

Prosel Ltd

Policy Statement on Human Rights

Our commitment to Human Rights

Prosel Ltd is aware of the importance of human rights from both a value-oriented and an economic point of view and is fully committed to respecting and observing human rights and to actively avoiding human rights violations. On the one hand, this applies to our own employees within the Company. All employees, regardless of age, gender, culture, religion, origin or other diversity characteristics, are granted the same rights and opportunities. On the other hand, we are also committed to respecting human rights in our cooperation along the value chain with regard to the selection of our business partners. This policy statement expresses our traditional values as well as our future responsibility and is internally and externally communicated at <https://proselimited.com/Resources/>.

Prosel Ltd commits to upholding and respecting internationally recognized human rights at the highest corporate level. Our approach for implementing and managing human rights issues is based on the following international standards and frameworks:

- UN Guiding Principles on Business and Human Rights
- OECD Guidelines for Multinational Enterprises
- ILO Core Labour Standards
- International Bill of Human Rights

In order to live up to our commitment, we have implemented guidelines throughout the Company that express our approach which we also expect of our business partners. These guidelines form the basis of our daily actions and take into account not only our own employees and suppliers, but also the employees in our value chains and our customers. At Company level, these policies and guidelines are particularly important:

- Prosel Ltd's Code of Conduct
- Prosel Ltd's Supplier Code of Conduct
- Prosel Ltd's HR Policy

Through the revision of our Code of Conduct and the implementation of a Supplier Code of Conduct as well as a dedicated HR Policy, human rights issues have been addressed even more.

We focus on Human Rights risks

At Prosel Ltd, we understand that ensuring Human Rights Due Diligence is a continuous process. As such, we regularly assess our own business activities and relationships to identify potential risks and violations.

Through this analysis, we determine human rights risks categorized by their severity and prioritize them accordingly. This approach allows us to derive appropriate measures to eliminate or reduce these risks. In this policy, we address the most severe risks, so called salient issues, meaning issues that have the highest negative impact on those potentially affected by Prosel Ltd's business activities, e.g., employees of our own operations and in the value chain.

In 2023, Prosel Ltd conducted a materiality assessment with internal stakeholders to analyze which individual human rights were most likely to be violated by the Prosel Ltd Company's operations and to better understand the severity of the impact on those affected. Within the assessment, three parameters were evaluated for each individual human right: The likelihood of a violation, the severity of the impact in the event of a violation, and the possibility of remediation in the event of a violation. These three parameters were then combined to determine a risk score for each human right. This materiality assessment, combined with a thorough analysis of the potential impact of Prosel Ltd groups operations on human rights, forms the basis of our human right's due diligence processes. The following three human rights have been identified as the most critical for strong due diligence due to their high-risk scores.

- **Right to respect for private and family life**

The Prosel Ltd Company's business activities could violate or adversely affect the right to respect for private and family life in various ways. The Company may engage in practices that violate an individual's right to privacy, such as collecting or sharing personal data without consent or in violation of regulations. This could result in individuals feeling that their private lives are being invaded and their right to respect for privacy is being compromised. Prosel Ltd could also engage in practices that violate individuals' right to family life, such as the separation of families through forced relocation or migration policies. This could result in individuals being deprived of their right to family life and feeling that their family relationships are being disrupted. Finally, Prosel Ltd could adopt practices that violate individuals' right to freedom of association, such as restricting the formation of trade unions or other organizations. This could result in individuals being deprived of their right to freedom of association and feeling that their right to respect for private and family life is being compromised.

- **Freedom of thought, conscience and religion**

Prosel Ltd's business activities could violate or impair the right to freedom of opinion, thought, conscience and religion in various ways. First, the Company could engage in practices that restrict individuals' freedom of thought, such as censorship or monitoring of individuals' activities or personal beliefs. This could result in individuals feeling that their right to freedom of thought is being compromised and that their personal beliefs are being restricted. Secondly, Prosel Ltd could engage in practices that restrict individuals' freedom of conscience, for example by forcing them to act against their beliefs or values. This could lead to individuals feeling that their right to freedom of conscience is being compromised and that they are being forced to act against their will. Third, Prosel Ltd may engage in practices that restrict individuals' religious freedom, such as discriminating against individuals based on their religious beliefs or preventing them from freely practicing their religion. This could result in individuals feeling that their right to religious freedom is being infringed and that they are being discriminated against because of their beliefs.

- **Freedom of assembly and association**

Prosel Ltd's business activities could violate or infringe the right to freedom of assembly and association in several ways. The Company may engage in practices that restrict individuals' freedom of association, such as preventing assemblies or peaceful protests. This could result in individuals feeling that their right to freedom of association is jeopardized and that their ability to express their views is restricted. The Company may also engage in practices that restrict individuals' freedom of association, for example by preventing them from forming or joining organizations or trade unions. This could result in individuals feeling that their right to freedom of association is jeopardized and that their ability to stand up for their rights is restricted.

Furthermore, Prosel Ltd may engage in practices that discriminate against individuals based on their political beliefs or affiliations. This could lead to individuals feeling that their rights to freedom of association and assembly are being infringed and that they are being discriminated against because of their beliefs.

- **Right to work in just and favorable conditions;**

Prosel Ltd's business activities could violate or impair the right of an employee to work in just and favorable conditions in various ways. First, the Company could expose the employee to work processes that expose the employee to risk of physical, social or psychological harm that could eventually lead to injury to the

employee while at the workplace. Secondly Prosel Ltd could infringe on the employee's right to a safe and favorable working environment by failing to supply and train the employee on the proper use of personal protective gears. This could result in individuals feeling that their right to work in just and favorable conditions is being infringed.

- **Rejection of forced or compulsory labor;**

Prosel Ltd is mindful of each individual's freedom to choose what work to engage in. Prosel Ltd is thus strongly against any form of forced labour in its operations and commits to prevent and decisively address any form of forced or compulsory labour all its workplaces.

Prosel Ltd rejects forced or compulsory labor as well as modern slavery and human trafficking. This includes work carried out involuntarily due to intimidation or threat of penalty. We thrive to protect our employees and ensure a safe and healthy working environment for everyone.

- **Rejection of child labor and young workers;**

Child labor is prohibited at all costs. Kenyan government and local laws determine the minimum age for employment, which must be adhered to.

Prosel Ltd commits not to engage in any form of child labor in the execution of its operations.

- **Equal treatment in employment;**

Prosel Ltd strictly prohibits any conduct in violation of our internal policies related to equal treatment or that constitutes unlawful discrimination as defined by the courts based on race, color, gender, gender identity, national origin, ancestry, religion, physical or mental disability, medical condition, pregnancy, childbirth or related medical condition, marital status, sexual orientation, age or any other characteristic protected under Kenyan government or other international law. We promote and protect a culture of diversity, equity, and inclusion.

In addition Prosel Ltd commits to protect and safeguard the rights of women in employment who most often are victims of gender discrimination.

While these seven human rights have been identified as having the highest risk score in our assessment, we recognize that all human rights are equally important and require adequate due diligence. As such, we have implemented robust processes to regularly assess the potential impact of our operations on human rights and to strengthen our due diligence processes accordingly.

Although we are diligent in our efforts to uphold human rights, we acknowledge that violations may still occur. As a result, we believe it is crucial to establish a grievance mechanism. This confidential reporting Company Number is accessible at <https://prosellimited.com>. Reports received are meticulously investigated, ensuring compliance with legal mandates. Our commitment to safeguard whistle blowers is paramount; any form of retaliation against individuals who highlight violations will not be tolerated.

We report on our progress

We report annually on our human rights due diligence process at Company level in our Annual Reports. Prosel Ltd is reporting on ethical issues, including child labour, forced labour and discrimination incidents. In the event of an incident, we confront suppliers and stakeholders, including our downstream value chain, regarding the specific incidents and ensure the implementation of measures to avoid similar incidents in the future. We monitor the progress against these measures and provide adequate remedy up to the termination of the contract with the supplier.

To assess supplier risks comprehensively, we use a risk methodology (360° Risk Scoring) in our Supply Chain audits and evaluations. Through it, we evaluate an array of risk categories encompassing climate-related and CSR concerns in our upstream value chain. From pollution to land conflicts, and even deforestation, our

regular supplier screening process integrates past incidents into our evaluation. In the event of actual incidents, we engage suppliers through a multi-tiered mechanism: We address the specific incident directly, request preventive measures from the supplier, and subsequently monitor the progress of these measures to ensure effective resolution.

Prosel Ltd continuously reviews its risk assessment of human rights and adapts its processes and communication to changing circumstances. We strive to improve the reporting of risks and measures even more transparently. The responsibility for implementing and complying with this declaration lies with the Management Board under the leadership of the Human Resource / Human Rights Manager with support of our Procurement Department.

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Head of Human Resources

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This document is subject to continuous review processes.

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