Environmental, Social and Governance (ESG) Report

Introduction

n an era where global challenges demand corporate responsibility, NMG is committed to driving positive change through its Environmental, Social, and Governance (ESG) practices.

Our ESG priorities are not just a checklist; they are the result of materiality assessments that shape our overarching strategy for sustainable and inclusive growth. These priorities are at the core of our commitment to responsible business practices, and serve as our guiding "North Star" for defining and executing our ESG objectives.

The insights we gather inform every aspect of our organisation's management. This, in turn, influences how we serve our clients and directs our contributions to the environment and communities. This focus ensures that our actions today, positively impact both the environment and society for a better tomorrow.

This report is therefore a testament to our dedication to transparency, positive impact and ethical leadership in all facets of our operations. It underscores our commitment to business sustainability, in harmony with the UN Sustainable Development Goals (SDGs) framework.

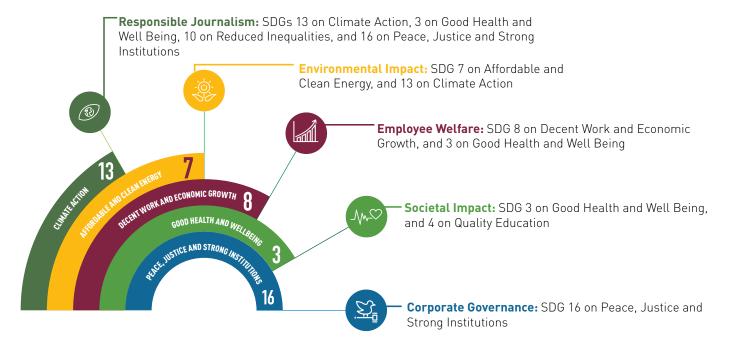


Materiality Assessment

n 2023, we conducted a comprehensive materiality assessment to identify the most significant issues for our business and stakeholders. This evaluation was designed to explore

external trends influencing our business operations, our societal role, and the impact of our activities on our operational environment. We have therefore aligned our ESG material topics to the SDGs

framework and ultimately, seek to contribute to the achievement of the following SDGs through our various areas of focus:



1. Responsible Journalism

ournalism is the reason NMG exists. We are committed to creating content that informs, educates and entertains our consumers across the different platforms, keeping in mind the changing needs and trends in the industry.

Journalism plays a vital role in driving sustainability by raising awareness, holding entities accountable, and fostering informed public discourse. For this reason, we not only report on environmental issues, we also highlight potential solutions by showcasing innovative sustainable practices.

Through investigative journalism, our reporters uncover and expose governance issues, holding corporations and governments accountable for their actions. Ultimately we strive to inspire action,



Our reporting on social issues serves as a catalyst for social change, empowering individuals, fostering empathy, and catalyzing collective action towards a more just and equitable society.

influence policies, and contribute to a more sustainable future. The character and philosophy of NMG's news and information outlets across the East African region are shaped by the editorial guidelines and objectives outlined in our Editorial Policy that has been socialised throughout the organisation.

The provisions of the policy have been discussed and adopted by the

NMG Board and its shareholders, and comprise of the rules governing all editorial content in our media platforms. Divided into four parts, they deal with issues of policy, professional, operational and administrative guidelines as well as journalistic conduct in the sourcing and compilation of news, features, documentaries as well as editorials and commentaries. While placing obligations on the Group and every member of the editorial staff, they require the unmitigated personal and philosophical commitment of all editorial executives and staff.

As an overreaching principle for managing responsible journalism, all NMG journalists are accredited by the Media Council of Kenya, an independent national institution that sets media standards and ensures compliance.



a) Your Thoughts Matter

As a business, we are consistently looking to our consumers for feedback not only on our reporting, but also on aspects of ESG that they feel should be incorporated in our content.

We have created a variety of feedback loops - via emails, calls, Quick Response (QR) and short codes - available across our platforms where audiences can share their feedback, concerns and complaints and enable us to respond to issues raised.

The Group has a Corrections Policy that is guided by our commitment to accuracy, fairness, and transparency as obligated by our industry's editorial code of ethical journalism, which we subscribe to wholly. In the event of an error, an official apology is rendered through an editorial or a correction published, depending on the extent of the error.

In addition, NMG has an independent Public Editor who is responsible for supervising the implementation of proper journalism ethics across platforms. He examines critical errors or omissions, and acts as a liaison to the public. The Public Editor subsequently responds to audience feedback and/or complaints through an independent public editor column that is published every Friday in the *Daily Nation*.

Ultimately, we adhere to all the regulations set out by the Media Councils of Kenya, Uganda and Tanzania, and the Rwanda Media Commission as well as the relevant legal guidelines in each country.

b) Driving Environmental Sustainability through Journalism

Journalism serves as a powerful tool for promoting sustainability by informing, engaging, and mobilizing individuals and communities to protect the planet and build a more sustainable future.

In 2023, the Nation Media Group set up the Nation Climate Desk, a special editorial unit that seeks to achieve the following objectives:

- Document the impact of climate change on Kenya and the continent at large, through powerful storytelling.
- Offer a platform for communities affected by climate change to tell their own stories.
- Raise awareness about the solutions that are being piloted or have been adopted, with a special focus on indigenous knowledge-based solutions.
- Foster strategic alliances to enhance NMG's reporting on climate issues.
- Host thought-leadership forums to track progress of implementation of policies, locally and internationally such as those generated under the United Nations Framework Convention on Climate Change (UNFCCC) process.

The following thought leadership initiatives geared towards environmental sustainability were carried out in 2023 to drive awareness, industry synergy and action around climate change.

Earthwise Summit:

NMG convened the summit as a response to the escalating vulnerability to climate change such as ravaging drought cycles, flooding, soaring temperatures and the surge in animal to humans' infections among other unpredictable manifestations of climate change. The summit, that brought together representatives from different sectors and cultural backgrounds, had a resounding message in the end — one of transformative action, re-imagination and an unwavering commitment to seeking solutions to climate change. We had 1.6m impressions on our social media platforms, with 162 inperson attendees.



Climate Change Symposium:

NMG's subsidiary in Tanzania, Mwananchi Communications Limited (MCL), organized two Climate Change Symposiums bringing together stakeholders to discuss climate change adaptation and mitigation. While the first one focused on post-COP-27 outcomes, pushing a national dialogue on implementing Tanzania's climate action plan, the second edition sought to uncover innovative local solutions for effective interventions, built on a knowledge-sharing culture.



The SMEs Conference & Expo:

Held under the theme: "Climate Financing Opportunities for MSME Growth, the event brought together various stakeholders including development partners, fund managers, banks, investors, venture capitalists, incubators and IT experts, among others. The conference focused on empowering MSMEs to

enable them not only access funding but also be innovative in creating business models that advocate for a climate-friendly future. Notably, a total of 2,976 industry players attended the conference



Energy in Climate Adaptability Conference:

This is a Thought Leadership Forum that aims to highlight the strategic role of renewable energy in enhancing climate change adaptation and resilience in Kenya, as well as the opportunities and challenges for scaling up renewable-based adaptation solutions across different communities and contexts.

Towards Universal Access to Clean Cooking Forum:

This virtual forum was held to create awareness on the role of clean cooking in the delivery of Net-Zero emissions by 2050.

It further provided an excellent opportunity for knowledge and information sharing, to increase publicity geared at accelerating access to clean cooking by 2028.

COP-28

NMG provided extensive coverage of the United Nations Climate Change Conference across all its platforms - from the continent's role in combating climate change to deliberations from the conference.

c) Climate Action Campaign

The campaign was launched in April 2021, and we continued with the initiatives in 2022 going into 2023. The TV series and publications in the *Climate Action Pullout* (published every Sunday in the *Sunday Nation*), contains content on how communities are adapting to the climate crisis, and the innovations created by individuals, SMEs and even corporations. Through TV segments like *Climate Voices*, NMG further recognizes the home-grown solutions in fighting the effects of the climate crisis. Overall, the campaign has served to position NMG as a creative thought leader on the climate crisis and its effects. During the reporting

period, 26 editions of the magazine were published in the *Daily Nation* with 624 minutes of climate action content on our *NTV Kenya* digital platform.

Similarly, we host a series of conversations around climate change on X Spaces. Expert panelists engage with audiences on emerging climate change issues and possible solutions. This way, we create awareness and push the various players including the public to participate in the climate change conversation.



d) Health:

Health coverage is an integral part of our reporting, and we utilise our various platforms to bring attention to a myriad of issues from information on disease outbreaks, symptoms to public health initiatives and challenges facing healthcare systems.

We also highlight gaps in healthcare access, advocating for reforms to address these issues. By informing the public, we help raise awareness about health risks and promote preventive measures. In this regard, NMG runs various initiatives across its various editorial platforms including: *Healthy Nation* and *Health Diary*. In 2023 alone we ran 104 editions of health content in the *Daily Nation* and produced 52 episodes of content, translating to 1,560 minutes of health content on *NTV Kenya* alone.

e) Accountability Journalism

As society's watchdog, the fourth estate has a mandate to provide the public with accurate and reliable information about the actions of those in power, and to promote transparency, integrity, and ethical behavior in private and public institutions. This involves thorough research, fact-checking, and often uncovering instances of corruption, misconduct, or incompetence.

In 2023, our editorial teams continued to prioritize high-quality stories, investigative pieces, special reports, and agenda setting articles. During the year under review, impactful content spanned a wide range, from in-depth investigations to systemic industry changes. As a result of such stories, action was taken against responsible institution and the authorities in charge.

f) Gender

SDG 5 on Gender Equality seeks to empower all women and girls, as a foundation for a peaceful, prosperous and sustainable world. There has been progress over the last decades, but the world is not on track to achieve gender equality by 2030. By setting up the first ever gender desk in Africa, NMG has intentionally created a platform that spotlights the challenges, lessons and opportunities that will drive gender equity through the following initiatives:



The Voice: A weekly pull out in the Friday *Daily Nation* that highlights the stories of women breaking barriers, setting up businesses, excelling in academia, leading SMEs and so much more. 52 editions of *The Voice* Magazine were published in 2023. The Gender Vertical on the *Nation.Africa* site gives these stories lifetime value.

NMG also runs gender themed events. In 2023, we hosted the International Women's Day (IWD) Gala Dinner that brought together women from across the nation. Themed "DigitALL: Innovation and Technology for Gender Equality," the event offered a platform for women to discuss the challenges they face, as well as avenues for growth and empowerment.

During the same period the Group held a women - only event dubbed "Changing Cycles" that attracted 512 women working in various fields. The event served as a platform to donate sanitary towels to needy school going girls. A total of 3,000 sanitary towels were donated.

g) Youth and Special Interest Groups

NMG recognizes the role of youth and special interest groups in national and global development. We strive to produce niche content that targets the youth and special interest groups and by doing so, we aim to amplify their voices in public discourse.

Our products include *Speaking of Gen Z*, a podcast introduced in 2023 that acts as a window into *Gen Z's* world and speaks on everything from technology to social issues and the latest trends. It has quickly gained popularity with 3,000 weekly listeners, over 20,000 downloads and a Spotify podcast top charts feature.

Over the years we have run *My Network, The HighSchooler, Teen Republique, JuniorSpot, The Trend* and *The Mavericks -* focused on content that empowers the youth, builds their knowledge and

guides them in their day to day activities in school or at home. The *Daily Nation* carried 156 editions of Education content with over 10,000 hours dedicated on our broadcast platforms.

In addition, we intentionally carry stories on special interest groups and Persons Living with Disabilities (PWDs). By highlighting their experiences, challenges, and achievements, we create awareness on some of the issues they face including barriers to accessibility, discrimination, stigma, and the need for inclusive policies and practices.

As part of our 'access to all principle', we use sign language interpreters during live broadcasts. We have also increased the use of text in videos, to ensure that consumers who have hearing challenges understand the substance in the videos.

2. Environmental Impact

In the face of climate change and resource scarcity, we recognize our responsibility to minimize our environmental footprint. We are dedicated to running a sustainable business model that preserves natural resources and ecosystems.

From renewable energy investments to waste reduction initiatives, every step we take is a move towards a greener future. We recognize the importance of measuring our environmental impact and establishing improvement targets for ourselves. This allows us to work with nature, not against it. In addition, we make it a point to openly discuss our advancements and work tirelessly to drive buy-in and enhance our environmental performance.

As part of our environmental management strategy, we identify and manage environmental risk events in all stages of our business, from raw material importation to production and operations.

By embracing environmental conservation, we contribute to SDG 7 on Affordable and Clean Energy, and 13 on Climate Action.

a) Waste Management and Recycling

As a business we appreciate the fact that responsible waste management and recycling practices are fundamental to our commitment to sustainability. Our approach to waste goes beyond mere disposal; it embodies our dedication to fostering

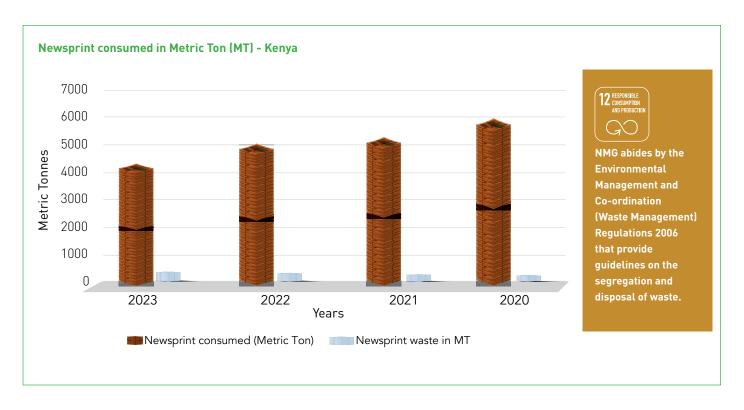
a circular economy where resources are used efficiently and waste is minimized.

We acknowledge the critical need to satisfy the demands of a growing population, safeguard the planet's ecosystems, provide equitable access to a healthy environment, and cut down on carbon emissions from the production, distribution, and disposal of trash.

Since newsprint makes up the majority of our raw material, its consumption and waste generation is closely monitored across our production plants in Kenya, Uganda and Tanzania.

Strict controls are applied to contaminated press waste, which includes water, oils, and inks. We have made a conscious effort to prevent their release into the environment, by utilizing an authorized and ecologically friendly collection and disposal method by a certified company.

Efficient management of waste newsprint remained a priority in 2023. Disposal of all paper waste generated within the printing plant such as white waste, slab and core, brown waste, printed waste including newspapers returned unsold and other solid waste was contracted to National Environment Management Authority (NEMA) licenced companies that manage the recycling process. This is in line with SDG 12, Reduced Environmental Impact.





b) Energy use

SDG 7 calls for "affordable, reliable, sustainable and modern energy for all" by 2030. It's three core targets are the foundation for our work:

- Ensure universal access to affordable, reliable and modern energy services
- Increase substantially the share of renewable energy in the global energy mix
- Double the global rate of improvement in energy efficiency

Energy is therefore not just a commodity for NMG, but a critical resource that powers our operations. At the core of our energy strategy is a relentless pursuit of efficiency. To mitigate the environmental impact of energy use in our industrial processes, we utilize a mix of clean, renewable energy sources alongside conventional energy. As a result of an increase in contract printing, there was an increase in power consumption in Kenya.



c) Greenhouse Gas Emissions

NMG is proactively implementing strategies to transition towards a low-carbon trajectory, aiming to achieve Net Zero Carbon emissions in our operations by 2030.

In late 2020, NMG commenced quarterly measurement and reporting of greenhouse gas emissions. The carbon footprint is determined using the Greenhouse Gas Protocol, with emissions quantified in 'Tons of carbon dioxide equivalent' (tCO2e), a standard unit for comparing various greenhouse gases relative to CO2. The largest contributors to emissions in our operations stem from the freight of raw materials and newspaper transport (scope 3).

To mitigate emissions, we have devised several reduction measures. These include the installation of solar water heating, replacing high-consumption halogen lamps with LED lighting, and sourcing raw materials from countries closer to our destinations and converting 4 vehicles in Tanzania to run on Liquefied Natural Gas (LNG) instead of

petrol or diesel. Additionally, current initiatives to offset emissions involve tree planting and utilizing solar tubes and skylights for daylight illumination instead of electricity.

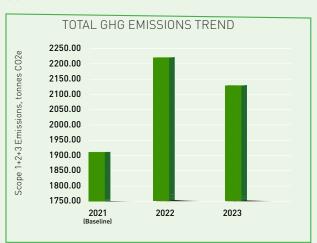
In a bid to achieve our 2030 goal, we continued to collaborate with our suppliers, to reduce carbon emissions throughout our supply chain. We are committed to directing at least 90% of NMG's expenditures towards companies actively managing, reporting, and reducing their emissions. Moreover, in the next few years, a minimum of 75% of NMG spending will be allocated to companies with science-based net zero targets for their Scope 1 and 2 emissions, aligned with the 2°C warming limit.

The Group is also sourcing for suitable e-mobility partners to help us transition to zero emission vehicles. Our goal is to have 90% of our fleet being Ultra Low Emission Vehicles (ULEV) as we work towards ultra-low or zero emissions by 2035 and totally net zero by 2050.

KENYA



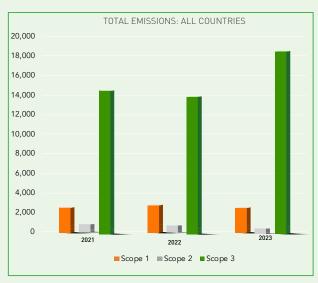
UGANDA



TANZANIA



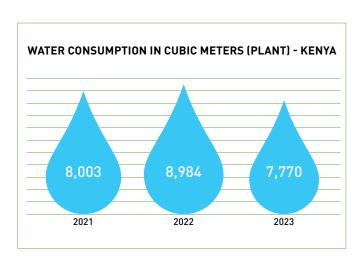
TOTAL EMISSIONS: ALL COUNTRIES



d) Water consumption

Water scarcity is increasingly impacting regions across the globe. Given our reliance on water availability, our environmental stewardship efforts prioritize sustainable water management. We adhere to the Water Act 2016, that states in part, "every person in Kenya has the right to clean and safe water in adequate quantities and to reasonable standards of sanitation."

All the water consumed at our Mavoko printing plant is metered to manage and control consumption, and users across all our offices are frequently sensitized on water conservation even as we embrace water management technologies. Notably, our consumption trend has been on a downward trajectory.



3. Employee Welfare



ur focus on Ensuring Employee Wellbeing aligns with SDG3 on Good Health and Well-Being, which seeks to 'Ensure healthy lives and promote well-being for all at all ages' as well as SDG8 that calls for promotion of sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all.

NMG prioritizes the well-being and development of employees as a fundamental pillar of its corporate responsibility. We believe that a healthy, motivated workforce is essential for sustainable business growth and positive societal impact.

To ensure the welfare of our employees, we provide a range of initiatives and benefits. This includes comprehensive healthcare coverage, wellness programs, and access to mental health resources.

We foster a culture of inclusivity and diversity, recognizing that a diverse workforce brings valuable perspectives and enhances innovation. Our commitment to fair labour practices extends to ensuring safe working conditions and promoting a healthy work-life balance for all employees.

Through ongoing dialogue and feedback mechanisms, we seek to understand our employees' needs and concerns, continuously striving to create an environment where everyone feels valued, respected, and supported.

Our employee wellbeing approach is anchored on the provision of a conducive and safe work environment characterised by open communication, team work, flexible working arrangements, employee medical scheme and psychosocial support.

In addition, we have a gym policy, a crèche, team Building sessions, and a football club that help staff with out-of-office activities.

Our dedication to employee welfare is not only a reflection of our values but also a critical component of our ESG strategy. By investing in our employees, we contribute to a sustainable future where individuals thrive, businesses succeed, and communities prosper.

The following are some of the steps we have taken towards Employee Welfare;



a. Equal Employment Opportunities: Our company firmly upholds the principle of selecting "the best person for the job," ensuring that no discrimination occurs against individuals or groups for any reason. Our decisions regarding recruitment, promotion, employee development, career advancement, salary policies, and general employment conditions aligns with this philosophy.



b. Employee Induction: Every new employee undergoes a tailored induction process designed to meet the requirements of their role, individual needs, and departmental context. This program, crafted by HR in collaboration with the line manager, aims to provide comprehensive support to employees as they begin their journey with the company.



the role of upskilling as a key contributor to performance. Our performance management process supports talent development with training opportunities tailored to meet specific individual and business needs. Training opportunities within the company encompass a variety of options, from trainee programs to internships, tertiary education, specific projects, short courses, and secondments. During the reporting period, a total of 481 employees were trained across the region, some of which are shown in the table below;



g. Employee Diversity and Inclusion

At NMG, we embrace the power of inclusivity and harness the strength of our differences to drive positive change in everything we do. NMG has a robust workforce of 1,245 employees. Out of this number, 870 are permanent staff, 375 are on contract. In our bustling corridors and vibrant meeting rooms, you will encounter a mixture of faces, backgrounds, and perspectives that collectively shape our dynamic culture. From seasoned professionals to fresh graduates, our team reflects a mosaic of experiences, talents, and identities. The female to male percentage ratio at Executive Management level stands at 44:56 while the overall staff ratio stands at 30:70.

Health and Safety

The well-being, both physical and mental, of our employees serves as the cornerstone of our performance. Safety has been ingrained as a fundamental philosophy, emphasizing our firm commitment to preventing occupational accidents.

We strive to cultivate a workforce and workplaces that prioritize health and safety, fostering a culture where individuals are proactive in safeguarding their well-being. Our focus lies in empowering individuals to approach their work with vitality and to enhance their ability to anticipate risks.

NMG has implemented comprehensive Health and Safety and security initiatives to manage the well-being of all employees, contractors, and visitors.

These initiatives include the formation of health and safety committees, the appointment of first aiders and fire marshals, training in first aid and fire prevention, and ensuring the availability of fire exits, among other measures.

Employees and premise visitors are strongly encouraged to adhere to all safety procedures and to promptly report any hazards, accidents, or potentially dangerous incidents to their supervisors.

In pursuit of continuous improvement, regular health and safety audits and risk assessments are conducted by our Internal Audit team to identify potential hazards, with corresponding measures implemented for mitigation. Staff members receive training in health and safety practices, and appropriate personal protective equipment is supplied when hazards cannot be entirely eliminated.

Fire protection equipment have been installed throughout various offices to detect and combat fire incidents, with the added assurance of fire insurance coverage for our establishments.

Additionally, Group Life Cover is provided for employees in the event of accidents resulting in temporary and/or permanent disability. We continuously assess potential hazards by monitoring noise emissions, air quality, and conducting annual health check-ups for our staff.

Unfortunately, the Group reported 4 Lost Time Injuries (LTIs) and 3 Near Misses incidents. As a result, there was a 1.11 Lost time Injury Frequency Rate (LTIFR) per million hours for a total of 3,603,280 hours worked at the Nation Centre, Production Plant, and NMG Contractors.

4. Societal Impact



a) Nation Media Foundation

n 2023, NMG operationalized the Nation Media Foundation (NMF) as a dedicated social-impact arm aimed at accelerating its efforts towards achieving the Sustainable Development Goals.

The Foundation stands as NMG's social impact initiative, designed to expand the Group's positive influence on society as it continues to grow its brand portfolio across the region.

With a focus on forming strategic alliances with like-minded organizations, NMF seeks to solidify NMG's initiatives into consistent, purposeful, and targeted actions that will have a broad impact and foster sustainable change. Serving as a bridge between business and development, the Foundation identifies and strengthens the links between socio-environmental progress and economic growth.

The Foundation's key areas of focus include:

- Education and Literacy
- Natural Resource Management

- Community Development through Entrepreneurship
- Media Development
- Health

A central pillar of the Foundation, Education and Literacy, aligns closely NMG's mission to enrich society by providing media that informs, educates, and entertains, ultimately creating value for stakeholders.

NMF aims to enhance literacy among 5 million young Kenyans over the next five years through improved access to books and reading materials in 141 libraries nationwide. The construction of the first library is set to begin with plans to incorporate renewable energy and a water recycling system for sustainability.

In addition to a physical facility, the Foundation will host engaging programs such as reading symposiums, literacy workshops, book festivals, and other enriching activities for children and students. Members of staff are encouraged to participate and contribute their time, skills, and ideas to support this meaningful cause.

b) Environmental Conservation

As stewards of this planet, we have a duty to protect and preserve its precious resources for future generations. Every action we take, whether big or small, has an impact on the environment and it is for this reason that we carry out activities that are geared towards conservation of the environment.

In 2023, NMG conducted tree growing activities in 5 schools; Eco-Green School in Kilifi County, The Ivugwi School, Uasin Gishu County, Nyachururu P.A.G Primary & Junior Secondary School, Nyamira County and Likii Special School, Laikipia County. In addition, the Group planted trees in 5 Golf clubs;

Nanyuki Sports Club, Kericho Golf Club, Malindi Golf & Country Club, Eldoret Club and Royal Nairobi Golf Club.

During the National Tree Growing Day, NMG partnered with the Green Blue Foundation Africa and the Family Group Foundation and planted 1,500 trees at the Ngong Forest. NMG has planted 40,500 trees in various parts of the country since 2019. Ultimately, as a business, we recognize that environmental conservation is about balance - finding ways to meet our needs without compromising the ability of future generations to meet theirs.



c) Textbook Donations

In our pursuit to bridge the gap in access to educational resources while empowering individuals and communities to thrive, NMG donated 1,500 textbooks to Likii Special School, Nyachururu Primary School, ECD Mbogolo and Echo-Green School and Ivugwi Primary School. We strongly believe that

every donated textbook is a step towards a more equitable and enriched learning environment, fostering a love for learning that can last a lifetime. A total of 1,550 pupils benefited from this program during the reporting period.

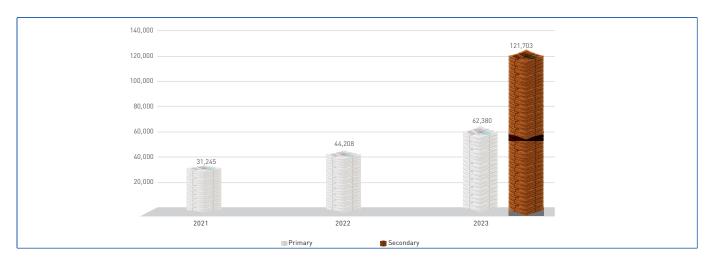




d) Newspapers in Education (NiE)

Newspapers in Education (NiE) serves as a 'Young Reader Development' initiative aimed at enhancing literacy and fostering a culture of reading among school children. The initiative also involves teacher training conducted through workshops. This aspect equips educators with the knowledge to integrate the NiE initiative into their classrooms. In 2023, NMG through the

NiE programme impacted 184,083 students both in primary and secondary schools signaling an upward trajectory from previous years. As a result of this initiative, the schools we engage with continue to record improved scores especially in the English and Kiswahili languages.



Partnerships for Impact

In the realm of social impact, partnerships hold immense power. They enable us to pool expertise, leverage resources, and reach broader audiences. In 2023, NMG partnered with the following institutions to advance its social impact initiatives;

In 2023, The Nation Media Foundation entered into a partnership with InABLE, a Non-Governmental Organisation that empowers Persons with Disabilities (PWDs) in the African Continent. The Partnership will see the two organisations work towards championing for a community where individuals with disabilities have the same access to educational, technological, and employment opportunities as the non-disabled.

The Foundation is also in partnership with Impact Philanthropy, an organisation that leads corporates in pulling their collective

influence as leverage to do social impact work in education, climate change and health. We offer our media platforms to create awareness on the work they do and as a result, we hope to get as many corporates as possible joining in the social impact work.

In Uganda, Monitor Publications Limited (MPL), partnered with Stanbic Bank to donate 500 Mama Kits to expectant mothers in Serere districts. The kits give women a great head start to motherhood as they get basic requirements.

MPL also partnered with AFRIpads to distribute 1,050 sanitary towels to women in Namuwongo area, Uganda. This is part of our support towards menstrual health.

5. Governance Excellence

Sound governance is the bedrock of our operations. We uphold the highest standards of ethics, transparency, and accountability in everything we do. The fundamental principles guiding employee conduct are embedded within the Group's Code of Conduct and Business Ethics, the Whistleblowing Policy, Procurement Policies, and several others. These policies are integral components of the onboarding process for all employees.

a) Regulatory Compliance

Nation Media Group has been publicly-listed on the Nairobi Stock Exchange since the early 1970s and cross listed in Tanzania, Uganda and Rwanda in the 2010s.

Regulatory compliance is therefore the cornerstone of our business practices. NMG adheres to media laws and guidelines set forth by governing bodies in Kenya, Uganda, Tanzania and Rwanda. In addition, we are a Blue Member Company and a member of the UN Global Compact (UNGC).

Risk Management

NMG embraces the reality that risk management is an ongoing and dynamic process. In line with this, we support a culture of continuous learning and adaptation by regularly reassessing risks and updating the risk mitigating strategies based on lessons learned from past experiences and changes in the business environment. This helps the business stay resilient in the face of uncertainties. Additionally, all relevant key stakeholders in the risk management process are regularly

involved in supporting a shared understanding and commitment to managing risks effectively.

The ERM framework guides the Group in the risk management process which involves identifying, assessing, treating, monitoring and reporting of risks faced by the business. The Framework stipulates the adopted risk management structures, processes, policies and stakeholders involved in the risk management.

A three lines of defense model has been adopted to ensure effective risk management. Each line of defence has specific roles and responsibilities in risk management defined and communicated in the ERM framework. The three lines work closely together to identify, assess, and mitigate risks.

The ERM Framework is regularly reviewed to ensure it reflects consideration of any emerging risks emanating from the evolving business environment, stakeholders' expectations and leading practice approaches.

Below are the specific risks within our defined risk categories where the business is dedicating its resources and efforts to manage. These risks include a mix of already established and emerging risks that could have significant impact in achieving the business strategy and delivering value to customers. The risks are identified, assessed, mitigated, reported and monitored on a continuous basis. They include:

Risk	Description	Mitigation Actions
Strategic Risk	It pertains to the uncertainty and hurdles linked with the strategic direction of the business, its competitive positioning, market dynamics, and potential disruptions within the industry. This risk has potential to impact profitability and brand reputation.	 The Group is keen on embracing innovation, staying ahead of market trends, investing in research and development as well as remaining agile and adaptable in response to changing market dynamics. NMG also strives to produce high-quality, original content that meets target audience needs to foster audience trust and loyalty. We also regularly monitor and evaluate the competitive landscape, consumer behaviour, and industry trends to identify and respond to strategic risks in a timely manner.
Macroeconomic and Geopolitical Risks	These are risks caused by uncertainties and volatilities from macroeconomic and geopolitical factors.	• To minimize this risk, NMG diversifies its revenue sources through digital growth, events, partnerships and expansion to other geographical markets.
Regulatory Compliance Risk	It relates to potential negative impact of changes in laws, regulations, or government policies on the Group's operations, finances, or reputation.	• The Group keeps abreast of regulatory changes and ensuring compliance with industry standards and guidelines to ensure that all its functions and staff adhere to applicable laws, regulations, code of conduct and standards of good practice.
Data Protection Risks	Potential risks under this category may include data breaches, copyright infringements, data privacy violations, data retention risks, third-party data sharing risks among others.	 NMG has set up the office of the Data Protection Officer who is responsible for ensuring compliance to data protection laws. We are fully registered with the Office of Data Protection Commissioner of Kenya. In addition, NMG has developed a privacy policy that guides all our digital assets.

Cyber Security Risks	These are cybersecurity threats such as, phishing attacks, intellectual property theft, and data breaches, that in turn have the potential of disrupting our business operations.	 NMG has invested extensive resources (human and technological) to support multi-layered cyber security controls, such as firewalls, intrusion detection systems, and endpoint protection solutions. The Group also conducts regular vulnerability assessments and penetration testing to help establish any gaps and improve on any security weaknesses.
Litigation Risks	NMG is exposed to litigation risk such as: defamation and libel lawsuits; copyright infringement claims; privacy violations, intellectual property disputes and contractual relationship, because of our role as a media company.	 The Editorial policies and procedures in place serve to ensure that robust gatekeeping measures are in place within content creation, distribution, data privacy, intellectual property management, and contractual relationships.
Business Continuity Risks	Various risk events such as technological failures, natural disasters and physical damage, cybersecurity threats, supply chain disruptions, and political unrests that have the potential to disrupt our operations and impair the Group's ability to produce, distribute, or monetize content.	 We have robust Business Continuity Plans in place. These plans are regularly tested to evaluate effectiveness and identify areas for improvement. Various risk assessments and impact analyses are deployed to establish critical assets, processes, and dependencies.
Human Capital Risk	With the ongoing shift from traditional to digital media, some traditional skills have become obsolete, requiring continuous upskilling and reskilling of employees in new digital skills to remain relevant.	 NMG is investing in talent development and training programs to equip employees with the skills and capabilities needed to adapt to changing industry trends and technological advancements. Additionally, NMG is implementing effective change management processes to support staff through transitions, overcoming resistance to change and building resilience and adaptability.
Disruptive Technology	They include new technologies such as Artificial Intelligence that is currently reshaping how media is produced, distributed, and consumed.	 The Group continues to evaluate, adapt and embrace new useful innovations and technology applicable in our operations to stay competitive and cater to the evolving demands of our target audiences.

Data Protection

NMG is committed to ensuring the highest standards of data protection and privacy for its customers, employees, and partners. In line with this commitment, we adhere to the General Data Protection Regulation (GDPR) best practices and framework, as well as the Kenya Data Protection Act (2019) Guidelines and best practices. In 2023, comprehensive Data Protection Impact Assessments and Data Protection Audits were undertaken to identify and address potential vulnerabilities in data handling processes.

To empower employees and vendors with the knowledge they need, the Group conducts regular training sessions across all departments. In 2023 alone, NMG trained over 80 staff members on topics such as data subject rights, principles of data protection, lawful basis of processing and cybersecurity threats.

As part of our efforts to increase awareness and promote data subject rights, we have placed informational posters in strategic locations at our offices. These posters serve as a reminder of our commitment to data privacy and the rights of individuals.

NMG communicates openly with all stakeholders, regulatory authorities, and the public, to maintain trust and demonstrate our commitment to protecting privacy.

Our Journey Ahead

This report shows NMG's impact and provides transparency on our contribution to sustainable development.

Our ability to mitigate risks ahead of time, reduce water consumption, contribute to the climate change conversation and ultimately use our influence as a media company to create awareness on sustainability issues, demonstrates our commitment to a greener planet.

While we are proud of our achievements, we recognize that the journey towards sustainability is ongoing. We remain committed to continuous improvement, innovation, and collaboration with our stakeholders. Through shared values and collective action, we are confident in our ability to create a sustainable and prosperous future for all.