CYLINDER WORKS LIMITED

ANTI-CORRUPTION POLICY

At Cylinder Works Limited, we are committed to conducting our business with integrity and in compliance with all applicable laws and regulations. Upholding high ethical standards is fundamental to our operations and reputation.

To this end, we make the following commitments:

- We strictly prohibit any form of bribery, corruption, or unethical inducements in all aspects of our business operations.
- Cylinder Works Limited employees, contractors, and representatives must adhere to the highest standards of honesty and ethical behavior.
- We do not tolerate facilitation payments or any payments made to improperly influence any business decision.
- Gifts and hospitality offered or received must be reasonable, transparent, and in compliance with company policies and legal requirements.
- Cylinder Works Limited will maintain accurate and transparent financial records that properly reflect all transactions.
- We will comply with all anti-corruption laws and regulations applicable in all jurisdictions where we operate.
- Cylinder Works Limited encourages employees to report any suspected violations of this policy through established reporting channels without fear of retaliation.

This policy applies to all employees, contractors, agents, and representatives of Cylinder Works Limited Failure to comply with this policy may result in disciplinary action, up to and including termination of employment or contract. Cylinder Works Limited is committed to fostering a culture of integrity and transparency in all our business dealings.

This policy shall be reviewed on an annual basis.

Approved By:

Michael Njoroge,
MD, Cylinder Works Limited.

CYLINDER WORKS LTD.
P. O. Box 591 - 00232
RUIRU

Document No:	Revision	Last Revision Date	Next Revision Date
CWL/HR/ACP/026	005	11th February 2026	11th February 2027

Cylinder Works Limited is committed to upholding the highest standards of integrity, professionalism, accountability and ethical conduct in all its business operations. We recognize that our employees, contractors and representatives play a vital role in maintaining the Company's reputation, achieving customer satisfaction and promoting responsible business practices.

This policy establishes the standards of behavior expected of all employees, contractors and representatives of Cylinder Works Limited in their dealings with colleagues, clients, suppliers, stakeholders and the wider community. All persons working on behalf of the Company shall uphold the following principles:

- Conduct all business activities with honesty, transparency, fairness and accountability, exercising due care, diligence and professionalism in the performance of assigned duties.
- Comply with all applicable laws, regulations, statutory requirements, Company policies, procedures and lawful instructions.
- Uphold the dignity and fundamental rights of all individuals, promoting equal opportunity and a workplace free from discrimination, harassment, intimidation and retaliation.
- Prioritize occupational health and safety, protect the environment and comply with established safety and environmental procedures in all activities.
- Protect confidential information, intellectual property and Company assets, and ensure that funds, equipment and facilities are used responsibly and exclusively for authorized purposes.
- Avoid actual, potential or perceived conflicts of interest and promptly disclose any personal or business interests that may compromise impartiality or the Company's interests.
- Neither offer nor accept bribes, improper payments or inducements. Employees shall not offer or accept money or inappropriate gifts intended to influence business decisions or transactions.
- Promote fair competition and ethical dealings with clients, suppliers and other stakeholders while avoiding fraudulent, deceptive or unlawful business practices.
- Foster mutual respect, cooperation, courtesy, open communication and constructive feedback at all levels of the Organisation.
- Promote excellence in workmanship, service delivery and customer relations while protecting the Company's reputation and interests.
- Promptly report suspected unethical conduct, violations or breaches of this policy through the appropriate management channels. Reports made in good faith shall be treated confidentially and without retaliation.

All employees, contractors and representatives are responsible for understanding and complying with this policy. Any breach may result in appropriate disciplinary or contractual action, up to and including termination of employment or engagement, in accordance with applicable laws and Company procedures.

Management shall ensure that this policy is communicated, implemented and reviewed at least annually to maintain its continued suitability and effectiveness.

This policy shall be reviewed on an annual basis.

Approved By:

Michael Njoroge,
MD, Cylinder Works Limited.

CYLINDER WORKS LTD.
P.O. Box 591 - 00232
RUIRU

Document No:	Revision	Last Revision Date	Next Revision Date
CWL/HR/CCP/026	005	11th February 2026	11th February 2027

CYLINDER WORKS LIMITED

DATA PROTECTION POLICY

Cylinder Works Limited is committed to ensuring the privacy and security of personal data in compliance with applicable data protection laws and regulations. This policy outlines our responsibilities and principles regarding the collection, processing, storage, and management of personal information. The policy applies to all employees, contractors, and third parties who handle personal data on behalf of Cylinder Works Limited.

Cylinder Works Limited is dedicated to protecting the personal data entrusted to us. We commit to:

- Collecting and processing only the minimum necessary personal data, strictly for legitimate business purposes.
- Ensuring personal data is processed fairly, transparently, and in a manner that respects individuals' rights.
- Maintaining accurate, complete, and up-to-date personal information, with corrections made promptly upon notification.
- Storing personal data securely, with robust technical and organizational measures to prevent unauthorized access, loss, or destruction.
- Limiting data retention to the period necessary for business and legal purposes, followed by secure disposal of the information.
- Respecting data subjects' rights, including access, correction, and deletion requests, in accordance with legal requirements.
- Conducting regular audits and assessments to ensure compliance with data protection laws and policies.
- Promptly reporting and responding to any data breaches to minimize risk and ensure regulatory compliance.
- Working with trusted third-party providers who commit to data protection standards aligned with Cylinder Works Limited's policy.

Compliance and Enforcement

All employees, contractors, and third-party partners must adhere to this Data Protection Policy. Violations may result in disciplinary action, including termination of employment or contractual arrangements. Any questions or concerns regarding this policy should be directed to Cylinder Works Limited's management.

This policy shall be reviewed on an annual basis.

Approved By:

Michael Njoroge,
MD, Cylinder Works Limited.

CYLINDER WORKS LTD.
P.O. Box 591 - 00232
RUIRU

Document No:	Revision	Last Revision Date	Next Revision Date
CWL/HSE/DPP/026	005	11th February 2026	11th February 2027

At Cylinder Works Limited, we are committed to ensuring occupational health, safety, and the environment are integrated throughout all stages of a project. We aim to minimize harm to persons and property by adopting a proactive approach to effective safety, health, and environmental management. All works will be carried out in accordance with best practice and **complying with relevant statutory provisions.** We shall endeavor to **set realistic objectives and targets** with reasonable measures to avoid risk to **employees, suppliers, subcontractors, service providers, or others** who may be affected by our activities.

Strategies for achieving the above will include:

- Conducting regular hazard identification and risk assessments to proactively eliminate or control workplace risks;
- Implementing a stop-work authority that empowers employees to halt unsafe operations without fear of retaliation;
- Implementing emergency preparedness and response procedures, including drills, to ensure readiness during incidents;
- Establishing occupational health, safety, and environmental performance indicators to track and improve performance;
- Providing adequate supervision to ensure work is carried out safely and in accordance with approved procedures.
- Ensuring proper maintenance of tools and equipment to prevent breakdowns and avoid unsafe conditions;
- Consulting with employees, suppliers, subcontractors, service providers, and other parties to improve decision-making on occupational health, safety, and environmental matters;
- Distributing occupational health, safety, and environment information, including this policy, to all employees, suppliers, subcontractors, service providers and interested parties;
- Providing and maintaining appropriate measures to safeguard the physical fitness of all employees during their duty, including health and safety inspection and screening.
- Ensuring all incidents are investigated and lessons learned are shared within the organization;
- Ensure training of employees to equip them with knowledge on Occupational health, safety environment, and quality.
- Promoting environmental conservation by managing waste, controlling pollution, and using resources efficiently;
- Provide adequate safety facilities and personal protective equipment (PPE) for all workers.

The Managing Director has the overall responsibility for, health, safety, welfare and environmental matters. Management and supervisory staff have the responsibility of implementing the policy throughout the company. **All employees, subcontractors, suppliers, and service providers** are expected to actively support and assist in implementing this policy. They should ensure that their tasks are carried out as safely as reasonably practicable, minimizing risks to themselves, others, and the environment.

This policy shall be reviewed on an annual basis.

Approved By:

Michael Njoroge,
MD, Cylinder Works Limited.

CYLINDER WORKS LTD.
P. O. Box 591 - 00232
RUIRU

Document No:	Revision	Last Revision Date	Next Revision Date
CWL/HSE/EHSP/026	005	11th February 2026	11th February 2027

CYLINDER WORKS LIMITED

ENVIRONMENTAL MANAGEMENT & SUSTAINABILITY POLICY

Cylinder Works Limited (CWL) is committed to protecting the environment, promoting sustainable development and minimizing the environmental impacts arising from its operations. The Company recognizes its responsibility to conserve natural resources, prevent pollution and conduct its activities in a manner that meets present needs without compromising the ability of future generations to meet their own needs. CWL shall integrate environmental considerations into all aspects of its planning and operations while complying with applicable national and county environmental legislation and regulatory requirements.

Cylinder Works Limited shall:

- Integrate environmental management practices into all areas and levels of its operations and promote environmental responsibility among employees, contractors and other interested parties.
- Identify environmental aspects and impacts associated with its activities and implement appropriate measures to prevent pollution, minimize environmental risks and protect the local, regional and global environment.
- Comply with applicable environmental laws and regulations relating to hazardous and industrial waste, wastewater and effluent discharge, dangerous goods, noise pollution, land use, air emissions and carbon emissions.
- Ensure proper segregation, handling, storage, transportation and disposal of waste. Hazardous waste shall only be managed and disposed of through appropriately licensed and NEMA-approved waste management contractors.
- Ensure wastewater and effluent are appropriately managed and discharged into approved sewer systems in accordance with applicable discharge requirements and environmental standards.
- Promote the conservation and efficient use of natural resources by setting annual targets for reducing energy and water consumption, minimizing waste, promoting reuse and recycling, and monitoring resource consumption and savings.
- Adopt energy-efficient electrical systems, lighting and equipment, and promote water-efficient appliances, plumbing fittings and water conservation practices.
- Encourage the use of environmentally friendly products and give preference, where practicable, to contractors and suppliers who demonstrate sound environmental management practices.
- Promote sustainable transportation and environmentally responsible driving practices to reduce fuel consumption, vehicle emissions and the Company's carbon footprint.
- Provide environmental awareness and encourage employee participation in environmental initiatives, pollution prevention, waste reduction and continuous improvement.
- Monitor environmental performance, assess the effectiveness of implemented measures and take appropriate corrective actions where environmental objectives or legal requirements are not met.

Responsibilities

Senior Management shall provide overall leadership and resources for implementing, monitoring and maintaining this policy. All employees and contractors shall support its implementation by complying with environmental procedures, conserving resources, preventing pollution and reporting environmental incidents or concerns.

This policy shall be communicated to all employees and relevant interested parties and reviewed at least annually, or whenever significant operational, environmental or legal changes necessitate revision.

Approved By:

Michael Njoroge,
MD, Cylinder Works Limited.

CYLINDER WORKS LTD.
P. O. Box 591 - 00232
RUIRU

Document No:	Revision	Last Revision Date	Next Revision Date
CWL/HSE/ESP/026	005	11th February 2026	11th February 2027

Cylinder Works Limited is committed to providing equal employment opportunity and a workplace free from discrimination, sexual harassment and bullying. This policy applies to all employees and contractors, all work-related functions and activities (including Company-sponsored external training), and recruitment, selection and promotion decisions.
The Company aims to attract and retain capable employees, provide a safe, respectful and reasonably flexible work environment, and deliver its services in a safe and respectful manner.

Equal Opportunity and Unacceptable Conduct

- Direct discrimination occurs when a person is treated unfavourably because of a personal characteristic protected under the Constitution or applicable equal opportunity requirements.
- Indirect discrimination occurs where an apparently neutral rule or requirement has a discriminatory effect on people with a protected characteristic.
- Sexual harassment includes unwelcome conduct of a sexual nature that a reasonable person would anticipate may offend, humiliate or intimidate the person concerned.
- Workplace bullying includes behaviour directed at an employee or group of employees that creates a risk to health and safety, such as physical or verbal abuse, excluding or isolating individuals, or assigning impossible tasks.
- CWL shall provide equal opportunity without discrimination on protected grounds identified in the Company's source policy, including age, breastfeeding, carer status, disability, employment activity, gender identity, marital status, parental status, personal association with a person having a listed characteristic, physical features, political activity or belief, pregnancy, race, religious activity or belief, sex and sexual orientation.
- Employees shall report discrimination, sexual harassment or bullying to their manager. Employees shall not be victimised or treated unfairly for raising a concern or making a complaint.

Reasonable Adjustments

CWL shall consider reasonable adjustments for a person with a disability who applies for a job, is offered employment or is an employee and requires an adjustment to participate in recruitment or perform the genuine and reasonable requirements of the job. Examples may include adjusting performance requirements, flexible working hours, telephone typewriter access for employees with hearing or speech impairments, screen-reading software, additional breaks for chronic pain or fatigue, or adjustable-height desks. The Company shall weigh the need for an adjustment against the expense or effort involved. An adjustment may not be reasonable where it would involve very high cost or significant workplace disruption, or where the person cannot perform the genuine and reasonable requirements of the job even with adjustments.

Procedure for Making a Complaint

- Where comfortable and safe to do so, the employee may tell the person responsible that the behaviour is unwelcome, offensive and must stop. The employee should keep a written record of the incident. If direct discussion is not comfortable, the employee should speak to a manager.

- If the behaviour continues, the employee should contact their supervisor or manager for support.
- If approaching the immediate supervisor is inappropriate, the employee feels uncomfortable, or the behaviour persists, the employee may contact another relevant senior manager or lodge a complaint with the Director.
- Complaints shall be treated confidentially as far as possible.

Receiving and Investigating Complaints

- The manager shall listen seriously, maintain confidentiality as far as possible and allow the complainant to have another person present during the interview if requested.
- The manager shall obtain the complainant's account step by step, record the details in the complainant's own words and ask the complainant to check the notes for accuracy.
- The manager shall explain and agree the next steps with the complainant. Where an investigation is not requested and the manager is satisfied that the conduct does not breach Company policy, the manager shall act promptly, maintain confidentiality and forward relevant notes to their manager.
- Where an investigation is appropriate, the manager shall not assume guilt; shall explain possible outcomes if allegations are substantiated; and shall interview the persons directly concerned and witnesses separately.
- The alleged harasser shall be informed clearly of the allegations and given an opportunity to respond. Interviews and investigation steps shall be documented, and disclosure shall be limited as far as possible.
- The manager shall decide appropriate action based on the evidence, check that the proposed action addresses the needs of the complainant and CWL, and refer the matter to more senior management where necessary.
- Relevant outcomes shall be discussed with the complainant where appropriate.

Possible Outcomes

Where a complaint is substantiated, outcomes may include counselling, a warning or dismissal of the person responsible; staff training or additional training for the person responsible or all staff; counselling for the complainant; or an apology on terms agreed by those involved.

Any employee found to have breached this policy may be subject to disciplinary action, up to and including dismissal, in accordance with Company procedures.

This policy shall be reviewed on an annual basis.

Approved By:

Michael Njoroge,
MD, Cylinder Works Limited.

CYLINDER WORKS LTD.
P. O. Box 591 - 00232
RUIRU

Document No:	Revision	Last Revision Date	Next Revision Date
CWL/HSE/HR/EEABP/026	005	11th February 2026	11th February 2027

Cylinder Works Limited is committed to conducting its business responsibly, lawfully and ethically. The Company recognizes its responsibilities to the communities in which it operates and to employees, customers, suppliers, regulators and other stakeholders.

In carrying out its business, CWL shall:

- Comply with applicable laws, regulations and decisions of the Republic of Kenya, particularly those relating to the environment, competition and employment.
- Remain sensitive to concerns raised by local and international governmental and non-governmental organizations in matters relating to the Company's operations.
- Observe the principles of free and fair competition.
- Reject bribery and corruption in all forms, whether involving public or private parties, and whether active or passive.

CWL also strives to uphold the principles of the Universal Declaration of Human Rights, the key conventions of the International Labour Organization and the principles of the United Nations Global Compact.

Employees and representatives shall support these principles in their dealings on behalf of the Company. Suspected breaches shall be raised through the appropriate management channels.

This policy shall be reviewed on an annual basis.

Approved By:

Michael Njoroge,

MD, Cylinder Works Limited.

CYLINDER WORKS LTD.
P. O. Box 591 - 00232
RUIRU

Document No:	Revision	Last Revision Date	Next Revision Date
CWL/HSE/HR/GP/026	005	11th February 2026	11th February 2027

CYLINDER WORKS LIMITED

HUMAN RIGHTS POLICY

Cylinder Works Limited is committed to upholding human rights in all aspects of our operations. We recognize that respecting human rights is not only a moral imperative but also crucial for sustainable business success.

Cylinder Works Limited adheres to the following commitments:

- We respect the dignity and rights of all individuals, including employees, contractors, clients, and community members.
- Cylinder Works Limited promotes a workplace free from discrimination, harassment, and unfair treatment of any kind.
- We ensure fair employment practices, including equal opportunities for recruitment, training, and career advancement.
- Cylinder Works Limited prohibits child labor and forced labor in any form within our operations and supply chains.
- We prioritize health and safety, providing a safe working environment for all employees and contractors.
- Cylinder Works Limited respects the rights of indigenous communities and local populations affected by our operations.
- We strive to minimize our environmental impact and promote sustainable practices in line with human rights principles.
- Cylinder Works Limited engages with stakeholders transparently and responsibly, fostering relationships based on mutual respect and integrity.
- We commit to continuous improvement, regularly reviewing and updating our human rights policies and practices.

This policy applies to all Cylinder Works Limited employees, contractors, and partners, guiding our actions globally. We believe that by upholding human rights, we contribute positively to the communities where we operate and enhance our reputation as a responsible corporate citizen.

This policy shall be reviewed on an annual basis.

Approved By:

Michael Njoroge,
MD, Cylinder Works Limited.

CYLINDER WORKS LTD.
P. O. Box 591 - 00232
RUIRU

Document No:	Revision	Last Revision Date	Next Revision Date
CWL/HR/HRP/026	005	11th February 2026	11th February 2027

Cylinder Works Limited is committed to maintaining the highest standards of legal and regulatory compliance in all aspects of its operations in Kenya. Our policy ensures that all business activities are conducted in full compliance with the relevant laws, regulations, and industry standards. Cylinder Works Limited recognizes the importance of ethical conduct and is dedicated to fostering a culture of integrity and accountability.

We commit to:

- Adhering to all applicable laws and regulations in Kenya, including but not limited to labor laws, environmental regulations, health and safety standards, and industry-specific legislation.
- Ensuring that all employees, contractors, and stakeholders are aware of and comply with our legal and regulatory obligations.
- Conducting regular training and awareness programs to keep our team informed about changes in laws and regulations relevant to our operations.
- Implementing robust internal controls and monitoring systems to ensure compliance with legal and regulatory requirements.
- Maintaining accurate and complete records of all transactions and activities in accordance with legal and regulatory requirements.
- Promptly reporting any non-compliance issues to the relevant authorities and taking corrective actions to address them.
- Protecting the privacy and confidentiality of personal and business information in accordance with data protection laws and regulations.
- Engaging in fair and ethical business practices, avoiding any forms of corruption, bribery, or unethical behavior.
- Ensuring that all contracts and agreements entered into by Cylinder Works Limited are compliant with applicable laws and regulations.
- Regularly reviewing and updating our compliance policies and procedures to reflect changes in the legal and regulatory landscape.
- Promoting a culture of compliance within the organization, encouraging employees to report any concerns or violations without fear of retaliation.
- Cooperating fully with regulatory authorities and external auditors in their inspections and audits.

This policy shall be reviewed on an annual basis.

Approved By:

Michael Njoroge,
MD, Cylinder Works Limited.

CYLINDER WORKS LTD.
P. O. Box 591 - 00232
RUIRU

Document No:	Revision	Last Revision Date	Next Revision Date
CWL/HSE/LRCP/026	005	11th February 2026	11th February 2027

CYLINDER WORKS LIMITED

QUALITY ASSURANCE POLICY

Cylinder Works Limited is committed to being a center of excellence in the revalidation and certification of LPG gas cylinders and tanks, providing quality products and services that consistently meet customer expectations and comply with applicable legal, regulatory, statutory and ISO 9001:2015 requirements.

We recognize quality as an integral part of our business strategy and are committed to continually improving our Quality Management System, operational processes and service delivery to achieve customer satisfaction and operational excellence.

To fulfil this commitment, we shall:

- Understand, meet and endeavor to exceed customer and other relevant stakeholders' requirements through effective communication, customer feedback and regular satisfaction reviews.
- Maintain and continually improve an effective Quality Management System in accordance with ISO 9001:2015 requirements.
- Establish measurable quality objectives and Key Performance Indicators (KPIs), monitor performance and periodically review targets to drive continual improvement.
- Ensure employees understand their roles and responsibilities in achieving quality objectives through effective communication, teamwork, training and competency development.
- Provide adequate resources, competent personnel and appropriate equipment to ensure consistent quality and high standards of workmanship.
- Promote a quality culture in which management, employees and suppliers share responsibility for delivering quality services.
- Conduct regular inspections, internal audits, performance appraisals and management reviews to identify gaps and implement corrective actions.
- Ensure projects and services are delivered in accordance with agreed specifications, within the stipulated timelines and budget, with appropriate documentation and effective handover.
- Integrate occupational health and safety and environmental considerations into our operations, including the implementation of relevant risk assessments and method statements.
- Minimize waste and optimize the use of materials and other resources in support of sustainable business practices.

Management shall ensure that this policy is communicated, understood and implemented at all levels of the organization and made available to relevant interested parties. It shall be reviewed at least annually to ensure its continuing suitability, adequacy and effectiveness.

Approved By:

CYLINDER WORKS LTD.
P.O. Box 591 - 00232
RUIRU

Michael Njoroge,
MD, Cylinder Works Limited.

Document No:	Revision	Last Revision Date	Next Revision Date
CWL/HSE/QAP/026	005	11th February 2026	11th February 2027

CYLINDER WORKS LIMITED

SECURITY POLICY

Cylinder Works Limited is committed to providing a safe, healthy, and secure environment for all our employees, suppliers, clients and visitors. To help achieve and maintain such an environment, comprehensive safety and security programs are maintained under the guidance of the Managing Director, HSSEQ Manager, Security and Emergency Response Team.

To ensure that the environment is kept safe everyone who accesses the company premises including Project sites, they must be aware of how they can contribute towards ensuring that the area is a safe place to be. The principal objective is to ensure that unwanted people who would seek to cause harm to individuals or steal property are stopped from entering the company building or project sites. The Company takes all reasonable measures to prevent life-threatening incidents and risks to the safety and security of persons and property.

All members of the Cylinder Works Limited fraternity, suppliers, and visitors, are responsible for conducting themselves in a manner that does not endanger themselves or others, or pose a risk to company equipment, other physical assets, or other persons' property.

This policy shall be achieved by;

- Stating out defined roles and responsibilities of all company departments and individuals tasked in implementing and carrying out such security programs and practices.
- Cylinder Works Limited shall establish principles, goals, programs, and practices that support a secure and safe environment for all company employees, suppliers, clients as well as visitors, and ensure that they minimize risks to the security of the employees as well as the company's physical assets.
- The principal access to the office for visitors should be through the main entrance doors into the main reception and all visitors who are to go beyond the waiting lobby public areas must be booked in at Reception (this is also required for health and safety reasons).
- Members of the public visiting our project sites must only be given access to the authorized areas unless accompanied by the site Supervisor or designated site member. This shall be after a prior comprehensive induction process.

This policy shall be reviewed on an annual basis.

Approved By:

Michael Njoroge,
MD, Cylinder Works Limited.

CYLINDER WORKS LTD.
P. O. Box 591 - 00232
RUIRU

Document No:	Revision	Last Revision Date	Next Revision Date
CWL/HSE/SP/026	005	11th February 2026	11th February 2027