It is the policy of EVEREADY East Africa Ltd and its affiliates to comply fully with all laws, rules and regulations which affect Company operations, whether within or outside Kenya, and to maintain its position as a good corporate citizen of Kenya a nd other nations.

In this questionnaire, you are being asked to respond to certain specific questions, as well as to certify that you have complied with the policies described in "BUSINESS PRACTICES & STANDARDS OF CONDUCT" throughout the period from January 1, 2007 to the present.

INSTRUCTIONS FOR COMPLETING QUESTIONNAIRE

References in this Questionnaire to the "Company" include EEAL as well as its affiliates.

Answer each question that follows by marking "YES" or "NO". Please do not leave any questions unanswered.

If your answer to any question is "Yes", you must explain your answer in the space provided immediately below the question.

You need NOT disclose the following:

- Your ownership of stock in the Company unless the ownership is significant
- Salary, wages, bonus, commission and any other employment compensation from the Company for your service;
- Benefits received under Company sponsored programs;
- Approved expense reimbursement or relocation assistance;
- Transactions with employee credit unions; or
- Ownership of less than 1% of the outstanding stock of a large, publicly traded corporation.

"Member of your family" means your spouse(s), dependants, children, stepchildren, mother, father, or siblings, or your spouse's mother, father or siblings, and any other adult living with you.

Once you have fully completed the questionnaire, you should deposit it into the appropriate box at the Legal Department or forward it to the Industrial Relations Department.

Before you submit this questionnaire it is required you read the Business Practices & Standards of Conduct document.

Last Name _____ First Name _____

Staff No. _____ Department _____

QUESTIONS:

1) Have you or, to your knowledge, has any member of your family:

a) Engaged in any business or financial transaction with the Company, including personal loans? (See instructions above.)
☐ YES ☐ NO
If you select YES as your answer, give your explanation here:

b) Had any personal financial interest in, or affiliation with, any company, partnership, proprietorship or other business entity that (1) has had any business relationship with the Company; (2) has competed with the Company; or (3) could have benefited by your acts or decisions for the Company? (See instructions above.)
☐ YES ☐ NO
If you select YES as your answer, give your explanation here:

c) Without approval of your supervisor, received any cash gift or any gift which has a value of more than KShs.1,500/- from any business entity or other outside concern which (1) does, has sought or is seeking to do business with the Company, or (2) is or has been a competitor of the Company?
☐ YES ☐ NO
If you select YES as your answer, give your explanation here:

d) Have you fully disclosed any situation described in (a), (b) or (c) above to your supervisor or direct report?
☐ YES ☐ NO
If you select NO as your answer, give your explanation here:

2) Are you aware of any deficiencies or weaknesses in the Company's financial and computer system controls which would allow for fraud, theft or embezzlement?
☐ YES ☐ NO
If you select YES as your answer, give your explanation here:

3) In the course of your employment, have you become aware of an illegal or unethical act, or have you been pressured to perform an illegal or unethical act?
☐ YES ☐ NO
If you select YES as your answer, give your explanation here:

4) Have you directly or indirectly done or participated in any of the following OR are you aware of any facts or circumstances which would indicate any other employee of the Company has directly or indirectly done or participated in any of the following:

a) Violated or caused a violation by the Company of any domestic or foreign law or governmental rule or regulation which has not been reported to the Legal Department?
☐ YES ☐ NO
If you select YES as your answer, give your explanation here:

b) Made or permitted any unauthorized disclosure of confidential information of the Company?
☐ YES ☐ NO
If you select YES as your answer, give your explanation here:

c) Given to any customer or received from any supplier any bribe, kickback or other unauthorized payment?
☐ YES ☐ NO
If you select YES as your answer, give your explanation here:

d) Used any funds or assets of the Company in connection with any unlawful act or purpose, including direct or indirect offers or payments to governmental officials or their agents, domestic or foreign?
☐ YES ☐ NO
If you select YES as your answer, give your explanation here:

e) Made any false or fictitious entry in the books, records or accounts of the Company or maintained or established any undisclosed or unrecorded Company fund or asset?
☐ YES ☐ NO
If you select YES as your answer, give your explanation here:

f) Made any false or misleading statement to, or withheld material information from, any person in connection with a Company investigation, an audit of the Company's financial statements or the preparation or filing of any governmental report?
☐ YES ☐ NO
If you select YES as your answer, give your explanation here:

g) Made any false or misleading statement to, or withheld material information from, any person in connection with a Company investigation, an audit of the Company's financial statements or the preparation or filing of any governmental report?
☐ YES ☐ NO
If you select YES as your answer, give your explanation here:

h) Made any expenditure or engaged in any transaction on behalf of the Company which was not generally or specifically authorized by management?
☐ YES ☐ NO
If you select YES as your answer, give your explanation here:

i) Made any unauthorized political contribution out of any Company fund or account?
☐ YES ☐ NO
If you select YES as your answer, give your explanation here:

j) Bought or sold the Company's common stock, options on that stock, commodities or commodity futures on the basis of material information relating to the operations of the Company that was not publicly released?
☐ YES ☐ NO
If you select YES as your answer, give your explanation here:

k) Traded in, supplied, exhibited, promoted,sold, or offered for sale any products which are in direct competition with any of the Company's products?
☐ YES ☐ NO
If you select YES as your answer, give your explanation here:

BY TRANSMITTING YOUR ANSWERS TO THIS QUESTIONNAIRE, YOU ARE CERTIFYING THAT YOU HAVE READ AND UNDERSTOOD THE FOREGOING QUESTIONS AND HAVE RESPONDED TO THEM TRUTHFULLY. YOU ARE ALSO CERTIFYING THAT YOU HAVE READ AND COMPLIED FULLY WITH THE POLICIES SET FORTH IN 'BUSINESS PRACTICES AND STANDARDS OF CONDUCT".

IF YOU BECOME AWARE OF ANY FACTS OR CIRCUMSTANCES WHICH WOULD CHANGE YOUR ANSWERS TO ANY OF THE ABOVE QUESTIONS, YOU MUST PROMPTLY ADVISE THE COMPANY BY NOTIFYING THE LEGAL RELATIONS MANAGER, MARGARET ODHIAMBO, AND/OR THE HEAD OF HUMAN RESOURCES & ADMINISTRATION, NARMIN KASSAM.

FAILURE TO TRUTHFULLY RESPOND TO THE ABOVE QUESTIONS MAY RESULT IN DISCIPLINARY ACTION.

TO:
AUDIT COMMITTEE
THE EVEREADY EAST AFRICA LIMITED
P.O BOX 46637-00100
NAIROBI, KENYA

EVEREADY®
EAST AFRICA LIMITED

Q&A

Have you done the right thing?

ANNUAL POLICY COMPLIANCE QUESTIONNAIRE