

THE STANDARD GROUP PLC

WHISTLE BLOWING POLICY

16.15 Whistle blowing policy

Ethical conduct is a requirement for all staff and other parties acting in relationship with the Group. This applies to all cadres of employees of SGL, Consultants, Agents and others who act on behalf of the Group. Journalists have a code of conduct and an Editorial Policy that sets journalistic standards and practices. The company's code of ethics applied fully alongside the prescribed journalistic code.

16.15.1 Definitions

Ethics

The company has laid down the rules of conduct recognized in respect to conducting business. These rules forbid betrayal of confidence, deal with values relating to employees' conduct and allude to how right and how wrong certain actions are and motives of such actions.

Good Faith

Good faith encompasses a sincere belief that any reports made by an employee or group do not contain an ulterior motive and are without malice or the desire to mislead. Any false or malicious disclosures will be judged to be without good faith.

Corruption

Corruption is deemed to be present when an employee behaves in a manner that is against moral purity and/or deviates from the ideal situation. Corruption will include; the use of power/position for personal gain, dishonesty, underhand dealings with suppliers, fraudulent behaviour, use of bribery to obtain business and/or acquire an undue advantage.

Wrong doing

Wrong doing will include situations that are a violation of rules, regulations and policies set by the Company, unethical behaviour or practices, negligence of duties, all kinds of fraudulent behaviour limited to and including: quotation fixing/mischarging, travel/expenses fraud, bid rigging, financial fraud and embezzlement.

16.15.2 Procedure for Reporting

Should anyone wish to report suspected ethical misconduct or wrongdoing by staff and any other parties working for the group in any capacity must contact the Group's Management on the following email address: whistleblower@standardmedia.co.ke or call the hotline 0719012100

16.15.3 Filing Allegations

Reports can be forwarded openly to the CEO, openly, confidentially or anonymously.

When filing an allegation, all employees are encouraged to ensure they are acting in good faith and that the allegations being made are not false. Any employee who knowingly or recklessly makes statements or disclosures that are not in good faith will be liable to discipline procedures which may include termination.

The Allegations:

Allegations must be specific and include:

- Nature of the wrongdoing
- When the wrongdoing occurred
- Where the incident happened
- Who was involved
- How the wrongdoing was committed
- Why the incident should be considered improper
- Corroborative evidence of wrongdoing, written or otherwise.
- Witnesses privy to the incident.

16.15.4 The Reports

All reports will be reviewed and thoroughly investigated. Investigative findings will be based on substantiated facts and related analysis and NOT on assumptions. Recommendation will be supported by the investigative findings.

16.15.5 The Defense

After thorough scrutiny, any employee who is the subject of an allegation will be warned. The employee will be allowed to present a defense. All material presented in defense will be reviewed and investigated. Human Resources Department will be involved if there is need for further action.

16.15.6 Protection of Whistle Blowers

- To the extent practicable, the identity of any employee who makes a report pursuant to this policy shall not be revealed
- Standard Group WILL NOT tolerate any effort made by any cadre of staff to ascertain the identity of any employee, organization or group that has made a good faith allegation openly or anonymously.
- Standard Group shall not discriminate or retaliate directly or indirectly against any employee who in good faith makes an allegation or provides assistance whilst investigation and allegation.
- Any employee who finds they are being discriminated as a result of an allegation made should contact the CEO's office and remedial action will be instituted immediately.