

CORPORATE GOVERNANCE STATEMENT REPORTING TEMPLATE FOR ISSUERS OF SECURITIES TO THE PUBLIC
TO BE FILLED IN LINE WITH THE REQUIREMENTS OF THE CODE OF CORPORATE GOVERNANCE PRACTICES FOR ISSUERS OF SECURITIES TO THE PUBLIC, 2015

Company Name (in full)
JUBILEE HOLDINGS LIMITED
 Reviewer's Name

Company Details to be Provided:

Company market to book ratio at end of financial year
 No. of outstanding shares at end of financial year
 Closing price of stock at end of financial year
 Net sales as per Income Statement at end of financial year
 Net profit as per Income Statement at end of financial year
 Total debt (short and long term) as per Balance Sheet at end of financial year
 Total equity as per Balance Sheet at end of financial year
 Total no. of Board members at end of financial year
 No. of independent directors at end of financial year
 No. of non-executive directors at end of financial year

Issued Shares: 362,364,750
 Unissued Shares: 87,635,250
 Kes. 173.50 per share
 Kes. 25,676,005
 Kes. 4,721,821
 Kes. Nil
 Kes. 51,182, 318
 Eight
 Four
 Eight

MARGARET KIPCHUMBA

Stock Code: JUB

Sector: Insurance

Year - 2024

Date of Financial Year End: 31 DECEMBER 2024

Jul Abdula
 Chairman:

CEO: *[Signature]*

Company Secretary: *[Signature]*

No.	Mandatory or 'apply or explain' No.	Part	Question	Kenya Code Reference	Application	Application or Explanation - Note 3 & 4	Source of Information
1	M	A	INTRODUCTION A.1 Has the Company developed and published a Board Charter which is periodically reviewed and which sets out the Board responsibility for internal control?	1.1.2, 2.6.2, 6.3.2	FA	Yes. The Board Charter is in place and is available on the Company's website. The Board Charter was last reviewed & approved by the Board in November 2024.	Board Charter - Website
2	M	A.2	Does the Board Charter or Company documents distinguish the responsibilities of the Board from management in line with Code requirements?	1.1.2, 2.3.1, 2.3.2, 2.6.2	FA	Yes. The Board Charter clearly articulates the roles of the Board, the Chairman and the CEO. In addition, the positions of the Chairman and CEO are held by different individuals which helps in demarcating the role of the Board and that of Management.	Board Charter - Website.
3	A or E	A.3	Is there a statement indicating the responsibility of Board members for the application of corporate governance policies and procedures of the Company?	1.1.6	FA	Yes. Both the Board Charter and 2024 Annual Report (CG Statement) affirm the Board's responsibility & commitment to upholding the highest standards of good corporate governance practices and in particular adoption of the CMA Code on Corporate Governance Practices for Issuers of Securities to the Public, 2015.	Board Charter 2024 Annual Report (CG statement) - Both available on the Website.
4	M	A.4	How has the Board ensured all Directors, CEOs and management are fully aware of the requirements of this Code?	1.1.6	FA	Directors and Management have been sensitised on the requirements of the Code in Board and Committee meetings. In addition, various aspects of the Code are discussed at Board & Committee meetings.	Board Minutes Board Nominating & HR Committee (BNHRC) Minutes Board Audit & Compliance Committee (BACC) Minutes Board Induction Material
5	M	A.5	Do Company documents indicate the role of the Board in developing and monitoring the Company strategy?	Part II - Overview, 2.3	FA	Yes. The Board is responsible for setting the overall strategy and reviewing the performance of the Group. The Board also approves the strategy, which is supported by a financial plan.	Board Charter Board Minutes and the Company's Strategic Plan/Budget
6	A or E	A.6	Does the Company strategy promote sustainability of the Company?	2.3.6	FA	Yes. Kindly refer to the ESG Report in the 2024 Annual Report	2024 Annual Report is available on the Website.
7	M	A.7	Are all Board committees governed by a written charter/terms of reference, disclosing its mandate, authority, duties, composition, leadership and working processes?	2.2.2	FA	Yes. A summary of the terms of reference for the committees is included in the Board Charter & the 2024 Annual Report (CG Statement). The full TOR are available on Company's website.	Board Charter 2024 Annual Report (CG statement) Terms of Reference all available on the Website.
8	M	B	BOARD OPERATIONS and CONTROL B.1 Has the Board established a Nomination Committee comprised mainly of independent and non-executive Board members?	2.1.2, 2.2.2	FA	Yes. The Board has established a Nominating & HR Committee - BNHRC. The Committee currently comprises 3 members all of whom are non-executive. In 2024 the Board appointed an independent Non-Executive director to chair the BNHRC.	Board Charter 2024 Annual Report (CG statement) both available on the Website.

CMA CODE CORPORATE GOVERNANCE REPORTING TEMPLATE

Mandatory No. or apply No. or explain	Part No.	Question	Kenya Code Reference	Application	Application or Explanation	Source of Information
1	M	A.1	1.1.2, 2.6.2, 6.3.2	Fully Applied	Yes. The Board Charter is in place and is available on the Company's website. The Board Charter was last reviewed & approved by the Board in November 2024.	Board Charter - Website.
2	M	A.2	1.1.2, 2.3.1, 2.3.2, 2.6.2	Fully Applied	Yes. The Board Charter clearly articulates the roles of the Board, the Chairman and the CEO. In addition, the positions of the Chairman and CEO are held by different individuals which helps in demarcating the role of the Board and that of Management.	Board Charter - Website.
3	A or E	A.3	1.1.6	Fully Applied	Yes. Both the Board Charter and 2024 Annual Report (CG Statement) affirm the Board's responsibility & commitment to upholding the highest standards of good corporate governance practices and in particular adoption of the CMA Code on Corporate Governance Practices for Issuers of Securities to the Public, 2015.	Board Charter 2024 Annual Report (CG statement) - Both available on the Website.
4	M	A.4	1.1.6	Fully Applied	Directors and Management have been sensitised on the requirements of the Code in Board and Committee meetings. In addition, various aspects of the Code are discussed at Board & Committee meetings.	Board Minutes Board Nominating & HR Committee (BNHRC) Minutes Board Audit & Compliance Committee (BACC) Minutes Board Induction Material
5	M	A.5	Part II - Overview, 2.3	Fully Applied	Yes. The Board is responsible for setting the overall strategy and reviewing the performance of the Group. The Board also approves the strategy, which is supported by a financial plan.	Board Charter Board Minutes and the Company's Strategic Plan/Budget.
6	A or E	A.6	2.3.6	Fully Applied	Yes. Kindly refer to the ESG Report in the 2024 Annual Report	2024 Annual Report is available on the Website.
7	M	A.7	2.2.2	Fully Applied	Yes. A summary of the terms of reference for the committees is included in the Board Charter & the 2024 Annual Report (CG Statement). The full TOR are available on Company's website.	Board Charter 2024 Annual Report (CG statement) Terms of Reference all available on the Website
8	M	B.1	2.1.2, 2.2.2	Fully Applied	Yes. The Board has established a Nominating & HR Committee - BNHRC. The Committee currently comprises 3 members all of whom are non-executive. In 2024 the Board appointed an Independent Non-Executive director to chair the BNHRC.	Board Charter 2024 Annual Report (CG statement) both available on the Website.
9	M	B.2	2.2.3	Fully Applied	Yes. The Chairperson of the BNHRC is an Independent Non-Executive Director.	2024 Annual Report (Directors Profiles & CG statement) - Website
10	M	B.3	2.1.1, 2.1.7	Fully Applied	Yes. The Board Charter outlines the process of appointing new Directors which are in line with the provisions of the Articles of Association of the Company.	Articles of Association Board Charter - Website
11	M	B.4	2.1.4	Fully Applied	Yes. The current number of Directors (8) is within the prescribed number as provided in the Articles of Association and is considered as adequate.	Articles of Association Annual Report (Directors Profiles & CG statement) - Website.
12	A or E	B.5	2.1.2, 2.1.3, 2.1.5, 2.5.1	Fully Applied	Yes. The Board is mindful of the importance of diversity & inclusivity.	Board Charter 2024 Annual Report (Directors Profiles) - Website
13	M	B.6	2.2.1	Fully Applied	Yes. The Profiles of Board members is given in the 2024 Annual Report (Directors Profiles) & discloses the qualifications, experience and independence of Board members.	2024 Annual Report (Directors Profiles & CG statement) - Website.
14	M	B.7	2.1.6	Fully Applied	Yes. The policy is set out in the Board Charter & is aligned to the limitations set by CMA regulations. All Directors are compliant with the policy.	Board Charter - Website
15	M	B.8	2.1.6, 2.1.7	Fully Applied	While the Articles of Association allow for the appointment of Alternate Board Members, there are currently no Alternate Directors.	Articles of Association Board Charter 2024 Annual Report - CG statement) - Website.
16	M	B.9	1.1.2, 2.1.3, 2.4.1	Fully Applied	Yes. 4 out of 8 Directors are independent.	2024 Annual Report (Directors Profiles & CG statement) - Website.
17	A or E	B.10	2.4.1	Fully Applied	Yes. The Board through the BNHRC evaluates the independence of Board members annually.	Board Charter BNHRC ToR - Website.
18	M	B.11	2.4.2	Fully Applied	Yes. For Directors appointed after 31.12.2023 the tenure for independence has been revised to 6 years in line with the POLD Regulations 2023.	Board Charter 2024 Annual Report - (Directors' Profiles & CG statement) - Website
19	M	B.12	2.1.3	Fully Applied	Yes. All Directors are Non-Executive.	2024 Annual Report (Directors Profile/ CG statement) - Website.
20	M	B.13	2.1.8	Fully Applied	By ensuring an adequate number of Board members and that no more than one-third of the Board members retire at the same time at the Annual General Meeting. The Board is alive to succession planning & through the BNHRC addresses this topic. In 2024, pursuant to successful succession planning, the Deputy Chairman, Mr. Zai Abdul, was appointed Chairman of the Board following the retirement of Mr. Nizar Juma.	Articles of Association / Board Charter - Website.

21	M	B.14	Has the Board established an effective Audit Committee according to Code requirements?	2.2.4, 6.5.1, 2.1.7	Fully Applied	The composition of the Committee has been given in the 2024 Annual Report. The members of the committee are all non executive directors & 2 out of 3 members are independent and members of the CPAK in good standing.	2024 Annual Report (CG statement) - Website.
22	M	B.15	Are the functions of the Chairperson and the Chief Executive Officer exercised by different individuals?	2.3.3	Fully Applied	Yes. The Chairman is a Non-Executive Director and his role is separate from that of the CEO which helps in clearly distinguishing between the role of the Board and that of Management.	Board Charter 2024 Annual Report - (CG statement) - Website
23	M	B.16	Is the Chairman of the Board a non-executive board member?	2.3.4	Fully Applied	Yes, the Chairman is a non-executive Director.	2024 Annual Report - (Directors Profiles & CG statement) - Website.
24	A or E	B.17	Has the Board established procedures to allow its members access to relevant, accurate and complete information and professional advice?	2.3.5	Fully Applied	Yes. The Board and respective committees have access to the quarterly financial key management figures which are reviewed at Board meetings. The Board / Committees are also empowered to access information from any employee of the Company & to seek independent professional advice at the expense of the Company. This right is enshrined in the Board Charter & TOR for the Committees.	Board Charter TOR of Board Committees 2024 Annual Report (CG statement) - Website.
25	M	B.18	Has the Board adopted a policy on managing conflict of interest?	2.3.8	Fully Applied	Yes. The Board has adopted a Conflict of Interest Policy which is published on the website. In addition, conflict of interest is addressed in a no. of Company documents including the Board Charter & Director's Code of Ethics. All meetings of the Board start with an invitation to the Directors to declare any conflict of interest.	Conflict of Interest Policy Board Charter / Directors Code of Ethics / 2024 Annual Report (CG statement) - Website.
26	M	B.19	Has the Board adopted a policy on related party transactions to protect the interests of the company and all its shareholders and which meets the requirements of the Code?	2.3.7	Fully Applied	Yes. The Board has adopted a policy on Related Party Transactions. In addition the Company reports on related party transactions in accordance with IFRS.	2024 Annual Report - Website.
27	M	B.20	Has the company appointed a qualified and competent company secretary who is a member in good standing of ICPSK?	2.3.9	Fully Applied	Yes. The Company Secretary is a duly registered Certified Public Secretary and is a holder of a Practising Certificate in good standing with ICPSK.	ICPSK records. Member No. 1367.
28	A or E	B.21	Has the Board adopted policies and processes to ensure oversight of sustainability, environmental and social risks and issues?	2.3.2, 2.3.6	Fully Applied	Yes. ESG is a standing agenda item in all Board meetings. The 2024 Annual Report as a section dedicated to ESG.	2024 Annual Report (ESG Report) - Website.
29	A or E	B.22	Has the Board developed an annual work-plan to guide its activities?	2.6.3	Fully Applied	Yes.	2023 Board Calendar approved by the Board in Nov. 2024.
30	M	B.23	Has the Board determined, agreed on its annual evaluation process and undertaken the evaluation or the performance of the Board, the Board Committees, the CEO and the company secretary?	2.6.4, 2.8	Fully Applied	Yes. The Board undertook an independent Board Evaluation exercise which was conducted by Scribe Services. Each director, Chairman, the CEO, Company Secretary and the Committees were evaluated.	Board Charter (Website) 2024 Board Evaluation Report by Scribe Services.
31	A or E	B.24	Has the Board established and applied a formal induction program for in-coming members?	2.7.1	Fully Applied	Yes. The Chairman in liaison with the GCEO & Company Secretary facilitates the induction of Directors. The newly appointed Directors are also furnished with Induction Packs containing Articles of Association, Board Charter, ToRs and any other relevant documentation. In 2024, the Board induction was carried out on 30.08.24 for new Directors within the Group.	Board Charter 2024 Induction programme.
32	A or E	B.25	Do Board members participate in on-going corporate governance training to the extent of 12 hours per year?	2.7.3	Fully Applied	The Board recognises the importance of ongoing training for directors to enhance their effectiveness on the Board and a no. of Directors have attended CMA accredited Corporate Governance courses. The Board is moving to a more structure training schedule.	Board Charter
33	A or E	B.26	Has the Board set up an independent Remuneration Committee or assigned to another Board committee the responsibility for determination of remuneration of directors?	2.9.2	Fully Applied	Yes. The Board has set up the Board Nomination and Human Resource Committee which is responsible for inter alia, reviewing the remuneration of Board members & making proposals on the same. In 2024 there was no change to the Directors remuneration.	Board Charter BNHRC ToR 2024 Annual Report (Directors Remuneration Report - Website.
34	M	B.27	Has the Board established and approved formal and transparent remuneration policies and procedures that attract and retain Board members?	2.9.1	Fully Applied	Yes there is a policy in place to ensure that remuneration of the Directors is formal, transparent and approved by shareholders. In line with the POLD Regulations 2023 the Remuneration Policy will be approved by the shareholders who have been asked to delegate authority to the Board to formulate & approve the same.	Board Charter BNHRC TOR 2024 Annual Report (Notice of the 2025 AGM, CG statement & Directors Remuneration Report).
35	M	B.28	How does the Board ensure compliance with all applicable laws, regulations and standards, including the Constitution and internal policies?	2.10, 2.10.1, 2.10.2	Fully Applied	The Board ensures compliance through the following functions which report to the Board/ Committees: Internal Audit, Risk & Compliance, Legal & Company Secretarial & External Auditors. In 2024, the Board constituted a Board Risk & Compliance Committee to give focused attention to matters within the Group.	Board Audit Committee and Board Risk & Compliance Committee TOR (Website) 2024 Annual Report (CG statement) (Website) & Minutes.
36	M	B.29	In the past year, has the Board organized a legal and compliance audit to be carried out on a periodic basis?	2.10.3	Fully Applied	Yes. The 2024 Legal & Compliance Audit was carried out by Kipitiness & Odhiambo Associates LLP.	2024 Annual Report (CG Statement) (Website) 2024 Legal & Compliance Audit Report by KO Associates LLP.
37	A or E	B.30	Has the Board subjected the company to an annual governance audit?	2.11.1	Fully Applied	A Governance Audit was carried out for the financial year ended 31.12.23 is due for the financial year 31.12.25.	2023 Governance Audit Report by Scribe Services
		C.	RIGHTS of SHAREHOLDERS				

38	M	C.1	Does the governance framework recognize the need to equitably treat all shareholders, including the minority and foreign shareholders?	3.0 Overview, 3.2.1	Fully Applied	Yes. The Board ensures that all shareholders notwithstanding their status are treated equally & in accordance with the Articles of Association. The Board uses various channels to communicate with the shareholders, including public notices, shareholder circulars & annual reports. All shareholder information is released through the Securities Exchanges & published in a timely manner in public platforms including newspapers and the Company's website. The Company has a Shares Registrar who is available physically & online to attend to shareholders queries relating to transfer of shares, payment of dividends, change of address etc.	Articles of Association 2024 Annual Report (CG statement) - Website	
39	M	C.2	Other than at the AGM, how does the Board facilitate the effective exercise of shareholders' rights?	3.1.1	Fully Applied	All shareholders have access to the Company Secretary and to the Shares Registrar whose contact details are given in the Annual Report. The Company has an open door policy for all shareholders who are welcome to raise any shareholding queries either physically or electronically. Shareholders in various towns in Kenya are also welcome to visit any of the Company branches listed in the Annual Report where they can be facilitated to communicate either in writing or electronically. As a cross listed company on the DSE & LSE, the Company has established liaison offices in Tanzania & Uganda through its subsidiary offices there where shareholders in these countries can be attended to.	2024 Annual Report - Website	
40	M	C.3	How does the Board facilitate shareholders participation at the AGM?	3.1.1	Fully Applied	By communicating the Notice, agenda and material for the AGM in 2 newspapers of wide circulation for 2 consecutive days & on the Company's website at least 21 days ahead of the AGM so that all shareholders have sufficient time to plan for the meeting. The Notice of the AGM clearly states the date, time, venue & agenda for the AGM & in the case of an electronic AGM, gives very detailed information on how shareholders can access the meeting, raise questions ahead & during the meeting & vote electronically. For electronic AGMs, the Company caters for the internet data costs of all shareholders registered to attend the AGM. All questions raised in advance during the AGM are responded to on the Company website. All resolutions passed at the AGM are announced at the conclusion of the meeting & notified through publication on the website within 10 days of the AGM.	Articles of Association 2024 Annual Report Newspaper publications - Website	
41	A or E	C.4	Are minority and foreign shareholders holding the same class of shares treated equitably?	3.2.1	Fully Applied	Yes. The Company ensures that all shareholders are treated equally in terms of return on investment, access to information and voting rights. In 2024 the Board published changes in the directorship in the daily newspapers in addition to all other corporate actions. These publications are also available on the Company's website.	Articles of Association Minutes of the AGM - Website	
42	A or E	C.5	Is there evidence that the Board proactively provides information to shareholders and the media, (and in a timely basis) on corporate affairs and corporate governance?	3.1.1, 3.4.1	Fully Applied	Yes. The release of any material information including interim & final financial accounts, appointment and resignation of Directors is published in the media & uploaded on the website within 24 hours of the decision being made.	Media publications Website /NSE Website /2024 Annual Report.	
D. STAKEHOLDER RELATIONS								
43	A or E	D.1	Does the Board have a stakeholder-inclusive approach in its practice of corporate governance and which identifies its various stakeholders?	4.1.1	Fully Applied	Yes. The Company regularly engages with its stakeholders via various forums including Employee Townhalls, intermediary and supplier forums held periodically, etc.	2024 Annual Report (ESG Report) - Website	
44	A or E	D.2	Has the Board developed policies, procedures and strategies to manage relations with different/key stakeholder groups?	4.1.2, 4.1.3, 4.1.5, 4.2.1	Fully Applied	Yes. The Group has adopted a Treating Customers Fairly (TCF) Policy with quarterly reports being tabled to the respective subsidiary Boards. The Group conducts regular customer satisfaction surveys to identify gaps and remedial action required. The Jubilee Holdings average NPS score for 2024 was +56.	2024 Annual Report (ESG Report) (Website) NPS Report for 2024 by Calltrox Kenya Limited	
45	A or E	D.3	How does the Board take into account the interests of key stakeholder groups prior to making decisions?	4.1.4	Fully Applied	Yes. By facilitating employee engagement forums at the monthly townhalls, regular engagement with supply chain partners and feedback from shareholders.	2024 Annual Report (ESG Report) - Website.	
46	M	D.4	How does the Board ensure effective communications with stakeholders?	4.2, 4.2.1	Fully Applied	Through timely and clear communication released through the Securities Exchange & published in the newspapers and Company Website. To encourage & facilitate two-way communication the Company has dedicated a email Talk2US@jubileekenya .	Website	
47	M	D.5	Has the Board established a formal dispute resolution process to address internal and external disputes?	4.3.1	Fully Applied	Yes. The company has an Appeals Committee that reviews any disciplinary action taken on an employee where such action is challenged by the employee.	2024 Annual Report (CG statement) - Website	
E. ETHICS AND SOCIAL RESPONSIBILITY								
48	A or E	E.1	Does the Board ensure that all deliberations, decisions and actions are founded on the core values (responsibility, accountability, fairness and transparency) underpinning good governance and sustainability?	5.1.1	Fully Applied	Yes. The Board members' skills and knowledge are applied to ensure that objective decisions are taken consistent with the values, business strategy and commitment to a transparent and high-quality governance system.	Board Charter Anti-Bribery and Anti-Corruption Policy Code of Conduct and Ethics - Website	
49	M	E.2	Has the Board developed a Code of Ethics and Conduct (which includes sustainability) and has it worked to ensure its application by all directors, management and employees?	2.6.1, 5.2.2, 5.2.3, 5.2.4	Fully Applied	Yes. The Company has formulated and implemented the Code of Conduct and Ethics for Directors & employees.	Code of Ethics and Conduct - Website	

50	A or E	E.3	How does the Board ensure that compliance with the Ethics Code and Conduct is integrated into company operations?	5.2.3	Fully Applied	All new employees are required to sign-up to the Code of Ethics and Conduct and all employees are required to make annual declarations that they shall abide by the Code of Ethics. Various aspects of the Code of Conduct are reinforced during the monthly townhall sessions attended by management & staff.	Code of Ethics and Conduct Human Resource Policy	
51	A or E	E.4	Does the Board incorporate ethical and sustainability risks and opportunities in the risk management process?	5.2.1	Fully Applied	Yes. There is a Risk Management Policy that covers all types of risks across the business including sustainability risks. The Board Risk & Compliance Committee (BRCC) has delegated authority to manage risks.	BRCC TOR Risk Management Policy 2024 Annual Report - Website	
52	A or E	E.5	How is the company performance on ethics assessed, monitored and disclosed to internal and external stakeholders?	5.2.4, 5.2.5	Fully Applied	Any unethical issues in the conduct of business are investigated & reported to the Board Risk & Compliance Committee by the Forensics & Security Services Department. The ESG reports details the fraud cases that were reported & actioned in 2024.	2024 Annual Report (CG Statement & ESG Report) - Website	
53	A or E	E.6	Has the company established and implemented a whistle blowing policy?	5.2.5	Fully Applied	Yes. It provides for the framework of managing and reporting malpractices and, fraudulent and corrupt behaviour. The Company has also signed-up to an external & accredited whistle blowing facility to enable employees & external persons to report any information they may have regarding any unethical or dishonest behaviour by co-workers or any external party dealing with the Company without fear of victimisation or retaliation. Reports through this facility are reported via Tip-Offs@Jubilekenya.com. These reports are dealt with in accordance with the Whistle Blowing Policy.	Whistle Blowing Policy - Website	
54	A or E	E.7	Has the Board/management developed policies on corporate citizenship and sustainability and strategies for company use?	5.3.1, 5.4	Fully Applied	The Board has approved a Sustainability Roadmap to guide the sustainability agenda. It has also adopted ESG reporting in line with the GRI reporting standard	2024 Annual Report (ESG Report) - Website	
55	M	E.8	Does the Board consider not only the financial performance but also the impact of the company's operations on society and the environment?	5.3.2, 5.3.3	Fully Applied	Yes. The Company is a founder member of the Blue Company Initiative, a certification mark for companies committed to doing clean business to build a sustainable business environment. JHL is also committed to contributing in this area through financing environmentally sustainable projects and through its corporate social responsibility activities. JHL has also approved a Sustainability Roadmap.	2024 Annual Report (ESG Report) - Website	
56	A or E	E.9	Does the Board monitor and report activities leading to good corporate citizenship and sustainability to demonstrate they are well coordinated?	5.4.1	Fully Applied	Yes.	2024 Annual Report (ESG Report) - Website	
F ACCOUNTABILITY, RISK MANAGEMENT AND INTERNAL CONTROL								
57	M	F.1	Does the Audit Committee and the Board consider and review the financial statements for integrity of the process and for truthful and factual presentation?	6.1, 6.1.1a	Fully Applied	Yes. The Board and the Audit Committee reviews the financial statements to ensure that the Company adheres to the International Financial Reporting Standards (IFRS). In addition, the Board also engages an external auditor to express an independent opinion on the financial statements	2024 Annual Report (Report of the Independent Auditor) BAC TOR - Website	
58	M	F.2	Does the Annual Report contain a statement from the Board explaining its responsibility for preparing the accounts and is there a statement by the external auditor about his/her reporting responsibilities?	6.1.2	Fully Applied	Yes. The 2024 Annual Report contains a statement from the Board accepting responsibility for the preparation and presentation of Financial Statements in accordance with IFRS & best practice. The Report also contains a statement from the external auditor on its reporting responsibilities.	2024 Annual Report (Statement of Directors' Responsibility & Report of the Independent Auditor) - Website	
59	A or E	F.3	Does the board or audit committee have a process in place to ensure the independence and competence of the Company's external auditors?	6.1.1b	Fully Applied	Yes. The Board, through the BAC reviews and monitors the external auditor's independence and objectivity and the effectiveness of the audit process, taking into consideration relevant professional and regulatory requirements.	BAC ToR - Website	
60	M	F.4	Do the shareholders formally appoint the external auditor at the AGM through a formal and transparent process?	6.1.3	Fully Applied	Yes. This is a standing agenda in all the Annual General Meetings of the shareholders	2024 Annual Report (2025 AGM Notice) and Shareholder resolutions passed at the 2024 AGM - Website	
61	A or E	F.5	Is the Company working towards the introduction of integrated reporting (incorporating financial and non-financial information) or is the company's Annual Report prepared on an integrated basis using a framework available from the Integrated Reporting Council, The Global Reporting Initiative, G4 Sustainability Guidelines and/or Sustainability Accounting Standards Board standards?	6.1.5	Fully Applied	Yes	2024 Annual Report (ESG Report in line with GRI reporting standards) - Website	
62	A or E	F.6	Has the Board established an effective risk management framework which is inclusive of key risks as well as foreseeable risks, environmental and social risks and issues?	6.2.1	Fully Applied	Yes. The Board has adopted a RM Framework which sets out the manner in which JHL realises opportunities and minimizes threats through implementation of adequate controls. The Board has constituted a Risk Management Function headed by the Group Head of Risk and Compliance	Enterprise Risk Management Framework. Reports of the Risk & Compliance Committees.	
63	M	F.7	Has the Board established and reviewed on a regular basis the adequacy, integrity and management of internal control systems and information systems (including for compliance with all applicable laws, regulations, rules and guidelines)?	6.3.1, 6.3.2, 6.3.3	Fully Applied	Yes. This is done through the Internal Audit & Risk & Compliance functions.	Internal Audit Reports/ Risk & Compliance Reports	
64	M	F.8	Does the Board annually conduct a review on the effectiveness of the company's risk management practices and internal control systems and report this to shareholders?	6.4.1	Fully Applied	Yes. Enterprise Risk Management Framework and internal control is reviewed quarterly by the Risk & Compliance & Internal Audit functions which then reports to the Board Risk & Compliance Committee (BRCC) & Board Audit Committee (BAC). The external auditor also reviews the internal control environment and reports thereon to the BAC. Disclosure is also made to shareholders through the Annual Report	2024 Annual Report (Report of the Independent Auditor) - Website	

65	M	F.9	Has the Board established an effective internal audit function according to Code requirements and which reports directly to the Audit Committee?	6.5.2	Fully Applied	Yes. The Board had constituted an Internal Audit Function which reports directly to the BAC. Yes, a summary is contained in the 2024 Annual Report & the TOR are on the website.	BAC ToR / Internal Audit Charter.
66	A or E	F.10	Does the Board disclose details of Audit Committee activities?	6.5.2	Fully Applied	Yes.	2024 Annual Report (CG statement) - Website.
		G	TRANSPARENCY and DISCLOSURE				
67	M	G.1	Does the company have policies and processes to ensure timely and balanced disclosure of all material information as required by all laws, regulations and standards and this Code.	7.0 Overview, 7.1.1	Fully Applied	Yes.	Media publications on public announcements - Website
68	A or E	G.2	Does the Annual Report cover, as a minimum, disclosures as prescribed in 7.1.1 relating to the company's governance, the Board and the Audit Committee?	7.1.1	Fully Applied	Yes.	2024 Annual Report (CG statement) - Website.
69	A or E	G.3	Does the Annual Report cover, as a minimum, disclosures as prescribed in 7.1.1 relating to the company's mission, vision and strategic objectives?	7.1.1	Fully Applied	Yes.	2024 Annual Report - Website.
70	A or E	G.4	Does the Annual Report cover, as a minimum, disclosures as prescribed in 7.1.1 relating to remuneration and whistleblowing?	7.1.1	Fully Applied	Yes.	2024 Annual Report (CG statement) - Website.
71	A or E	G.5	As a minimum, does the company website disclose current information on all areas prescribed in 7.1.1 (Board Charter, Whistleblowing Policy, Code of Ethics and information on resignation of directors)?	7.1.1	Fully Applied	Yes.	Company Website - www.jubileeinsurance.com
72	A or E	G.6	Does the Board disclose the management discussion and analysis as required in 7.1.1?	7.1.1	Fully Applied	Yes.	2023 Annual Report
73	A or E	G.7	Has the Board provided disclosures as required in 7.1.1 on compliance with laws, regulations and standards; ethical leadership, conflict of interest, corporate social responsibility and citizenship?	7.1.1	Fully Applied	Yes.	2023 Annual Report
74	A or E	G.8	Has the Board made all required disclosures, including confirming requirements of 7.1.1 which include that a governance audit was carried out and that there are no known insider dealings?	7.1.1	Fully Applied	Yes.	2023 Annual Report (CG statement) - website
75	A or E	G.9	Has the Board disclosed the company's risk management policy, company procurement policy, policy on information technology as per 7.1.1?	7.1.1	Fully Applied	Yes.	2023 Annual Report / Website
76	M	G.10	Has the Board disclosed information on shareholders, including the key shareholders, including shareholding by directors and senior management and the extent of their shareholdings as required in 7.1.1 and on stakeholder who influence company performance and sustainability?	7.1.1	Fully Applied	Yes. The Board has disclosed key shareholder statistics in the Annual Report	2023 Annual Report (Shareholding details) / Monthly reporting to CMA and NSE
77	M	G.11	Has the Board disclosed all related-party transactions?	7.1.1	Fully Applied	Yes. All transactions relating to related parties are disclosed in the Financial Statements.	2023 Annual Report (Notes to the financial statements) - Website.
78	M	G.12	Does the Board include in its Annual Report a statement of policy on good governance and the status of the application of this Code?	1.1.3, 7.1.1r	Fully Applied	Yes. The Board included a statement of policy on good governance and the status of the application of this Code in the Annual Report.	2023 Annual Report (CG statement) - Website