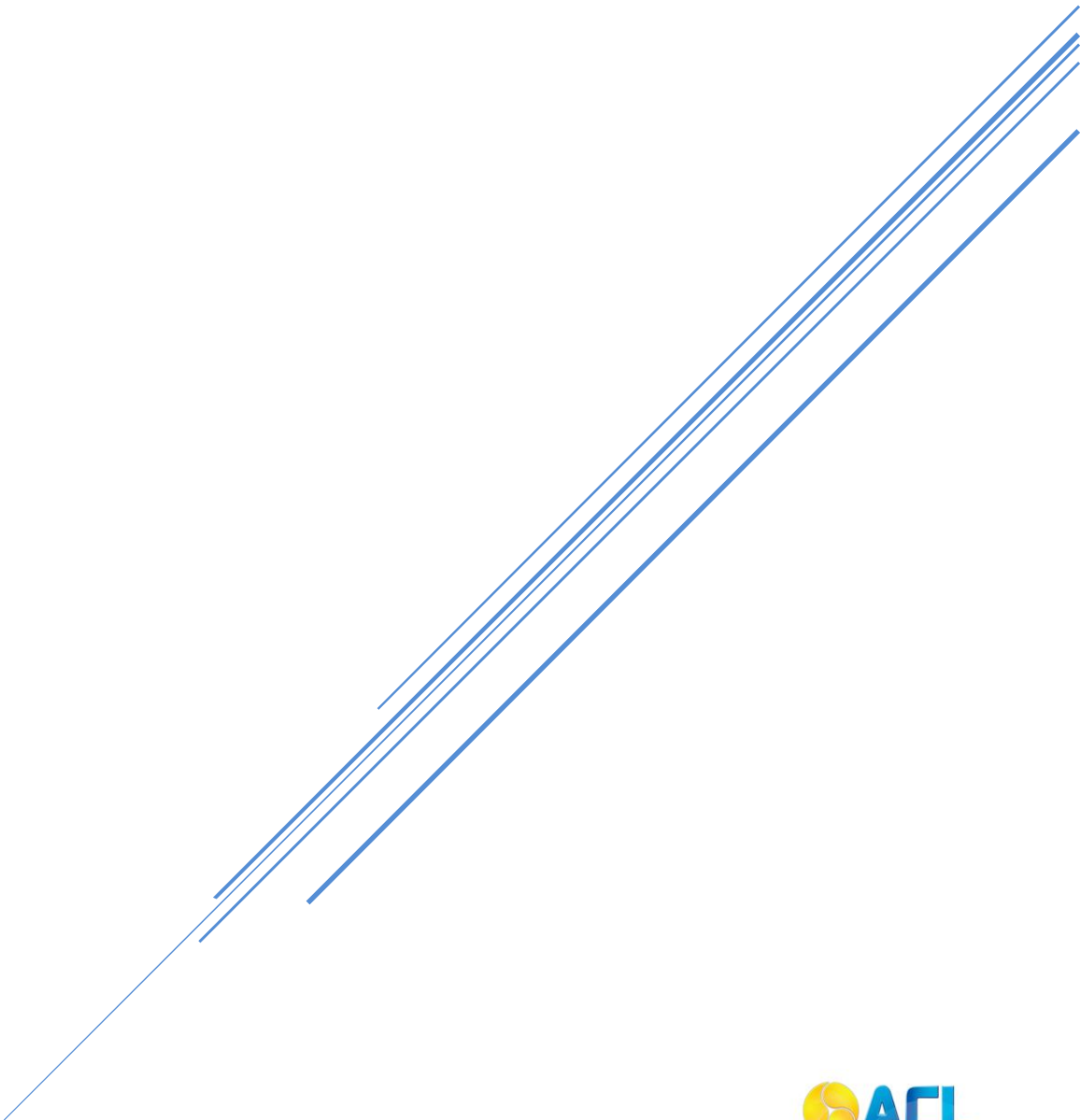


# ACL CABLES PLC

## Asset and Shareholder Investment Control Policy



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## **1. Purpose:**

The purpose of this Asset and Shareholder Investment Control Policy is to establish a framework for the management, protection, and oversight of ACL Cable's assets and shareholder investments. This policy aims to ensure the responsible stewardship of resources and the safeguarding of shareholder interests.

## **2. Asset Management**

### **2.1 Inventory and Classification:**

ACL Cables will maintain an inventory of all assets, including but not limited to property, equipment, intellectual property, and financial instruments. Assets will be classified, and their value regularly assessed.

### **2.2 Asset Acquisition:**

All acquisitions of assets must be authorized and documented. The procurement process will adhere to established policies and procedures, ensuring transparency, fairness, and compliance with applicable laws and regulations.

### **2.3 Use and Maintenance:**

Assets will be used for legitimate business purposes only. Regular maintenance schedules and protocols will be established to ensure the longevity and optimal performance of assets.

### **2.4 Disposal:**

Assets that are no longer required will be disposed of responsibly. Disposal methods will comply with environmental regulations, and proceeds, if any, will be appropriately accounted for.

## **3. Financial Investments**

### **3.1 Eligible Investments**

The eligible investments

- Government Securities, Bonds and Repurchase Agreements (REPOs)
- Deposits with Licensed Commercial Banks
- Unit Trust
- Equity Investments.
- Money Market Accounts at Commercial Banks

### **3.2 Investment Approvals**

Investments should be approved by the Board of Directors of the Company.

## **4. Investment Management:**

### **4.1 Fiduciary Responsibility:**

ACL Cables PLC acknowledges its fiduciary responsibility to shareholders. Investments will be managed with prudence, diligence, and in accordance with applicable laws and regulations.

### **4.2 Diversification:**

The organization will pursue a diversified investment strategy to manage risk and enhance the overall performance of the investment portfolio.

### **4.3 Due Diligence:**

Before making any significant investment decisions, thorough due diligence will be conducted. This includes an assessment of potential risks, returns, and alignment with the organization's strategic objectives.

### **4.4 Reporting to Shareholders:**

Shareholders will be provided with regular and comprehensive reports on the performance of their investments, including financial results, portfolio composition, and any material changes in investment strategy.

## **5. Mergers and Acquisition of Subsidiaries and Associates**

ACL Board and senior management shall always take due care and diligence to ensure that the investments in acquisition, creation and merging of entities are in the best interest of ACL shareholders.

The process of acquisition, creation or merger of a company, the ACL Board should ensure that required analysis and care is taken.

## **6. Internal Controls**

### **6.1 Segregation of Duties:**

Internal controls will be established to ensure the segregation of duties related to asset management and investment decisions. This includes checks and balances to prevent conflicts of interest.

### **6.2 Approval Processes:**

Clearly defined approval processes will be in place for significant asset acquisitions and investment decisions. These processes will involve multiple layers of review and approval.

### **6.3 Record Keeping:**

Accurate and detailed records of all asset transactions and investment decisions will be maintained. These records will be subject to regular internal and external audits.

## **7. Risk Management**

### **7.1 Risk Assessment:**

Regular risk assessments will be conducted for both assets and investments. Identified risks will be evaluated, and strategies will be implemented to mitigate, transfer, or accept risks based on the organization's risk appetite.

### **7.2 Insurance:**

Adequate insurance coverage will be maintained to protect against potential risks to assets. The organization will assess the need for additional insurance coverage based on changes in the asset portfolio.

## **8. Compliance:**

All asset management and investment activities will comply with applicable laws and regulations. The organization will stay informed about changes in legislation and adjust its practices accordingly.

## **9. Communication**

### **9.1 Transparency:**

The organization is committed to transparency in its asset management and investment activities. Shareholders will be provided with clear and understandable information about the performance of their investments.

### **9.2 Stakeholder Engagement:**

Shareholders and stakeholders will have opportunities to engage with the organization regarding asset management and investment practices. Feedback will be considered in decision-making processes.

## **10. Review and Updates**

This policy will be subject to periodic reviews to ensure its continued relevance and effectiveness. Updates will be made as necessary to reflect changes in organizational goals, industry standards, or regulatory requirements.