EPHESUS INVESTMENTS AND ASSETS LTD

Beneficial Ownership, PEP Declarations and Audit Rights

Statement of Availability — what we provide to counterparties for integrity due diligence

Version	1.0	**Date**	9 October 2026	**Next review**	October 2027
Owner	Compliance Officer (Dr Adiele Onyeze, Chairman & CEO, acting as Compliance Officer until a separate appointment is made)				
Approval	Approved by the Board of Directors			**Status**	Subject to review by Kenyan counsel

1. Purpose

Development finance institutions, sovereign funds, ministries and institutional investors need to know who owns and controls the firms they work with, whether those firms are connected to politically exposed persons, and whether they can verify what they are told. This statement records what we make available and how to obtain it.

2. What we make available on request

Subject to section 3, we provide the following to any counterparty or prospective counterparty, or to its integrity, compliance or legal team.

- **Beneficial ownership.** An extract from our beneficial ownership register, kept in accordance with the Companies (Beneficial Ownership Information) Regulations 2020 of Kenya, showing every natural person who directly or indirectly owns or controls 10% or more of Ephesus Investments and Assets Ltd, with the nature and extent of each interest, and a current ownership chart.
- **PEP declarations.** A signed declaration from each director and each shareholder stating whether they are, or have been within the past twelve months, a politically exposed person, or a family member or close associate of one, and if so the public function concerned.
- **Corporate documents.** A certified copy of our certificate of incorporation in Kenya ([Kenya company registration no.]); a current CR12 from the Business Registration Service showing our directors and shareholders; and the equivalent registry documents for our Zimbabwe entity ([Zimbabwe registration no.]).
- **Audit rights.** For any engagement, a contractual right for the counterparty, or an independent auditor it appoints, to inspect and audit our books, records and correspondence relating to that engagement: fee invoices, payments made and received, third-party contracts, due-diligence files and the relevant entries in our Gifts and Hospitality Register and Conflicts Register. The right is exercisable on reasonable notice, during business hours, for seven years after the engagement ends.
- **Policies.** Our Code of Conduct and our Anti-Bribery and Corruption, AML/KYC/Sanctions, Conflicts of Interest, ESG and Whistleblowing policies, all published on our website.

3. Conditions

The beneficial ownership extract, the PEP declarations and the corporate documents contain personal data. We provide them under a non-disclosure agreement, or under the confidentiality terms of an existing engagement, in accordance with the Data Protection Act 2019 of Kenya. Audit rights are set out in the engagement letter or consortium agreement. We do not charge for any of these items. We respond to requests within ten working days.

Contact · Compliance Officer, Ephesus Investments and Assets Ltd
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