STATUS REPORT OF SIKIKA 2 ACTIVITIES

FOR THE PERIOD BETWEEN 1ST JANUARY 2025
TO 31ST DECEMBER 2025

complaints@sikikatwo.co.ke

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SIKIKA 2
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1ST JANUARY 2025 TO 31ST DECEMBER 2025

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ACRONYMS

ABHRF	-	Africa Business and Human Rights Forum
CEPCJ	-	Centre for Education Policy & Climate Justice
CSR	-	Corporate Social Responsibility
FFT	-	Fact Finding Team
IEC	-	Information, Education, and Communication
IHRAC	-	Independent Human Rights Advisory Committee
IHRM	-	Independent Human Rights Mechanism
IM	-	Independent Monitor
LAO	-	Legal Administrative Office
LSK	-	Law Society of Kenya
OGM	-	Operational- level Grievance Mechanism
PLC (In relation to Kakuzi)	-	Public Limited Company
SGBV	-	Sexual and Gender Based Violence
UNGP	-	United Nations Guiding Principles
WIBA	-	Work Injury Benefits Act

DEFINITION OF TERMS

Ad-hoc cases	These are cases which were first registered at SIKIKA Tier 1 at Kakuzi Plc and transferred to SIKIKA 2 at SIKIKA Tier 2's inception for processing.
Deferred Decisions	These are cases where the Head of SIKIKA 2 has already written the decision, but the complainant has not availed themselves to SIKIKA 2 to receive the decision despite being summoned. Under SIKIKA 2 procedures, a decision is never read in the absence of the complainant and the file is not closed until the complainant avails himself/herself for the reading out of the decision.
FFT Stage	Files at this stage are either undergoing the verification of documents/medical records, pending independent medical assessment, pending further statements, or site visits by fact finders.
Finalized cases	Files in which the complainant has been compensated and the file has been closed; or the decision of the Head-IHRM has been read out to the complainant and the complainant decided not to appeal; or where the decision of the Appeal judge has been read out.
Grievance Register	This is a register in which every grievance is entered into. The register captures the file number, name, contacts, age and gender of the complainant and other details such as brief description of the grievance,the year of incident, and the various dates on which the file got to any of the SIKIKA 2 stages. This is different from the other register used to record just the names and phone numbers of complainants.
LAO Stage	Files at this stage are either pending witnesses, or documents, or under review by the Legal Administrative Officer before they are forwarded to Triage, or files referred back by the Head- SIKIKA 2 to LAO with instructions.
Pending Appeal	Files sent to the Appeals Panel and are pending determination.
Pending Decision	Files that have gone through all the stages and are being reviewed by the Head of SIKIKA 2 for final determination and recommendations.
Pending further action by complainants (suspended):	Files that are still open and undergoing SIKIKA 2 processes. These files are waiting for more information/witnesses/documents from the complainant and the complainant no longer avails himself/herself to provide the Information/documents and/or witnesses as required either at the LAO or FFT.
'Period under Review' or 'Reporting Period'	The period of SIKIKA 2 operations which this report analyzes i.e. 1st January 2025 to 31st December 2025.
Registered and Processed Complainants	These are registered complainants who have recorded grievances and opened files. This entails recording of the Grievance Registration Form and other Forms such as Informed Consent; and also recording statements and providing witnesses and supporting documents. These complaints are entered into the Grievance Register.
Registered and Inactive Complainants	Persons who have been entered into SIKIKA 2's register. This entails recording of names and phone numbers. At this point, no file has been opened and no complainant has a file number as the complainants have not returned back despite numerous follow-ups.
Referral Cases	These are the 174 Ad-Hoc cases which were referred to SIKIKA Tier 2 from SIKIKA Tier 1 at SIKIKA Tier 2's inception, or files subsequently referred to SIKIKA Tier 2 from SIKIKA Tier 1.

FOREWORD

The year 2025 has been pivotal for companies operating in Africa. Regional and national institutions, alongside businesses and civil society, intensified efforts to strengthen responsible business conduct through policy reforms, multi-stakeholder forums, and corporate initiatives. One of the most prominent markers of this movement was the Africa Business and Human Rights Forum (ABHRF) – a recurring multi-stakeholder platform bringing together governments, companies, civil society, UN agencies, national human rights institutions and indigenous groups. The Fourth Forum of the ABHRF (2025) took place in Lusaka, Zambia in October 2025, focusing on how companies in Africa can improve their processes to prevent human rights violations of their employees as well as local communities of the areas they operate in. The forum also focused on the need for companies to identify human rights violations they cause, and to provide remedies for such violations. The forum was attended by participants from across the continent with Kenya being represented by a diverse delegation that included government officials, as well as representatives of civil society and the private sector. The Forum happened while Kenya's National Action Plan on Business and Human Rights was undergoing its scheduled review. These events reinforced the need for companies to move beyond policy commitments and demonstrate practical implementation, meaningful stakeholder engagement, and access to remedy.

Discussions and shared experiences at the ABHRF highlighted the importance of effective grievance mechanisms, continuous dialogue with affected communities, and independent oversight as core elements of responsible business operations. These lessons directly inform Kakuzi PLC's approach, where SIKIKA serves as a grievance mechanism seeking to identify potential risks of human rights violations early, addressing grievances, recommending remedy and strengthening trust with surrounding communities.

As at 31st December 2025, SIKIKA 2 has registered a total of **1,959** Complainants. Out of these, **1,509** complainants have been processed. These numbers reflect a high level of awareness among stakeholders, of the OGM and our commitment to ensuring that concerns are handled in a timely, fair, and transparent manner. SIKIKA is subject to oversight by independent bodies. The first body is the Independent Human Rights Advisory Committee (IHRAC). IHRAC reviews the operations of SIKIKA to ensure it continues to operate in line with the United Nations Guiding Principles. The Committee then provides independent technical advisory to Kakuzi's Board of Directors. SIKIKA is also subject to oversight by an international expert called the Independent Monitor (IM). The IM independently oversees and assesses the OGM and reports on how well it is functioning, whether its operations are thorough and rights-compatible, and how effectively grievances and remedies are being handled in line with the UN Guiding Principles on Business and Human Rights. The reports of the Independent Monitor are made public and SIKIKA provides an overview of the IM's findings in its reports.

1,959

Total Registered Complainants

1,509

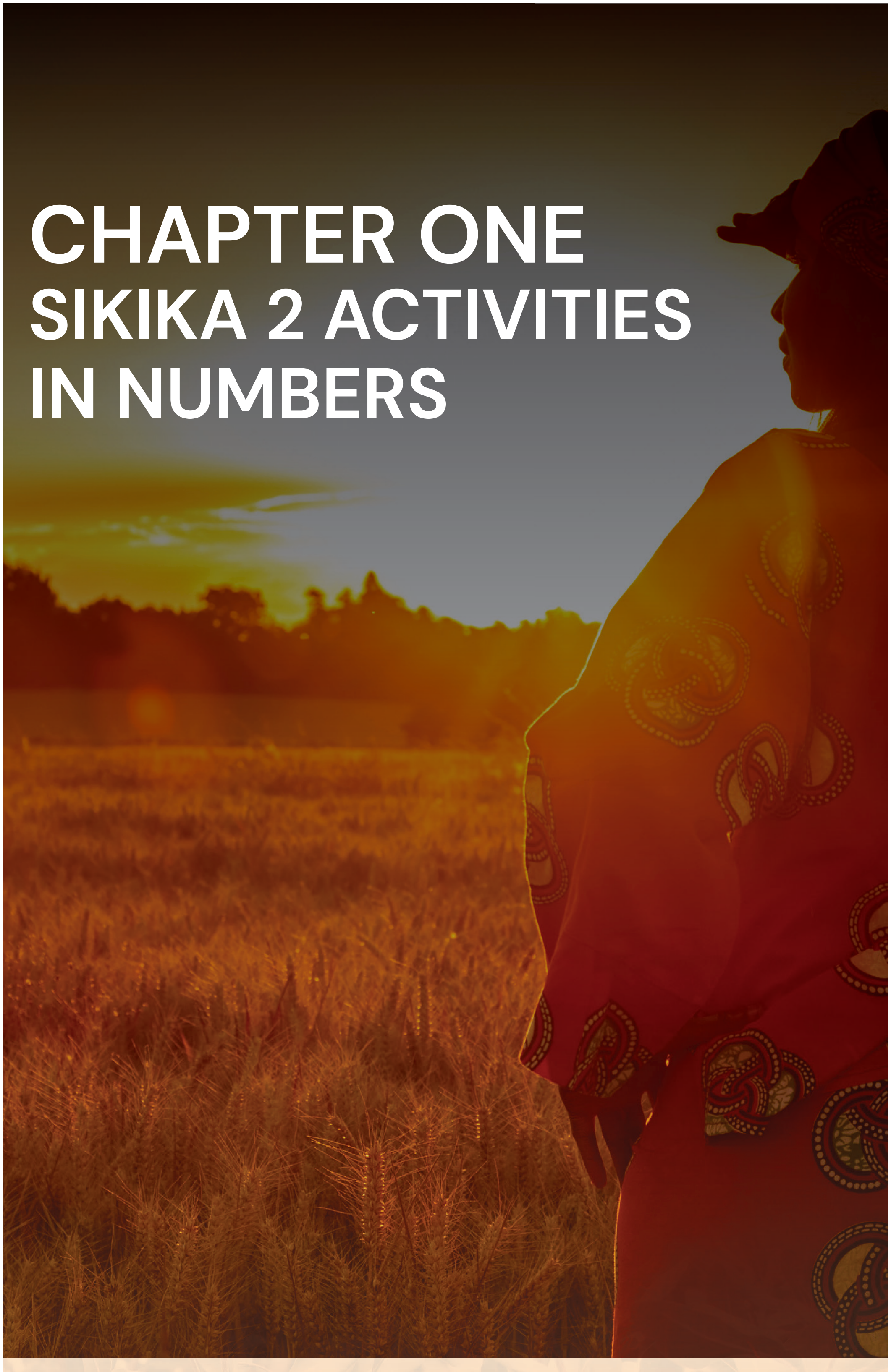
Complainants Processed

In 2025, the Independent Monitor conducted the third annual review of SIKIKA, and his findings and recommendations — presented in this report — provide important guidance for strengthening accessibility, consistency, and effectiveness of the mechanism. The Independent Monitor's review found that SIKIKA 2 is broadly aligned with the UN Guiding Principles on Business and Human Rights effectiveness criteria. The IM found that SIKIKA 2 demonstrates strong performance across the criteria of legitimacy, accessibility, transparency, rights-compatibility, continuous learning, and stakeholder engagement. Trust in the mechanism remains high, reflected in over 3,000 Complainants registered across both tiers, thorough investigations, attention to physical safety concerns of Complainants, robust stakeholder engagement activities and tailored remedies, including financial and non-financial remedies. The review also identified areas for improvement, recommending stronger engagement by SIKIKA of employee unions in fact-finding, improvement of the Mechanism and updating of the compensation matrix/ framework. Our commitment to human rights is grounded in respect for human dignity, responsiveness to community needs, and continuous improvement. SIKIKA is not only a mechanism for resolving complaints, but a source of learning that informs Kakuzi PLC's policy decisions.

This Annual Report outlines the progress made during the year and the steps we are taking to further embed human rights into Kakuzi PLC's governance and operations. While challenges remain, we remain committed to transparency, accountability, and constructive engagement with stakeholders. We believe that responsible business conduct is essential to long-term resilience and shared value creation. We thank all our stakeholders, particularly Kakuzi PLC employees, community members, providers of support services and all other partners for their continued trust and engagement.

(Rtd) Lady Justice Violet Mavisi

Head - SIKIKA 2 Independent Human Rights Mechanism

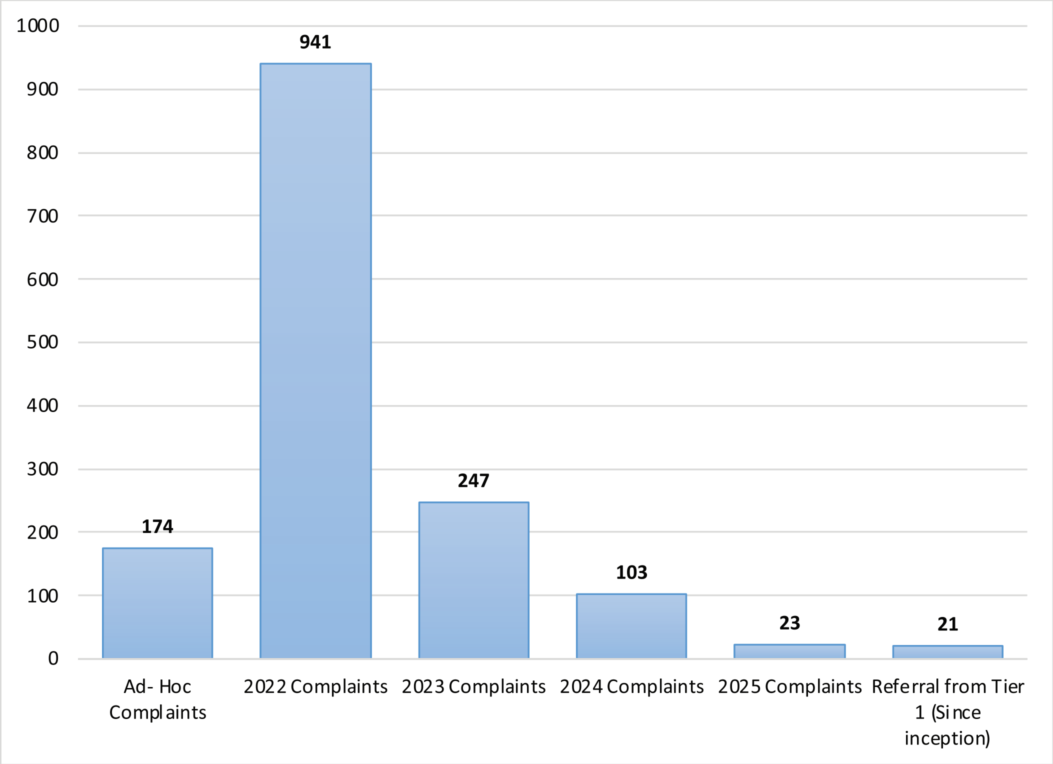


CHAPTER ONE
SIKIKA 2 ACTIVITIES IN NUMBERS

1.0. BACKGROUND

Since inception, SIKIKA 2 has registered **1,959** Complainants. Registration means the entering of a complainant's details (name and phone contacts) into a register following which appointments are granted for grievance recording and processing. Out of the 1,959 Complainants, **1,509** have been processed. Below is a breakdown of the complaints:

Illustration 1: Breakdown of all Cases Registered Since Inception According to Year of Registration



- *Ad-Hoc Complaints* refer to complaints that were initially registered at Kakuzi PLC and were transferred to SIKIKA 2 in 2022. They were transferred to SIKIKA 2 because they involved claims of serious human rights violations.

- The complaints categorized as *Referral from Tier 1* are complaints that were registered at SIKIKA 1, but were referred to SIKIKA 2 because the grievance involves a serious human rights violation. Once referred, the complaint is registered afresh at SIKIKA 2 and is processed in line with SIKIKA 2 procedures.

- All other Complaints are categorized according to year of registration.

The following illustration shows the various stages at which the complaints are in, within the SIKIKA 2 process

Illustration 2. Breakdown of Registered Complaints According to Stage in SIKIKA 2 Process at the end of the Reporting Period i.e. 31st December 2025

<table>
<tr><td rowspan="15">SIKIKA 2 Complainants Registered (ALL CASES)

1,959</td><td rowspan="7">Referral

(Ad- Hoc) Complainants Registered

(174)</td><td rowspan="7">Processed

(Complainants) Cases

174</td><td>Processing Ongoing</td><td>2[1]</td></tr>
<tr><td>Referral to SIKIKA 1</td><td>0</td></tr>
<tr><td>Pending further action by Complainant (Suspended)</td><td>21</td></tr>
<tr><td>Dismissed</td><td>120</td></tr>
<tr><td>Deferred Decisions</td><td>23</td></tr>
<tr><td>Appeal Stage</td><td>0</td></tr>
<tr><td>Compensated</td><td>9</td></tr>
<tr><td rowspan="8">General Cases Complainants Registered

1,785</td><td rowspan="7">Registered and Processed Complainants New Cases

1,335[2]</td><td>Processing ongoing</td><td>166</td></tr>
<tr><td>Referral to SIKIKA 1</td><td>28[3]</td></tr>
<tr><td>Pending further action by complainants (Suspended)</td><td>54</td></tr>
<tr><td>Dismissed</td><td>937[4]</td></tr>
<tr><td>Deferred Decisions</td><td>141</td></tr>
<tr><td>Appeal Stage</td><td>1</td></tr>
<tr><td>Compensated</td><td>8</td></tr>
<tr><td colspan="2">Registered Inactive Complainants</td><td>450[5]</td></tr>
</table>

***In total, 17 Complainants have been compensated.**

1 The complainants in these two files have been assigned pro-bono lawyers.
2 These files include 941 cases registered in 2022, 247 cases registered in 2023,103 cases registered in 2024, 23 cases registered in 2025 and 21 files referred from Tier 1 from inception till 2024.
3 This figure reduced from 30 to 28 because 2 files were recalled back from Tier 1.
4 Out of these, 35 were dismissed at Appeal Stage.
5 As SIKIKA 2 increased efforts to process the complaints of complainants living in far flung areas, more complainants were registered. The number of persons unavailable has expectedly increased. Strategies to reduce this number has been rolled out including grouping of complainants who live close to each other for easier coordination of processing.

1.1. GENERAL OVERVIEW OF SIKIKA 2 ACTIVITIES IN 2025

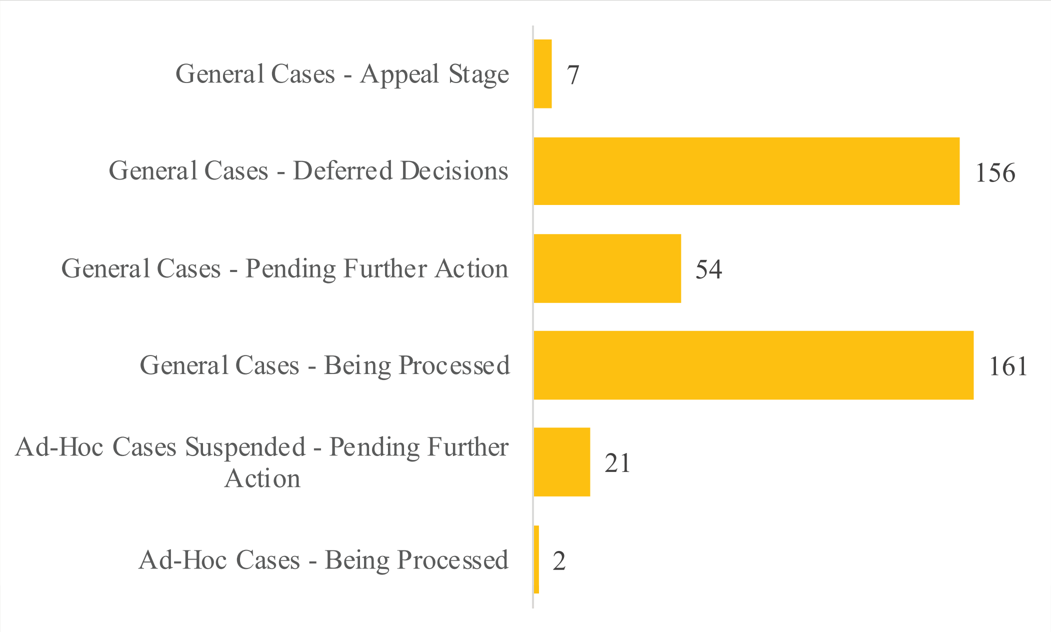
SIKIKA 2 as an OGM was created as an Ad-Hoc mechanism where members of the OGM offer their services on a need's basis.

Since its inception, SIKIKA 2 OGM has been tasked with implementing the UNGP Effectiveness Criteria for OGMs. One of the criteria is accessibility. The OGM through LAO has over the years designed strategies intended to maximize the accessibility of the OGM by community members and Kakuzi PLC employees. These strategies have been successful and have resulted in the registration of 1,959 Complainants.

In the year 2025, SIKIKA 2 handled **424** files which were at various stages. This includes **401** cases carried over from the other years and 23 new cases registered by the LAO in the course of the year. During the Reporting Period, the LAO focused more on ensuring the expeditious processing of complaints. The following illustration shows a breakdown of the 401 cases carried over from the previous years. The 23 cases registered in 2025 are analyzed under the next section which covers the activities of the LAO.

The cases handled over the period are as shown below:

Illustration 3. Breakdown of the 401 Cases Carried Over from Previous Years According to Stage in SIKIKA Process



*It should be noted that files keep moving to and from LAO, FFT and as a result a single file would have been handled by a combination of all the teams within a reporting period.
During the Reporting Period, SIKIKA 2 carried out sensitization across all of Kakuzi PLC's departments and factory plants. The sensitization was conducted during working hours which maximized the number of employees who accessed this sensitization. SIKIKA also shared IEC materials.

The sensitization meetings were attended by the Kakuzi PLC Managers – Legal, Gender and Human Rights, Head of SIKIKA 2 OGM, , SIKIKA 2 Head- FFT, FFT and LAO officers; and SIKIKA 1 Grievance Officer.

The OGM addressed **1,316** employees and security watch-keepers.

Illustration 4. Number of Kakuzi PLC's Employees and Security Watchkeepers sensitized about the OGM, Business and Human Rights

1,316

The employees and security watchkeepers were sensitized about the areas outlined in the illustration below:

Illustration 5. Breakdown of Areas of Sensitization by SIKIKA

Select	Area of Sensitization
√	What SIKIKA is and why it exists (Origin, mandate, and the difference between SIKIKA 1 and SIKIKA 2)
√	Issues falling outside the mandate of either or both Tiers
√	Composition of both Tiers of SIKIKA OGM
√	Access Points of the OGM – Available channels of reporting
√	Step-by- Step Processes of reporting a complaint or registering a grievance with either Tier of SIKIKA OGM
√	Anonymous reporting, when it is appropriate and how to access it
√	Independence of SIKIKA 2
√	Step -by- step handling of complaints
√	Retaliation, the zero- tolerance policy against it, examples of the vice, how to report it and the consequences of retaliating against complainants and witnesses
√	Confidentiality, its limits and how the OGM protects complainants and Witnesses
√	Handling of Sexual Harassment and Gender Based Violence Complaints- Including what constitutes SGBV, issues of consent and power imbalance, access points for reporting, availability of free counselling for complainants, witnesses and/or victims and SIKIKA's victim centered approach
√	Remedies available under the OGM be they financial or non-financial
√	The right of an employee to procure their own legal representation during the SIKIKA process and the availability of pro-bono legal services upon request
√	Kakuzi PLC's Human Rights and Work Place Policies such as the Human Rights Policy and the Anti-Sexual Harassment Policy

1.2. ACTIVITIES OF THE LEGAL ADMINISTRATIVE OFFICE DURING THE REPORTING PERIOD

During the Reporting Period, the Legal Administrative Office dealt with **84** active files. These included 50 grievances already in the domain of the LAO at the beginning of the year, 11 grievance files which were referred back by the Head-IHRM and 23 new grievance files.

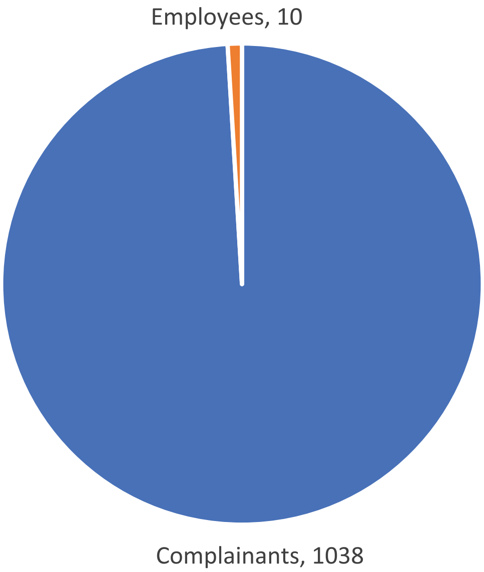
The LAO further dealt with **215** grievance files which had either been suspended at triage or had deferred decisions, reviewing them, assessing evidentiary requirements and/ or confirming availability of complainants for grievance processing. LAO attended to **1,110** visits by Complainants and **25** visits by Witnesses. Further, to enhance accessibility, the LAO made trips to far flung areas where clusters of complainants are located in order to reduce the burden of transport costs on complainants. The aforementioned 1,110 engagements with Complainants and 25 engagements with Witnesses have been at the SIKIKA 2 Office and off site.
Below is an illustration showing the purpose of the visits:

Illustration 6. Breakdown of Complainant and Witness Visits Attended to by the Legal Administrative Office During the Reporting Period

- A single complainant may have visited the SIKIKA 2 office or any of the outfield posts more than once, this is why the **1,110** engagements are counted as visits **and not** complaints;
- The purpose of the visits by complainants varies from:
    - Specific enquiries about the status of complaints, whether to avail additional witnesses and/or documents and the relevance of the evidence intended to be adduced;
    - General enquiries on whether certain issues affecting the complainants qualify to be grievances that can be raised through the OGM;
    - Requests or suggestions that complainants need SIKIKA 2 to raise with the company that could improve on the company's engagements with employees and/or community members;
    - Recording of statements and/or further statements;
    - Complainants providing evidence (supporting documents and/or witnesses);
    - Visits for the provision of support services such as counselling, assignment of pro-bono legal services, medical assessment, medical verification and financial literacy training;
    - Complainants attending the reading out of decisions;
    - Complainants prosecuting their Appeals or attending the reading out of the Appeal Decisions.
- 25 Witnesses visits have been for the purpose of recording statements.

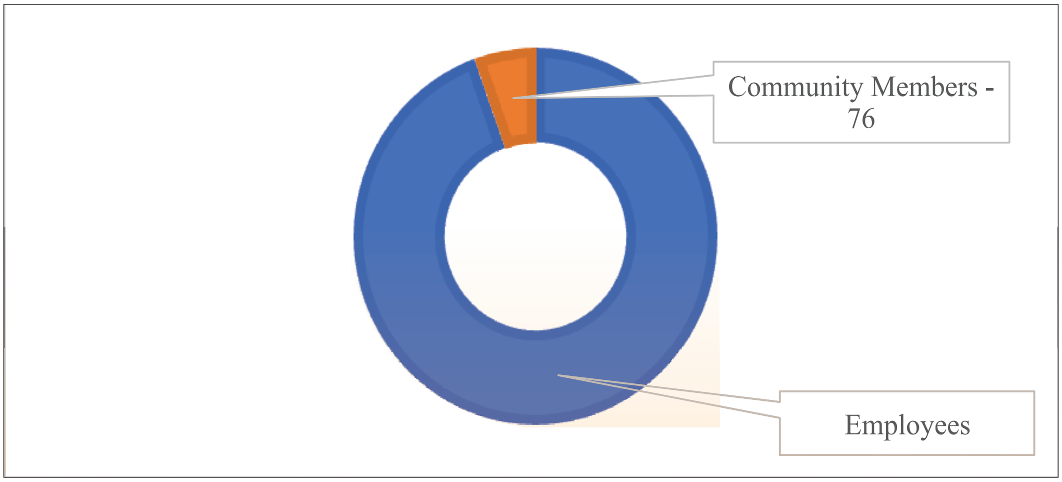
The following part shows a breakdown of persons attended to by LAO according to location:

Illustration 7. Breakdown of Persons Attended to by LAO at SIKIKA 2 Office



The LAO attended to 76 community members at off-site locations and 1,316 employees. Off-site activities were mainly geared towards sensitization of employees hence the huge number of employees compared to community members. The 76 Community Members were attended to by LAO on visits planned for the processing of grievances of complainants who had already registered with SIKIKA 2 but were hampered from processing their complaints because of the remoteness of the area and high transport costs.

Illustration 8. Breakdown of Persons Attended to by LAO at Off Site Locations



New Grievances Registered by the LAO

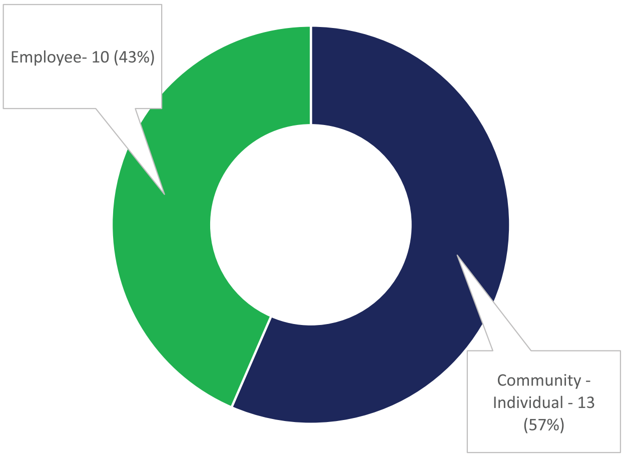
During the Reporting Period, the LAO registered 23 new grievances. 19 of the 23 new grievances were registered at the SIKIKA 2 Office while 4 new grievances were registered in off-site locations where the LAO had visited on separate occasions.

Illustration 9. Breakdown of Registered Complaints According to Registration

23/23

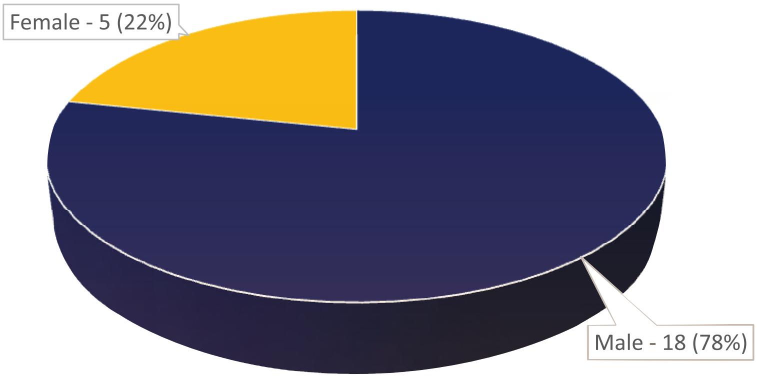
There was an increase in employees registering complaints. 10 out of the 23 complainants (accounting for 43% of the grievances) were employees, or former employees of Kakuzi Plc. Below is a breakdown:

Illustration 10. Breakdown of Registered Complainants According to Stakeholder Category



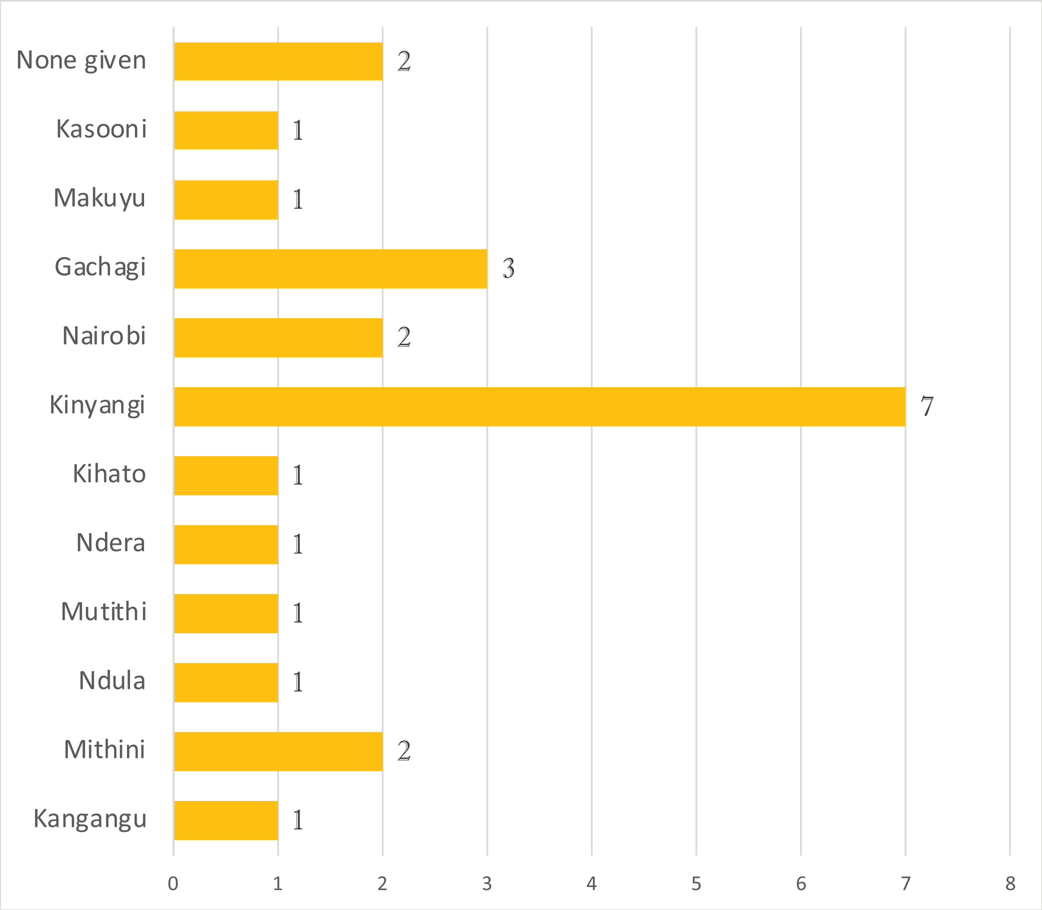
An analysis of the registered grievances shows that there were more men registering complaints than women. Below is a breakdown:

Illustration 11. Breakdown of Registered Complainants According to Gender



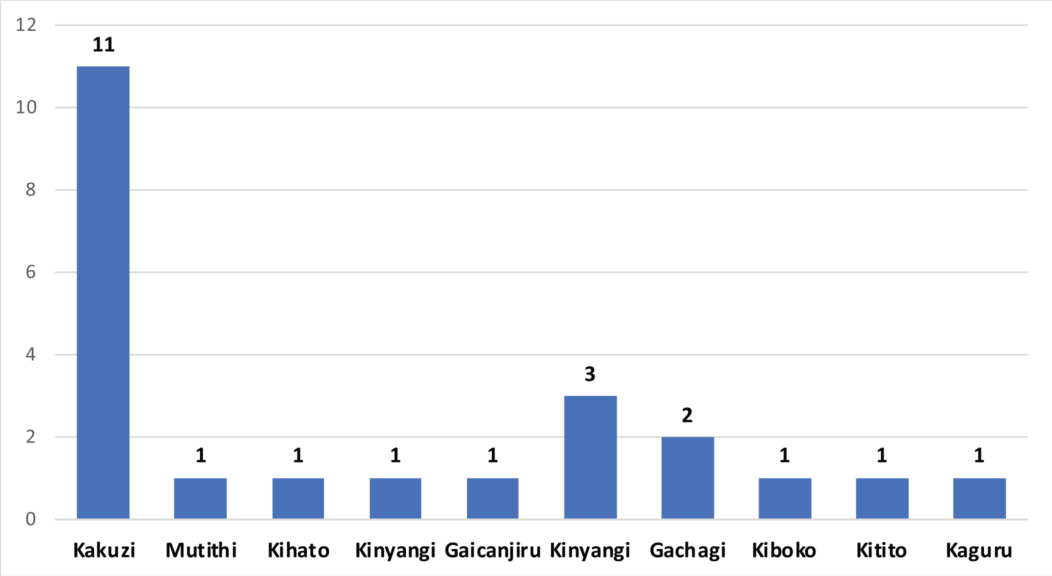
Below is a breakdown of the complaints according to Area of Residence

Illustration 12. Breakdown of Registered Complainants According to Area of Residence



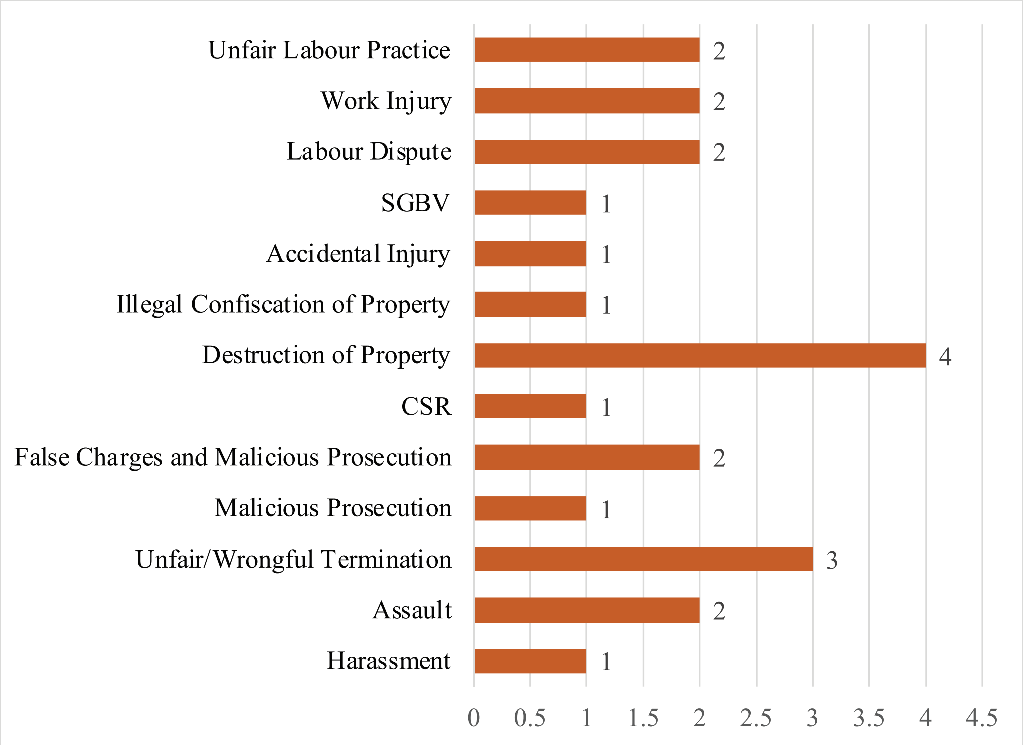
Most of the grievances reported occurred in Kakuzi. Below is a breakdown of grievances registered according to Incident Location

Illustration 13. Breakdown of Registered Complaints According to Incident Location



Below is a breakdown of grievances registered according to Grievance Theme

Illustration 14. Breakdown of Registered Complaints According to Grievance Theme

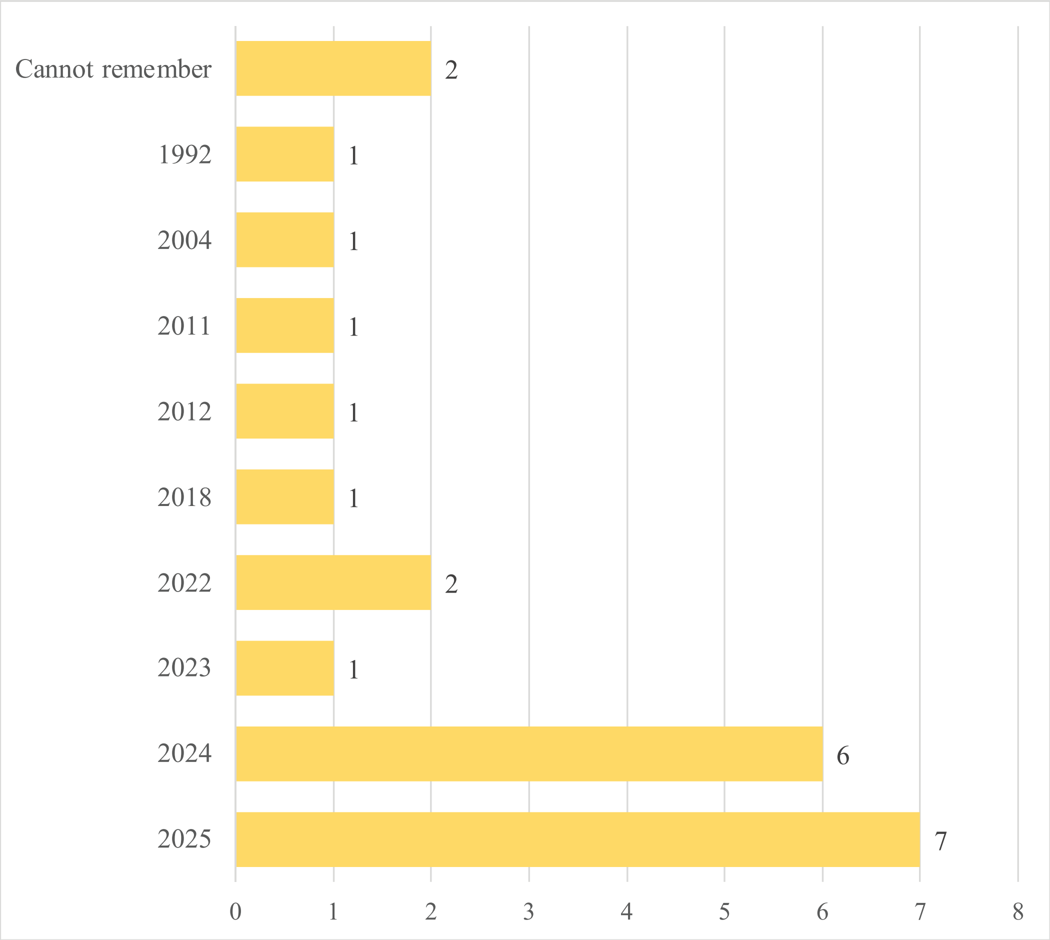


Below is a brief explanation of what each grievance theme means:

Grievance Theme	Description
Unfair Labour Practice	The complainants allege that Kakuzi PLC engaged in acts or omissions towards the employees that undermined their right to fair treatment in the workplace
Work Injury	Grievances where the complainants allege to have suffered injuries or illnesses arising out of, or in the course of their employment.
Labour Dispute	Situations where complainants alleged to disagree with Kakuzi PLC over actions they claimed required mediation, or the OGM recommending policy changes.
SGBV	This category addresses a range of crimes that can be considered as sexual offences, including non-consensual crimes such as rape, defilement, harassment, or violence that occurs in connection with any sexual act directed against another person, without the consent of that person.
Accidental Injury	Injuries suffered by members of the community as a consequence of the actions of Kakuzi employees or contractors e.g. where a person got injured while fleeing from a security watch-keeper.
Illegal Confiscation of property	Grievances where complainants allege that Kakuzi employees/ watchkeepers, or contractors took their property illegally.
Destruction of property	Grievances where complainants allege that security watchkeepers intentionally damaged their property without repair during evictions.
CSR	Appeals from individuals, groups, or institutions asking Kakuzi to provide voluntary community support, such as funding, materials, or services, as part of its corporate social investment activities.
False Charges and Malicious Prosecution	Grievances where complainants allege that Kakuzi PLC, or its workers and/or contractors made false reports to the police, or made such reports with reasonable grounds to have known that the allegations were not true. The complainants allege that as a result of such actions they were charged in court.
Malicious Prosecution	Allegations that Kakuzi PLC engaged in acts that contributed towards the complainant being charged in court.
Assault	Grievances in which complainants allege that Kakuzi Security Watch-keepers or contractors such as KK Security guards physically battered them, or beat them.
Unfair/ Wrongful Termination	Grievances that allege Kakuzi PLC dismissed an employee without a valid reason and/or without following the legally required procedure under the Employment Act, 2007.
Harassment	Grievances alleging that Kakuzi PLC Security Watchkeepers engaged in unlawful, unwarranted, or oppressive conduct against community members that violates their constitutional rights, dignity, safety, or property.

The following is an analysis of complaints registered according to Year of Incident

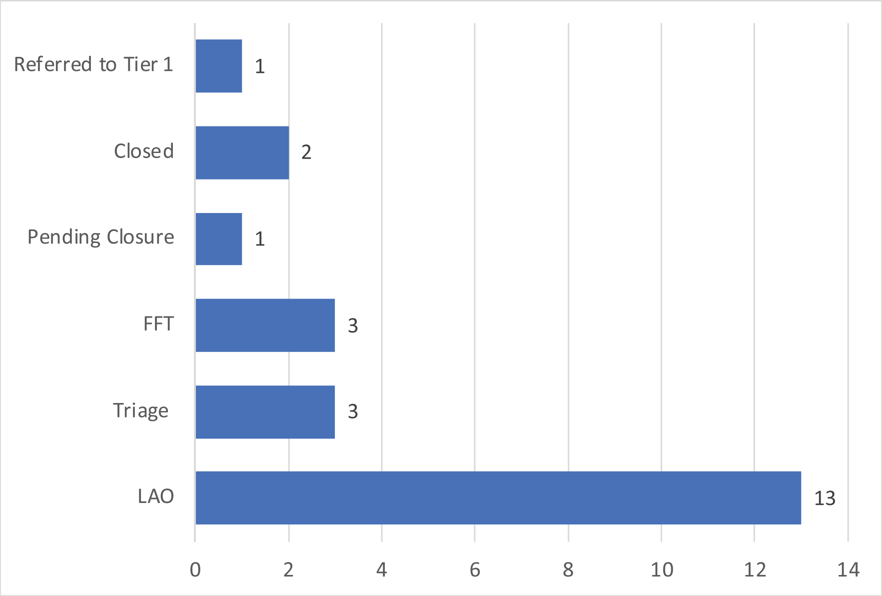
Illustration 15. Breakdown of Registered Complaints According to Year of Incident



Grievance Handling Process

At SIKIKA 2 the process that a complaint goes through is structured. The complaint is first registered at the LAO (Legal-Administrative Officer) stage, where the case is registered, statements recorded, and evidence received. Where SIKIKA 2 lacks jurisdiction the case may be referred to other avenues such as SIKIKA 1. The file is then forwarded to the Head -IHRM who may summarily dismiss the grievance where there is no evidence, or where there is evidence, refer the grievance to Fact Finding for investigations which may include further interviews and statement recording, verification of medical and other records, assessment of injuries and field visits. After fact finding the file is sent to Head-IHRM and the Head writes a decision which is read out to the complainant. If the Complainant is dissatisfied they may appeal to the Appeal Judge. The following is a breakdown of the complaints registered in 2025 according to the stage in SIKIKA 2's Process that they are in:

Illustration 16. Breakdown of Registered Complaints According to Stage in SIKIKA 2 Process



CHALLENGES, OPPORTUNITIES AND OBSERVATIONS OF THE LEGAL ADMINISTRATIVE OFFICE

1. **Some complainants are unable to avail witnesses and documents-** The LAO are at times unable to process complaints as witnesses are unavailable or the complainants are seeking more time to gather documents. In some cases, Complainants have been unable to produce crucial witnesses because the witnesses are senior government officials e.g. Chiefs.

2. **Unavailability and/or Death of Complainants -** Complainants are at times unable to avail themselves to process their grievances because of work and family commitments. The OGM never disqualifies cases on technicalities such as failure to meet timelines. While complainants are made aware of these timelines, where they are unavailable, the LAO put the files aside and schedules bring-ups, to set up future appointment dates. In some extreme and unfortunate situations, complainants have died without the OGM being made aware of the incidents. This has necessitated the OGM amending its forms to have next of kin recorded. Files of Complainants who become unavailable or untraceable in line with SIKIKA 2 procedures are suspended and not dismissed. They are placed aside until such a time when the complainant is traced and he/she avails themselves or is substituted by a next of kin.

3. **Fear of retaliation by employees and former employees of Kakuzi PLC -** Several employees and former employees fearing the risk of never being employed again have indicated their unwillingness to register complaints with the OGM due to fear of retaliation. The LAO has heightened efforts to entrench trust and disseminate information that the OGM process includes explicit safeguards for confidentiality and risk assessment so that employees and other stakeholders can submit grievances without fear of adverse consequences, including the option to register grievances anonymously or use intermediaries or trusted representatives where needed.
   Further, Kakuzi PL's human rights policy prohibits threats, intimidation, harassment, or retaliation against employees or rights-holders and undertakes investigations where such allegations are raised.

4. **The LAO deal with a considerable number of enquiries over phone and in physical visits where employees and former employees seek assistance on WIBA related issues -** The employees and former employees often seek explanations as to why the OGM does not take their cases yet they involve Kakuzi PLC. The LAO continues to spread awareness that the mandate of SIKIKA 2 does not extend to WIBA issues as WIBA claims are handled under the Work Injury Benefits Act process, which SIKIKA 2 cannot seek to replace.

5. **Dissatisfaction by Complainants with Support Services –**

- In some cases, Complainants have decried the transport stipend offered to reduce the burden of commuting to the OGM's offices. They stated that they used up more funds beyond the standard transport stipend awarded. Some complainants further stated that they live in very remote areas that it is difficult for them to avail multiple witnesses. In other cases, complainants face difficulties as they are persons with disabilities or ill. To deal with this challenge, the LAO have intensified the remote processing of complaints at off-site locations in far flung community areas. At these off-site locations, the LAO record statements, advise complainants on evidentiary requirements and receive and document evidence provided.

- Some complainants have expressed dissatisfaction with the OGM's standard process of referring them to a compulsory Financial Literacy Training. They feel that it amounts to policing of their compensation awards. The LAO has engaged complainants with active cases and those being compensated about the functions of the Financial Literacy Training. It helps to enable complainants to manage their compensation wisely through budgeting, saving, and informed investment decisions, reducing the risk of financial mismanagement or exploitation. The training promotes long-term financial stability and self-reliance, allowing victims to rebuild their lives sustainably. It also demonstrates corporate responsibility and ethical commitment by Kakuzi PLC, strengthening trust, transparency, and community relations while ensuring the compensation achieves its intended purpose of meaningful recovery and empowerment.

6. **Dissatisfaction by Complainants with remedies provided –** There have been instances where complainants expressed dissatisfaction with the remedies awarded by the IHRM. The IHRM financial remedies are based on judicial precedents and although this is shared with complainants, they have still felt dissatisfied as they sought higher awards. The LAO have sought to deal with this challenge by having conversations with Complainants since inception to equip them with the necessary legal knowledge on how compensation is awarded in order to help complainants manage expectations. The LAO also explains the process of Appeal to the complainants who wish to appeal against the decision made by the Head- IHRM.

1.3. ACTIVITIES OF THE FACT-FINDING TEAM DURING THE REPORTING PERIOD

During the Reporting Period, the Fact-Finding Team handled **161** cases. Out of these, **109** cases were community/group complaints and **52** general individual cases. These cases are part of the live cases at the IHRM and that;

a. They could have been attended to by FFT more than once; and
b. They could have within the same reporting period been handled by LAO or Head-IHRM.

This is because files at the IHRM keep moving to/from one stage to another.

In the first half of the year, the FFT priority was to process the community cases as they had community wide interest. The following activities were comprehensively carried out.

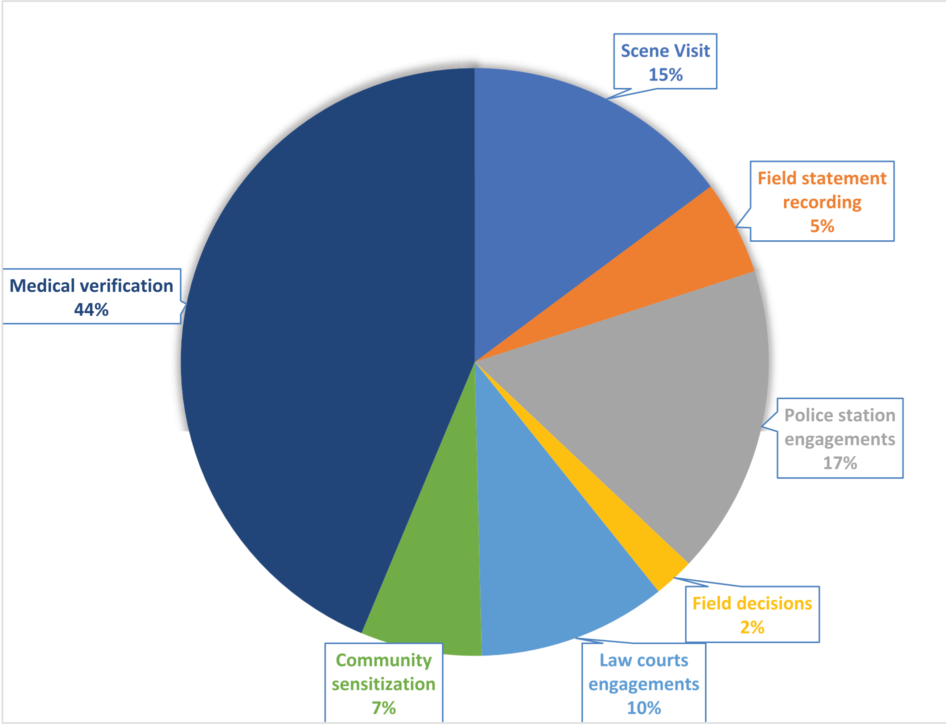
Illustration 17. Breakdown of FFT Activities for community cases

Activity	Progress	Number of Cases
Fact-Finding Tasking /case planning & preparation	✓ (done)	109
Fact-Finding General Focus (*documents/ material review, investigative interviews, engagements with complainants, statement recording, verification processes with Kakuzi & other offices*)	✓ (done)	109
Evidence Analysis	✓ (done)	109
Site visits	✓ (done)	

FFT Field Activities

During the reporting period, the FFT office undertook various fact-finding activities in the field to ensure a comprehensive information gathering and analysis. The total number of field activities within this period were **137**. The activities spread from scene visits, field statements recording, medical verifications, police engagements, law courts registry engagements and supporting community sensitization. The activities are illustrated below.

Illustration 18. Breakdown of FFT Field Engagements



Field Engagements	Count
Scene Visit	20
Field statement recording	7
Police station engagements	23
Field decisions	3
Law courts engagements	14
Community sensitization	9
Medical verification	59

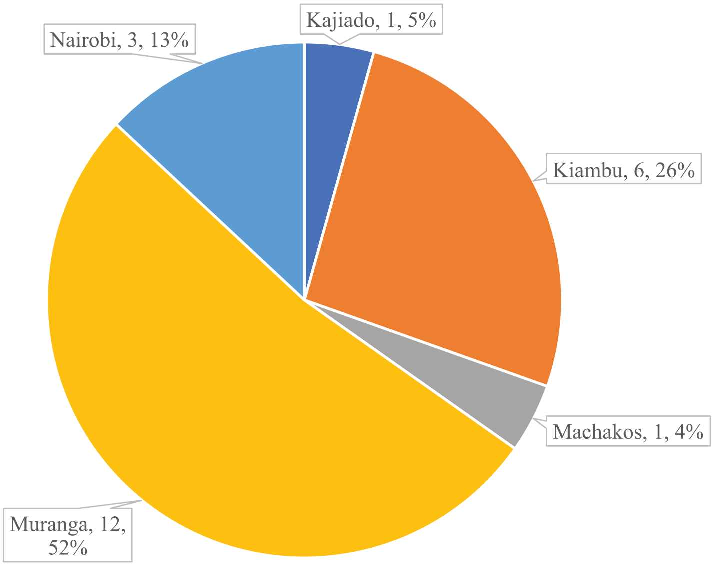
Verification of Medical and Non-Medical Documents During the Reporting Period

- Verification of documents is the process through which SIKIKA checks the documents relied on in a grievance are genuine and correctly linked to the complainant, the incident, and the claim being made. When a complainant submits medical records (such as treatment notes, P3 forms, or hospital reports), Fact Finders verify the documents with the issuing medical facility to ascertain whether they were, indeed, issued by the medical facility. The Fact Finders also visit multiple hospitals across counties to check records and determine whether the patient was treated there and whether the injury description matches the alleged incident. Verification of non-medical documents involves Fact-Finders investigating whether the documents originated from the respective facilities and or institutions and whether what is contained in the documents is accurate.

- A high number of documents that complainants adduce are medical documents intended to prove that they sustained injuries as a result of a human rights violation e.g. a case of assault. There are cases where documents from other non-medical institutions are adduced e.g. employment contracts, court proceedings, contracts etc.

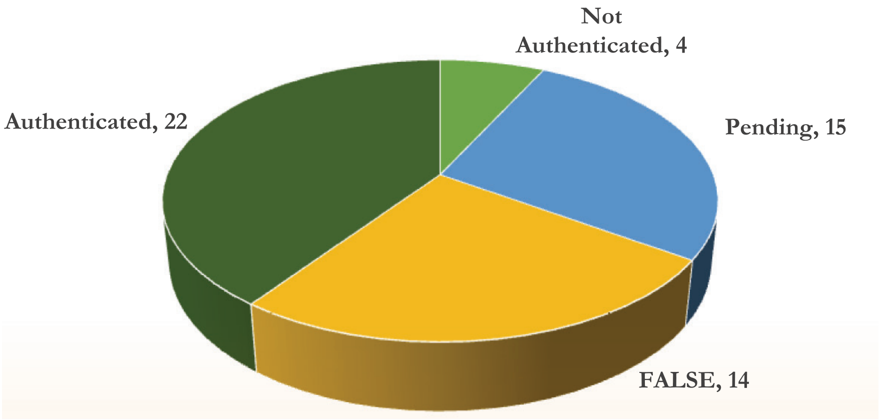
- During the Reporting Period, 55 verifications were carried out across 28 cases. The verifications were done across five (5) Counties. Below is a breakdown of the Counties where verifications were done:

Illustration 19. Breakdown of Verifications According to Locations Where they were Conducted



Below is a breakdown of the results of medical verification conducted during the Reporting Period.

Illustration 20. Breakdown of Findings of Medical Verification Carried Out in the Reporting Period



Authenticated: These are outcomes where a document is confirmed as emanating from a certain facility and in relation to the complainant. This does not mean that the complaints are automatically proven. The IHRM will in the next stages consider the totality of evidence including statements recorded and documents provided.

False: These are outcomes where a document was found not authentic.

Pending: Results of verification have not yet been obtained.

Not Authenticated : The medical institutions could not verify the documents, especially due to the periodical destruction of records.

Medical Assessment of Injuries During the Reporting Period

After the medical documents have been confirmed to have been authentic (confirmed as emanating from a certain facility and in relation to a complainant, or unverifiable due to destruction of records, SIKIKA 2 sends the Complainant to the next stage i.e. Independent Medical Assessment of Injuries.

- Where complainants allege that they suffered injuries emanating from a human rights violation caused or linked to Kakuzi PLC, SIKIKA 2 utilizes independent medical experts in various fields to review those injuries and give their expert opinion. This process is known as Independent Medical Expert Assessment.
- This process investigates whether there is indeed a relationship between the complainant's alleged physical injuries/scars, complainant's treatment record, or the complainant's persistent medical condition and the allegation made in the grievance. The Independent Medical Experts also give medical advice where appropriate. For example, the medical experts have, in some instances, recommended counselling for complainants in cases deemed severe medical conditions to help the complainant understand and cope with the diagnosed condition.
- During the reporting period, 12 complainants were subjected to independent medical expert assessment. Below is an illustration showing the findings:

Challenges and Observations of the Fact-Finding Team

- Scene visit challenges: Due to long time lapses, the scenes have since changed and therefore, difficult for complainants to identify or infer the exact locations of alleged violations. Example is when a previous bare/shrub land which had footpaths or access has since been cultivated and converted to productive use.
- Complainants forgetting facts due to long time lapse; There are instances where complainants have since forgotten material facts of their complaints over time.
- No show complainants: At times complainants fail to turn up on engagements with Fact Finders even after prior confirmation.
- Verification challenges - Missing institutional records, closed medical facilities and long waiting times especially by courts and police offices.
- Delays in getting official information due to institutional bureaucracy especially in medical facilities where authority to verify records is not readily forthcoming.

1.4. ACTIVITIES OF THE DATA MANAGER DURING THE REPORTING PERIOD

Throughout the reporting period, the data manager has undertaken a comprehensive initiative to digitize and centralize all case documentation. This process involves the meticulous scanning and cloud-integration of physical files to ensure both long-term accessibility and high-level data confidentiality.

While maintaining and reconciling core internal registers, the data manager has successfully processed 1,283 (1,003 fully scanned, 280 partially scanned) out of 1,509 total complaints files. It is important to note that only closed files have been fully scanned and stored in the cloud platform while the rest have been partially processed. Each of these files undergoes a rigorous review before being indexed into our secure digital archive.

Illustration 21: Breakdown of Progress made by the Data Manager in Saving Physical files in the cloud Files

Files Category	Number of Files Scanned and saved in the cloud
Ad-Hoc Files	138 files out of a total 174 files
2022 Files	913 files out of a total 941 files
2023 Files	180 files out of 247 files
2024 Files	30 files out of 103
2025 Files	2 files out of 23
Referral Files	20 files out of 21 files
TOTAL	**1312** files out of **1509 files**

CHAPTER TWO
REVIEW OF SIKIKA 2'S ACTIVITIES BY THE INDEPENDENT MONITOR

2.0. OVERVIEW

The United Nations Guiding Principles on Business and Human Rights (UNGPs) require companies to be accountable for human rights impacts that they (or their contractors) directly cause, contribute to or are linked to. OGMs like SIKIKA 2 operate under the UNGPs, National laws and National Action Plans. The UNGPs require OGMs to be accountable and the foundation of this framework lies with UNGPs Principle 31. The Principle provides that UNGPs must be:

a. **Legitimate** – clear governance, independence, and trust;
b. **Accessible** – known, reachable, and usable by affected people;
c. **Predictable** – clear procedures, timelines, and outcomes;
d. **Equitable** – fair access to information and support;
e. **Transparent** – clarity on process and outcomes (while respecting confidentiality);
f. **Rights-compatible** – outcomes must align with international human rights standards;
g. **A source of continuous learning** – used to improve practices and prevent future harm;
h. **Based on engagement and dialogue** – not imposed or one-sided.

By design, SIKIKA 2 is subject to oversight from two (2) bodies: The Independent Human Rights Advisory Committee (IHRAC) and the Independent Monitor (IM).

- The Independent Human Rights Advisory Committee (IHRAC) is an independent advisory committee set up by Kakuzi PLC to carry out oversight of SIKIKA 2 OGM. It reviews challenges, progress, and outcomes from the grievance mechanism and advises on how to improve alignment with the UNGPs. It advises the Kakuzi Board of Directors on human-rights matters and helps ensure the company's policies and practices are aligned with global human-rights standards, particularly the UNGPs and UN Declarations on Human Rights. During the Reporting Period, SIKIKA 2 reported on its activities to the IHRAC periodically, receiving feedback and implementing recommendations. The oversight is carried out on a quarterly basis.
- The Independent Monitor is a separate, external reviewer tasked with overseeing the implementation and performance of Kakuzi's OGM (SIKIKA). He reviews whether procedures are being followed and whether the process reflects the design principles and assesses the SIKIKA process against the UN Guiding Principles on Business and Human Rights (UNGPs) effectiveness standards — such as legitimacy, accessibility, transparency, rights-compatibility, and more. The Independent Monitor Reports are made public with the intention of contributing to external transparency and stakeholder trust. This is carried out on a yearly basis.

In 2025, the Independent Monitor carried out the **third** review of SIKIKA 2. This included interviews carried out with a wide range of relevant stakeholders including Tier 1 and Tier 2 claimants, OGM personnel, personnel at Kakuzi, union representatives, and others.

2.1. ANALYSIS OF THE FINDINGS OF THE INDEPENDENT MONITOR FOLLOWING REVIEW OF SIKIKA ACTIVITIES

Arising from the aforementioned review of SIKIKA's activities, the Independent Monitor submitted a Report on his findings. The following part provides a summary of the IM's findings on the level of implementation of the various UNGP effectiveness criteria. It also outlines the feedback and/or observations of the OGM as well as the recommendations on the way forward.

Illustration 22. A Breakdown of some of the Findings and Recommendations of the Independent Monitor Regarding SIKIKA 2's Progress in Implementation

No.	UNGP Effectiveness Criteria and what it Requires	Feedback the IM Gave Regarding SIKIKA 2's Adherence to the UNGP Effectiveness Criteria	Recommendations that the IM Gave on What SIKIKA 2 Should Do	SIKIKA 2 Feedback and Areas Implemented
1.	**Legitimacy**: (Enabling trust from the stakeholder groups for whose use they are intended, and being accountable for the fair conduct of grievance processes).	The IM upon review reported that: ▪ There have been more than 3000 Complainants registered across both tiers since operationalisation signifying a level of trust in SIKIKA. ▪ The OGM has built in procedures that it continues to uphold and respect in practice. ▪ The OGM is attentive to physical safety concerns for complainants and witnesses and takes steps in that regard. ▪ SIKIKA 2 has implemented the IM's recommendations and its strategies in doing so have resulted in identification and registration of collective grievances and group claims. ▪ Stakeholders reported that SIKIKA 2 is responsive to their concerns. They were pleased with the thorough and credible investigations. They further reported that SIKIKA 2 approaches towards remedies and resolution of grievances is thorough and collaborative. SIKIKA 2 provides non-financial remedies such as counselling or training regardless of whether the claim has met the evidentiary burden of proof. ▪ SIKIKA 2 appeal processes yield lengthy and considered decisions though they are not often utilized. ▪ Stakeholders reported concerns surrounding SIKIKA 1 particularly that fact finding is not participatory and appeals are determined by the same individuals evaluating initial grievances. Tier 1 appeals rarely lead to differing outcomes. There is a perception among stakeholders that managers are "never" disciplined leading to a reluctance to continue reporting and fairness concerns.	The IM has recommended that: ▪ SIKIKA 1 should review its fact-finding processes and make them thorough and participatory. This could include greater utilisation of shop stewards and union personnel. ▪ SIKIKA 1 should evaluate its Appeals to ensure that the individuals involved in the initial determination are not also reviewing the Appeals. ▪ Claims against Managers before SIKIKA should be reviewed to ensure that there is no bias in outcomes for claims involving them. ▪ SIKIKA 2 should evaluate its Appeal Process and analyze how the degree of trust and confidence held by Stakeholders can be improved. ▪ SIKIKA should continue to view evidence in submitted claims liberally and enhance transparency surrounding the evaluation of evidence. Where some supporting evidence exists but it is not sufficient evidence to meet the burden of proof, SIKIKA should consider expansive approaches to the claims. ▪ SIKIKA should consider whether there are gender-based reasons for reporting or not reporting claims, at both tiers.	1. SIKIKA 2 is engaging complainants whose appeals were dismissed on any issues they may have encountered and their level of satisfaction with the Appeals Process. These discussions have also included pro-bono lawyers who represented them as well as pro-bono lawyers currently involved in active appeals. 2. The OGM has noted a key gap in the Appeal Process which is the misunderstanding that the Appeal process takes as much time as the time taken to process the initial claim. The OGM is providing clarifications to complainants that this is not the case bearing in mind that Appeals are lodged on very specific grounds. By this time most of the work involving verification of medical documents, assessment of involving verification of medical been conducted at initial Fact Finding. 3. SIKIKA is working towards implementing all other IM recommendations.

No.	UNGP Effectiveness Criteria and what it Requires	Feedback the IM Gave Regarding SIKIKA 2's Adherence to the UNGP Effectiveness Criteria	Recommendations that the IM Gave on What SIKIKA 2 Should Do	SIKIKA 2 Feedback and Areas Implemented
2.	**Accessible**: (Being known to all stakeholder groups for whose use they are intended, and providing adequate assistance for those who may face particular barriers to access).	The IM upon review found that: ▪ SIKIKA 2 has undertaken extensive promotional efforts including numerous community meetings about the OGM at churches and community centres. The OGM has also conducted meetings in communities more distant from the main office which has resulted in a substantial number of new claims from those communities. ▪ The OGM has a SIKIKA Awareness Week which occurs every year to increase awareness among Stakeholders. ▪ SIKIKA has created merchandise including key chains and t-shirts. ▪ Concerted efforts and strategies by the company and the OGM heve been successful in addressing defilement in and around Kakuzi. ▪ For employees, SIKIKA 1 has provided numerous channels to lodge grievances including in person, through a hotline, using email, contacting the Supervisor and/or Gr < * Officer. ▪ The OGM has provided multiple reporting channels and permitted anonymous claims in order to prevent retaliation. Further, Tier 2 is located off site and generally provides transportation costs to claimants. Many of the staff that receive claims are women. These strategies have addressed barriers hindering access such as illiteracy, lack of telephones and safety concerns.	The IM recommended that: ▪ SIKIKA conducts socialization in schools. ▪ SIKIKA 1 takes additional steps to increase the support of managers and supervisors in conjunction with Human Resource Department as well as SIKIKA 2. ▪ SIKIKA 2 in conjunction with the Head of Human Rights and Gender consider means of addressing sexual harassment among the workforce. ▪ The Head of SIKIKA 2 and the Head of Human Rights and Gender work to consider how fear of retaliation among the work force can be addressed particularly for Tier 1 claims. ▪ Tier 1 should, in conjunction with the Head of SIKIKA 2 and Human Rights and Gender, consider how investigations may be conducted to maximize confidentiality.	1. SIKIKA 2 notes the positive feedback regarding the outreach efforts. Outreach efforts are already. underway to process remaining files for complainants residing in far flung areas. 2. The OGM is devising strategies to implement all recommendations in a timely fashion. 3. SIKIKA 2 will work alongside SIKIKA Tier 1 to reach the areas recommended by the IM.

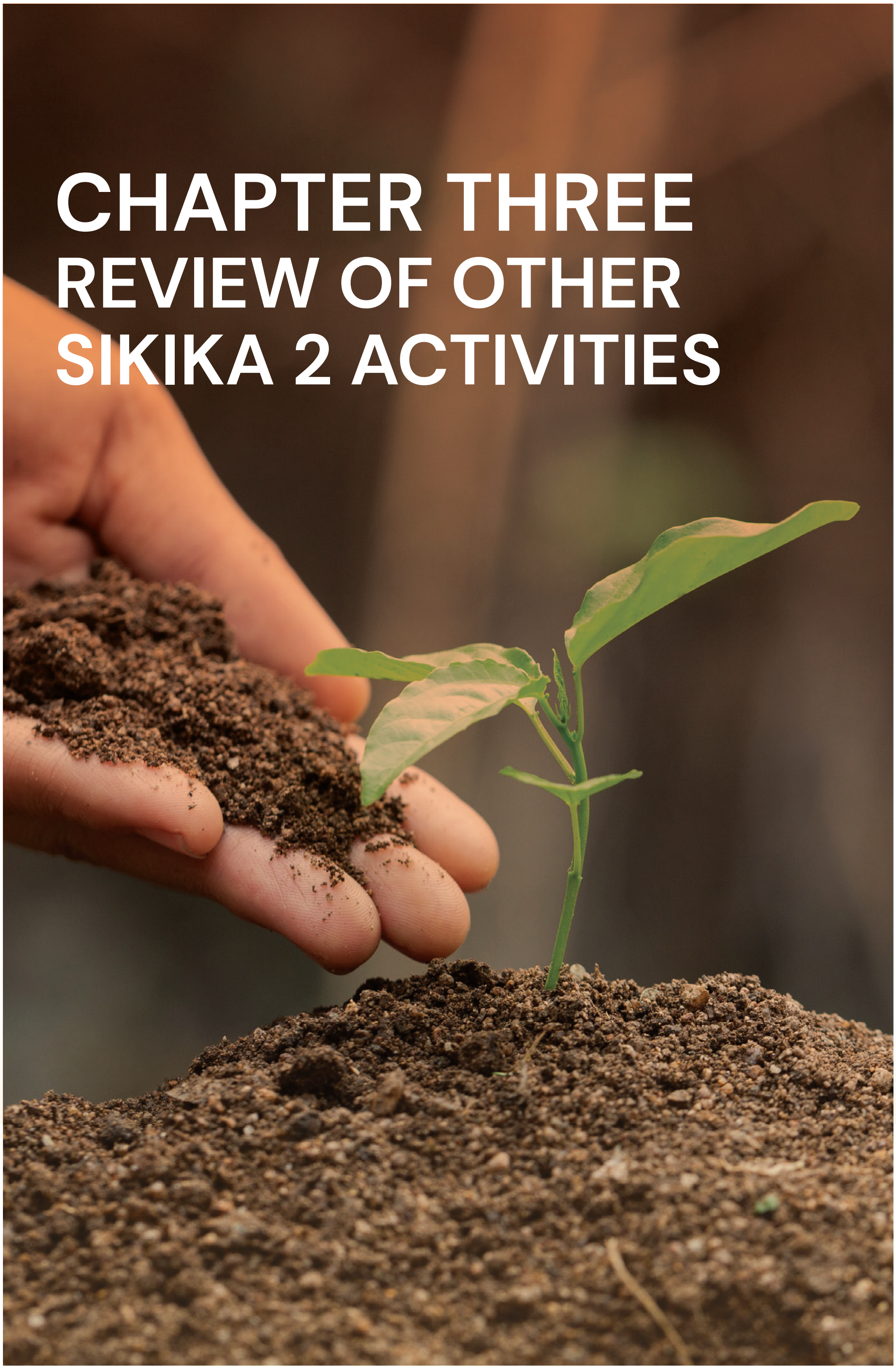
No.	UNGP Effectiveness Criteria and what it Requires	Feedback the IM Gave Regarding SIKIKA 2's Adherence to the UNGP Effectiveness Criteria	Recommendations that the IM Gave on What SIKIKA 2 Should Do	SIKIKA 2 Feedback and Areas Implemented
3.	**Predictable**: (Providing a clear and known procedure with an indicative time frame for each stage, and clarity on the types of process and outcome available and means of monitoring implementation).	The findings of the IM's review were that: ▪ SIKIKA 2 has implemented all the suggestions of the IM. ▪ Both Tiers have an impressive set of Forms which are utilized and followed in practice. This has built consistency. The files at SIKIKA 2 are particularly thorough, complete, and consistent with the OGM's requirements. They demonstrate a high-level of process-related predictability, showing that Tier 2 operates in line with its design. Both Tiers are well resourced and overseen by highly qualified experts. ▪ SIKIKA has clear and simple infographic posters for Tier 1 and Tier 2 that have been published widely. ▪ Tier 1's staff are able to capably address grievances that are filed within the relatively short (30 days) indicative timeframe, and nearly all claims are resolved within that timeframe. ▪ Tier 2 staff now are having to work in shifts to avoid being considered Kakuzi employees under Kenyan employment law. Cases continue to take a significant time to progress and finalize, and the shift-based schedule is not helping. Delays remain a concern, with grievances remaining open for years. ▪ The OGM's processes are intentionally flexible, and allow for adjustments depending on the needs of claimants and the facts of each case. Indeed, the processes have been adjusted on multiple occasions, including in relation to IM recommendations.	The IM has recommended that SIKIKA should: ▪ Continue to identify ways to progress claims more efficiently at Tier 2. ▪ Consider how to enhance managing claimant expectations about the length of time it may take to resolve claims. ▪ Consider how to encourage claimants to seek appeals, even in cases that may take time to resolve. ▪ Conduct periodic (e.g., quarterly) reviews of all outstanding files to determine potential sticking points and how the cases may be progressed.	▪ SIKIKA 2 has resumed the processing of complaints in far flung areas. The team has been recording statements and receiving evidence at the outfield station in order to progress claims. ▪ SIKIKA 2 is amending its Forms to have a flow chart as an appendix. The flow chart shows the SIKIKA 2 process and the timelines for each stage. ▪ SIKIKA 2 is encouraging complainants to take ownership of the process by sensitizing complainants about the importance of providing witnesses and documents promptly. ▪ The OGM is devising strategies to implement all recommendations in a timely fashion.

No.	UNGP Effectiveness Criteria and what it Requires	Feedback the IM Gave Regarding SIKIKA 2's Adherence to the UNGP Effectiveness Criteria	Recommendations that the IM Gave on What SIKIKA 2 Should Do	SIKIKA 2 Feedback and Areas Implemented
4.	**Equitable**: (Seeking to ensure that aggrieved parties have reasonable access to sources of information, advice and expertise necessary to engage in a grievance process on fair, informed and respectful terms).	Review of SIKIKA 2 activities found that: ▪ Fact-finding under Tier 1 is less participative than in prior years, although claimants are appraised of the results rapidly ▪ For Tier 2, each claimant is advised of the relevant investigatory facts. ▪ Tier 2 claimants have been referred to counsellors, medical professionals and outside lawyers. Claimants still generally view their experiences with counsel as positive, and the responses from counsel have also indicated smooth working relationships for the most part	▪ For SIKIKA 1, union representatives can be utilized to assist claimants to a greater degree, including in regard to understanding outcomes and participatory fact-finding	SIKIKA 2 shares its reports and IEC materials as part of its communication strategy
5.	**Transparent**: (Keeping parties to a grievance informed about its progress, and providing sufficient information about the mechanism's performance to build confidence in its effectiveness and meet any public interest at stake).	The IM's review conclusively found that: ▪ Tier 2 provides periodic notifications to claimants regarding the status of their claims, which is important given the overall delays in case processing. Tier 1 claimants are notified quickly about their claims. ▪ Both Tiers collect substantial data about the types of cases, the channels being used for filing, where the claimants are from, the dates of the alleged incidents, outcomes, and other factors. Tier 2 publishes lengthy and detailed reports that include such data. Tier 1 still can provide further public information about its cases, as the IM has previously suggested.	Tier 1 should consider increased reporting regarding its metrics and outcomes	

No.	UNGP Effectiveness Criteria and what it Requires	Feedback the IM Gave Regarding SIKIKA 2's Adherence to the UNGP Effectiveness Criteria	Recommendations that the IM Gave on What SIKIKA 2 Should Do	SIKIKA 2 Feedback and Areas Implemented
6.	**Rights-compatible**: (Ensuring that outcomes and remedies accord with internationally recognized human rights).	▪ For Tier 1, management receives monthly reports on the OGM's progress, including descriptions of each claim filed, along with relevant metrics for the month; the board of directors also receives periodic reporting. For Tier 2, the IHRAC receives detailed monthly written reports containing key data, metrics and trends, and there are quarterly meetings to discuss the OGM. Information about Tier 2 also is shared with the board of Kakuzi PLC. ▪ Tier 1 and Tier 2 regularly engage with each other to discuss trends, patterns and issues, and enable changes to policies and practices at Kakuzi PLC. The IM reports that: ▪ Under both tiers of the OGM, remediation is tailored to the needs of individual claimants. ▪ The Head of the IHRM is an expert in her own right, and has access to the IHRAC, which contains further experts who can advise on appropriate remediation. She also has sought guidance from outside counsel in developing a quantum matrix, and the OGM has received extensive input from experts regarding the OGM's policies and procedures. ▪ Claimants are advised of alternative pathways to remedy, such as the WIBA process, and have access to a variety of social services, as well as translators and pro bono counsel, as needed. ▪ There are mixed responses in terms of perceived fairness. Most Tier 1 participants report being treated fairly. Many stakeholders, believe the process and quantum of remedy for Tier 2 also is fair. Claimants seeking compensation are frustrated that their evidence does not withstand scrutiny, or that the amount of compensation is unduly low – which they construe as unfair. ▪ The OGM has adopted a new procedure for receiving consent for juvenile grievances where both parents cannot be found, consistent with our prior recommendations.	The IM recommended that ▪ Consider whether there are instances in which employees, previously blacklisted, may be reconsidered for employment in less egregious cases. ▪ Refresh the compensation matrix in light of new precedents, experience with the OGM, and input from the Appeals Judge handling Tier 2 appeals.	▪ SIKIKA 2 is updating the compensation matrix and has been reviewing decisions issued in order to ensure that the remedies recommended for complainants do not vary with Kenyan courts. ▪ SIKIKA 2 is considering amending its forms to provide for the various options of remedies available. This will aid in deepening understanding of the remedies by complainants. ▪ The rest of the recommendations are also being implemented.

No.	UNGP Effectiveness Criteria and what it Requires	Feedback the IM Gave Regarding SIKIKA 2's Adherence to the UNGP Effectiveness Criteria	Recommendations that the IM Gave on What SIKIKA 2 Should Do	SIKIKA 2 Feedback and Areas Implemented
7.	**Source of continuous learning**: (Drawing on relevant measures to identify lessons for improving the mechanism and preventing future grievances and harms).	Upon review of the OGM operations, the IM has concluded that: ▪ Both tiers of the OGM actively engage with claimants during and at the end of their engagements. In particular, Tier 2 keeps claimants apprised of their claims, and seeks feedback, recorded in a "feedback diary." Based on the feedback, Tier 2 has changed several steps in the process. ▪ Meetings with external stakeholders, such as community leaders and chiefs, also continues to occur. ▪ The OGM has participated in external engagements with other groups, such as grievance handling workshop series organized by DanChurchAid Kenya, an EU-funded project which workshops were held in Nairobi. The OGM also made presentations at regional meetings regarding grievance mechanisms in Zambia. ▪ SIKIKA collects, records and analyses data to identify patterns in the claims being filed. This has led to changes in the OGM's procedures as well as Kakuzi's policies. SIKIKA 1 and SIKIKA 2 also track numerous metrics and KPIs and utilise them to identify actions needed to improve the OGM.	None.	The OGM continues to maintain networks developed in the various business and human rights fora attended. Engagements with other stakeholders are guiding OGMs like SIKIKA to exchange experiences and outcomes. SIKIKA intends to use the lessons learned to improve its own processes.
8.	**Based on engagement and dialogue**: (Consulting the stakeholder groups for whose use they are intended on their design and performance, and focusing on dialogue as the means to address and resolve grievances).	The IM found that: ▪ SIKIKA actively seeks feedback from claimants and external stakeholders, and the OGM was developed following consultation with numerous community members, chiefs, claimant representatives, and others. The OGM has engaged extensively with claimants about its processes and steps for improvement, and there has been engagement with a variety of stakeholders, including international organizations. Tier 2 has engaged in public barazas with local chiefs, conducted church visits, and performed numerous socialization and registration visits to areas remote from its office. ▪ Tier 1 continues to resolve disputes through dialogue, though both Tiers still play a largely adjudicative role. Tier 2 identifies potential remedies that claimants and their counsel can consider, and provided non-financial remedies to try to avoid the "all or nothing" approach raised by the IM the previous report.	None.	SIKIKA 2 is considering feedback from the community and stakeholders particularly in recommending differing remediation approaches, including compensation, medical fees, school fees, state engagement, and psychological counselling.

CHAPTER THREE
REVIEW OF OTHER SIKIKA 2 ACTIVITIES



3.0. OVERVIEW

The activities of the OGM during the period under review have been geared towards processing of files. There were, however, activities that SIKIKA 2 still had to conduct in order to comply with the UNGPs effectiveness criteria as follows:

3.1. PARTICIPATION IN VARIOUS SAKEHOLDER FORA

- The Head- IHRM and the Legal Administrative Officers have attended three (3) sessions of the Grievance Handling Workshop Series. The Series were designed to strengthen private sector capacity to operationalize grievance mechanisms aligned with global standards, national legal frameworks, and emerging anti-corruption practices. They involved a hands-on training for agribusiness leaders on creating effective grievance mechanisms that enhance compliance, protect rights, and boost market competitiveness. The Workshop Series were organized by DanChurchAid Kenya, Pamoja Trust and CEPCJ. Members of the LAO shared insights with attendees and made presentations.

- The OGM (SIKIKA Tier 1 and 2) was represented at the **4th African Business and Human Rights Forum (ABHRF)** which took place between 7th October 2025 and 9th October 2025 in Lusaka Zambia. The forum was a major continental multi-stakeholder event focused on advancing responsible business conduct and human rights in Africa and was prepared and held under the theme "From Commitment to Action: Advancing Remedy, Reparations and Responsible Business Conduct in Africa." Participants explored ways to make grievance mechanisms, judicial processes, and policy frameworks more effective so that individuals and communities harmed by business-related impacts can obtain effective remedy and justice. The event emphasized embedding human rights due diligence into corporate practices, aligning with standards such as the UN Guiding Principles on Business and Human Rights (UNGPs), African Union policies, and regional frameworks like the draft AU Business and Human Rights Policy. SIKIKA was mentioned as an example of best practice.

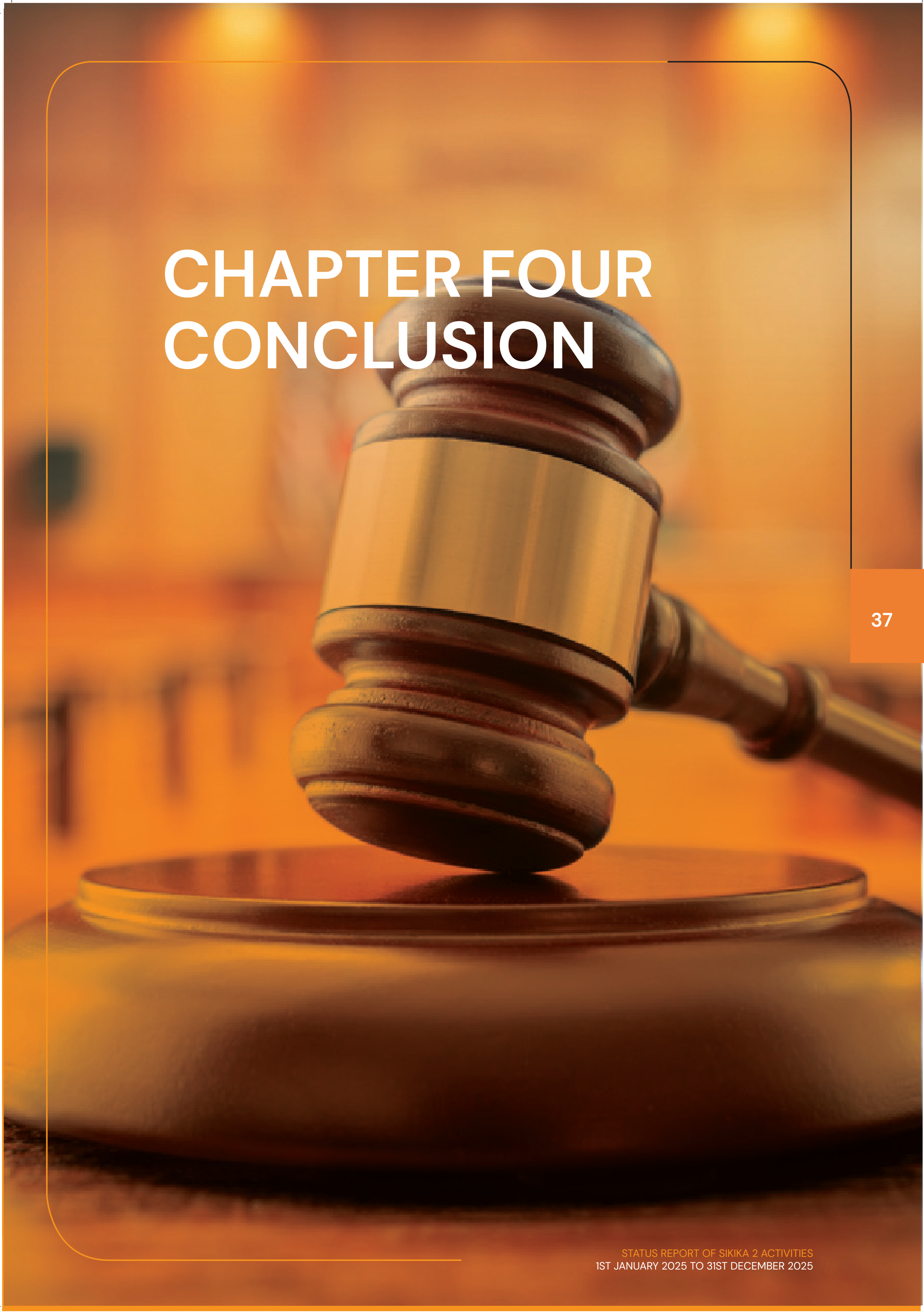
3.3. EXTENSION OF PRO- BONO PROFESSIONAL SUPPORT SERVICES

Kakuzi PLC through SIKIKA 2 extends professional support services to needy cases regardless of the stage that the complaint is at, and whether or not liability has been established against the company. Below is an overview of how each service was extended to complainants:

- 5 (five) new complainants were granted pro-bono lawyers. Upon request and/ or in needy and complex cases, SIKIKA 2 offers lawyers who provide free legal advice and support to complainants to enable them pursue remedy at the OGM. These lawyers are not employees of Kakuzi PLC or members of SIKIKA. They are members of a panel formed following a call by SIKIKA 2 to various LSK Branches to provide volunteers for pro-bono legal services.

- **1** (one) extra complainant was provided free Financial Literacy Training. Complainants who have been awarded compensation under the SIKIKA process are provided such training to sharpen their financial management and business planning skills to enable them to have a widened perspective of entrepreneurship.

- **4** (Four) extra complainants were onboarded onto the free confidential professional counselling list. SIKIKA 2 extends psycho-social support services for complainants whose grievance involves trauma, severe emotional distress, or human rights harm to enable them cope with the trauma and regain their mental health. This support is extended at the initial stages (even before liability or lack of) of the company has been established.



CHAPTER FOUR
CONCLUSION

CHAPTER FOUR – CONCLUSION

In 2025, SIKIKA 2 continued to serve as a vital independent avenue for communities and other rights-holders seeking accountability and remedy in relation to Kakuzi PLC's operations. The Independent Monitor's review affirmed the importance of SIKIKA 2's role in upholding independence, due process, and fairness, while also highlighting areas for further strengthening and continuous improvement. Engagement with complainants throughout the year underscored the centrality of trust, transparency, and respectful participation in achieving meaningful outcomes. Guided by these findings and lessons, SIKIKA 2 remains committed to deepening access to remedy and supporting more constructive, rights-respecting relationships between Kakuzi PLC and affected communities.

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