KENYA DEVELOPMENT CORPORATION

SUSTAINABILITY POLICY

POLICY DEVELOPMENT & APPROVAL FORM

Description:

This sustainability policy was developed to guide KDC on the requisite of responsible investments and sustainable development while promoting sustainable operations and transparent reporting. It provides a structured approach to identifying and managing ESG risks and opportunities across all operations and investments.

Document Properties & Approvals

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Board of Directors	Chairperson		

Controlled copy: Circulation authorized by the Quality Management Office.

Distribution:

Board of Directors

Leadership Team

All Staff

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1. Background

Kenya Development Corporation Ltd (KDC) is a Development Finance Institution established in 2020 through the merger of Industrial and Commercial Development Corporation (ICDC), Tourism Finance Corporation (TFC), and IDB Capital Limited.

KDC plays a catalytic role in Kenya's socio-economic development by providing long-term financing and other financial, investment, and business advisory services. As such, KDC is instrumental in addressing critical financing gaps across target sectors.

Vision – A globally competitive development finance partner

Mission – To provide financial and technical support to medium and large-scale enterprises for sustainable socio-economic development

Our Core Values:

- Customer-centric
- Integrity
- Sustainability
- Inclusivity
- Collaboration

2 Policy Statement

Kenya Development Corporation (KDC) recognizes sustainability as a core enabler of its development finance mandate and long-term institutional resilience. The increasing significance of environmental, social, and governance (ESG) considerations presents both risks and opportunities that directly influence KDC's investment decisions, portfolio performance, and development impact.

In line with its Sustainability Strategy, KDC is committed to integrating ESG considerations across its governance structures, operations, and financing activities to support sustainable economic development, manage material risks, and enhance long-term value creation for stakeholders.

3 Purpose Statement

This Sustainability Policy provides the overarching policy direction for implementing KDC's Sustainability Strategy. It formalizes the Corporation's commitment to responsible financing, sound governance, and sustainable development outcomes.

The Policy guides the systematic identification, management, and disclosure of ESG risks and opportunities across KDC's operations and investment portfolio, while ensuring alignment with Kenya's Vision 2030, the Sustainable Development Goals (SDGs), and applicable national and international standards.

3.1 Policy Objectives

This Sustainability Policy aims to:

1. Minimize environmental impacts, promote climate resilience, and support the transition to a low-carbon economy
2. Foster inclusive development, protect human rights, promote decent work, and contribute to community wellbeing
3. Ensure ethical business practices, transparency, accountability, and effective risk management
4. Create sustainable value for all stakeholders including investors, employees, communities, and the environment
5. Identify, assess, and mitigate ESG risks across all operations and investments
6. Meet or exceed all applicable legal, regulatory, and international ESG standards
7. Foster a culture of learning and continuous enhancement of ESG performance.

4 Scope of Application

The application for this Sustainability Policy will cover;

Organizational Scope

This policy applies to:

1) Kenya Development Corporation headquarters and all offices
2) All employees, directors, officers, and contractors
3) All departments and business units
4) All operations and activities

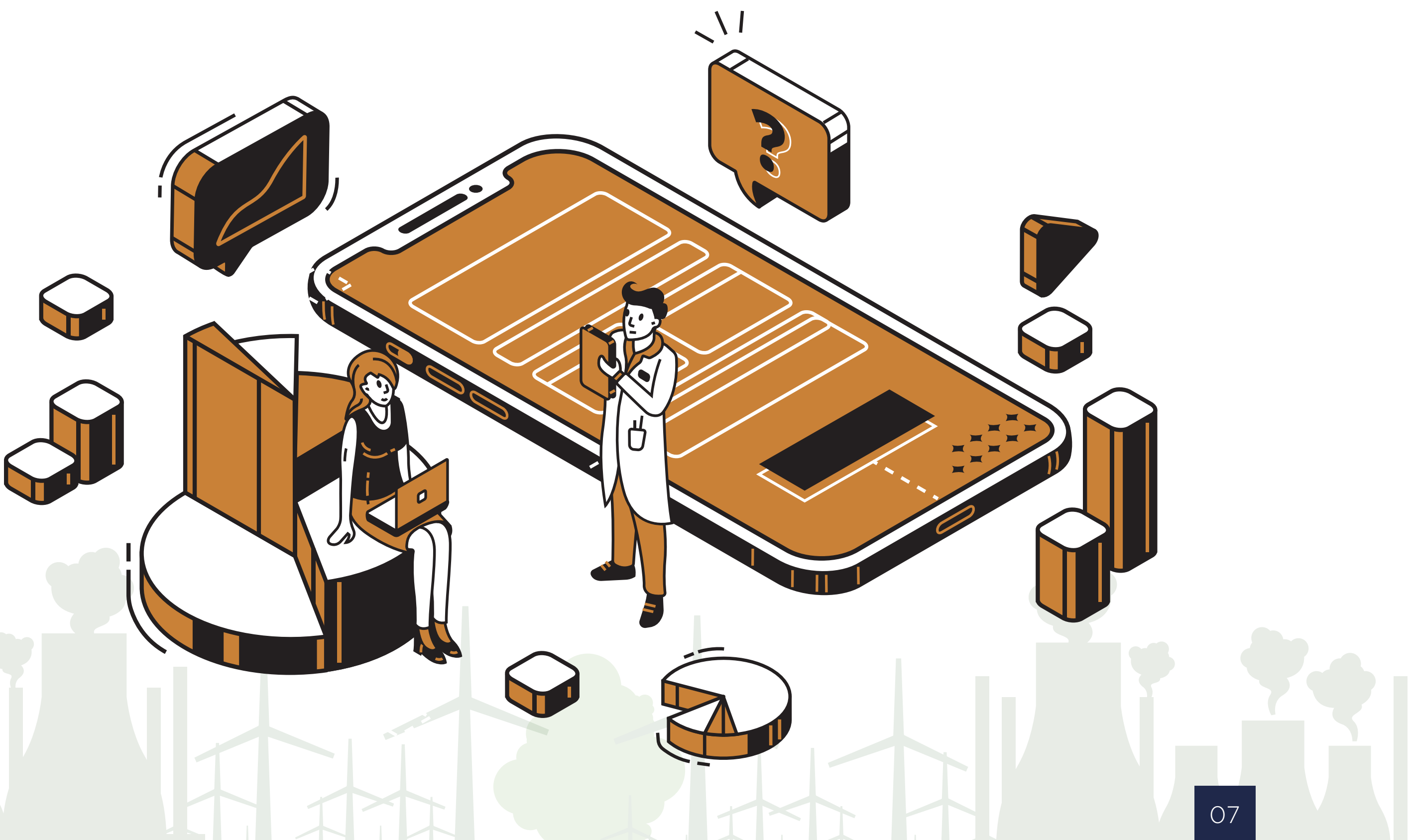
Investment Scope

This policy applies to:

1) All investment screening and due diligence processes
2) Portfolio companies and investees
3) Co-investors and financial partners
4) Project beneficiaries and affected communities
5) Supply chain and service providers

Geographic Scope

This policy applies to all KDC operations and investments within Kenya and any international operations or partnerships.



5 Governance Structure

KDC shall adopt a structured approach on governance of its ESG and Sustainability framework to provide, strategic and effective management of its ESG and Sustainability agenda. The structure shall have

I. *The Board of Directors:* Who hold ultimate accountability for ESG performance and risk management within the Corporation. This responsibility is operationalized through delegated authority to the Director General, senior leadership, and departmental heads, with support from the Risk & Compliance Department.

II. *ESG and Sustainability Champions:* ESG governance is embedded across all levels of the organization through designated ESG and Sustainability Champions in each department, ensuring that ESG and Sustainability principles are integrated into strategic planning, investment decisions, and daily operations.

III. *ESG and Sustainability Committee:* The ESG Committee, or its equivalent under the leadership of the Risk & Compliance function, provides oversight and coordination of ESG implementation, monitoring, and reporting. This includes ensuring alignment with the Corporation's Enterprise Risk and Opportunities Management Framework, the World Bank Environmental and Social Standards (ESSs), GRI Standards, SDG Goals and other applicable national and international frameworks.

KDC promotes board independence, diversity, and competence, and ensures that ESG and Sustainability considerations are reflected in funding approvals, investment memos, and annual performance reviews. The Corporation maintains transparency and accountability through regular ESG and Sustainability disclosures, stakeholder engagement, and adherence to a robust Code of Conduct and Ethics.

6 ESG and Sustainability Framework Commitments

KDC is dedicated to incorporating Environmental, Social, and Governance (ESG) principles into all investment decisions, operations, and stakeholder interactions. This dedication is rooted in the Corporation's strategic mission to promote sustainable development, responsible investment, and inclusive growth in Kenya and beyond.

KDC's ESG and Sustainability framework shall be guided by

I. The World Bank Environmental and Social Framework (ESF)
II. The UN Principles for Responsible Investment (UNPRI)
III. The Global Reporting Initiative (GRI) Standards
IV. The Central Bank of Kenya Climate Risk Guidelines
V. The ISO 31000:2018 Risk Management Guidelines
VI. United Nations Guiding Principles on Business and Human Rights (UNGPs)
VII. International Labor Organization (ILO) Conventions
VIII. International Financial Reporting Standards (IFRS)
IX. Green Climate Fund Accreditation Framework (GCF)

6.1 Environmental Commitments

KDC is committed to integrating environmental considerations into its financing decisions and operations in order to manage climate- and environment-related risks and support sustainable development outcomes. Environmental sustainability is applied as a core component of project appraisal, portfolio management, and institutional operations, in line with the Sustainability Strategy.

Key Focus Areas:

i. **Climate Risk and Resilience**
KDC shall incorporate climate-related risks and opportunities into investment appraisal and portfolio oversight, with a focus on supporting climate mitigation and adaptation outcomes aligned with national priorities.

ii. **Resource Efficiency and Circularity**
Financed activities shall be assessed for efficient use of energy, water, and materials, with preference given to investments that promote resource efficiency, waste reduction, and circular economy principles.

iii. **Biodiversity and Natural Capital**
KDC shall avoid financing activities that result in significant adverse impacts on protected areas or critical habitats and shall promote sustainable land use and biodiversity conservation where relevant.

iv. **Environmental Management and Stewardship**
The Corporation shall seek to minimize adverse environmental impacts across the lifecycle of its operations and investments, including emissions, water use, and waste generation, through proportionate environmental management measures.

6.2 Social Commitments

KDC is committed to advancing inclusive and equitable development outcomes while safeguarding human rights and social well-being. Social considerations shall be integrated into project design, stakeholder engagement, and monitoring processes in accordance with the Sustainability Strategy.

Key Focus Areas:

i. **Human Rights and Labour Standards**
KDC shall uphold internationally recognized human rights and labour standards and ensure that financed activities do not contribute to human rights abuses. Projects shall be assessed for social and human rights risks, including labour conditions, land acquisition, impacts on vulnerable groups, and community relations.

ii. **Gender and Inclusion**
The Corporation shall promote gender-responsive and inclusive financing, supporting equitable access to economic opportunities for women, youth, persons with disabilities, and other underserved groups.

iii. **Stakeholder and Community Engagement**
KDC shall require meaningful and transparent engagement with affected stakeholders and communities, including appropriate consultation and grievance mechanisms, to support social acceptance and project sustainability.

iv. **Health, Safety, and Well-being**
Financed projects shall comply with applicable health and safety standards to safeguard workers, communities, and beneficiaries.

6.3 Governance Commitments

KDC is committed to strong corporate governance, ethical conduct, and accountability as foundational elements of its sustainability agenda. Governance arrangements shall support sound decision-making, integrity, and effective oversight of ESG risks and opportunities.

Key Focus Areas:

i. **Ethical Conduct and Integrity**
KDC shall enforce a Code of Conduct and Ethics applicable to its Board, management, staff, and relevant partners, promoting integrity and responsible behavior.

ii. **Anti-Corruption and Compliance**
The Corporation maintains zero tolerance for bribery and corruption and requires financed entities to comply with applicable anti-corruption requirements. Mechanisms for reporting and addressing misconduct, including whistleblowing channels, shall be maintained.

iii. **Transparency and Accountability**
KDC shall promote transparency through appropriate ESG and sustainability disclosures and maintain accessible mechanisms for stakeholder feedback and grievance redress.

iv. **Corporate Governance Oversight**
The Corporation shall promote board independence, diversity, and competence, and ensure that ESG considerations are integrated into financing approvals, risk management, and strategic decision-making.

6.4 Cross-Cutting Sustainability Activities

KDC's Sustainability Policy is underpinned by cross-cutting sustainability commitments that apply across all environmental, social, and governance dimensions. These commitments enable consistent and effective implementation of the Sustainability Strategy across the Corporation.

6.5 ESG Integration Across the Investment Lifecycle

KDC shall integrate ESG and sustainability considerations across all stages of the investment lifecycle, including screening, appraisal, approval, monitoring, and exit, in a manner proportionate to risk and impact.

I. Risk-Based and Proportionate Application

Sustainability requirements shall be applied using a risk-based and proportionate approach, ensuring that ESG due diligence and oversight are commensurate with the nature, scale, and riskprofile of each investment.

II. Stakeholder Engagement and Grievance Redress

KDC shall maintain appropriate stakeholder engagement and grievance redress mechanisms to ensure transparency, accountability, and timely resolution of sustainability-related concerns across its operations and financed activities.

III. Capacity Building and Institutional Awareness

The Corporation shall promote internal awareness and capacity building to support effective implementation of ESG and sustainability commitments across all functions and levels.

IV. Monitoring, Reporting, and Disclosure

KDC shall monitor and disclose sustainability and ESG performance in line with applicable regulatory requirements and recognized reporting standards, ensuring consistency, accuracy, and transparency.

V. Partnerships and Collaboration

KDC shall engage strategic partners to support sustainable finance, market development, and the scaling of investments aligned with national development and climate objectives.

6.6 ESG and Sustainability Commitments Performance Tracking

Detailed indicators, baselines, and performance metrics shall be defined and maintained through internal reporting tools and management processes, and shall inform periodic sustainability disclosures.

7 ESG Integration and Sustainability Mechanisms

All investments undergo ESG and sustainability screening and categorization aligned with World Bank ESSs and IFC Performance Standards. ESG risks are assessed and managed throughout the investment lifecycle.

The following are the phases involved in the integration of ESG and sustainability:

i. *Screening and Categorization:* All proposed investments undergo an ESG screening to identify potential environmental and social risks, categorizing projects as High, Moderate, or Low risk based on the World Bank's ESS1 and KDC's exclusion list, which includes site visits and stakeholder consultations.

ii. *Due Diligence:* Thorough ESG due diligence assesses labor practices, environmental impact, community health, land use, and biodiversity, following the World Bank ESF and IFC Performance Standards. This includes stakeholder engagement and historical compliance reviews, with ESG consultants engaged as needed.

iii. *ESG Action Plans:* For projects with identified risks, KDC requires Environmental and Social Action Plans (ESAPs) to mitigate impacts. These plans specify measurable actions and are monitored for updates based on performance.

iv. *Monitoring and Reporting*: KDC tracks ESG performance using standardized tools, requiring periodic compliance reports from portfolio companies. Site audits and stakeholder consultations ensure data validity.

v. *Exit Strategy:* ESG considerations are incorporated into the exit strategy to preserve sustainability gains and address legacy risks, enhancing valuation to attract responsible investors.

vi. *Strategic Planning:* Sustainability objectives are integrated into KDC's corporate strategy and investment policy.

vii. *Project Appraisal:* Projects are evaluated. for contributions to Sustainable Development Goals (SDGs), climate resilience, and social inclusion.

viii. *Stakeholder Engagement:* We engage with communities, regulators, and partners to develop sustainable solutions and secure a social license to operate.

Each Mechanism shall be assigned a lead department and tracked on a periodic basis as per the table:

Table 1

Mechanism	Unit resp	Frequency	Remarks
Strategic Planning	Strategy	Quarterly	
Project Appraisal	Investment	Rolling basis	
Stakeholder Engagement	Partnerships	Quarterly	
Monitoring and Reporting	Research	Annual	

Performance against these sustainability objectives will be disclosed in KDC's annual ESG and sustainability reports, as outlined in Section 9.

8 ESG Metrics & Indicators

KDC is committed to transparent, consistent, and decision-useful ESG and sustainability reporting as a core pillar of accountability, risk management, and value creation. In line with the ESG Strategy, KDC will report its ESG performance using globally recognized and investor-relevant frameworks, primarily the Global Reporting Initiative (GRI) Standards and the IFRS Sustainability Disclosure Standards (IFRS S1 and IFRS S2), which incorporate climate-related financial disclosures.

Reporting will be informed by KDC's Double Materiality Assessment, which will be reviewed after every 3 years or on a need basis, ensuring that disclosures address both:

(i) KDC's impacts on the environment and society (impact materiality), and

(ii) ESG-related risks and opportunities that may affect KDC's financial performance, resilience, and long-term sustainability (financial materiality).

ESG metrics will be monitored quarterly for management oversight and reported annually through KDC's ESG and Sustainability Report to support continuous improvement, regulatory compliance, and access to sustainable finance.

8.1 Reporting Scope and Key Disclosure Areas

Environmental Performance

Environmental disclosures will focus on KDC's operational footprint and portfolio-level impacts, with particular emphasis on climate and resource efficiency. Key metrics include:

1. Greenhouse gas (GHG) emissions (Scope 1 and Scope 2, with progressive expansion where feasible)
2. Energy consumption and energy efficiency improvements
3. Water use and water efficiency
4. Waste generation, recycling, and responsible disposal
5. Environmental compliance and climate-related risks within the investment portfolio

These disclosures support alignment with IFRS S2, Kenya's climate commitments, and KDC's green finance objectives.

Social Performance

Social disclosures will reflect KDC's contribution to inclusive economic growth, employee wellbeing, and beneficiary welfare, in line with the Strategy's social material topics. Key metrics include:

1. Employment and job creation (direct and portfolio-level, including green jobs)
2. Workforce diversity, equity, and inclusion
3. Occupational health and safety performance
4. Employee training and human capital development
5. Customer and beneficiary satisfaction
6. Stakeholder engagement outcomes and grievance management

These indicators demonstrate KDC's developmental impact and social risk management across its operations and investments.

Governance Performance

Governance disclosures will emphasize ethical conduct, accountability, and effective oversight, consistent with KDC's role as a state-owned Development Finance Institution. Key metrics include:

1. Board composition, diversity, and ESG oversight structures
2. Ethics, anti-corruption, and compliance performance
3. Risk management effectiveness, including ESG risk integration
4. Internal and external audit findings
5. Data governance, privacy, and regulatory compliance

Strong governance disclosures reinforce investor confidence and institutional credibility.

Development Impact and Sustainability Alignment

Beyond ESG performance, KDC will disclose how its activities contribute to national development priorities and the United Nations Sustainable Development Goals **(SDGs)**. Reporting will highlight:

1. Alignment of investments with priority SDGs
2. Contribution to climate resilience, green finance, and inclusive growth
3. Measurable development outcomes and long-term impact

This impact-oriented reporting ensures that sustainability performance is directly linked to KDC's mandate and strategic objectives.

9 Roles and Responsibilities

Responsible	Roles
Board of Directors	• Provide strategic oversight of ESG policy and performance • Approve ESG policy and material updates • Review ESG reports and ensure accountability • Integrate ESG considerations into strategic decisions • Ensure adequate resources for ESG implementation
Strategy Department	• Champion ESG integration across the organization • Ensure organizational goals are aligned, to the ESG policy. • Report ESG performance to the Board on a quarterly basis
Management	• Allocate resources for ESG programs • Ensure ESG policy implementation • Ensure ESG considerations are integrated into the organization's activities. • Coordinate ESG training and capacity building
Risk & Compliance Department	• Coordinate ESG policy implementation • Develop ESG frameworks, procedures, and tools • Conduct ESG risk assessments • Prepare ESG reports and disclosures • Ensure compliance with ESG standards
All Staff and Employees	• Comply with ESG policy and related procedures • Participate in ESG training • Report ESG incidents and concerns • Contribute to ESG objectives • Embody ESG values in daily work
Investees and Partners	• Comply with KDC ESG requirements • Implement ESG action plans • Report ESG performance to KDC • Allow ESG monitoring and audits • Engage with affected communities • Address ESG incidents promptly

10 Strategic Anchors

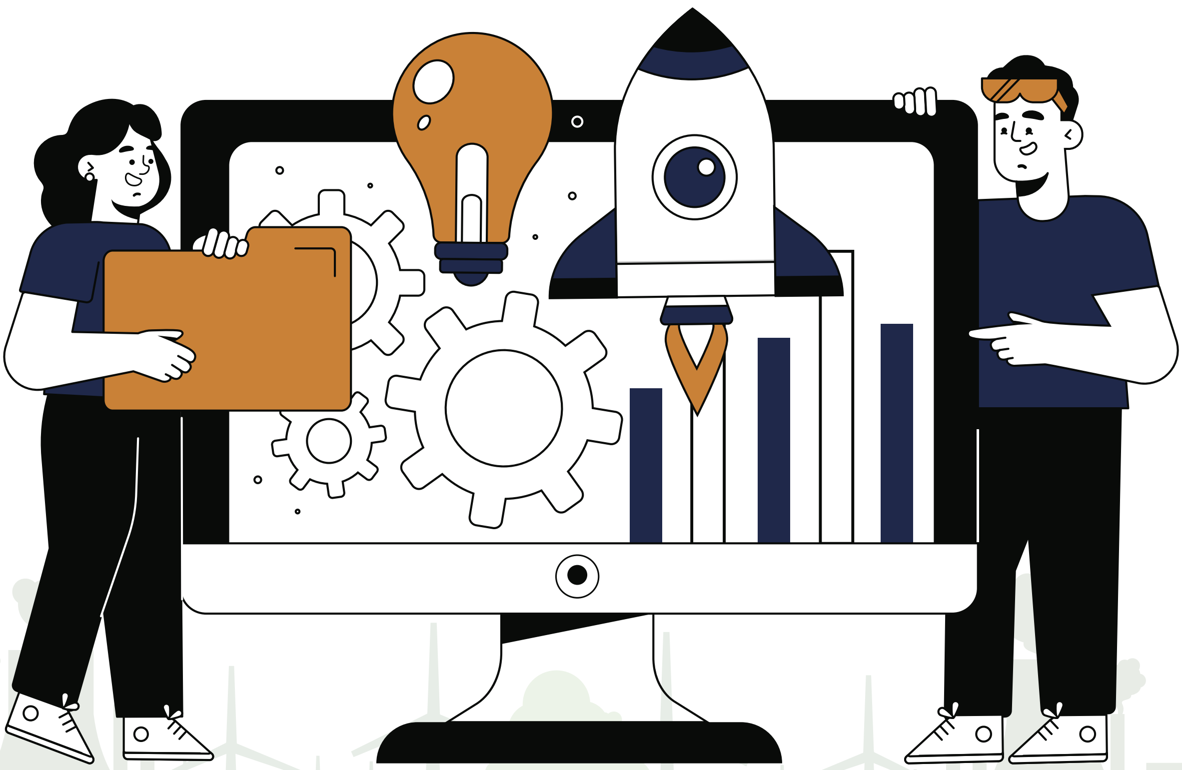
Inclusive Growth: KDC prioritizes investments that generate decent jobs, promote gender and youth inclusion, and support underserved regions, including arid and semi-arid areas. Our strategy ensures that economic growth is equitable and leaves no one behind.

Climate Resilience: Recognizing climate change as a systemic risk, KDC integrates climate adaptation and mitigation into its investment decisions. We support projects that reduce carbon emissions, enhance resource efficiency, and build resilience against climate shocks.

Ethical Governance: KDC upholds the highest standards of corporate governance, transparency, and accountability. Our sustainability strategy is underpinned by ethical leadership, stakeholder engagement, and robust ESG risk management.

All investments are mapped to the relevant SDGs, with priority given to SDG 1,2,5,7, 8,9,10,12,13, 15 and 17.

Reporting will be based on impact per SDG. The following table guides SDG alignment and impact tracking. Indicators are drawn from GRI and IFRS S1/S2 standards, and progress is monitored annually.



11 Stakeholder Engagement & Disclosure

KDC ensures meaningful stakeholder engagement and transparent disclosure of ESG performance through annual sustainability reports, public consultations, and grievance redress mechanisms in line with the WB standards, GRI standard 2 on disclosures, and UNGPs.

At KDC, we ensure that stakeholders are consulted meaningfully including VMGs. To achieve this, KDC is guided by the following Mechanisms:

i. Grievance Redress Mechanism (GRM); provides a platform for raising concerns for stakeholders
ii. Public ESG Reports; Public disclosure of ESG performance in line with ESG requirements
iii. Stakeholder Engagement; plan tailored to offer structured engagement of KDC stakeholders, complete with the feedback loop.
iv. Strategic Communications; leveraging on digital platforms, print media, and public forums to disseminate information about its mandate, investment opportunities, and ESG commitments.

The table below provides a template to guide reporting on stakeholder mapping and reporting.

Table 3 Stakeholder engagement reporting

Stakeholder group	Engagement Method	Frequency	Feedback mechanism	Action taken/Remarks

KDC recognizes that meaningful stakeholder engagement and transparent disclosure are foundational to responsible investment and sustainable development. The Corporation is committed to building trust, fostering inclusivity, and ensuring that all stakeholders especially affected communities, are informed, consulted, and empowered throughout the investment lifecycle

12 ESG Risk Management

ESG risks including climate, social, reputational, and compliance risks, are integrated into KDC's Enterprise Risk Management Framework. Risk registers and mitigation plans are maintained for all high-risk projects.

KDC's ESG risk governance ensures that risks are identified early, assessed rigorously, and managed proactively through structured policies, controls, and stakeholder engagement.

12.1 Strategic ESG Governance

The BOD provides strategic leadership for all ESG matters, with delegated authority to the DG, supported by the Risk and Compliance Manager and the ESG champions.

The following shall be done to ensure proper management of the ESG space

i. Risk identification and categorization
ii. Risk assessment and Mitigation
iii. Climate risk management
iv. Monitoring and reporting
v. Management of reputational risks and compliance
vi. Continuous improvement through risk assessment, mitigation and management plans

The following table shall guide the development of the ESG risk matrix:

Table 4 ESG risk matrix

Type of risk	*Details*	*Likelihood*	*Impact*

13 Reporting & Assurance

KDC will publish annual ESG and sustainability reports in accordance with GRI Standards and IFRS S1 & S2. Our disclosures will include both qualitative narratives and quantitative metrics, covering governance structures, climate-related risks and opportunities, social inclusion, and environmental impact. The reports will be structured to meet the expectations of both domestic and international stakeholders.

To enhance credibility and data quality, KDC will progressively pursue independent third-party assurance of ESG disclosures and strengthen internal data governance systems. Reporting insights will be used to refine targets, improve performance, and inform strategic and investment decisions over time.

13.1 ESG Principles

The ESG reporting shall be guided by the following principles:

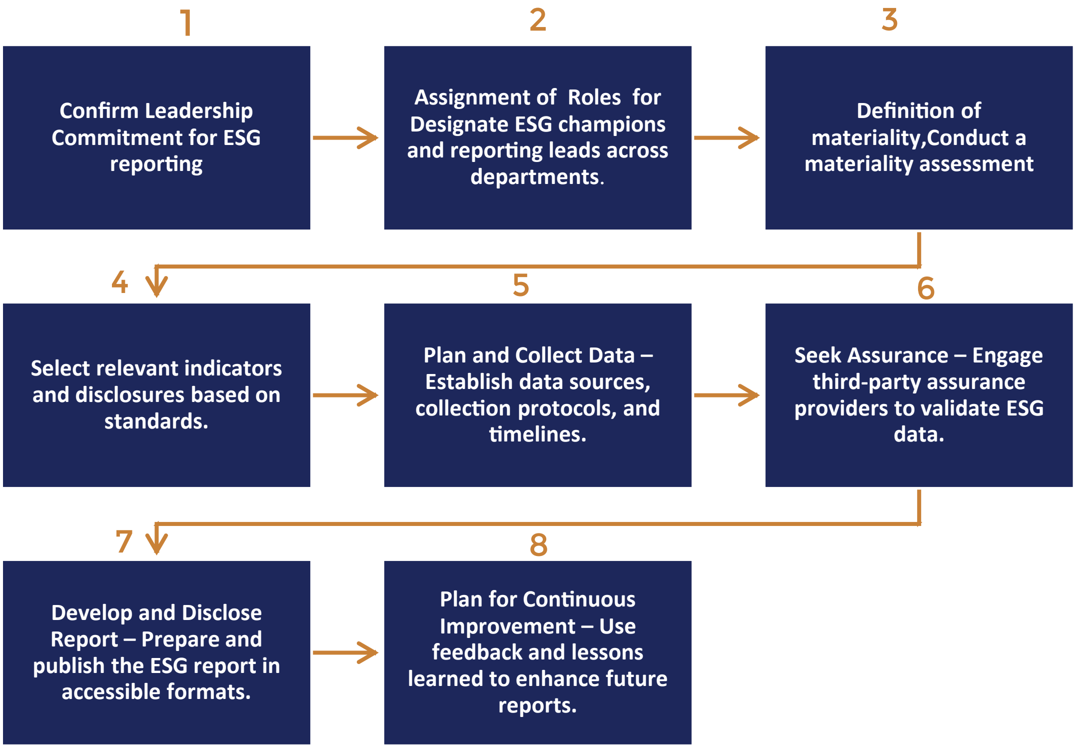
- Stakeholder Inclusiveness
- Sustainability alignment
- Materiality
- Completeness
- Accuracy
- Clarity
- Comparability
- Reliability
- Timeliness

13.2 IFRS sustainability disclosure standards.

Requirements	Remarks
Same reporting date	Reporting will be required at the same time and for the same period as the financial statements.
Materiality – investor focused	Materiality is the same as the IFRS definition, commonly referred to as “Financial Materiality”. Information is deemed material if omitting, misstating, or obscuring it could reasonably be expected to influence the user’s decision.
Report location	The sustainability report will be included as part of KDC general-purpose financial reports. The report’s location in a company’s general-purpose financial report will be subject to regulatory or other requirements that apply to the company.
Forward-looking information	Disclosures need to provide information on the impact of sustainability-related risks and opportunities on the company’s strategy, business model and financial statements over the short, medium and long-term.
TCFD (Taskforce on Climate Related Financial Disclosures) - Aligned	The four pillars of governance, strategy, risk management and metrics & targets from the Taskforce on Climate-Related Financial Disclosures (TCFD).
Statement of compliance	KDC shall make an explicit and unreserved statement of compliance when the sustainability-related financial disclosures comply with all the requirements of IFRS SDS.

13.3 ESG reporting Process.

To ensure consistency, transparency, and alignment with international best practices, KDC shall adopt a structured 8-step ESG reporting process. This process guides the Corporation from commitment to continuous improvement and is aligned with GRI, IFRS, and UNDP recommendations:



This process will be embedded in KDC's ESG governance and monitored annually KDC will disseminate ESG reports through its website, investor briefings, stakeholder forums, and regulatory submissions. Data from section 4 will inform the below score card.

Table 4 reporting and Assurance Score card

Standard	Indicator	Target	Actual Performance	Remarks
GRI				
IFRS 1				
IFRS 2				

14. Continuous Improvement & Capacity Building

KDC is committed to continuous improvement in ESG performance through regular training, policy updates, and incorporation of lessons learned from project implementation. This will be done through:

i. Capacity Building of staff and investees for sub projects
ii. Policy updates
iii. Lessons learnt from monitoring findings
iv. Innovation and though leadership

15 Conclusion

The Kenya Development Corporation (KDC sustainability policy represents a major step in integrating responsible investment, inclusive development, and climate resilience into its operations. This policy demonstrates KDC's commitment to aligning with global best practices, such as the World Bank ESF, GRI Standards, IFRS Sustainability Disclosure Standards, UN Principles for Responsible Investment, and ISO 31000 Risk Management Guidelines.

Through this framework, KDC integrates environmental, social, and governance (ESG) considerations into investment decisions, ensuring active monitoring, disclosure, and continuous improvement. It provides an approach for managing ESG risks, engaging stakeholders, and achieving measurable sustainability outcomes in Kenya.

KDC views sustainability as a continuous journey and will evolve its practices through learning, feedback, and partnerships. This will help create long-term value, support Kenya's Vision 2030, and contribute to the Sustainable Development Goals (SDGs).

16 Annex

Annex 1: Exclusion List

List of Activities that KDC will not finance:

1. Any activities resulting or anticipated to result in permanent or temporary physical or economic displacement.
2. Any activities involving adverse impacts on biodiversity conservation and sustainable management of living natural resources.
3. Any activities that have adverse impacts on cultural heritage as defined under ESS8.
4. Any activities that, due to the nature and scale of the activities, would result in a wide range of significant adverse impacts and risks, which are long-term, permanent, and/or irreversible, impossible to avoid entirely, and cannot be mitigated or required complex, unproven mitigation and excessive associated costs, rendering its risk classification as high.
5. Production or trade in any product or activity deemed illegal under the Recipient's laws or regulations or ratified international conventions and agreements.
6. Production or trade-in pesticides/herbicides subject to international phase outs or bans.
7. Any activities that would curtail workers' fundamental rights. These would include: (i) freedom of association and the effective recognition of the right to collective bargaining; (ii) prohibition of all forms of forced or compulsory labor; (iii) prohibition of child labor, including without limitation the prohibition of persons under 18 from working in hazardous conditions (which includes construction activities), persons under 18 from working at night, and that persons under 18 be found fit to work via medical examinations; (iv) elimination of discrimination in respect of employment and occupation, where discrimination is defined as any distinction, exclusion or preference based on race, color, sex, religion, political opinion, national extraction, or soeal origin.
8. Production or activities that impinge on the lands owned, or claimed under adjudication, by indigenous peoples, without full documented consent of such peoples.
9. Any other excluded activities as set out in the ESMF for the Project.

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