

Summary of Camco policies

The primary purpose of this policy brief is to inform our stakeholders about the policies and procedures that regulate the compliance of Camco and any projects and/or developers we enter into financing agreements with. Camco and its Investee companies are required to be compliant with the following:

- Anti-corruption and Integrity Policy
- Code of Conduct
- Environmental and Social Safeguards Policy
- Gender Equality Strategy
- Human Resource Policy
- Risk Management Policy
- Whistleblowing Policy

Anti-Corruption and Integrity Policy

Camco requires compliance, in letter and spirit, with best practice and relevant laws to prevent corruption, money laundering and the financing of terrorism, including the UK Bribery Act 2010 and the UK Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017. Camco's Anti-Corruption and Integrity Policy stipulates that all those working for Camco (or as applicable, receiving funding from Camco) should take all appropriate measures to prevent and combat fraud and corruption, money-laundering and the financing of terrorism.

Camco uses all reasonable efforts to prevent fraud, including:

- Adopting appropriate administrative practices and institutional arrangements to ensure that Camco funds are only used for the purposes for which they were given, and that any fraud and corruption can be easily detected. These practices are fund-specific;
- Providing regular training on the company's *Anti-Corruption and Integrity Policy* and changes in relevant legislation to the staff of Camco; and,
- Having provisions in transaction documents with a counterparty as may be required to give full effect to the *Anti-Corruption and Integrity Policy*, including requirements to comply with relevant regional legal frameworks on anti-corruption.

All Camco team members are required and expected to adopt the highest standards of financial and ethical conduct, and all indications of inappropriate behaviour will be investigated thoroughly.

Code of Conduct

Camco is committed to providing a safe working environment and ensuring fair employment practices in line with the company's core values and behaviours and all relevant employment legislation. In turn, Camco requires and expects all company staff (including contractors) to act and behave honestly, ethically and with integrity.

The Code of Conduct provides information and guidance covering conflicts of interest, non-competition, confidentiality, honesty and sustainability.

Environmental and Social Safeguards Policy

Camco's Environmental and Social Safeguards Policy ensures that the environmental and social performance of the projects supported by the company are sustainable and of a bankable standard.

The policy incorporates environmental and social considerations into Camco's decision-making to avoid - and where avoidance is impossible, mitigate - adverse impacts to people and the planet within reasonable time, as well as give due consideration to vulnerable populations, groups and individuals.

All Investees supported by Camco are required to design and implement projects and programmes in a manner that will promote, protect and fulfil universal human rights. Furthermore, the design and implementation of activities must be guided by the rights and responsibilities set forth in the UN Declaration on the Rights of Indigenous Peoples. All Investees supported by Camco must avoid adverse impacts on indigenous peoples, support the full and effective participation of indigenous peoples, and obtain free, prior, and informed consent (FPIC) of the affected communities of indigenous peoples.

The policy also requires the establishment of a labour policy and occupational health and safety procedures in accordance with International Labour Organization (ILO) guidelines.

All Camco-supported projects and/or developers are required to not only comply with host country legislation, but also with International Finance Corporation (IFC) Performance Standards for Environmental and Social Sustainability and the sustainability principles advocated by the UN Global Compact, of which Camco is a signatory.

Gender Equality Strategy

Camco has adopted a twin-track gender strategy. This means that it will firstly mainstream gender equality in its management and operations and, secondly, work with donors to ensure that gender equality is mainstreamed into the design, implementation, monitoring and assessment of all energy initiatives managed by Camco.

Furthermore, Camco's *Gender Equality Strategy* recognises and supports the global body of gender equality principles as set out in:

- Convention on the Elimination of All Forms of Discrimination Against Women (1979);
- Gender Action Plan of UNFCCC (decision 3/COP23);
- The Protocol to the African Charter on Human and Peoples' Rights on the Rights of Women in Africa; and
- Women's Empowerment Principles (UN Women 2010).

Camco has established gender and diversity action plans for its own operations and requires its Investee companies to do the same in accordance with the *Environmental and Social Safeguard Policy*.

Human Resource Policy

Camco values the contribution all of its team members, being our employees and contractors, make to our success and is committed to their health and wellbeing. The *Human Resource Policy* sets out Camco's:

- Equality policy;
- Leave and absence policy, including parental leave and pay; and
- Safeguarding procedures.

Risk Management Policy

Camco's Risk Management Policy and Risk Management Framework ensure that the management of Camco's risks and those of the underlying funds which it manages is conducted with considered judgement and discipline. This includes all exposures to adverse events across all of Camco's services and business activities.

Camco manages its risk using an Enterprise Risk Management portfolio approach that recognises the trade-off between risk and return and ensures that Camco assumes appropriate levels of risk to ensure that it can still meet its strategic and business objectives.

The policy covers strategic risk, business risk, financial risk and operational risk.

Whistleblowing Policy

All Camco employees are required and expected to adopt the highest standards of financial and ethical conduct, and all indications of inappropriate behaviour will be investigated thoroughly.

Camco's whistleblowing policy concerns the reporting of suspected wrongdoing or dangers in relation to all Camco activities. This includes bribery, fraud or other criminal activity, miscarriages of justice, health and safety risks, damage to the environment and any breach of legal or professional obligations.

The policy covers all employees and stakeholders and provides information on how to raise concerns - internally, externally and anonymously - and the support and protection provided to whistleblowers. Details of whistleblowing hotline are available at www.camco.energy/contact.