



Cape Media Limited
Hse 3 West End Park Court, Muthaiga North,
P. O. Box 599 - 00606, Nairobi - Kenya
Tel: +254 740 047 047
Email: info@capemedia.co.ke

MANAGEMENT POLICIES

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At Cape Media, we believe that sound management policies are the cornerstone of a successful, safe and compliant business. The policies are designed to provide clear guidelines and ensure that every employee understands their roles, responsibilities, and the company's expectations.

This document brings together summaries of essential management policies that guide our operations and shape our company culture. These summaries include:

- ❖ Employment Policy
- ❖ Health and Safety Policy
- ❖ Risk Management and Business Continuity Policy
- ❖ Data Protection and Cyber Security Policy
- ❖ Waste Management Policy
- ❖ Corporate Social Responsibility Policy
- ❖ Customer Service Policy
- ❖ Bribery and Corruption Policy
- ❖ Employee Integrity
- ❖ Environmental Policy
- ❖ Code of Conduct and Ethics Policy

These summaries reflect our core values and legal obligations as a responsible employer and corporate citizen in Kenya. They serve as a reference to guide daily operations, but for comprehensive details, the full versions of each policy can be made available upon request.

Signed for Circulation by:

Name: WILSON MBURA NDIKU

Signature: [Signature] **Date:** 17TH NOV 2020



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EMPLOYMENT POLICY**1. INTRODUCTION****1.1 Policy mandate**

It is the policy of Cape Media to strategically manage human capital in areas of talent acquisition, employees' relations, performance management, compensations & benefits, legal compliance and workforce planning, trainings and developments.

1.2 Objectives of the policy

- ❖ Ensure consistency and uniformity in employment practices and procedures across the organization, promoting fairness and equity among employees.
- ❖ Provide clear guidelines and expectations for employees regarding their rights, responsibilities, and the consequences of non-compliance.
- ❖ Serve as a framework for ongoing review and refinement of HR policies and procedures to adapt to changing organizational needs, industry trends, and regulatory requirements.

1.3 Scope of the Policy

The policy encompasses a wide range of areas related to the management of human capital at Cape Media Ltd. It applies to all employees, interns and trainees, contractors, consultants and probationary employees in Cape Media Ltd. It provides stakeholders with a comprehensive understanding of their rights, responsibilities and expectations.

1.4 Update of the Manual

- ❖ The Management reserves the right to revise, eliminate, or add to the policies.
- ❖ Any change or review will however be initiated by the Human resources Manager who shall make recommendations to the BOD for consideration and approval.
- ❖ Policies shall only become valid after formal approval by the BOD.
- ❖ Regularly, the manual will be reviewed every two (2) years as per the manual review procedure of Cape Media.

2. General employment principles**2.1 Broad guiding principles**

Cape Media Ltd is guided by the following broad human resources principles:

- ❖ Ensure that as far as possible an optimum number of staff is maintained for efficient and effective management of the Company.
- ❖ Offer compensation and maintain a salary structure that is fair, equitable and attractive to sustain and motivate staff.

- ❖ Provide reasonable terms and conditions of service to staff that are comparable with those applicable for similar positions in other such companies, subject to availability of adequate funds and ability to pay in a sustainable manner.
- ❖ Promote favourable relations between Cape Media Ltd as employer and its employees and among employees themselves.
- ❖ Provide an environment where individual employees will participate in the development of their careers and where they will have opportunity to fully utilize individual talents and ambitions.
- ❖ Keep staff informed of changes taking place within the company to enable them appreciate the reasons for the changes.

2.2 General conduct

- ❖ Cape Media Ltd requires order and discipline to succeed and to promote efficiency, productivity and cooperation among its employees.
- ❖ Employees who fail to maintain proper standards of conduct toward their work, their co-workers or the people who are targeted and served by the Company, or who violate any of the policies, are subject to appropriate disciplinary action, up to and including discharge.
- ❖ All instances of misconduct should be referred to the Human Resources Manager.
- ❖ All staff will be expected to portray the utmost respect for one another, irrespective of seniority or personal status.
- ❖ Staff discrimination or favouritism of any member of staff by another will not be tolerated.
- ❖ Whether on or off-duty, staffs of Cape Media are expected to conduct themselves in a manner that portrays their professionalism.
- ❖ Any sign of lack of integrity in any matter may be grounds for counselling in the first instance and if there is no positive response, then disciplinary action process shall be initiated against such staff.
- ❖ All our staffs are expected to honour, in a timely manner, all personal and organizational obligations to internal and external parties.

2.3 Equal employment opportunities

- ❖ It is the policy of Cape Media Ltd to be an equal opportunity employer.
- ❖ Cape Media shall provide employees with equal opportunities and shall not discriminate on the basis of marital status, health, gender, religion, disability or ethnicity.

- ❖ Employment at Cape Media Ltd shall be based upon personal capabilities and academic qualifications.
- ❖ Employees' concerns on this subject should be referred to the Human Resources Manager.
- ❖ Appropriate disciplinary action shall be taken against any employee who wilfully acts in a manner that is either discriminatory or promotes discrimination in the company.

2.4 Confidentiality

- ❖ Confidentiality refers to the access and/or being in privy to data and/or information of Cape Media Ltd by virtue of the position one holds as a result of employment.
- ❖ Cape Media staff are required treat as confidential all information that comes to them by way of their employment and shall not without written consent of the company, disclose any of its affairs to any unauthorized person.
- ❖ Staff may not make use of any such information for their own purposes or for the benefit of any person or firm except for Cape Media Ltd during or after their employment.
- ❖ All requests for information by other agencies must follow the laid down communications procedure in administrative procedures.
- ❖ Any employee who violates this policy will face disciplinary action.
- ❖ New employees will be required to fill and sign a Confidentiality Agreement Form a copy of which shall be retained in the personal file.

2.5 Harassment at the work place

- ❖ Harassment refers to any behaviour that degenerates or shows hostility toward an individual or group.
- ❖ Cape Media Ltd's policy is to provide a work environment that is free of any form of harassment, including sexual harassment.
- ❖ Cape Media Ltd shall maintain an open-door policy to encourage harassment reporting.

2.6 Drugs and substance abuse

- ❖ Reporting to work under the influence of drugs, alcohol and prohibited substances is prohibited.
- ❖ Possession, distribution or use of any illegal drug, alcohol, or controlled substance while on duty or the Company's premises is strictly prohibited.

- ❖ Employees in violation of the policy are subject to appropriate disciplinary action, as described in this manual.

2.7 Solicitation

- ❖ Cape Media Ltd limits solicitation and distribution of materials that might in any way interfere with normal business operations and negatively impact on employee efficiency.
- ❖ However, solicitations connected with charitable activities and community programs authorized by the BOD may be permitted.

2.8 Corruption

- ❖ Cape Media Ltd prohibits all forms of corruption, including bribery, extortion, fraud, embezzlement or any other illegal or unethical behaviour.
- ❖ Employees are required to comply with all applicable laws and regulations related to anti-corruption.
- ❖ Employees are expected to conduct themselves with the highest standards of integrity, honesty and fairness in all aspects of their work.
- ❖ Employees must disclose any actual or potential conflicts of interests that may arise in the course of their duties and take appropriate steps to mitigate or avoid them.
- ❖ The outlined Cape Media Ltd policies aim to create a culture of transparency, integrity and accountability and to effectively prevent and address instances of corruption.

3. Employment policies and procedures

3.1 Selection and recruitment of staff

- ❖ The policy of Cape Media Ltd is to build a highly skilled and motivated workforce that further its mission.
- ❖ All recruitments shall be conducted in an open and transparent manner.

3.2 Staff induction/orientation

- ❖ An induction programme shall be put in place by the HR department for all new employees of Cape Media Ltd to be taken through.
- ❖ The programme will provide new employees with basic information about Cape Media Ltd such as brief history, expose the employee to the organization's values and philosophy, policies and procedures, and enable their assimilation to the new work environment as smooth and quickly as possible.

- ❖ The process will acquaint the employee with the organization structure and reporting relations, activities, rules & regulations and basic but essential amenities.

3.3 Performance management

- ❖ Cape Media Ltd will put in place performance management program aimed at providing employees with opportunity for constructive work reviews.
- ❖ The program is designed to address performance and skills developmental needs and interests once an employee has been confirmed into a position.
- ❖ A performance review will be carried out to measure the employee's performance within a calendar year but is a continuous exercise.
- ❖ Performance management will help Cape Media Ltd to compensate employees in a fair and equitable manner based upon demonstrated job performance, and in accordance with its Equal Employment Opportunity policy.

3.4 Staff capacity building, training and development

- ❖ It is the policy of Cape Media Ltd to have well trained and equipped employees.
- ❖ Cape Media Ltd will build the capacity of the staff and enhance leadership capacity through training and facilitation at every level to operate effectively.
- ❖ The HR department in liaison with the management committee will establish and coordinate a continuous staff training program that will serve the needs of the organization effectively.
- ❖ Cape Media Ltd will enable its staff with access to training programs based on employee development needs.

3.5 Discipline and grievance handling procedure

- ❖ Cape Media will manage its disciplinary procedures within the context of good management where employees have opportunity to receive orientation and induction, have easy access to policy manuals and are acquainted with their contents, are encouraged to discuss their job responsibilities, and receive feedback on their performance.
- ❖ Supervisors and managers are encouraged to coach, guide and counsel staff members and only resort to disciplinary action if they are not receiving any positive progress or in instances that warrant immediate response to curb situations from deteriorating.
- ❖ Disciplinary action will not be taken until the case that gives rise to it is fully investigated.
- ❖ The seriousness of the case will dictate the stage at which the disciplinary action will commence (verbal warning, suspension, written warning, termination or

summary dismissal) and this will be communicated in writing by the Human Resources Manager

- ❖ At all stages of the disciplinary procedure the employee will be advised of the nature of the complaint and will be given the opportunity to state their case before any decision is reached.
- ❖ At stages 1, 2, and 3 of the procedure, targets for performance and expected standards of behaviour will be agreed for the employee to achieve within the defined timeframe.
- ❖ An employee will not be dismissed for a first breach of discipline, except in the case of gross misconduct.
- ❖ An employee may appeal against any disciplinary penalty imposed.
- ❖ The disciplinary procedure will be recorded in the employee's personal file.
- ❖ At all stages, the initiator of disciplinary action will consult with Human Resources Manager who will inform the Management of the need to use the disciplinary procedure.

3.6 Compensation and benefits

- ❖ It is the policy of Cape Media Ltd to compensate each employee in a fair and equitable manner for good job skills and satisfactory job performance.
- ❖ Promotional and job enrichment opportunities will be based on employee performance, objective evaluations and the organizations staffing needs.
- ❖ Cape Media will have a compensation system that will attract and retain capable people who are rewarded fairly according to their ability, competence, effort, and contribution towards the achievement of the objectives of Cape Media Ltd.
- ❖ Cape Media's compensation philosophy is based on the following principles:
 - ✓ Pay employees in a manner sufficient to support and develop a high performance workforce that provides quality services in a responsible manner.
 - ✓ Adopt and implement compensation practices that reflect best practices that are generally accepted in the media industry as well as Kenyan laws.
 - ✓ Offer compensation and maintain a salary structure that will enable Cape Media Ltd to attract, retain and motivate in a sustainable manner staff with the right skills and competencies.
 - ✓ Focus on the value of total compensation, which includes basic salary, other cash benefits and non-cash benefits.

- ✓ Establish a salary and benefits structure that is competitive with the labour market.
- ✓ Develop a system that encourages and enhances individual and team performance.

3.7 Promotions

Whenever possible, new and vacant positions will be filled from within Cape Media Ltd by promoting qualified employees in accordance with the following criteria:

- ❖ Promotions will be made on the basis of qualifications and merit, and provided the person under consideration has the required skills and competencies for the position.
- ❖ Length of continuous service shall be considered in promotions when it is the only significant difference among employees with equal or nearly equal qualifications.
- ❖ If there are no employees within Cape Media Ltd qualified to fill a vacancy, the best-qualified candidate shall be selected from external applicants.
- ❖ Promotions will depend on organization's financial capability.
- ❖ Promotions to positions falling vacant as a result of either termination of services or establishment of a new position will be done according to the official recruitment processes and procedures.

3.8 Termination of employment/separation terms

- ❖ An employee's employment contract with Cape Media Ltd may be terminated under any of the following circumstances:
 - ✓ Termination during probation period by either party before confirmation.
 - ✓ Redundancy as a result of restructuring or scrapping of a functional area.
 - ✓ Termination on disciplinary grounds or poor performance.
 - ✓ Summary dismissal.
 - ✓ Voluntary resignation
 - ✓ Normal retirement on attaining the retirement age.
 - ✓ Death of an employee.
- ❖ In all cases of termination by Cape Media Ltd, the Human Resources Manager shall always ensure that the concerned staff has been given the opportunity to express his/her views of the situation through an **exit interview**.

- ❖ The management of Cape Media Ltd will endeavour to handle staff issues amicably, and will only terminate the services of an employee if that is the only appropriate course of action given the circumstances.

HEALTH AND SAFETY POLICY

1. Policy Statement

At Cape Media, we are committed to ensuring the health, safety and welfare of all employees, contractors, visitors, and the general public who may be affected by our operations.

We will comply with all applicable health and safety laws and regulations, including the Occupational Safety and Health Act (OSHA), 2007 of Kenya, and any other legal requirements relevant to our business.

2. Objectives of a Health and Safety Policy

- ❖ To comply with all applicable health and safety laws, regulations and industry standards to avoid legal penalties and ensure safe working conditions.
- ❖ To identify, assess, and mitigate risks in the workplace to minimize the occurrence of accidents, injuries, and occupational diseases, ensuring the well-being of all employees.
- ❖ To foster a culture of safety by providing safe work practices, necessary training and equipment.
- ❖ Encourage Employee Participation and Awareness

3. Scope and Application

This policy addresses health and safety issues in all environments where the Cape Media operates; from the office to field assignments and includes all employees and third parties involved in the company's operations.

4. Health and Safety Responsibilities

- ❖ Cape Media's management is responsible for implementing this policy and fostering a culture of safety and providing necessary training and equipment.
- ❖ Employees are required to follow all health and safety rules.
- ❖ The designated Health and Safety Officer is responsible for overseeing the health and safety measures.

5. Risk Assessments and Hazard Identification

- ❖ **Cape Media** regularly assesses the risks associated with its operations to identify potential hazards, mitigate risks and ensure that appropriate measures are in place.

- ❖ The general workplace risks include electrical hazards, fire risks, ergonomic issues from prolonged sitting, and risks associated with equipment such as lighting, cameras, and studio setups.
- ❖ The field reporting risks include working in volatile environments and hazards associated with transport or outdoor reporting in remote locations.
- ❖ Employees are encouraged to report hazards and potential safety concerns to their supervisor or the Health and Safety Officer.

6. Emergency Procedures

- ❖ Cape Media has fire alarms, fire extinguishers, and clearly marked emergency exits in all office and studio premises.
- ❖ Fire drills will be conducted regularly to ensure preparedness.
- ❖ In the event of an accident or medical emergency, employees should contact the nearest first aider and call emergency services if necessary. First aid kits are available in the office and studio areas.
- ❖ Evacuation routes are clearly marked, and employees will be trained on the evacuation procedures to follow during emergencies.
- ❖ Emergency numbers for local services (police, fire, and ambulance) and internal health and safety contacts are provided to all employees.

7. Training and Awareness

- ❖ Cape Media will provide health and safety training to all employees on general workplace safety, hazard identification, equipment use and emergency procedures.
- ❖ Cape Media will offer ongoing safety education including refresher courses and updates on new risks or equipment.

8. First Aid and Medical Assistance

- ❖ Fully stocked first aid kits are available in the office, studio and field reporting kits.
- ❖ The kits are regularly checked and restocked as necessary.
- ❖ Cape Media will ensure that trained first aiders are present in the office and studios.
- ❖ In the event of a serious injury or medical emergency, employees will be directed to the nearest medical facility.
- ❖ Contact information for emergency medical services is readily available to all employees.

RISK MANAGEMENT AND BUSINESS CONTINUITY POLICY**1. Policy Statement**

Cape Media is committed to managing risk. In pursuit to this commitment, all the company's employees shall be required to be responsible and accountable for managing risk in so far as is reasonably practicable within their area of responsibility.

2. Purpose of this Policy

This policy is a formal acknowledgement of the commitment of Cape Media to a holistic, efficient and effective approach to risk management. Its aim is to ensure that every effort is made by the media house to manage risk appropriately, to maximize potential opportunities and minimize the adverse effects of risk.

The purpose of this policy is therefore to embody adoption of best practices in the identification, evaluation and cost-effective control of risks, to ensure effective risk management.

3. Objectives

- ❖ To formalize and communicate a consistent approach to managing risk for all
- ❖ Cape Media's activities and to establish a reporting protocol.
- ❖ To ensure that all potentially harmful risks to the company's interests and staff are identified, assessed mitigated and managed.
- ❖ To assign responsibility and accountability for the management of risks to all staff within their areas of control.

4. Scope of the policy

This Risk Management Policy applies to all areas of operations within **Cape Media** which includes;

4.1 Employees and Contractors

The policy applies to all levels of staff within Cape Media, including:

- ❖ Executive management
- ❖ Department heads
- ❖ Full-time and part-time employees
- ❖ Freelancers, contractors, and other third-party service provide

4.2 Business Functions

The policy is applicable to all departments and functions within the media house, including:

- ❖ News and Content Production.
- ❖ Editorial and Creative Services.
- ❖ Sales, Marketing, and Advertising.

- ❖ Finance, Procurement and Human Resources.
- ❖ IT and Digital Services.
- ❖ Legal and Compliance.

4.3 Operational Locations

This policy is applicable across all physical and virtual locations where Cape Media operates, including:

- ❖ Head office, production studios, and satellite offices.
- ❖ On-location reporting sites, including domestic and international assignments.
- ❖ Remote or home-based work locations for employees.

4.4 Risk Categories

Cape Media manages a wide range of risks including

- ❖ Strategic Risks: Risks related to the long-term direction of the company.
- ❖ Operational Risks: Risks arising from day-to-day activities.
- ❖ Financial Risks: Risks related to financial management.
- ❖ Reputational Risks: Risks that could impact the company's reputation.
- ❖ Compliance Risks: Risks related to non-compliance with media regulations, industry standards, and contractual obligations.
- ❖ IT and Cybersecurity Risks: Risks associated with the company's digital infrastructure, including data breaches, cyber-attacks, and system downtimes.
- ❖ Health and Safety Risks: Risks associated with employee safety, especially in field reporting and production environments.

5. Cape Media risk management and business continuity Process

5.1 Risk Identification

Identify potential risks that could affect Cape Media's operations, financial health, reputation, or legal compliance.

5.2 Risk Assessment

Analyze identified risks to understand their potential impact and likelihood of occurrence.

5.3 Risk Mitigation

Develop strategies to reduce the likelihood or impact of identified risks.

5.4 Risk Monitoring and Reporting

Continuously monitor identified risks and evaluate the effectiveness of mitigation measures.

5.5 Risk Response and Review

Actively respond to risks when they occur and review the risk management process for continuous improvement.

7. Business continuity planning and strategy

- ❖ Outlines specific plans and procedures to be followed during a disruption, including backup locations, data recovery methods, and alternative communication channels.
- ❖ Defines a recovery timeline and goals for each critical function to minimize downtime and ensure service restoration.

8. Data backup and it recovery

- ❖ Details processes for secure, regular backups of critical data to prevent data loss during disruptions.
- ❖ Includes plans for IT infrastructure recovery, such as server and system restoration, to ensure continuity of Cape Media's digital services.

9. Testing and maintenance

- ❖ Mandates regular testing of the business continuity plan, including simulations, drills, and evaluations to assess its effectiveness.
- ❖ Includes procedures for updating and refining the plan based on testing outcomes and evolving risks.

DATA PROTECTION AND CYBER SECURITY POLICY**1. Policy Statement**

As per the provisions of Data Protection Act 2019 that governs the collection and processing of personal data, it is the policy of Cape Media Ltd to ensure that we use personal data as provided for by the law.

2. Purpose of the Policy

The purpose of this policy is to provide guidelines relating to the processing of personal data by Cape Media Ltd.

This Policy is intended to provide minimum standards concerning the protection of personal data that we collect, process, and store and will cover the use of personal data about all individuals, including consumers, employees, customers, and other third parties, that deal with Cape Media Ltd and its affiliates.

3. Objectives of the Policy

The Policy ensures that Cape Media Ltd:

- ❖ Complies with local and, to the extent applicable, international laws and regulations on data protection.
- ❖ Protects the rights of its employees, consumers, customers and business partners.
- ❖ Fosters transparency in how it collects, processes, and stores people's data.

❖ Safeguards itself from the risks of data breaches.

4. Scope and Applicability

This policy covers data collected, received and stored on the Cape Media-owned physical and electronic databases and resource centre. It shall apply to all staff, students, and other members of the company. It shall also apply to all users of the company's applications, software, databases, websites, social media platforms, and all other suchlike resources.

This policy shall cover all data/ information collection tools of Cape Media Ltd including but not being limited to assessment tools, employee databases, beneficiary databases, research databases, mobile applications, publications, and communication tools such as photos, videos, social and mainstream media

5. Policy guidelines

Cape media shall in dealing with personal information and data ensure that the information/ data is processed; without infringing the privacy rights of the data subject, in a lawful manner; and in a reasonable manner

5.1 Accuracy

Cape Media shall store personal data/information as accurately as possible and update and systematically review it to ensure it fulfils the purpose(s) for which it is processed.

Lawful and fair processing

Data processing shall be carried out lawfully and fairly for specified and legitimate purposes without prejudicing the fundamental rights and freedoms of data subjects.

5.2 Confidentiality

The confidentiality of personal data must be respected by the company when processing data at all times with access to the same limited on a need-to-know basis.

5.3 Security

Cape Media will ensure and implement a high level of data security that is appropriate to the risks presented by the nature and processing of personal data taking into account the level of technology available and existing security conditions as well as the costs of implementing additional security measures.

5.4 Accountability

Cape Media will be responsible for compliance and will be required to demonstrate that appropriate measures have been employed within the organization to comply with the data protection guidelines.

5.5 Rights of data subjects

A data subject has a right as per the laws and regulations.

5.6 Access control

Establishes protocols for granting, modifying, and revoking access based on roles and responsibilities.

Requires strong authentication methods and regular reviews of user permissions.

5.7 Incident response and reporting:

Outlines steps to be taken in the event of a security breach, including immediate reporting, containment, and recovery.

Specifies a dedicated response team and a communication plan to inform affected parties.

5.8 Network security and monitoring:

Defines measures for firewall configuration, intrusion detection, and regular security audits.

Mandates real-time monitoring for unusual activities and swift response to suspicious events.

5.9 Device security:

Establishes requirements for securing devices accessing company data, such as enforcing passwords, antivirus software, and patching protocols.

Covers both company-issued and personal devices under BYOD (Bring Your Own Device) guidelines.

5.10 Third-party vendor management:

Ensures that third-party service providers meet Cape Media's cyber security standards.

Mandates secure data exchange protocols and regular audits of vendor security practice

WASTE MANAGEMENT POLICY**1. Policy Statement**

Cape Media is committed to the safe and environmentally responsible management of hazardous waste. Where possible, the generation of hazardous waste will be actively avoided. Where this is not possible, the volume of hazardous waste generated will be minimized and the waste will be handled in accordance with relevant legislation and established best practices.

2. Objectives of the policy

- ❖ Implement processes and encourage practices that reduce the amount of waste generated by Cape Media's activities.

- ❖ Maximize recycling efforts and encourage the reuse of materials wherever feasible.
- ❖ Properly dispose of all waste materials, including electronic and hazardous waste, in compliance with relevant environmental laws and guidelines.
- ❖ Educate employees and contractors on the importance of waste management, emphasizing environmental sustainability.
- ❖ Regularly review and enhance waste management processes to align with evolving best practices and technological advancements in waste handling.
- ❖ Support Cape Media's sustainability goals by reducing the company's carbon footprint and promoting a green workplace environment.

3. Scope of the policy

The waste management policy at Cape Media would cover:

- ❖ All Departments and Operations: Applies to all activities, including administrative offices, production studios, and any on-location activities.
- ❖ Types of Waste: Addresses various waste categories including general waste, electronic waste (e-waste), paper, hazardous materials, and recyclable materials.
- ❖ Waste Reduction and Recycling Initiatives: Outlines Cape Media's commitment to reduce waste at source, maximize recycling efforts, and responsibly manage unavoidable waste.
- ❖ Employees and Contractors: Involves all staff and external contractors in adhering to waste management practices.
- ❖ Reporting and Monitoring: Specifies tracking, reporting, and ongoing improvement measures to manage waste outputs efficiently.

4. Policies to minimize waste generation

To reduce the amount of waste generated in the company, the following policies and practices shall be implemented:

- ❖ **Source reduction:** purchasing restrictions to ensure the selection of methods or supplies that are less wasteful or generate less hazardous waste.
- ❖ **Recyclable products:** use of materials that may be recycled, either on-site or off-site.
- ❖ Also consider whether the waste materials can be used in another process or treated for reuse.
- ❖ **Waste segregation:** Careful segregation (separation) of waste matter into different categories helps to minimize the quantities of hazardous waste.
- ❖ **Minimize Waste Volumes via Treatment:** Some waste streams can be treated on site to reduce the volume of waste for disposal.

5. Waste management process**❖ Waste Identification and Categorization**

Identify types of waste generated, such as general office waste, electronic waste (e.g., obsolete computers, cameras), paper and print waste, hazardous waste (e.g., batteries, chemicals), and production-related waste.

Waste Reduction and Minimization

Implement waste reduction initiatives like digital documentation to reduce paper waste, shared resources to minimize consumption, and efficient production planning to reduce excess materials.

❖ Recycling and Reuse Initiatives

Establish recycling stations across the facility for paper, plastic, and other recyclable materials.

Collection and Segregation of Waste

Place clearly labelled bins and stations for different waste types (e.g., general waste, recycling, e-waste).

❖ Storage of Hazardous Waste

Designate secure storage areas for hazardous

Proper Disposal and Partnering with Licensed Vendors

Work with certified waste disposal companies to handle hazardous waste, e-waste recycling, and general waste collection.

❖ Employee Training and Awareness

Conduct regular training sessions on waste reduction practices, segregation guidelines, and recycling protocols.

❖ Monitoring and Reporting

Track and record waste generation metrics, recycling rates, and disposal frequency. Regularly review waste management goals and progress.

❖ Policy Review and Improvement

Periodically review the waste management policy to assess effectiveness, adapt to regulatory changes, and incorporate industry best practices.

CORPORATE SOCIAL RESPONSIBILITY POLICY**1. Policy Statement**

Pursuant to its commitment to contribute to social responsibilities, Cape Media shall;

- ❖ Strive to operate in a responsible and sustainable manner to improve environmental conservation.
- ❖ Encourage and strive to maintain a clean, healthy and safe working environment.

- ❖ Encourage stakeholders to adopt responsible business policies and practices.
- ❖ Study, monitor and manage the social, environmental and economic impact, to enable the Company contribute to society's wider goal of sustainable development.

2. Purpose

The purpose of Corporate Social Responsibility shall be to facilitate activities that impact positively on the following aspects among others;

- ❖ Protection and conservation of the environment.
- ❖ Natural resource management.
- ❖ Health.
- ❖ Food Security.
- ❖ Community empowerment in addressing socio-economic issues.

3. Objectives

- ❖ To bridge the gap between the Company and the Community.
- ❖ To enhance Stakeholder relationships.
- ❖ To support initiatives that promote sensitizing and educating the public on activities that promotes high standards of living.
- ❖ To build local capacity to address issues related to socio-economic development.

4. Corporate Social Responsibility Activities

The Company shall coordinate CSR activities that are within the Institution policies paying attention to the relationships Cape Media has established with its employees, suppliers, customers, and the communities in which it operates key impact areas:

4.1 Workplace

The Company management shall be committed to enriching the lives of all stakeholders to provide an enabling environment where employees feel supported, can develop their skills, and have a clear understanding of the institutional strategic objectives. The Company shall encourage employees to participate in opportunities and programs that will contribute to their ability to add value and ensure further growth and success for themselves and the institution.

4.2 Health & Safety

The company shall strive to conduct awareness campaigns of a clean, healthy and safe working environment and cultivate a culture that encourages employees to maintain a workplace free of preventable hazards in compliance with all laws and regulations governing workplace safety and health, including the Occupational Safety and Health Act (OSHA).

The management shall play a role to ensure that university business is conducted according to rigorous professional, ethical, legal standards.

4.3 Marketplace

❖ Customers

The Management shall strive to deliver world class services that add value to customers.

❖ Supplier Relations

The Management shall aim to work actively with suppliers & partners who commit to Company values.

❖ Community outreach

To further support communities, the management in conjunction with employees and staff shall take part in spearheading the CSR activities for community outreach like organizing free medical camps, animal clinics, field days and business clinics, and donations to Children's homes.

CUSTOMER SERVICE POLICY

1. Policy Statement

Cape Media is committed to delivering exceptional customer service that exceeds our clients' expectations. We aim to foster positive, lasting relationships with our audience, advertisers, and other stakeholders by maintaining a responsive, respectful, and solution-focused approach to every interaction.

2. Purpose

The purpose of this Customer Service Policy is to provide a consistent framework for managing all customer interactions at Cape Media. This policy outlines the standards and practices for ensuring that our clients, viewers, listeners, and readers receive high-quality service that is timely, accurate, and considerate. It also serves as a guide for our staff on effective customer engagement and conflict resolution, enhancing customer satisfaction and loyalty.

3. Scope

This policy applies to all Cape Media employees, including customer service representatives, journalists, marketing and sales staff, and any other team members who engage directly or indirectly with customers and stakeholders. It covers all channels of customer interaction, including in-person, phone, email, social media, and any other form of digital or print communication. This policy also encompasses the handling of customer feedback, inquiries, complaints, and service requests.

4. Objectives

- ❖ To create awareness on the importance of good customer service.
- ❖ To identify and promote the best customer service practices.

5. Attributes to Good Customer Service

Two critical attributes to good customer service/customer friendly approach are positive communication and cordial relationships. Customer friendly approach encompasses being courteous, timely, friendly, flexible and interested among other attributes. Professional qualities in customer service include:

- ❖ Friendliness-it is the most basic and associated with courtesy and politeness.
- ❖ Empathy- customers need to know that the service provider appreciates their wants and circumstances.
- ❖ Fairness- customers want to feel they receive adequate attention and reasonable answers.
- ❖ Control-customers want to feel their wants and inputs have influence in the outcome.
- ❖ Information- customers want to know about products and services but in a pertinent and time-sensitive manner.

6. Interpersonal Actions

Interpersonal actions that mean a great deal in the area of customer relations are: Smiling, eye contact- shaking hands, being attentive, tone of voice, hand gestures, personal space and posture.

7. Communication with Unsatisfied Customers

Good customer service means accountability, responsibility and taking action to satisfy the customer but not making excuses. The policy defines the techniques used to win unsatisfied customers.

8. Benefits of Good Customer Service

Benefits of good customer service are:

- ❖ Higher income due to a number of customers.
- ❖ Recognition
- ❖ Personal satisfaction and fulfilment
- ❖ Less stress
- ❖ Greater authenticity
- ❖ Higher self-awareness and self-control

BRIBERY AND CORRUPTION POLICY**1. Policy Statement**

Cape Media is committed to create a corruption free working environment for its staff and stakeholders. This policy takes into cognizance the provisions of key relevant legislations namely: Ethics and Anti-Corruption Commission (EACC) Act No. 22 of 2011, Anti-Corruption and Economic Crimes Act of 2003, the Leadership and Integrity Act of 2012, the Bribery Act of 2016 and the National Ethics and Anti-Corruption Policy, 2018; Leadership and integrity Regulation 2015 in addition to overall corporate governance best practices.

2. Objectives of the policy

These Policy will serve as a practical tool for the prevention of bribery and corruption as required under the Anti-Bribery Act. They provide the accepted standards in relation to prevention of bribery and corruption.

3. The scope of the Policy

The responsibility of addressing bribery and corruption practices rest with the management, staff, and other stakeholders guided by the relevant laws, regulations, and core values. This policy, therefore, provides a framework that concedes its obligation to institute measures aimed at combating and preventing bribery, corruption, unethical practices and promoting standards and best practices in at cape media.

4. Strategies for fighting corruption

The policy provides strategies for prevention of corruption, bribery and unethical in the company which shall include:

- ❖ Conducting Bribery and Corruption Risk Assessments in all Departments /Section/units and developing Risk Mitigation Plans;
- ❖ Conducting Training and Awareness Creation;
- ❖ Service charters in all the key areas of operations;
- ❖ Enforcing provisions in the Code of Conduct and Ethics;
- ❖ Maintaining gifts and conflict of interest registers;

5. Corruption Prevention Committee (CPC)

The Terms of Reference of the CPC are:

- ❖ Sensitizing members of cape Media community on corruption issues.
- ❖ Setting the company Corruption Prevention Policy and reviewing it at such intervals as management may determine.
- ❖ Receiving and taking action on corruption reports made by staff and other stakeholders.

- ❖ Spearheading anti-corruption campaigns within the company.
- ❖ Keeping a constant check on the operations and procedures of the company and ensure there are no opportunities for corruption.
- ❖ Prioritising activities in the implementation of corruption prevention programme.
- ❖ Ensuring that corruption prevention initiatives are integrated in the company.
- ❖ Receiving and reviewing reports on corruption prevention initiative and recommend appropriate action to the corruption prevention committee.
- ❖ Co-ordinating corruption prevention strategies in the company.
- ❖ Considering and recommending training on the Integrity Programme for staff in the Company
- ❖ Receiving complaints and information on alleged corrupt activities in the company, evaluating, analysing and recommending appropriate action to the corruption prevention committee.
- ❖ Monitoring the impact of corruption prevention initiatives and other recommended actions.

6. Protection of whistle blowers

Whistle-blower protection is crucial for the success of anti-corruption detection and enforcement and should be a key aspect of any whistle-blowing system. Cape media is committed to ensuring that employees can speak up with confidence if they have any concerns or need to ask for help. If they suspect or observe anything that they think might be in contravention of this policy, they have an obligation to report. Cape media has therefore come up with effective measures for the protection of whistle blowers.

EMPLOYEE INTEGRITY POLICY

1. Policy Statement

Cape Media is committed to maintaining a culture of integrity, transparency, and accountability in all its operations. Employees are expected to conduct themselves with the highest standards of ethical behavior, demonstrating honesty, fairness, and respect in their professional duties. This policy aims to protect Cape Media's reputation and uphold trust among employees, clients, stakeholders, and the public.

2. Objectives

- ❖ Encourage employees to act ethically and honestly in all aspects of their work.
- ❖ Identify and mitigate risks related to fraud, conflicts of interest, and other unethical behaviors.

- ❖ Ensure the company maintains a positive reputation through high standards of integrity and accountability.
- ❖ Foster a culture of mutual respect and accountability among employees and leadership.
- ❖ Align employee behavior with relevant laws, regulations, and internal policies.

3. Scope

The Employee Integrity Policy applies to; all employees, all operations, third-Party Relationships and all work environments in Cape Media Ltd.

4. Employee integrity policy guidelines

4.1 Employee Training and Awareness

The company Conducts regular training on ethical standards, integrity expectations, and reporting procedures. Provide guidelines on recognizing and handling conflicts of interest and ethical dilemmas.

This ensures employees understand the policy, can identify integrity-related issues, and know how to act responsibly.

4.2 Code of Conduct Compliance

The company has a Code of Conduct that outlines expected behavior, confidentiality requirements, and adherence to anti-fraud and anti-bribery standards. Employees acknowledge their commitment to the code upon hiring and periodically thereafter.

4.3 Conflict of Interest Disclosure

The policy require employees to disclose any actual or potential conflicts of interest, such as external business relationships or personal interests that may influence their work.

4.4 Whistleblower and Reporting Mechanism

A confidential channel for employees to report unethical behavior or integrity violations without fear of retaliation has been established. The company regularly promote this reporting mechanism to encourage its use. This encourages transparency and helps identify integrity issues early, fostering a safe environment for reporting misconduct.

4.5 Investigation and Disciplinary Action

The policy establishes a formal investigation process for handling reported integrity violations, outlining clear disciplinary actions for violations, which may include warnings, suspension, or termination. This ensures accountability by addressing violations fairly and promptly while deterring unethical behavior.

4.6 Performance Monitoring and Feedback

There is an integrated integrity assessments into performance reviews, evaluating adherence to ethical standards as part of employee evaluations. Provides feedback and corrective measures as necessary.

4.7 Policy Review and Updates

Cape media regularly reviews and updates the Employee Integrity Policy to incorporate new regulations, industry standards, and best practices.

ENVIRONMENTAL POLICY

1. Policy Statement

Cape Media is dedicated to preserving the environment and promoting sustainable practices across all operations. This policy outlines our commitment to reducing environmental impact, conserving natural resources, and fostering a culture of environmental responsibility among our employees, clients, and stakeholders. We aim to contribute positively to global sustainability efforts and uphold our social responsibility to protect the planet for future generations.

2. Objectives

- ❖ Minimize waste, pollution, and carbon footprint associated with Cape Media's operations.
- ❖ Promote efficient use of energy, water, and other resources throughout the organization.
- ❖ Ensure all activities adhere to environmental laws, regulations, and industry standards.
- ❖ Integrate sustainable practices in all operational and production processes.
- ❖ Educate employees and stakeholders on environmental issues and encourage eco-friendly practices.

3. Scope

The Environmental Policy applies to All Departments and Employees, Suppliers and Partners, Facilities and Equipment: and addresses the consumption of resources like water and energy, as well as waste generated through Cape Media's activities.

4. Environmental policy guidelines

4.1 Environmental Training and Awareness

The company provides training sessions and workshops on environmental issues, sustainable practices, and the policy itself. Include tips for reducing energy and water use, managing waste, and adopting eco-friendly habits. This Ensures employees understand the importance of environmental conservation and are equipped to make sustainable choices in their daily work.

4.2 Waste Reduction and Recycling

We have waste reduction practices, such as digital documentation to minimize paper use, recycling programs and designated waste segregation bins throughout facilities with targets for reducing waste generation annually.

4.3 Resource Conservation (Energy and Water Management)

Establish energy-efficient practices, such as using LED lighting, optimizing heating/cooling systems, and setting guidelines for energy-efficient equipment use. Encourage water conservation by fixing leaks and installing water-saving devices.

4.4 Carbon Footprint Reduction and Sustainable Production

Cape media encourages remote work and virtual meetings to reduce travel-related emissions, and utilize sustainable practices in production, like reducing excess materials and choosing eco-friendly materials where possible. This Lowers Cape Media's carbon footprint and aligns production practices with sustainability goals.

4.5 Supplier and Vendor Environmental Standards

Cape media shall partner with suppliers who align with Cape Media's environmental standards. This extends the organization's environmental commitment to its supply chain, supporting broader sustainability efforts.

4.6 Monitoring, Reporting and Continuous Improvement

Track key metrics like energy and water use, waste generation, and recycling rates. Report progress on environmental goals and adjust policies based on data insights and evolving best practices.

4.7 Policy Review and Updates

Cape media regularly reviews and updates the environmental policy to incorporate new regulations, industry standards, and best practices.

CODE OF CONDUCT AND ETHICS POLICY**1. Policy Statement**

Cape Media is committed to fostering a workplace environment where integrity, professionalism, and respect are fundamental. Our Code of Conduct and Ethics Policy serves as a guiding framework for ethical decision-making and responsible behavior across all levels of the organization.

2. Purpose

The Code of Conduct and Ethics Policy at Cape Media establishes guidelines for professional behavior and ethical standards expected from all employees, contractors, and representatives.

3. Scope

This policy applies to all Cape Media employees, contractors, and stakeholders involved in the company's activities. It covers interactions with clients, audiences, colleagues, and partners, and it applies to both on-site and off-site conduct, including online and social media behavior.

4. Policy Content Overview

❖ Professional conduct

Sets expectations for respectful communication, punctuality, and high standards of professionalism. It prohibits discrimination, harassment and any form of workplace bullying.

❖ Confidentiality and privacy

Mandates safeguarding sensitive company and client information restricting unauthorized sharing or use of confidential data, both during and after employment.

❖ Conflicts of interest

Requires employees to avoid situations where personal interests could conflict with professional responsibilities.

❖ Responsible use of company resources

Provides guidance on the appropriate use of company assets, including equipment, information, and funds. It prohibits personal use of resources that could impair business operations or compromise data security.

❖ Compliance with laws and regulations

Requires adherence to all relevant legal and regulatory requirements governing media, advertising, and content production.

❖ Social media and public representation

Sets guidelines for responsible use of social media, ensuring that online conduct reflects positively on Cape Media. It restricts unauthorized public statements or comments on behalf of the company.

❖ Enforcement and disciplinary action

Non-compliance with this Code of Conduct and Ethics may result in disciplinary action, including termination of employment. Cape Media is committed to investigating breaches of this policy fairly and confidentially. All employees are expected to familiarize themselves with and uphold these standards, contributing to a trustworthy and ethical workplace