicit in human rights abuses.

Our understanding

We understand human rights as universal and minimum standards aimed at securing dignity and equality for all human beings. In this regard, we endeavor to assess and determine any human rights risks that may occur due to our operations and activities. Our intention is to ensure we respect human rights and avoid any infringements. We have placed our emphasis on issues that present key human rights risks and report on them accordingly.

Our policy

Our company takes cognizance of the importance of adhering to sound human rights practices in our business undertakings. The company has developed several human rights related policies to underpin its commitment to observing, protecting and respecting human rights. Among these policies are



Health and safety policy

This policy seeks to comply with the Occupational Safety and Health Act, 2007 (OSHA) and all other relevant legal requirements. Through the policy, the company commits to:

- Comply with all relevant statutory requirements and quality standards.
- Ensure each employee is given information, instruction and training necessary for safe performance of work.
- Protect health and safety of all employees.
- Adequately enable employees raise issues of the health and safety through health and safety committees.
 - Ensure assessment of risks on health and safety at workplace and taking necessary action.
 - Provide Personal Protective Equipment (PPE) to employees and ensuring they're properly used.
 - Reduce the losses caused by consequences of occupational diseases, accidents and improving the general environment.

Broadband has put several strategies in place to attain the objectives of the health and safety policy. These include:

- Providing suitable working tools and protective equipment
- Liaising and adhering to relevant government and regulatory authorities to ensure compliance to health and safety standards
- Sensitizing staff through continuous training and updating all policies

and procedures on safety, health and environment practices.

- Providing and maintain plant systems and procedures of work that are safe and without risks to health.
- Undertaking of Job hazard analysis (JHA) before executing any task
- We have weekly reports that highlights any issues of HSE

The policy sets out clear responsibilities for the Managing Director, General Managers, Heads of Departments and employees on issues of health and safety, ensuring that overall responsibility is vested in the top leadership of the company. It also provides for the establishment of Health and Safety Committees, Environmental Health and Safety (EHS) trainings and EHS guidelines. A set of EHS rules have been developed with specific emphasis to the following safety concern



Sexual harassment policy

The Company has developed a sexual harassment policy that seeks to ensure that all employees are protected from sexual harassment. Sexual harassment is defined as “unwelcome and unreciprocated sexual advances, requests for sexual favors, either verbal or physical conduct of a sexual nature that results in the individual feeling threatened or compromised in any way. Key to note is that sexual harassment is an offence punishable under Section 23 of the Sexual Offences Act, Laws of Kenya. A perpetrator of sexual harassment is liable to imprisonment for a term of not less than 3 years or to a fine of not less than 100,000 shillings or to both

The policy recognizes instances of sexual harassment as occurring if the employer of that employee or a representative of that employer or a co-worker;

- Uses language whether written or spoken of a sexual nature
- Shows physical behaviour of a sexual nature which directly or indirectly subjects the employee to behaviour that is unwelcome or offensive to that employee that by its nature has a detrimental effect on the employee's employment, job performance or job satisfaction.
- Uses visual material of sexual nature
- Directly or indirectly requests that employee for sexual intercourse, sexual contact or any other form of sexual activity that contains an implied or express, promise of preferential treatment in employment, threat of determined treatment in employment; or threat about the present or future employment status of the employee.

Examples of sexual harassment covered by the policy include verbal, unwanted propositions, language of a suggestive or explicit nature, jokes of a suggestive or explicit nature, questions or comments of a personal nature, pin-ups, offensive publications, unsolicited and unwanted gifts and staring/leering.

Complaint and grievance policy

Our grievance procedure policy explains how employees can voice their complaints in a constructive way. Supervisors and senior management should know everything that annoys employees or hinders their work, so they can resolve it as quickly as possible. Employees should be able to follow a fair grievance procedure to be heard and avoid conflicts.

The company encourages employees to communicate their grievances. That way we can foster a supportive and pleasant workplace for everyone.



A clearly defined grievance mechanism is in place ensuring confidentiality and non-victimization of those who highlight grievances.

Our performance

Health and safety are a critical concern of our organization. This is because our work entails various forms of health and safety risks that need constant vigilance and adherence to our safety policy. Among the critical issues include safety concerns for persons working at height, handling of electrical appliances and electricity, driving including long distance and night driving and proper use of Personal Protective Equipment (PPE). We currently have HSE Manager and assistant and field team leaders are HSE supervisors responsible for their teams

Managing safety concerns at our client's sites is a key consideration. This work includes many hazardous tasks and conditions such as working with height, excavation, noise, dust, power tools and equipment. The most common fatalities are caused by the fatal four: falls, struck by object, electrocutions and caught-in/between. We have developed clear procedures for ensuring safety within sites based on the tasks at hand and risks associated with these tasks.

In general, we ensure that all sites are well secured and a safety induction is conducted before commencement of work. Where necessary, safety signage is also erected on site.

Working at height is acknowledged as one of the most dangerous activities in the construction, maintenance and facilities management scope of work. Amongst many hazards and associated risks, working at height exposes workers to the risk of falls from height, and others being hit by objects that may fall from height. Working at height is a predominant aspect of our work since we provide support to telecommunication companies by building and maintaining their infrastructure. Construction, equipping and maintenance of this infrastructure and subsequent maintenance creates the need for working at height. In this respect, we have developed a clear set of practices including compulsory use of protective equipment like harnesses, specific requirements on the type of harnesses that can be used and clear guidelines on working positions when working at height.

In addition, all employees involved in working at height are certified for this type of work and undergo site induction meeting before each assignment. Certification is renewed annually with refresher courses undertaken after every three years.

Personal Protective Equipment (PPE) are an essential part of our safety practice and are provided to all personnel as required. Use of PPE is compulsory based on task and site requirements. Employees have been trained in the proper use of PPE to ensure that they accrue the safety benefits intended from the use of these equipment. On site, an induction process is conducted at the commencement of tasks in which PPE usage is covered among key induction facts.



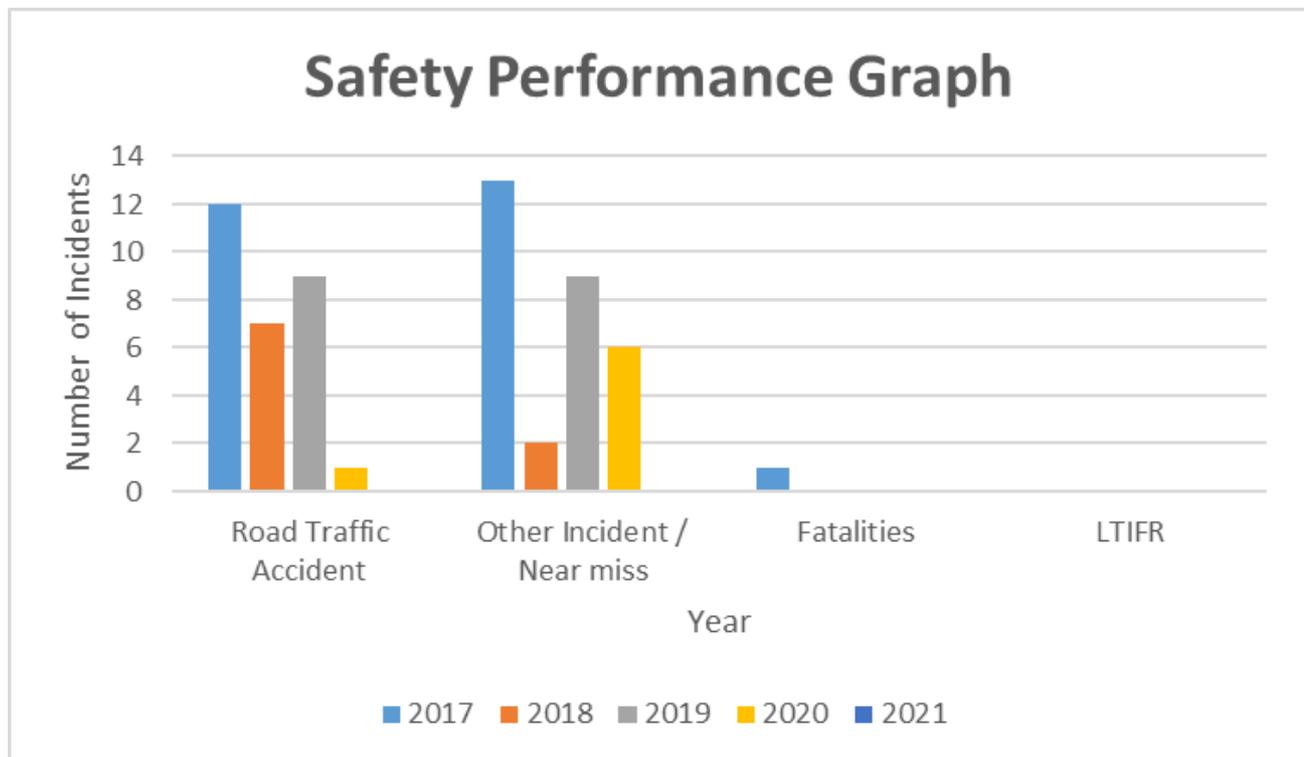
Where necessary, all persons on a site including visitors, suppliers and inspectors are required to observe PPE requirements for them to access the site.

Other considerations that are essential for safe practices include safety procedures around site construction, excavation and working with electricity. We have ensured that our employees are appropriately qualified for these functions and also invested in their skills around safety practices.

In addition, our assignments call for driving in various forms of terrains, for diverse distances and at different hours, since we also provide emergency support to telecommunication companies. This creates several forms of driving and road related risks.

To address this issue, we have developed a comprehensive procedure for each journey which includes pre-journey assessment of all vehicles based on a clear assessment template. The subsequent vehicle inspection report must be completed and submitted. In addition, journey planning is undertaken to determine safety risks and mitigation needed for each journey. Drivers are expected to make journey breaks as a key part of safe driving. At a company level, all drivers undergo defensive driving courses as a prerequisite for working in that role. We also ensure the safety of our personnel who work in areas that are prone to insecurity or during night hours.

Our overall safety performance for the last five year 2017-2021 is as shown below:



Training	Attendees	No.
OSH Awareness Training	All Employees	130
Fire Marshals	Nominated Fire Marshals	45
Occupation Safety & Health Training	Health and Safety Champions	50
Health and Safety Committee Training	All H&S Representatives'	20
First Aider	All Nominated First Aiders	28
Working at Heights	All Riggers/ Persons who work at height	16
Defensive Driving Training	All drivers and persons authorized to drive	18
HSE Internal Audit Training	Health and Safety Champions	15
Stress Management	All employees	130
HIV/AIDS	All employees	130
Civil Engineering and HSE Training	Civil Engineer	2
HSE Supervision Training	Supervisors	20

Labour

Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

Principle 4: the elimination of all forms of forced and compulsory labour;

Principle 5: the effective abolition of child labour; and

Principle 6: the elimination of discrimination in respect of employment and occupation.

Our understanding

We are committed to respecting international and local legislation on labour relations and practices. Several international and national policies, treaties, regulations and legislation provide an overarching framework for

sound labour practices. Key legislation in Kenya includes the Employment Act, Labour Institutions Act, Labour Relations Act, Occupational Safety and Health Act and Work Injury Benefits Act. These laws and the Constitution of Kenya (2010) provide for key labour rights including freedom of association, prohibition of forced and compulsory labour and discrimination in respect to employment and occupation.

In respect to child labour, Section 10 of the Children Act 2001 (Chapter 141) states that all children must be protected from economic exploitation that would have a detrimental effect on their wellbeing or access to education. Furthermore, Part VII of the Employment Act 2007 sets out the standards for the protection of children in the workplace



and prohibits employment of children under the age of 13.

Our policy

The Human Resource Manual sets out the company's comprehensive approach to the management of human capital to ensure achievement of complete and appropriate communication, records and controls with an objective of attracting, recruiting and retaining of competent

staff that meet both the company and individual goals. The Manual caters for a wide variety of labour related issues including freedom of association, non-discrimination, child labour and forced and compulsory labour.

d) Freedom of association

Employees of the company are permitted to form or join any trade union of their choice. This is in adherence with local legislation and best labour practice. No restrictions or requirements have been put in place to prevent or prohibit employees from collective engagements.

b) Child labour

The company has a child labour policy that acknowledges the existence of child labour and the need to address it proactively. The company has assessed its risks in regards to child labour and determined that the highest risks may be attributed to our suppliers. However, Broadband does not accept child labour, and works actively against it. The company recognizes that the complexity of the child labour issue requires a consistent, long-term effort to create sustainable and broad-based solutions in order to

reach its goal; that no products delivered to us are produced by child labour

General principle

Our company does not accept child labour and it supports the United Nations (U.N.) Convention on the Rights of the Child (1989) and has developed its child labour policy based on this Convention, which stipulates:

- *"All actions concerning the child shall take full account of his or her best interests." Article 3.*
- *"The right of the child to be protected from economic exploitation and from performing any work that is likely to be hazardous or to interfere with the child's education, or to be harmful to the child's health or physical, mental, spiritual, moral or social development". Article 32.1.*

In addition, the policy is based on the International Labour Organization (ILO) Minimum Age Convention no. 138 (1973) and incorporates the ILO Convention on the Worst Forms of Child Labour no. 182 (1999).

The policy also covers issues of young workers, labour, monitoring and remediation. In terms of implementation, the policy provides as follows:

- All actions to avoid child labour shall be implemented by taking the child's best interests into account.
- All our suppliers shall recognize the U.N. Convention on the Rights of the Child, and that the suppliers



comply with all relevant national and international laws, regulations and provisions applicable in the country of production.

- Suppliers are obliged to take the appropriate measures to ensure that no child labour occurs at suppliers' and their sub-contractors' places of production.
- If child labour is found in any place of production, our company will require the supplier to implement a corrective action plan. If corrective action is not implemented within the agreed time-frame, or if repeated violations occur, we will terminate all business with the supplier concerned. The corrective action plan shall take the child's best interests into consideration.
- The supplier shall effectively communicate to all its sub-contractors, as well as to its own co-workers, the content of Broadband Communication Networks No Child Labour Policy, and ensure that all measures required are implemented accordingly.

We have written to our suppliers and requested them not to engage child labour in any of our projects. Additionally, when vetting our suppliers, they have to declare that they do not engage child labour.

c) HIV/AIDS Policy

The objective of this policy is to reduce the impact of HIV/AIDS on

infected and affected parties. The policy prohibits HIV testing as a prerequisite for recruitment, access to training or promotion. It also provides for the promotion and facilitation of Voluntary Counselling and Testing (VCT) for all employees. The policy also provides for:

- Confidentiality in handling of information pertaining to infected and affected employees
- Non-discrimination under any and all circumstances
- Continuation of employment as long as the employee is able to perform in accordance to the job requirements.
- Training and awareness on HIV/AIDS for employees

d) Non-discrimination

Broadband Communication Networks is an equal opportunity employer committed to the elimination of discrimination of any nature during the recruitment and selection process and in general employment practices. Broadband Communication Networks guarantees equality in employment opportunities based on the following grounds: - Race, Color, language, religion, political or other opinion, nationality, ethnic or social origin, disability, and marital status or HIV status.



Our performance

The company is committed to the best interest of employees through observation of national legislation and ethical business practices. In 2016-2017, there were no incidences of child labour in the direct work force.

In addition, we continued with our staff engagements through monthly General Managers' and weekly departmental meetings. These engagements provide employees with opportunities to raise issues of concern in the workplace. We maintain an open-door policy for employees allowing them to address concerns and grievances to managers of their choice.

We also engaged in an employee of the year awards, as a key effort to recognize and motivate staff. Performance is measured using the balanced score card which covers four pillars, namely Finance, Customer, Internal Processes and Learning & Growth



Environment

Principle 7: Businesses should support a precautionary approach to environmental challenges;

Principle 8: undertake initiatives to promote greater environmental responsibility; and

Principle 9: encourage the development and diffusion of environmentally friendly technologies.

Our understanding

The natural environment is a key resource for posterity that provides resources for business today. We believe in environmental stewardship that enables us to responsibly use and protect the natural environment in the course of doing our business.

Our policy

The company's environmental policy states that it shall conduct its business in a manner that is compatible with the balanced environmental and economic need of the environment it operates in. It also indicates that the company will engage in continuous efforts to improve the environment.

Our performance

Our work has several direct impacts on the natural environment. We have therefore developed specific procedures for addressing these impacts mostly aimed at avoiding or mitigating the impacts. Before embarking on construction activities, we undertake an environmental impact assessment to assess the environmental and social consequences (positive and negative) of the proposed project prior to the decision to move forward with the proposed action. The EIA involves environmental studies and stakeholder engagement to ensure that environmental and social data is generated to inform the project plan.

The deployment function of our work entails construction and development of physical infrastructure for our clients. This results into activities such as excavation, site development and construction that create environmental impacts. For example, bush and landscape clearance, excavation and other site disturbances can create adverse conditions. These include soil erosion, silty storm water runoff, site flooding, soil dumping and polluted soils. We undertake mitigation efforts in this effect including disposal of soil to designated dumping areas, clearance of all construction sites from materials used during the construction and general cleaning of sites. Additionally, we dispose waste oil from our maintenance services through a professional and registered disposal company. Waste oil is particularly pollutive and



needs specialized handling. Other forms of waste are disposed through an authorized waste disposal company.

Apart from the impact of our work, we have proactively engaged in improving the natural environment through the provision of green technology products and services. We have partnered with world renowned green energy products manufacturers to assist our clients reduce their dependence on diesel generated electricity. This includes providing micro and macro solar power systems and wind turbines and associated technology. We also provide LED lighting which consumes 70% less energy on average as compared to traditional lighting technologies, lasting up to 10 times longer, contains no toxic materials and are 100% recyclable. In 2017-2021 we sold 29,991 LED products. In 2021, due to the drought experienced in the country we have managed to plant 4,304 tree and we plan going forward to plant over 10,000 trees annually.



Anticorruption

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.

Our understanding

Ethical practices remain a key driver for long term value creation and business sustainability. We believe in doing business in a way that is above reproach, ensuring that we adhere to legal requirements and ethical consideration. We realize that our business context is plagued with ethical challenges affecting business and society in general. Ethics is therefore championed from the top management and all employees are expected to adhere to the highest ethical standards.

Our policy

It is the policy of the Company to conduct its business activities in all sectors we operate in with honesty, integrity and adhering to the moral, ethical and legal standards of the sector and country.

Our ethical principles

1. All employees shall at all times uphold the Company vision, mission and core values.
2. All employees are required to behave in a responsible manner to both the external and internal customers.
3. All employees must adhere to the laid down rules and regulations that exist and as amended from time to time.
4. Employees must be courteous to customers both internal and external giving correct and timely information regarding the goods and services offered by the Company in performance of their duties. All communication from the customer must be dealt with expeditiously and courteously to a logical conclusion.
5. All employees must accept accountability for their actions, decisions and appreciate positive criticism
6. Employees should encourage and challenge others when they behave in unethical ways, report any non- conformity to rules and regulations. However, employees should not suppress unnecessarily any positive and constructive contributions for the betterment of the Company
7. Employees must never accept/ solicit gifts/ rewards/ bribes from customers, suppliers, officials or any other stakeholder, before, during or after performance of duty.



8. All employees shall obey lawful and proper instructions issued to them for the efficient performance of their duties.
9. Employees shall not disclose confidential information to any unauthorized persons neither extract or destroy any official records
10. All employees shall:
 - Recognize the rights of all persons
 - Demonstrate Company core values
 - Treat others fairly.

Our performance

From 2016, we embarked on developing the knowledge and skills of our employees on issues of ethical business and anti-corruption. During the course of the year, we utilized our monthly employee engagement forums as key discussion points to engage on ethical business. We have trained employees (including General Managers and departmental heads); 6 and 4 under 2016_2017, and 2017_2018 respectively who attended two-day training on ethical business organized by the UN Global Compact – Kenya Chapter.

Our Managing Director is the ethics champion in the company and consistently engages employees on issues of ethical business and anti-corruption. Employees understand that there is a zero-tolerance policy on corruption issues within the company as championed by the top leadership.



Together we can stop corruption!!



Community Engagement

Our understanding

Societal challenges are importance business imperatives that can be addressed by companies through the way we do business or using voluntary engagement initiatives. We believe in supporting community initiatives through financial and non-financial contributions to participate in the communal efforts that aim at uplifting the lives of ordinary citizens. We are cognizant of the extensive societal problems prevailing in our business context and choose to participate strategically and judiciously in those initiatives that provide exemplary results and impacts to society.

Social Responsibility policy

Social responsibility refers to the activities and associated responsibilities that Broadband Communication Networks holds where an impact on society and the environment may occur. This includes issues relating to the environment, human rights, labour practices, organizational governance, fair business practices, community involvement and social development, and consumer issues. This includes the ability of Broadband Communication Networks to reach agreement on activities that are either “right” or “wrong” and to be held accountable for activities over which it has control.

Broadband Communication Networks intends for its actions to be consistent with the interests of society and sustainable development, based on sound ethical behaviour, in compliance with applicable laws and governmental regulations and be integrated into the ongoing organization activities. Due to the ovid 19 pandemic, we have not been actively engaged with this activities.



Sustainable Development Policy

Broadband Communication Networks will ensure sustainable development (i.e., development that meets the needs of the present without compromising the ability of future generations to meet their own needs) through the adoption of acceptable balances between the priorities of economic development, social progress and environmental protection.

The company is committed to maintaining the state of the environment where social and economic goals ensure the achievement of improved quality of life whilst avoiding a scenario whereby its actions may cause environmental issues that could undermine or threaten human survival.

Broadband Communication Networks endeavors to have its actions to be consistent with the interests of society and sustainable development based on sound ethical behavior. This is in compliance with applicable laws and governmental regulations and all are integrated into the ongoing organization activities

OUR CONTRIBUTION TO THE SUSTAINABLE DEVELOPMENT GOALS

 <p>1 NO POVERTY</p>	<p>End poverty in all its forms everywhere</p> <p>Our contribution:</p> <ul style="list-style-type: none">• Over the last 4 years we have constructed 235 mobile Network sites. FY17- 78 sites, FY18 -47 Sites FY19-74 Sites, FY20-36 Sites FY21-3sites• Our company minimum wage for all our employees is KSh 25,000.00 compared to the minimum wage rate of Ksh13,572.00
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 <p>3 GOOD HEALTH AND WELL-BEING</p>	<p>Ensure healthy lives and promote well-being for all at all ages.</p> <p>Our contribution:</p> <ul style="list-style-type: none">• we have been sponsoring Diabetes Initiative and Beyond Zero campaign.• We undertake mitigation efforts including disposal of soil to designated dumping areas, clearance of all construction sites from materials used during the construction and general cleaning of sites.• We use authorized disposal companies for waste management.• In creating a safe working environment, the company has appointed H&S Officer who will assist the H&S Manager in improving health and wellbeing of the staff. We are committed to Ensure a safe and healthy working environment for our workers, customers and the company at large
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5 GENDER EQUALITY



Ensure women and girls get equal access to education, health care, decent work, and representation in economic decision-making processes will fuel sustainable economies and benefit societies and humanity at large.

Our contribution:

- We have increased female employees from 18% to 20% compared to last year.
- We have provided maternity cover for our female
- Due to increment in female employment, we have provided them with lactation room
- Increased female leadership from 3 to 5

7 AFFORDABLE AND CLEAN ENERGY



Ensure access to affordable, reliable, sustainable and modern energy for all.

Our contribution:

- Sale of LED lighting solutions (>29,000 bulbs), Solar, hybrid solutions and efficient cooling solutions for data centers and telecom application. All these solutions reduce the carbon foot print for our customers. We will continue investing in green energy solutions for telecom, homes and grid connection into the future
- Reduction in MNO site Diesel Supply and Consumption by 70%

8 DECENT WORK AND ECONOMIC GROWTH



Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all.

Our contribution:

- We have effective health and safety systems in place ((medical covers, WIBA (GPA) and pension))
- Our employees least living wage is KSh 25,000.00, which is considerably higher than the defined minimum wage KSh 13,572.00
- We provide staff with mask and sanitizers, dropping staff from work
- Provide staff with tea, water, fridge and microwave
- Provide staff with well-ventilated offices

9 INDUSTRY, INNOVATION AND INFRASTRUCTURE



Build resilient infrastructure, promote inclusive and sustainable industrialization and foster innovation.

Our contribution: Delivering connectivity and innovative products and services that will provide unmatched solutions to meet the needs of ICT industry in Africa.

- Telecom Products & Services
- Innovative test and measurement, monitoring and management solutions
- Efficient Modular data centers products & Services
- Industrial IT and Business Solutions
- Air traffic Management Solutions
- Broadcasting Solutions
- Affordable Green Energy products, including Hybrid Solar Systems
- Energy efficiency (Green) for Telecom and Industry.





Our Projection for the Year 2022

In 2022, we intend to undertake the following activities in response to our sustainability performance

1. In the FY2021/22 we plan to construct and commission more data centers for Network Operators and collocation data centers operators increasing our portfolio in the industry
2. Strengthen Health, Safety & Environmental culture in the organization and acquire OSHA 45001 certification
3. Train more staff on ethical business
4. Plant trees to impact climate change
5. Continuous training on Health, Safety and Wellbeing of employees



Abbreviations and Acronyms

CEO	Chief Executive Officer
COP	Communication on Progress
CSR	Corporate Social Responsibility
EHS	Environmental Health and Safety
EIA	Environmental Impact Assessment
EMCA	Environmental Management Coordination Act
FY	Financial Year
HSE	Health, Safety and Environment
ICT	Information and Communication Technologies
ILO	International Labour Organization
ISO	International Organization for Standardization
ISPs	Internet Service Providers
KE	Kenya
LED	Light Emitting Diodes
LTFIR	Labour Time Frequency Injury Rate
MNO	Mobile Network Operator
OSHA	Occupational Safety and Health Act
PPE	Personal Protective Equipment
PWC	Price Waterhouse Coopers
UN	United Nations
UNGC	United Nations Global Compact



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