

Chui Ventures



Responsible Investment Policy

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POLICY GOVERNANCE

Scope

This policy applies to all Chui Venture’s (“Chui VC” or “the Firm”) business activities and operations. It will be reviewed periodically and updated as the Firm’s strategy develops, and/or as best practice emerges.

This policy was formally approved by the Firm and LP Advisory Committee (“LPAC”) on 26th February, 2025.

Governance

Oversight

The Chui VC board hold ultimate responsibility for the Firm’s responsible investment strategy and ownership of this policy.

Implementation

Implementation of this policy is every Chui VC team member’s’ responsibility as documented in our accompanying Responsible Investing process document (also referred to as the Environmental and Social Management System or “ESMS”). In addition, as part of the Firm’s stewardship efforts, we seek to apply and share this policy and its principles with our partners and investee companies but recognize the relevancy and ability to implement these commitments may vary materially by sector, region, and/or stage of growth. We therefore encourage application on a *best-efforts* basis.

Communication

This policy will be communicated to Chui VC employees during onboarding and training, including employees’ role in implementation of this policy via the ESMS. As noted above under implementation we may share this policy with partners and investee companies to support them in adopting these commitments progressively over time.

Resources

The Firm is committed to providing adequate resources to execute its responsible investment strategy, including using external consultants where necessary to enhance value.

Reporting

The Firm will report on broader progress against its responsible investment strategy through periodic updates to stakeholders. To the extent we are able to obtain relevant data we will also track progress from investee companies relating to progress on their ESG journeys and impact priorities.

Collaboration and adherence to best practice

The Firm seeks to align its thinking and practices to globally recognized standards, frameworks, and benchmarks where relevant, as well as seeking inspiration from leading peers and wider industry collaborative efforts.

Chui VC will also actively engage and support specific initiatives, including prioritizing partnerships with African organizations or groups to support the growth of local expertise and knowledge where relevant.



Frameworks, bodies and guidance that are referenced, including during the drafting of this policy include:



[UN Principles of Responsible Investment \(PRI\)](#)

[UN Declaration of Human Rights](#)

[UN Guiding Principles on Business and Human Rights \(UNGP\)](#)

[UN Sustainable Development Goals \(SDGs\)](#)

[G20/OECD Principles of Corporate Governance](#)

[ILO Fundamental Worker's Rights conventions](#)

[2X Global – Gender Lens Investment](#)

[Task Force on Climate-related Financial Disclosures \(TCFD\)](#)

[Sustainability Accounting Standards Board \(SASB\)](#)

[Paris Agreement](#)

[OECD AI Principles](#)

[UNESCO's AI Ethics Guidelines](#)

[African Private Equity and Venture Capital Association \(AVCA\)](#)

[East Africa Venture Capital Association \(EAVCA\)](#)

[ESG for Venture Capital initiative \(ESG_VC\)](#)

[HV Capital – ESG Guide for Startups](#)

[Atomico Conscious Scaling 2.0 Report](#)

[BII \(CDC\) / FMO Responsible Venture Capital Good Practice note](#)

INTRODUCTION

Mission and business purpose

Venture Capital in Africa plays a critical first role in underwriting the next generation of African business leaders and entrepreneurs. At Chui VC we provide seed funding and strategic support to high-potential African founders—with a gender equity focus—who are driving digital and tech-enabled solutions to address mass-market needs.

In doing so we commit to the principles of responsible investing, including ESG integration, active stewardship, and impact alignment. We believe responsible and ethical businesses deliver greater long-term value to investors and broader stakeholders.

Through our investments we strive for positive, measurable impact, emphasizing gender and financial inclusion, economic participation, and private sector job creation. We seek to amplify underrepresented voices in innovation and to empower local entrepreneurs to redefine how Africans live, work, and spend – creating a sustainable and inclusive future to reflect Africa’s full potential.

Responsible investment pillars

We see responsible investing as the combining of three core pillars: ESG integration, stewardship, and impact. Our rationale and beliefs underlying each pillar are outlined below, with accompanying integration processes documented within our ESMS.

1) ESG Integration

All businesses face ESG issues, which vary in materiality by sector, region, and stage of growth. At Chui VC we believe businesses able to identify and manage their material ESG issues will be better protected against downside risks and thus more likely to deliver long term value. We recognize most startups are at the beginning of their business journey, which includes navigating a complex and emerging ESG regulatory landscape.

To the extent we have ownership or influence over an investee company we encourage them to embark on an ESG journey, including drafting key policies and establishing priorities, which at a minimum includes compliance with applicable ESG regulations (e.g. tax, employment, minimum wages, environmental protections, health and safety, data privacy and security). Maintaining ongoing compliance is the responsibility of each portfolio company’s founding team, and we seek to explore and assess their ability to manage ESG issues during our investment process.

We draw special attention to corporate governance which we see as a critical proxy to the overall success of a company’s ESG management (without effective corporate governance, environmental or social issues cannot be managed).

2) Stewardship

We see active stewardship as critical in shaping the trajectory of early-stage seed companies, ensuring solid foundations for future growth. We provide access to a robust network, strategic advisory services, and mentorship in addition to financial capital. As part of this, and to the extent we have ownership or influence, we take a proactive role in supporting companies on their ESG journey and impact priorities post investment.

3) Impact

While we are not a pure impact investor, we prioritize minimizing the potential negative impact of our strategy. This is achieved through applying screens and exclusions to our investment universe, avoiding sectors we or our LP investors identify as having the potential to cause material environmental or social harm (see section on ‘Exclusions’).

Secondly, we actively aim to drive positive impacts through aligning to several UN Sustainable Development Goals (SDGs). We have chosen the SDGs for their global recognition and effectiveness in communicating impact to our stakeholders.



The following SDGs and objectives guide our impact stewardship priorities, as well as determining the data we seek to collect from our investee companies:

	<p>SDG 5: Gender Equality - <i>Championing Women and Gender Inclusive Growth</i></p> <p>We promote gender equity through supporting women entrepreneurs and businesses addressing female focused markets and solutions.</p>
	<p>SDG 1: No Poverty - <i>Improving Livelihoods and Financial Inclusion</i></p> <p>We focus on scalable, tech-enabled innovations that enhance financial inclusion, improve livelihoods, and extend access to businesses and consumers.</p>
	<p>SDG 8: Decent Work and Economic Growth – <i>Creating Local African Solutions</i></p> <p>We empower African entrepreneurs to create scalable, impactful solutions grounded in local realities to drive sustainable and inclusive growth.</p>

ESG COMMITMENTS

Here we outline responsibilities and commitments in respect of each area of ESG.

Environment

Mandatory: Adherence to all applicable environmental laws and regulations across all jurisdictions of operation.

Commitments:

- Seek to minimize environmental footprints where possible. Environmental footprint includes all types of waste, pollution (air/water/soil), emissions, biodiversity, and use of natural resources. Where such footprints are material, these must be brought within the realm of core business strategy with a plan to manage and mitigate these effectively.
- Seek to make choices with lower environmental impact where practical, cost effective or feasible, especially where such choices form a core part of business operations (e.g. selecting recyclable or lighter packaging options for a new product line).
- In offices and/or office-based companies:
 - Implement waste management initiatives including clearly labelled recycling bins, eliminating single use plastic (e.g. cups, plates) and establishing a formal e-waste recycling process for electronic items.
 - Support hybrid work and investing appropriately in virtual collaboration tools and high-quality internet connection to reduce and/or avoid unnecessary travel.
 - Support greener travel through incentives for carpooling, cycling or public transport where relevant to office location.
 - Begin to collect electricity consumption data, including reviewing opportunities for potential cost and/or efficiency savings (e.g. opportunities to switch to greener electricity).
 - Transition to a paperless workplace through investing appropriately in digital tools and use of electronic signatures.
 - Encouraging nature positive choices (e.g. vegetarian catering, office plants, team visits to places that inspire connection with nature).
 - Where possible source office supplies and equipment from local and/or sustainability focused vendors.
- Begin exploring the potential impact of climate change on business operations. This includes potential physical risks to property or fixed assets, and transition risks/opportunities arising from mandatory regulation e.g. carbon taxes. This may result in a strategy for enhancing climate resiliency as relevant to business context.

Social

Mandatory: Adherence to all applicable social laws and regulations across all jurisdictions of operation. This includes respecting formal employment laws and acting with strict regard for fundamental human rights.

Commitments:

- Seek to proactively identify, prevent, and address potential negative human rights risks in business operations and associated value chain. These include potential negative impacts on local communities, members of the public, customers, or vulnerable groups including through products or services sold by the business, as well as child /forced labour. Local or potentially impacted stakeholders should be involved in decision-making processes where risks and/or potential interactions are present. Where such risks are identified as material these must be brought within the realm of core business strategy and managed and mitigated effectively.
- All employees should have formal employment contracts in line with local employment regulations, and businesses should proactively monitor emerging changes to local employment legislation to ensure ongoing compliance. Businesses should also promote fair labor practices in their value chain by encouraging suppliers and partners to pay the minimum wage and comply fully with local legislation. There should be a willingness to switch partners/suppliers where such standards are not met.
- Adopt a health and safety management system commensurate with the nature and risks inherent in the business.
- Protect and support employee wellbeing and health (physical and mental) through the provision of employee benefits and parental leave commensurate with the size and stage of the business.
- Proactively promote and support diversity in all its forms (especially gender but also ethnicity, socioeconomic background, age and disabilities). In addition, the business should demonstrate a preference for local employment by encouraging startups to prioritize hiring from within their own communities or regions while ensuring fair wages consistent with local living standards.
- For businesses using big data and/or machine learning techniques, businesses should integrate emerging social risks from rapid technological advancement, such as ethical use of AI, data privacy, algorithmic biases, and resulting inequalities into core business strategy where relevant.

Governance

Governance is a critical pillar in our investment process, and a core contributor to the likely success of a business. A thorough assessment of governance is therefore embedded within our investment decision-making process through structured scoring that evaluates a variety of governance factors including founder diversity, alignment of skill sets within the founding team, presence of formal governance structures/ documentation, and a thorough review of the founder's background and history across platforms like LinkedIn, Twitter, and Instagram as well as CVs and investment track record.

Mandatory: Adherence to all applicable governance laws and regulations in jurisdictions across all jurisdictions of operation, including critically corporate governance, investment governance and data governance.

Commitments:

- Uphold at all times the highest standards of ethical business practice, as enshrined in a company code of conduct and/or ethics, as well as through a core list of policies and documented procedures including an anti-bribery / corruption policy , and formal grievance mechanism.
- Remain politically neutral i.e., not favour any political party, group or individual over another, nor permit the use of funds or resources to be used as contributions to any political campaign, party, candidate, or affiliated organization, or for political advocacy or lobbying.
- Effectively manage conflicts of interest through transparency in decision-making processes. This involves identifying, disclosing, and addressing conflicts of interest as and when these arise. Additionally, established protocols should include seeking independent advice where complex conflicts arise.
- Proactively promote and support diversity at the board and/or leadership level, especially gender and skills diversity.
- Encourage formal defining of roles, responsibilities, and contributions of the founding teams, through a formally binding agreement.
- Invest in appropriate management systems to address risks like cash flow management, regulatory compliance, and reputational issues early on in a company's growth stage. This includes building basic financial controls to support audit-readiness and foster investor confidence for future funding rounds. The business should also establish data privacy and cybersecurity protections, especially where handling personal or sensitive data.
- Implement clear but simple reporting mechanisms, including periodic updates on financial performance, growth metrics, and challenges. This includes standardizing reporting templates where possible for consistency in data collection, benchmarking, and analysis.

MINIMUM REQUIREMENTS

Minimum expectations of investee companies

We expect investee companies to meet the following requirements on a *best-efforts* basis:

1. Designate HR and/or ESG champion(s) for the business.
2. Report ESG and impact data annually to us.
3. Seek to adhere to the commitments in this policy.
4. Establish core policies within the first three years of investment that reflect the recommendations and commitments outlined herein.

Where possible we seek to introduce the above commitments within legally binding documentation (typically the term sheet and/or shareholder's agreement) pre-investment.

Exclusions list

While we are a sector agnostic fund, we will not finance business activities where we or our investors assess the governance practices and/or record, or environmental and/or social externalities of a business or sector as materially negative. This includes activities covered under the IFC Exclusion List (2007) as follows:

- Production or trade in any product or activity deemed illegal under host country laws or regulations or international conventions and agreements, or subject to international bans, such as pharmaceuticals, pesticides/herbicides, ozone depleting substances, PCB's, wildlife or products regulated under CITES.
- Production or trade in weapons and munitions¹
- Production or trade in alcoholic beverages (excluding beer and wine).¹
- Production or trade in tobacco.¹
- Gambling, casinos and equivalent enterprises.¹
- Production or trade in radioactive materials. This does not apply to the purchase of medical equipment, quality control (measurement) equipment and any equipment where IFC considers the radioactive source to be trivial and/or adequately shielded.
- Production or trade in unbonded asbestos fibers. This does not apply to purchase and use of bonded asbestos cement sheeting where the asbestos content is less than 20%.
- Drift net fishing in the marine environment using nets in excess of 2.5 km. in length.
- Production or activities involving harmful or exploitative forms of forced labour² or child labour.³
- Commercial logging operations for use in primary tropical moist forest.
- Production or trade in wood or other forestry products other than from sustainably managed forests.
- Production, trade, storage, or transport of significant volumes of hazardous chemicals, or commercial scale usage of hazardous chemicals. Hazardous chemicals include gasoline, kerosene, and other petroleum products.
- Production or activities that impinge on the lands owned, or claimed under adjudication, by Indigenous Peoples, without full documented consent of such peoples.
- Sanctioned or embargoed materials or sectors
- Any funding of political parties or lobbying.

1. This does not apply to companies who are not substantially involved in these activities. "Not substantially involved" means that the activity concerned is ancillary to a company's primary operations.

1. Forced labor means all work or service, not voluntarily performed, that is extracted from an individual under threat of force or penalty.

1. Harmful child labor means the employment of children that is economically exploitive, or is likely to be hazardous to, or to interfere with, the child's education, or to be harmful to the child's health, or physical, mental, spiritual, moral, or social development.

Chui Ventures



GET IN TOUCH

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