



**Broadband**  
Communication Networks

# Communication On Progress Report



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# ABOUT THIS REPORT

This report has been developed to provide summarized information on the sustainability performance of Broadband Communication Networks. The report highlights our key material matters under the ten principles of the United Nations Global Compact (UNGC) and provides insight on our approach in addressing these matters. It covers the period July 2017 – June 2018 and forms our second Communication on Progress Report to the UN Global Compact.

# INTRODUCTION

## MESSAGE FROM THE CEO & MANAGING DIRECTOR



“Our Organization's objective is to provide Products, Services and Solutions that contribute to sustainability for our customers, our Country and the world at large.

Indeed, our sustainability vision is to provide products, services and solutions that contribute to the success of our own customers, and the quality of life of each person affected by our actions.

The foundation of this vision is our continued commitment to managing our operations responsibly and ethically. We are dedicated to add value to our customers' technology needs.

Welcome to our Communication on Progress Report. “

In this annual COP, we describe our actions to continually improve the integration of the Global Compact and its principles into our business strategy, culture and daily operations. We strive at all times to ensure adherence to these principles. We also commit to sharing this information with our stakeholders using our primary channels of communication.

Our organization mission is, to be the preferred provider of innovative and superior technology solutions and services in East & Central Africa. We continue to deliver Technology Solutions addressing; Telecom, Utilities, Broadcasting, UN bodies and large businesses in the region. Indeed, we are pretty much a one Stop shop for ICT in the region.

In general, the last one year has been a good year for Broadband. However, the last two months of the year were challenging as we lost a substantial scope with our major customer. The main reason for loss of business is the demand for more discounts and pressure from new entrants to lower prices yet our costs are increasing.

Our organization's sustainability is hinged on six pillars that include: Customer Focus, Products and Services Excellence, Our human Resource, Innovation, Governance, Health Safety and Environment. These pillars are also aligned with the UNGC requirements. Indeed, we have policies that cover Human Resource, Health, Safety, Environment and Business Ethics among others.



## Human Rights

Our organisation is committed to continue respecting the protection of internationally proclaimed human rights and do not tolerate human rights abuse of any form. We are ready to report any person involved in human rights abuses if it ever happens in our operation.

## Labour Standards

We are committed to ensure that, in our recruitment and work sub-contracting; we do not employ children, discriminate in employment, advocate for forced labour, block employees from having collective bargaining among other international labour standards.

## The Environment

Our activities have the capacity to degrade the environment. We however believe in ensuring we protect the environment so that we leave the earth if possible better than we found it. Indeed, we believe we are among the 1st Telecom Company in Kenya to have an active Health, Safety and Environment (HSE) policy. We are totally compliant as far as HSE is concerned and in accordance with the best practice in environmental conservation requirements.

Indeed our staff must read, understand and sign our HSE handbook before they can be allowed to go to the field. We have all required Health and Safety Personal Protective Equipment (PPE) tools for the people going to the field and especially climbing towers.

Our organization has invested in energy efficient solutions that enable us and our customers to go green. Initiatives include; Sale of LED lighting solutions, Solar, hybrid solutions and efficient cooling solutions for data centers and telecom application. All these solutions reduce the carbon foot print for our customers. We will continue investing in green energy solutions for telecom, homes and grid connection into the future.

## Anti-Corruption

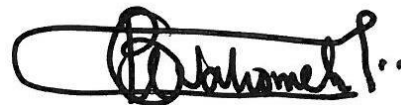
Corruption remains a key challenge in our operation. This is a key issue especially when dealing with government officers and some customers. This is especially true when getting development approvals and licenses in our operations among others. This often causes work to delay resulting in our organization incurring undue losses and poor performance appraisal by our customers. As the CEO of the company I have ensured that my management and staff have, zero tolerance to corruption in all forms concerned. We continue training our senior and middle management staff on Code of Ethics for Business in Kenya and above all, our staff has signed the code of conduct handbook,

We require all our employees to adhere to administration requirements, to the letter and spirit, in order to avoid opportunities for corruption. To further eradicate corruption, we have requested our suppliers to register with UNGC and in particular sign the Code of Ethics for business in Kenya. I am pleased to report that 11 suppliers have already registered and other 3 suppliers are in the processes of registering with UNGC. We commit to continue to train all staff to ensure they adhere to the 10 UNGC principals. Indeed, we look forward to a world where corruption is totally eradicated.

## Conclusion

In conclusion, I take this opportunity to thank my team for the effort so far. I believe that there is a lot of room to be covered and we are committed and willing to go that extra mile. I however believe that we need each and every Corporate, Small and Medium Enterprises, Government to follow suit in order to achieve the desired global goals. My commitment is that we will ensure we do our part and look forward to reporting on our progress next year.

"Yes, we can"



**Bernard G. Wahome**  
Founder and Chief Executive Officer

# ABOUT BROADBAND COMMUNICATION NETWORKS





# ABOUT BROADBAND COMMUNICATION NETWORKS

Broadband Communication Networks is a Communication Technologies Organization dedicated to provide Complete Communication Network Solutions for:-

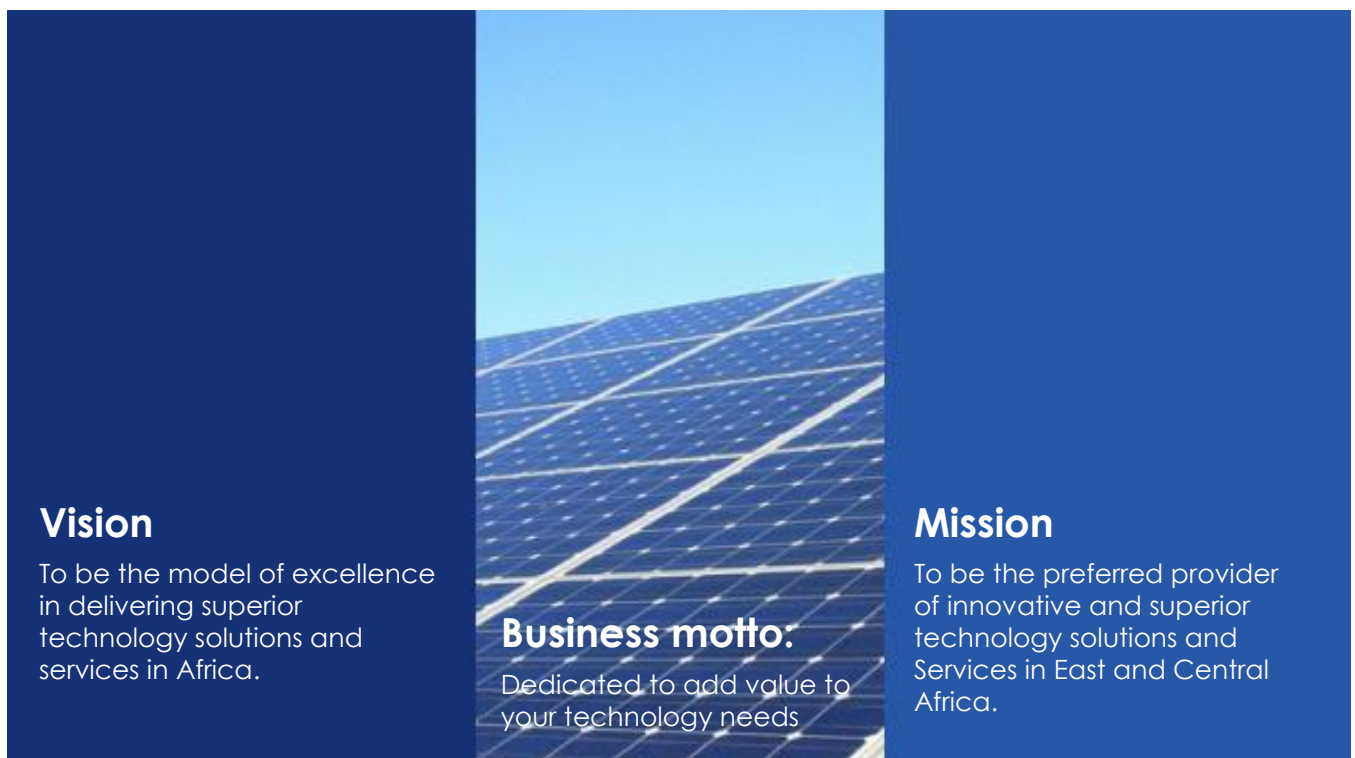
- Network Operators,
- Communication Regulators,
- Broadcasting Houses,
- Internet Service Providers (ISPs)
- Utilities, Governments,
- UN bodies and
- Large business organizations in East & Central Africa.

The company covers the full telecom life cycle through three main business divisions each headed by a General Manager. These three divisions are:-

- Implementation which covers physical network planning, deployment and optimization.
- Maintenance and Support involves active and passive Maintenance and Support.
- Network Solutions includes End to End 2G, 3G and 4G Mobile Broadband Network, Quality of service monitoring system (QSMS), Conformance Testing, Network Monitoring, Performance Management, Telecom Power and Green Energy among others.

We have headquarters in Nairobi, Kenya and have implemented large Telecom Network Projects across East & Central Africa. This includes Cameroon, Rwanda, Burundi, Ethiopia, Tanzania, Congo B, Gabon and Sudan besides many in Kenya.

To achieve our objectives, we have partnered with major global tier 1 manufacturers to deliver the desired Solutions to our Customers. Our partners include, Rohde & Schwarz, Nokia, Infinera, Calix, Aviat, Emerson (Vertiv), Viavi and Netscout among others.



**Vision**  
To be the model of excellence in delivering superior technology solutions and services in Africa.

**Business motto:**  
Dedicated to add value to your technology needs

**Mission**  
To be the preferred provider of innovative and superior technology solutions and Services in East and Central Africa.

## Core Values

- Honesty
- Integrity
- Sincerity
- Superior quality
- Competence
- Timely
- Hard work
- Maintenance of good health
- Safety and wellbeing
- Protection of the environment
- Respect of our internal and external customers
- Superior customer satisfaction

## Our Products and services:-

- Network Implementation (Deployment)
- Network Maintenance
- Network Solutions
- Green Energy Solutions



Field Technicians installing micro wave dish

## Our Sustainability Pillars





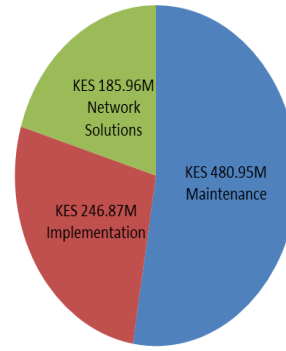


# **BROADBAND COMMUNICATION NETWORK PERFORMANCE HIGHLIGHTS**



**General**

Country of operation (Kenya)

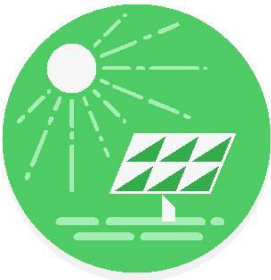


**Key revenues by segment**

**Environmental**

7 Environmental Impact Assessments (EIAs) conducted in 2018

**Green products**



Solar products



wind energy Products



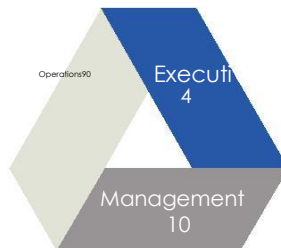
LED lighting products

**Social**

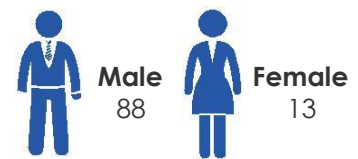
**Number of employees**



**Employee diversity by position**



**Employee diversity (M/F)**



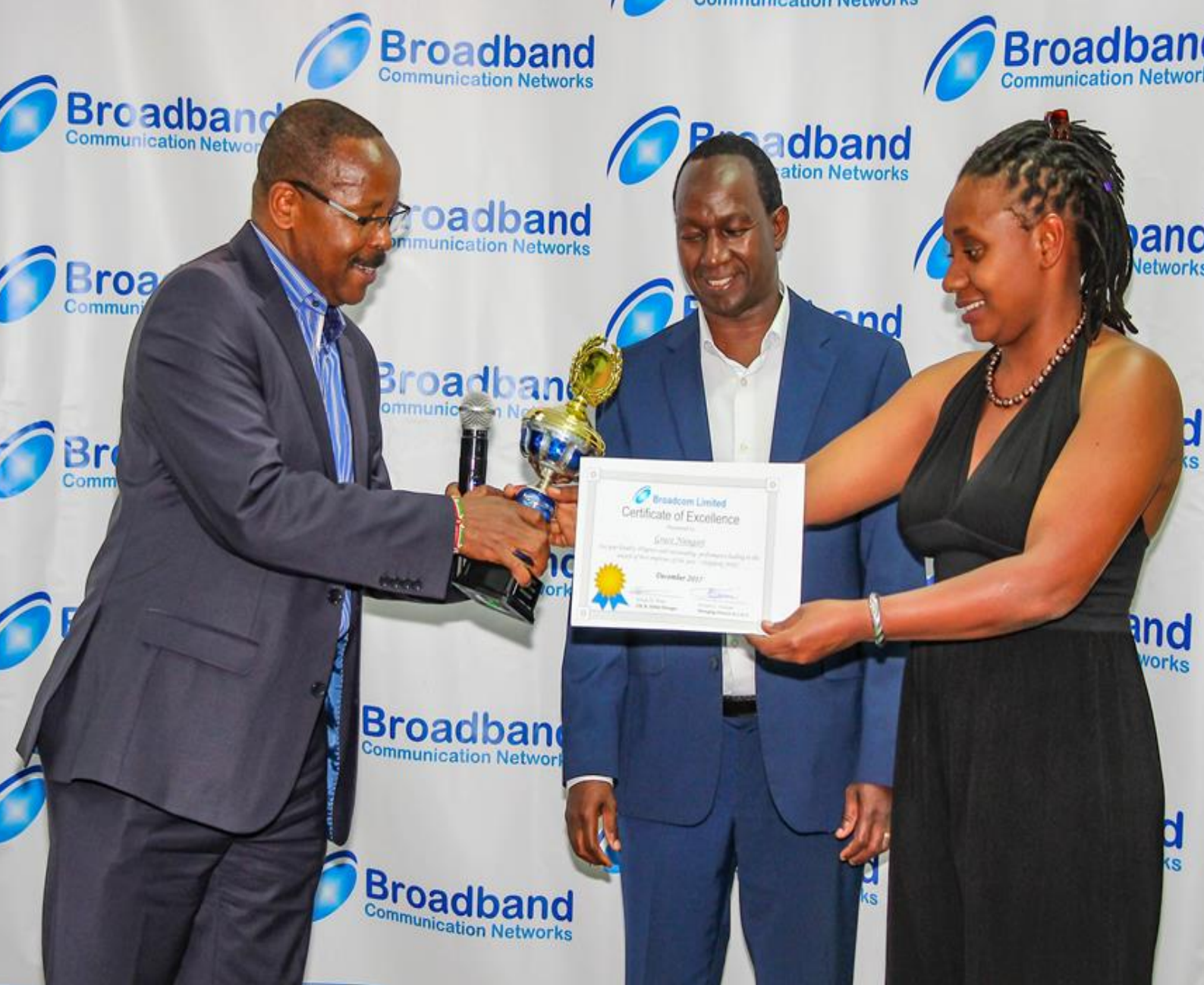
Average Employees Age  
38 Years

Employee training spend	KES 205,821/=
Man hours on employee training	1352hrs
CSR initiatives spend	KES 285,000
Employee volunteering hours	500hrs

**Other**

ISO 9001 QMS 2015 – certified in 2017





# OUR MATERIAL MATTERS

A sustainability issue is considered material if it could substantively affect the organization's ability to create value in the short, medium or long term.

Material matters in this report have been developed under the four key themes of the UN Global Compact namely;

1. Human Rights,
2. Labour
3. Environment
4. Anti-corruption.

Material matters are determined by considering the sustainability impacts and opportunities of the company, stakeholder concerns and assessments of key issues within the operating environment. These themes reflect key relationships, spheres of influence, footprints or impacts of our operations, stakeholder concerns and our operating context.



## Human Rights

Human rights are rights inherent to all human beings, whatever their nationality, place of residence, sex, national or ethnic origin, colour, religion, language, or any other status. All human beings are equally entitled to human rights without discrimination. These rights are all interrelated, interdependent and indivisible.

Material matters as relates to human rights and business in Kenya are hardly documented. The Kenya National Commission on Human Rights (KNCHR) highlights issues for businesses including workplace rights, local communities / business relations, human rights and sustainable land use, human rights and sustainable environment and human rights and small- and medium-sized enterprises. The Commission also noted that manufacturing and agricultural companies are more prone to human rights challenges.

Although Broadband Communication Networks operates in the service arena that is hardly considered in respect to matters of human rights, the company considers human rights as being important especially with respect to employees. Key rights issues of concern to the company include health and safety of employees, sexual harassment and management of grievances.

## Labour

Labour relations and labour rights remain a highly emotive subject in Kenya. In 2016 alone, the national government faced key labour challenges with major employee segments including teachers, university lecturers, nurses and doctors. In terms of child labour, the U.S. Department of Labor reported that 32 percent of Kenyan children, from 6 and 14 years old, were working.

Freedom of association is enshrined in Bill of Rights under Chapter 4 of the Constitution of Kenya 2010 which states that (1) Every person has the right to freedom of association, which includes the right to form, join or participate in the activities of an association of any kind; and (2) A person shall not be compelled to join an association of any kind. Association through trade unions is also catered for in the Labour Relations Act (2007). In addition, the country has several labour related laws that support freedom of association and prohibit all forms of forced and compulsory labour, infringements of employee rights and protection of employees.



Broadband Network teambuilding activity at Safaripark Hotel



As an employer, Broadband considers labour relations as a key facet of long term sustainability. Observance of labour legislation and consistent engagement of employees is considered an essential part of sound business practice by the company. In addition, the company has identified unique features of its labour performance that require additional attention and management.

## Environment

Article 42 of the Constitution of Kenya (2010) states that every person has the right to a clean and healthy environment. This reinforces the provision of the key environmental legislation, the Environmental Management and Coordination Act (EMCA), 1999 which states that every person in Kenya is entitled to a clean and healthy environment and has a duty to safeguard and enhance the environment. Despite these robust provisions, Kenya faces severe environmental challenges including deforestation, soil erosion, desertification, water shortage and degraded water quality, flooding, poaching and domestic and industrial pollution.

Given this context, it is imperative for companies in the region to embrace sound environmental practices. Increasingly, stakeholders are demanding for companies to be more proactive in their environmental practices. For example, in early 2017, the national government issued a ban on the use, manufacture and importation of all plastic bags used for commercial and household packaging on environmental grounds.

Broadband therefore considers the natural environment as a key material concern requiring the requisite policies and procedures. We have on board the HSE policy that drives the organization to protect the environment.



## Anticorruption

Corruption in Kenya has been characterised as endemic and systemic covering the entire swath of petty to grand corruption. The Business Anti-Corruption portal states that "one third of all firms regularly experience extortion and have to make facilitation payments and give gifts to carry out basic business operations such as obtaining operating licences, construction permits and utility connections". The private sector has been characterized as being both a perpetrator and a victim of corruption in the country. According to a survey on prevalence of economic crimes by PriceWaterhouseCoopers (PwC), Kenya has a high prevalence of embezzlement, bribery and procurement fraud. Transparency international 2016 corruption perception index ranked Kenya at 145 out of 154 countries.

Given this challenging environment for business, anti-corruption measures become a pertinent component for businesses that seek to operate in an ethical and responsible manner. Broadband is particularly vulnerable to this context due to its operations as a business to business service provider in a highly competitive sector. In addition, its business dealings with the government and participation in competitive bidding creates a facilitative environment for corruption. The company therefore considers corruption as a key challenge.





# OUR SUSTAINABILITY PERFORMANCE

This section looks at our sustainability performance by focusing on the four core themes (Human Rights, Labour, Environment and Anti-Corruption) and ten principles of the UN Global Compact. We have prepared this information by presenting three key facets of our sustainability performance model. Firstly, we have provided insights on our understanding of the core sustainability issues and why we believe it is important to our business. We realize that different businesses have different explanations of the terms used by the UN Global Compact. We therefore want to highlight our understanding of the core themes and the necessity for our engagement in each of these themes.

Secondly, we have highlighted our policy position on each of the themes. This is in recognition of the need for companies to develop internal policy commitments in respect to each of the core themes of the UN Global Compact. Policy statements and policy highlights are provided to underscore the seriousness with which we take each of the core themes. Without policies, implementation tends to be ad-hoc and guided by personal vision of those charged with implementing. By developing and publicising our policies, we intend to ensure that our stakeholders understand our position and approach on diverse issues.

Finally, we have provided insight on some of the activities we have undertaken to implement our policies. We appreciate that policies that are not implemented are simply "wish lists". Instead, we want to show our commitment through specific and targeted actions that seek to address the sustainability agendas incorporated in the Compact. This provides our core measurement of our sustainability performance in 2017 through qualitative narrative and quantitative data (where applicable). We believe that this three-part design provides holistic and logical insight on our sustainability performance in the course of the year.



## Human Rights

**Principle 1:** Businesses should support and respect the protection of internationally proclaimed human rights; and

**Principle 2:** make sure that they are not complicit in human rights abuses.

### Our understanding

We understand human rights as universal and minimum standards aimed at securing dignity and equality for all human beings. In this regard, we endeavor to assess and determine any human rights risks that may occur due to our operations and activities. Our intention is to ensure we respect human rights and avoid any infringements. We have placed our emphasis on issues that present key human rights risks and report on them accordingly.

### Our policy

Broadband Communication Networks takes cognisance of the importance of adhering to sound human rights practices in our business undertakings. The company has developed several human rights related policies to underpin its commitment to observing, protecting and respecting human rights. Among these policies are:

#### *Health and safety policy*

This policy seeks to comply with the Occupational Safety and Health Act, 2007 (OSHA) and all other relevant legal requirements.

Through the policy, the company commits to:

- Comply with all relevant statutory requirements and quality standards.
- Ensure each employee is given information, instruction and training necessary for safe performance of work.
- Protect health and safety of all employees.
- Adequately enable employees raise issues of the health and safety through health and safety committees.
- Ensure assessment of risks on health and safety at workplace and taking necessary action.
- Provide of Personal Protective Equipment (PPE) to employees and ensuring properly used.
- Reduce the losses caused by consequences of occupational diseases, accidents and improving the general environment.

Broadband has put several strategies in place to attain the objectives of the health and safety policy. These include:

- Providing suitable working tools and protective equipment
- Liaising and adhering to relevant government and regulatory authorities to ensure compliance to health and safety standards
- Sensitizing staff through continuous training and updating all policies and procedures on safety, health and environment practices.
- Providing and maintain plant systems and procedures of work that are safe and without risks to health.

The policy sets out clear responsibilities for the Managing Director, General Managers, Heads of Departments and employees on issues of health and safety, ensuring that overall responsibility is vested in the top leadership of the company. It also provides for the establishment of Health and Safety Committees, Environmental Health and Safety (EHS) trainings and EHS guidelines. A set of EHS rules have been developed with specific emphasis to the following safety concerns

#### *Sexual harassment policy*

The Company has developed a sexual harassment policy that seeks to ensure that all employees are protected from sexual harassment. Sexual harassment is defined as "unwelcome and unreciprocated sexual advances, requests for sexual favours, either verbal or physical conduct of a sexual nature that results in the individual feeling threatened or compromised in any way.

The policy recognizes instances of sexual harassment as occurring if an if the employer of that employee or a representative of that employer or a co-worker;

- Uses language whether written or spoken of a sexual nature
- Shows physical behaviour of a sexual nature which directly or indirectly subjects the employee to behaviour that is unwelcome or offensive to that employee that by its nature has a detrimental effect on the employee's employment, job performance or job satisfaction.
- Uses visual material of sexual nature
- Directly or indirectly requests that employee for sexual intercourse, sexual contact or any other form of sexual activity that contains an implied or express, promise of preferential treatment in employment, threat of determined treatment in employment; or threat about the present or future employment status of the employee.

Examples of sexual harassment covered by the policy include verbal, unwanted propositions, language of a suggestive or explicit nature, jokes of a suggestive or explicit nature, questions or comments of a personal nature, pin-ups, offensive publications, unsolicited and unwanted gifts and staring/leering.

### *Complaint and grievance policy*

This policy is designed to provide guidelines and procedure to ensure workplace disciplinary, complaints and grievance issues that affect the company's performance are received and appropriately dealt with in a timely manner for the mutual interest of both the company and the employee.

It provides for grievances to be handled and settled near the point of origin and as soon as possible with the immediate manager in the first instance. It also provides clear timelines for addressing grievances. All work-related complaints and grievances should be reported within three working days from the date of occurrence of the incidence and hearing held within seven working days after the reporting date and feedback given within the next three working days after the hearing.

A clearly defined grievance mechanism is in place ensuring confidentiality and non-victimization of those who highlight grievances.

### **Our performance**

Health and safety is a critical concern of Broadband Communication. This is because our work entails various forms of health and safety risks that need constant vigilance and adherence to our safety policy. Among the critical issues include safety concerns for persons working at height, handling of electrical appliances and electricity, driving including long distance and night driving and proper use of Personal Protective Equipment (PPE). We currently have a HSE Manager and field team leaders are HSE supervisors responsible for their teams

Managing safety concerns at our client's sites is a key consideration. This work includes many hazardous tasks and conditions such as working with height, excavation, noise, dust, power tools and equipment. The most common fatalities are caused by the fatal four: falls, struck by object, electrocutions and caught-in/between. We have developed clear procedures for ensuring safety within sites based on the tasks at hand and risks associated with these tasks.

In general, we ensure that all sites are well secured and a safety induction is conducted before commencement of work. Where necessary, safety signage is also erected on site.

Working at height is acknowledged as one of the most dangerous activities in the construction, maintenance and facilities management scope of work. Amongst many hazards and associated risks, working at height exposes workers to the risk of falls from height, and others being hit by objects that may fall from height. Working at height is a predominant aspect of our work since we provide support to telecommunication companies by building and maintaining their infrastructure. Construction, equipping and maintenance of this infrastructure and subsequent maintenance creates the need for working at height. In this respect, we have developed a clear set of practices including compulsory use of protective equipment like harnesses, specific requirements on the type of harnesses that can be used and clear guidelines on working positions when working at height. In addition, all employees involved in working at height are certified for this type of work and undergo site induction meeting before each assignment. Certification is renewed annually with refresher courses undertaken after every three years.

Personal Protective Equipment (PPE) are an essential part of our safety practice and are provided to all personnel as required. Use of PPE is compulsory based on task and site requirements. Employees have been trained in the proper use of PPE to ensure that they accrue the safety benefits intended from the use of these equipment. On site, an induction process is conducted at the commencement of tasks in which PPE usage is covered among key induction facts. Where necessary, all persons on a site including visitors, suppliers and inspectors are required to observe PPE requirements for them to access the site.

Other considerations that are essential for safe practices include safety procedures around site construction, excavation and working with electricity. We have ensured that our employees are appropriately qualified for these functions and also invested in their skills around safety practices.

In addition, our assignments call for driving in various forms of terrains, for diverse distances and at different hours, since we also provide emergency support to telecommunication companies. This creates several forms of driving and road related risks.



To address this issue, we have developed a comprehensive procedure for each journey which includes pre-journey assessment of all vehicles based on a clear assessment template. The subsequent vehicle inspection report must be completed and submitted. In addition, journey planning is undertaken to determine safety risks and mitigation needed for each journey. Drivers are expected to make journey breaks as a key part of safe driving. At a company level, all drivers undergo defensive driving courses as a prerequisite for working in that role. We also ensure the safety of our personnel who work in areas that are prone to insecurity or during night hours.

Our overall safety performance in 2017\_2018 was as shown below:

July 2017 - June 2018	Road Traffic Accident	Other Incident / Near miss	Fatalities	LTIFR
JUL	0	0	0	0
AUG	1	0	0	0
SEPT	4	0	0	0
OCT	0	0	0	0
NOV	0	0	0	0
DEC	0	0	0	0
JAN	0	1	0	0
FEB	1	0	0	0
MAR	1	0	0	0
APR	0	0	0	0
MAY	0	0	0	0
JUN	0	1	0	0
<b>TOTAL</b>	<b>7</b>	<b>2</b>	<b>0</b>	<b>0</b>

Training and development on health and safety topics in 2017-2018 were as follows:

OSH Induction Training	All Employees	0
Fire Marshals	Nominated Fire Marshals	11
Incident Investigation	Health and Safety Champions	0
Health and Safety Committee Training	All H&S Representatives' (1 -50 ratio)	2
First Aider	All Nominated First Aiders (1 per team)	17
Working at Heights	All Riggers/ Persons who work at height	15
Defensive Driving Training	All drivers and persons authorized to drive company vehicles	0
Toolbox meetings (HSE Awareness)	All technical employees	0
Health Awareness	All employees	0
Business Ethics	Managers	4



# **BROADBAND COMMUNICATION NETWORKS HEALTH & SAFETY POLICY**

Ensuring a safe and healthy working environment for its workers, customers and the company at large



# SAFETY FIRST

All employees, contractors and visitors at broadband Communication Networks limited must abide by these rules

Safety in the office	Safety in the field
<p>This is a cigarette free zone.</p> 	<p>Safety harness must be worn when working at heights.</p> 
<p>Watch out for slippery floor.</p> 	<p>Always buckle up while driving.</p> 
<p>Take note of all fire escape routes.</p> 	<p>Do not exceed speed limit.</p> 
<p>Never work under the influence of Alcohol or drugs.</p> 	<p>Never use mobile phone whilst driving.</p> 
<p>Never work on electrical equipments if unqualified.</p> 	<p>In case of emergency call Charles Mulli on 0722 540 950 or AAR on 020 2717374 / 5 /6</p> 

Safety is a team effort in which each individual must share in eliminating or reducing the risk of loss or damage to personnel or Property. It's better to lose one minute in life observing safety than lose life in one minute. Be safe always. The lines managers are sorely responsible for enforcing all safety rules and regulations. For more information see our safety Handbook



**Broadband communication Networks Limited**

"Dedicated to add value to your communication needs"

## Labour

**Principle 3:** Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

**Principle 4:** the elimination of all forms of forced and compulsory labour;

**Principle 5:** the effective abolition of child labour; and

**Principle 6:** the elimination of discrimination in respect of employment and occupation.

### Our understanding

We are committed to respecting international and local legislation on labour relations and practices. Several international and national policies, treaties, regulations and legislation provide an overarching framework for sound labour practices. Key legislation in Kenya include the Employment Act, Labour Institutions Act, Labour Relations Act, Occupational Safety and Health Act and Work Injury Benefits Act. these laws and the Constitution of Kenya (2010) provide for key labour rights including freedom of association, prohibition of forced and compulsory labour and discrimination in respect to employment and occupation.

In respect to child labour, Section 10 of the Children Act 2001 (Chapter 141) states that all children must be protected from economic exploitation that would have a detrimental effect on their wellbeing or access to education. Furthermore, Part VII of the Employment Act 2007 sets out the standards for the protection of children in the workplace and prohibits employment of children under the age of 13.

### Our policy

The Human Resource Manual sets out the company's comprehensive approach to the management of human capital to ensure achievement of complete and appropriate communication, comprehensive records and controls with an objective of attracting, recruiting and retaining of competent staff that meet both the company and individual goals. The Manual caters for a wide variety of labour related issues including freedom of association, non-discrimination, child labour and forced and compulsory labour.

#### *a) Freedom of association*

Employees of the company are permitted to form or join any trade union of their choice. This is in adherence with local legislation and best labour practice. No restrictions or requirements have been put in place to prevent or prohibit employees from collective engagements.

#### *b) Child labour*

The company has a child labour policy that acknowledges the existence of child labour and the need to address it proactively. The company has assessed its risks in regards to child labour and determined that the highest risks may be attributed to our suppliers. However, Broadband does not accept child labour, and works actively against it. The company recognizes that the complexity of the child labour issue requires a consistent, long-term effort to create sustainable and broad-based solutions in order to reach its goal; that no products delivered to Broadband Communication Networks are produced by child labour.

#### *General principle*

Broadband Communication Networks Ltd does not accept child labour. The company supports the United Nations (U.N.) Convention on the Rights of the Child (1989) and has developed its child labour policy based on this Convention, which stipulates:

- *"All actions concerning the child shall take full account of his or her best interests."* Article 3.
- *"The right of the child to be protected from economic exploitation and from performing any work that is likely to be hazardous or to interfere with the child's education, or to be harmful to the child's health or physical, mental, spiritual, moral or social development".* Article 32.1.

In addition, the policy is based on the International Labour Organisation (ILO) Minimum Age Convention no. 138 (1973) and incorporates the ILO Convention on the Worst Forms of Child Labour no. 182 (1999).

The policy also covers issues of young workers, labour, monitoring and remediation.



In terms of implementation, the policy provides as follows:

- All actions to avoid child labour shall be implemented by taking the child's best interests into account.
- Broadband Communication Networks requires that all suppliers shall recognise the U.N. Convention on the Rights of the Child, and that the suppliers comply with all relevant national and international laws, regulations and provisions applicable in the country of production.
- Suppliers are obliged to take the appropriate measures to ensure that no child labour occurs at suppliers' and their sub-contractors' places of production.
- If child labour is found in any place of production, Broadband Communication Networks will require the supplier to implement a corrective action plan. If corrective action is not implemented within the agreed time-frame, or if repeated violations occur, Broadband Communication Networks will terminate all business with the supplier concerned. The corrective action plan shall take the child's best interests into consideration.
- The supplier shall effectively communicate to all its sub-contractors, as well as to its own co-workers, the content of Broadband Communication Networks No Child Labour Policy, and ensure that all measures required are implemented accordingly.

We have written to our suppliers and requested them not to engage child labour in any of our projects. Additionally, when vetting our suppliers, they have to declare that they do not engage child labour.

### *c) HIV/AIDS Policy*

The objective of this policy is to reduce the impact of HIV/AIDS on infected and affected parties. The policy prohibits HIV testing as a prerequisite for recruitment, access to training or promotion. It also provides for the promotion and facilitation of Voluntary Counselling and Testing (VCT) for all employees. The policy also provides for:

- Confidentiality in handling of information pertaining to infected and affected employees
- Non-discrimination under any and all circumstances
- Continuation of employment as long as the employee is able to perform in accordance to the job requirements.
- Training and awareness on HIV/AIDS for employees

### *d) Non-discrimination*

Broadband Communication Networks is an equal opportunity employer committed to the elimination of discrimination of any nature during the recruitment and selection process and in general employment practices. Broadband Communication Networks guarantees equality in employment opportunities based on the following grounds: - Race, Colour, language, religion, political or other opinion, nationality, ethnic or social origin, disability, and marital status or HIV status.

## **Our performance**

The company is committed to the best interest of employees through observation of national legislation and ethical business practices. In 2016-2017, there were no incidences of child labour in the direct work force.

In addition, we continued with our staff engagements through monthly General Managers' and weekly departmental meetings. These engagements provide employees with opportunities to raise issues of concern in the workplace. We maintain an open-door policy for employees allowing them to address concerns and grievances to managers of their choice.

We also engaged in an employee of the year awards, as a key effort to recognize and motivate staff. Performance is measured using the balanced score card which covers four pillars, namely Finance, Customer, Internal Processes and Learning & Growth.

## Environment

**Principle 7:** Businesses should support a precautionary approach to environmental challenges;

**Principle 8:** undertake initiatives to promote greater environmental responsibility; and

**Principle 9:** encourage the development and diffusion of environmentally friendly technologies.

### Our understanding

The natural environment is a key resource for posterity that provides resources for business today. We believe in environmental stewardship that enables us to responsibly use and protect the natural environment in the course of doing our business.

### Our policy

The company's environmental policy states that it shall conduct its business in a manner that is compatible with the balanced environmental and economic need of the environment it operates in. It also indicates that the company will engage in continuous efforts to improve the environment.

### Our performance

Our work has several direct impacts on the natural environment. We have therefore developed specific procedures for addressing these impacts mostly aimed at avoiding or mitigating the impacts. Before embarking on construction activities, we undertake an environmental impact assessment to assess the environmental and social consequences (positive and negative) of the proposed project prior to the decision to move forward with the proposed action. The EIA involves environmental studies and stakeholder engagement to ensure that environmental and social data is generated to inform the project plan. In 2017-2018, we conducted 7 EIAs.

The deployment function of our work entails construction and development of physical infrastructure for our clients. This results into activities such as excavation, site development and construction that create environmental impacts. For example, bush and landscape clearance, excavation and other site disturbances can create adverse conditions. These include soil erosion, silty storm water runoff, site flooding, soil dumping and polluted soils. We undertake mitigation efforts in this effect including disposal of soil to designated dumping areas, clearance of all construction sites from materials used during the construction and general cleaning of sites.

Additionally, we dispose waste oil from our maintenance services through a professional and registered disposal company. Waste oil is particularly pollutive and needs specialized handling. Other forms of waste are disposed through an authorised waste disposal company.

Apart from the impact of our work, we have proactively engaged in improving the natural environment through the provision of green technology products and services. We have partnered with world renowned green energy products manufacturers to assist our clients reduce their dependence on diesel generated electricity. This includes providing micro and macro solar power systems and wind turbines and associated technology. We also provide LED lighting which consumes 70% less energy on average as compared to traditional lighting technologies, lasting up to 10 times longer, contains no toxic materials and are 100% recyclable. In 2017-2018 we sold 8,000 LED products.





## Anticorruption

**Principle 10:** Businesses should work against corruption in all its forms, including extortion and bribery.

### Our understanding

Ethical practices remain a key driver for long term value creation and business sustainability. We believe in doing business in a way that is above reproach, ensuring that we adhere to legal requirements and ethical consideration. We realize that our business context is plagued with ethical challenges affecting business and society in general. Ethics is therefore championed from the top management and all employees are expected to adhere to the highest ethical standards.

### Our policy

It is the policy of the Company to conduct its business activities in all sectors we operate in with honesty, integrity and adhering to the moral, ethical and legal standards of the sector and country.

### Our ethical principles

1. All employees shall at all times uphold the Company vision, mission and core values.
2. All employees are required to behave in a responsible manner to both the external and internal customers.
3. All employees must adhere to the laid down rules and regulations that exist and as amended from time to time.
4. Employees must be courteous to customers both internal and external giving correct and timely information regarding the goods and services offered by the Company in performance of their duties. All communication from the customer must be dealt with expeditiously and courteously to a logical conclusion.
5. All employees must accept accountability for their actions, decisions and appreciate positive criticism
6. Employees should encourage and challenge others when they behave in unethical ways, report any non- conformity to rules and regulations. However, employees should not suppress unnecessarily any positive and constructive contributions for the betterment of the Company
7. Employees must never accept/ solicit gifts/ rewards/ bribes from customers, suppliers, officials or any other stakeholder, before, during or after performance of duty.
8. All employees shall obey lawful and proper instructions issued to them for the efficient performance of their duties.
9. Employees shall not disclose confidential information to any unauthorized persons neither extract or destroy any official records
10. All employees shall:
  - Recognize the rights of all persons
  - Demonstrate Company core values
  - Treat others fairly.

### Our performance

From 2016, we embarked on developing the knowledge and skills of our employees on issues of ethical business and anti-corruption. During the course of the year, we utilised our monthly employee engagement forums as key discussion points to engage on ethical business. We have trained employees (including General Managers and departmental heads); 6 and 4 under 2016\_2017, and 2017\_2018 respectively who attended two-day training on ethical business organized by the UN Global Compact – Kenya Chapter.

Our Managing Director is the ethics champion in the company and consistently engages employees on issues of ethical business and anti-corruption. Employees understand that there is a zero-tolerance policy on corruption issues within the company as championed by the top leadership.



## Community Engagement

### Our understanding

Societal challenges are importance business imperatives that can be addressed by companies through the way we do business or using voluntary engagement initiatives. We believe in supporting community initiatives through financial and non-financial contributions to participate in the communal efforts that aim at uplifting the lives of ordinary citizens. We are cognisant of the extensive societal problems prevailing in our business context and choose to participate strategically and judiciously in those initiatives that provide exemplary results and impacts to society.

### Our policy

#### *Social Responsibility policy*

Social responsibility refers to the activities and associated responsibilities that Broadband Communication Networks holds where an impact on society and the environment may occur. This includes issues relating to the environment, human rights, labour practices, organisational governance, fair business practices, community involvement and social development, and consumer issues. This includes the ability of Broadband Communication Networks to reach agreement on activities that are either "right" or "wrong" and to be held accountable for activities over which it has control.

Broadband Communication Networks intends for its actions to be consistent with the interests of society and sustainable development, based on sound ethical behaviour, in compliance with applicable laws and governmental regulations and be integrated into the ongoing organisation activities.

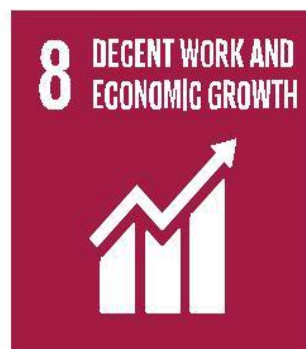
#### *Sustainable Development policy*

Broadband Communication Networks will ensure sustainable development (i.e. development that meets the needs of the present without compromising the ability of future generations to meet their own needs) through the adoption of acceptable balances between the priorities of economic development, social progress and environmental protection.

The company is committed to maintaining the state of the environment where social and economic goals ensure the achievement of improved quality of life whilst avoiding a scenario whereby its actions may cause environmental issues that could undermine or threaten human survival.

### Contribution to the (SDGs)

Our work contributes directly to the following SDGs:-





## SOCIAL RESPONSIBILITY POLICY

Broadband Communication Networks endeavours to have its actions to be consistent with the interests of society and sustainable development based on sound ethical behaviour. This is in compliance with applicable laws and governmental regulations and all are integrated into the ongoing organisation activities.



## GOING FORWARD

In 2019, we intend to undertake the following activities in response to our sustainability performance

1. Strengthen Health, Safety & Environmental culture in the organization and OSHA 45000 certification
2. Increase business in green energy solutions and ensure we acquire ISO 14000 certification.
3. Train more staff on ethical business
4. Increase social responsibility to impact on social well-being in our society
5. Proactively strengthen staff engagement with a focus on staff wellbeing
6. We will train as many people as possible on Health and Safety



Wind turbine installed by Broadband at a Mombasa site



## ABBREVIATIONS AND ACRONYMS

<b>CEO</b>	Chief Executive Officer
<b>COP</b>	Communication on Progress
<b>CSR</b>	Corporate Social Responsibility
<b>EHS</b>	Environmental Health and Safety
<b>EIA</b>	Environmental Impact Assessment
<b>EMCA</b>	Environmental Management Coordination Act
<b>HSE</b>	Health, Safety and Environment
<b>ICT</b>	Information and Communication Technologies
<b>ILO</b>	International Labour Organization
<b>ISO</b>	International Organization for Standardization
<b>ISPs</b>	Internet Service Providers
<b>LED</b>	Light Emitting Diodes
<b>OSHA</b>	Occupational Safety and Health Act
<b>PPE</b>	Personal Protective Equipment
<b>PWC</b>	PriceWaterhouseCoopers
<b>UN</b>	United Nations
<b>UNGC</b>	United Nations Global Compact

