



CHART OF AUTHORITY POLICY

For Kwacha Access Finance Limited

Version : V1.1

Effective Date: 1 August 2025

Approved By: Board of Directors

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1. PHILOSOPHY & REGULATORY ANCHOR

1.1 Why This Policy Exists

To empower agile decision-making while preventing unauthorized risks that could destabilize our institution or violate RBM mandates. This framework turns our values of Leadership and Responsibility into operational guardrails.

1.2 Regulatory Imperatives

Regulation	Requirement
RBM Microfinance Governance S5.2	Documented delegation matrices
Malawi Companies Act S147	Board approval for material capital commitments
RBM Prudential Standard 8	Dual controls for transactions above MK5,000,000.00

2. DEFINITIONS & SCOPE

2.1 Key Terms

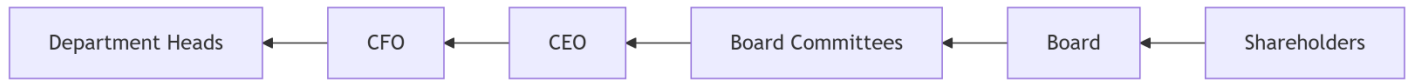
Term	Definition
Material Transaction	Equal to or over 5% of monthly loan sales (MK750,000.00 at current scale)
CEO	Chief Executive Officer
CFO	Chief Financial Officer
Dual Control	Two authorized signatures (CEO+CFO)
RBM Reporting Threshold	Transactions above MK20,000,000.00 (filed within 3 days)

2.2 Scope

- **Covered:** Capital expenditure, loan products, funding, talent, vendor contracts.
- **Excluded:** Day-to-day branch operations (handled by *Operations Manual v2.1*).

3. GOVERNANCE PRINCIPLES

3.1 Decision-Making Hierarchy



3.2 Core Rules

1. **Unity of Command:** No decision approved by more than one authority tier.
2. **Segregation of Duties:** Initiator ≠ Approver ≠ Executor.

4. AUTHORITY MATRIX

4.1 Financial Authorities

Decision Threshold	Initiator	CFO	CEO	Board Committee	Full Board
CAPITAL EXPENDITURE					
≤ MK2M	Dept Head	✔ Approve	← END Inform	–	–
> MK2M ≤ MK20M	CFO Team	✔ Risk Review	✔ Approve	← END Inform (Audit Com)	–
> MK20M ≤ MK40M	CEO	← END Due Diligence	← END Recommend	✔ Approval (Audit Com)	← END Inform
> MK40M	Audit Committee	–	–	← END Recommend	✔ Approval

Decision Threshold	Initiator	CFO	CEO	Board Committee	Full Board
LOAN PORTFOLIO					
NPL Write-off ≤ MK500K	Credit Manager	✓ Approve	–	–	–
> MK500K ≤ MK2M	CFO	← END Audit Review	✓ Approve	← END Inform (Credit Com)	–
> MK2M	Credit Committee	–	–	← END Investigate	✓ Approval
New Loan Product ≤ MK100M Book	Product Team	✓ Pricing Model	✓ Launch	–	–
New Product > MK100M Book	CEO	← END Impact Analysis	← END Recommend	✓ Approval (Risk Com)	← END Inform

4.2 Operational Authorities

Decision Type	Authority	Escalation Path
Talent Management		
- Hire/Fire ≤ Manager	CEO	Human Capital Committee (if dispute)
- C-Suite Roles	Human Capital Committee → Board Approval	N/A

5. DELEGATION PROTOCOLS

5.1 Temporary Delegation

- Filed with Company Secretary (max 30 days).
- **Conditions:**
 - Absence of primary authority holder.
 - Delegation excludes Board-reserved powers.

5.2 Prohibitions

- No redelegation of delegated powers.
- No delegation to conflicted parties.

6. CONTROLS & MONITORING

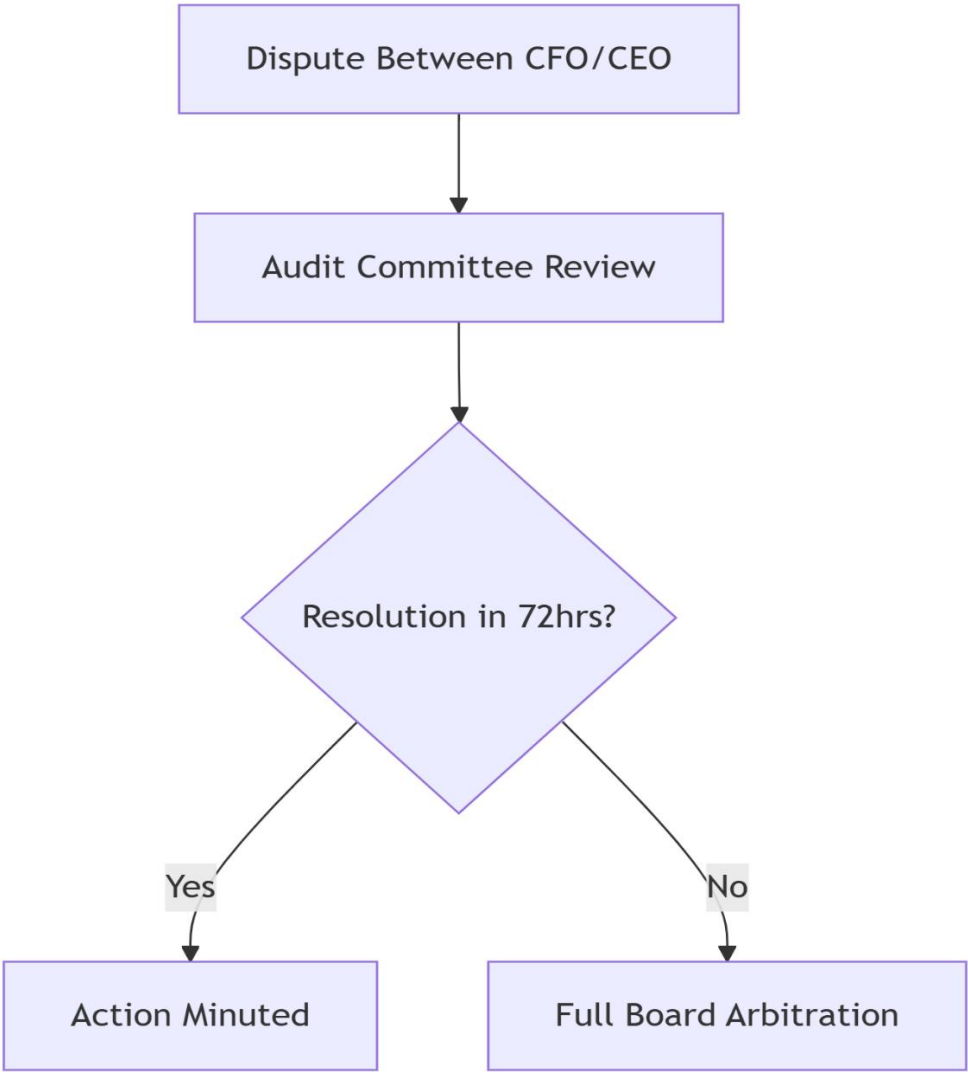
6.1 Control Mechanisms

- **Dual Signatories:** All payments (Material) over MK750,000.00 (CEO+CFO).

6.2 Compliance Monitoring

Activity	Frequency	Owner	Output
Transaction Audit	Quarterly	Internal Audit	RBM Compliance Report
Delegation Register Review	Quarterly	Company Secretary	Board Update

Escalation Flowchart



Board Resolution:

RESOLVED: This Chart of Authority Policy (v1.0) is adopted effective 1 August 2025. The CFO will file it with RBM within 14 days and train all staff by 30 September 2025.

Signatures:

Chairperson, Board of Directors

Chief Executive Officer

Chief Financial Officer
