

Policy on Control and Management of Company Assets and Shareholder Investments

Revision history			
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1. Definitions and Abbreviations

Unless otherwise defined or the context otherwise requires, all capitalized terms used in this Policy shall have the following meanings.

Applicable Laws	means all applicable statutes, laws, ordinances, rules and regulations, including but not limited to the Listing Rules, SEC Act and the Companies Act, in each case as in effect from time to time;
Board	means the Board of Directors of the Company;
Companies Act	means the Companies Act No. 7 of 2007;
Company	means Laugfs Gas PLC and Laugfs Power PLC;
Personnel	means all directors, consultants, management, officers and employees (including permanent, probation, temporary or contract staff) of the Company, and individuals (including trainees, seconded staff, casual workers, agency staff, interns);
Policy	means this Policy on Control and Management of Company Assets and Shareholder Investments;

2. Introduction

The effective control and management of company assets and shareholder investments are critical to ensuring the financial stability, integrity, and growth of our Company. This Policy outlines the principles and procedures governing the stewardship of company resources and shareholder interests. By establishing clear guidelines for asset management and investment oversight, we aim to safeguard the Company's assets, optimize investment returns, and uphold the trust placed in us by our shareholders. Adherence to these guidelines is essential for maintaining transparency, accountability, and ethical conduct in all financial dealings.

3. Scope

This Policy applies to all Personnel responsible for managing and controlling company assets and shareholder investments. It covers physical and intangible assets, including real estate, equipment, intellectual property, and financial investments. The Policy establishes guidelines for investment decisions, asset valuation, and risk management, ensuring consistent and compliant practices across the Company.

4. Related Policies

This Policy should be read in conjunction with the other policies, key documents, and guidelines of the Company, including the following:

- Policy on Risk Management and Internal Controls
- Policy on Control and Management of Company Assets and Shareholder Investments

5. Asset Management

Effective asset management begins with accurate identification, classification, and recording of all company assets in the asset register. Assets must be categorized based on their type, use, and value to facilitate efficient management and reporting. Regular valuation of assets is required to ensure accurate financial reporting, and depreciation methods should be established and reviewed periodically to reflect the asset's usage and market conditions.

To safeguard assets, the Company shall implement appropriate physical and cybersecurity measures to protect against loss, theft, or damage. Maintenance procedures must be established to ensure that assets remain in good working condition. When it comes to the disposal of obsolete

or surplus assets, the Company shall develop procedures that include necessary approvals and documentation, ensuring compliance with legal and environmental regulations.

6. Investment Management

The investment management process requires that all significant investment decisions be reviewed and approved by the designated investment committee or the Board. Routine investments must be managed by the finance department within predefined thresholds. A comprehensive risk assessment must be conducted for all potential investments, evaluating financial, operational, market, and strategic risks, and developing risk mitigation strategies and contingency plans accordingly.

Regular monitoring of investment performance is essential to ensure alignment with the Company's strategic objectives and to assess returns. Detailed reports on investment performance must be prepared for the Board and shareholders, including analyses of returns, risks, and strategic alignment. The Company shall develop and maintain an investment strategy that aligns with its overall strategic goals and risk tolerance, reviewing and adjusting this strategy periodically based on market conditions and Company performance.

7. Compliance and Reporting

Compliance with Applicable Laws and industry standards is a fundamental aspect of asset and investment management. The Company shall stay updated on changes in legal and regulatory requirements and adjust its policies and practices accordingly. Effective internal controls are necessary to prevent fraud, mismanagement, and financial misreporting, and regular audits should be conducted to ensure adherence to this policy.

Transparency in reporting is crucial, and the company must provide clear and timely reports on asset management and investment activities to stakeholders. This includes disclosing financial information in accordance with legal and company requirements.

8. Roles and Responsibilities

The Board is responsible for overseeing the overall strategy and ensuring compliance with this Policy. Major investments and strategic asset management decisions require their approval. An Investment Committee shall evaluate and approve significant investment proposals, monitors investment performance, and ensures adherence to the company's investment strategy.

The Finance Department must manage the day-to-day administration of assets and investments, maintain accurate records, performs valuations, and prepares financial reports. All employees are expected to adhere to the procedures outlined in this policy and report any discrepancies, irregularities, or concerns related to asset and investment management.

9. Training and Awareness

- (a) Training Programs: Comprehensive training programs will be provided to all Personnel to ensure they understand the risk management and internal control policies and procedures. Training will be tailored to specific roles and responsibilities.
- (b) Ongoing Education: Regular refresher courses and updates will be provided to keep Personnel informed of any changes to policies or emerging risks.
- (c) Evaluation: The effectiveness of training programs will be evaluated periodically to ensure they meet the needs of the organization and its Personnel.

10. Compliance and Review

Compliance with this Policy is mandatory for all Personnel. Regular reviews of this Policy will be conducted to ensure its relevance and effectiveness. Updates will be made as necessary to reflect changes in the organizational environment or regulatory requirements.

11. Enforcement

Violations of this Policy may result in disciplinary action, up to and including termination of employment. All instances of non-compliance should be reported to management or through established reporting channels.

12. Reviews

This Policy and related procedures will be reviewed at least annually, or more frequently if required, by the Board to:

- ensure they remain effective and relevant to the Company;
- ensure that they continue to comply with Applicable Laws and industry standards;
- determine if any changes are required.