








Human Rights Policy

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HUMAN RIGHTS POLICY

1. Preamble

The Company underwrites the foundational principle that human rights are rights inherent to all human beings, regardless of race, sex, nationality, ethnicity, language, religion, or any other status. Human rights include the right to life and liberty, freedom from slavery and torture, freedom of opinion and expression, the right to work and education, and many more. Everyone is entitled to these rights, without discrimination.

These rights are set in international law and oblige Governments to act in certain ways or to refrain from certain acts, to promote and protect human rights and fundamental freedoms of individuals or groups. The United Nations has created a comprehensive body of human rights law which is contained in a universal and internationally protected code to which the Company subscribes. In the instance of this policy, the first 6 rights are in focus and address -

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and

Principle 2: Businesses should ensure that they are not complicit in human rights abuses.

Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.

Principle 4: Businesses must take steps to eliminate of all forms of forced and compulsory labour.

Principle 5: Business must take steps to support the abolishment of child labour; and

Principle 6: Businesses must not unfairly discriminate in respect of employment and occupation.

The above Principles are also to be read in conjunction with other international labour standards such as those of the International Labour Organisation (ILO) as well as national labour laws.

2. Purpose/Business Philosophy


The Company believes that its sustainability starts with its value system and a principles-based approach to doing business. This means operating in ways that, at a minimum, meet fundamental responsibilities in the areas of human rights and labour. By incorporating human resources and labour relations principles into strategies, policies, and procedures, and establishing a culture of integrity, the Company and its stakeholders have a higher prospect of long-term success.

3. Scope

This policy applies to all our employees and all Company activities associated with our employees' cycle of employment.

4. National Statutes of Application

In the South African jurisdiction, there are a multiplicity of laws that require organisations to comply with statutes enforcing human rights. These laws are enforced by various institutions and Courts as well as through procurement and other stakeholder procedures: -

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- 4.1 Constitution of South Africa (Human dignity, the achievement of equality and advancement of human rights and freedoms).
- 4.2 Labour Relations Act (no. 66 of 1995 - to give effect to the public international law obligations of the Republic relating to labour relations).
- 4.3 Employment Equity Act (no. 55 of 1998 – to abolish unfair discrimination and to advance the rights of those previously disadvantaged).
- 4.4 Promotion of Equality and Prevention of Unfair Discrimination Act (no. 4 of 2000 - to prevent and prohibit unfair discrimination and harassment).
- 4.5 Cybercrimes Act (no.19 of 2020 – which addresses matters including threats of violence, harassment, and intimidation).
- 4.6 Broad-based Black Economic Empowerment Act and its corresponding Codes (no.53 of 2003).

The Company warrants that it complies with and enforces the above laws as well as other applicable laws and will not tolerate any form of human rights violations.

5. Policy

5.1 Freedom of Association and Protection of Right to Organise

- 5.1.1 Employees and employers, without distinction whatsoever, shall have the right to establish and join organisations of their own choice without previous authorisation by the Company. The Company and its employees shall refrain from any interference which would restrict this right or impede the lawful exercise thereof.
- 5.1.2 Employer and employee organisations shall have the right to establish and join federations and confederations and any such organisation, federation or confederation shall have the right to affiliate with international organisations of workers and employers.
- 5.1.3 The Company undertakes to take all necessary and appropriate measures to ensure that employees may exercise these rights freely. Specifically, employees shall enjoy adequate protection against acts of anti-union discrimination in respect of their employment. Such protection shall apply more particularly in respect of acts calculated to
 - (a) make the employment of a worker subject to the condition that he/ she shall not join a union or shall relinquish trade union membership.
 - (b) cause the dismissal of or otherwise prejudice a worker by reason of union membership or because of participation in union activities outside working hours or, with the consent of the employer, within working hours.
- 5.1.4 Further to the above, measures appropriate to national law shall be taken, where applicable, to promote the full development and utilisation of measures for voluntary negotiation between employers or employers' organisations and employee organisations, with a view to the regulation of terms and conditions of employment by means of collective agreements.


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5.2 Forced Labour

- 5.2.1 The Company shall oppose the use of forced or compulsory labour in all its forms. The term ***forced or compulsory labour*** shall mean all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered themselves voluntarily.
- 5.2.2 The Company undertakes to suppress and not to make use of any form of forced or compulsory labour: -
- (a) as a means of political coercion or education or as a punishment for holding or expressing political views or views ideologically opposed to the established political, social, or economic system.
 - (b) as a method of mobilising and using labour for purposes of economic development.
 - (c) as a means of labour discipline.
 - (d) as a punishment for having participated in strikes.
 - (e) as a means of racial, social, national, or religious discrimination.

5.3 Minimum Age and Worst Forms of Child Labour

- 5.3.1 The Company undertakes to pursue a policy to ensure the effective abolition of child labour and to propagate the admission of individuals to employment or work on a level consistent with the fullest physical and mental development of young persons.
- 5.3.2 The Company shall put procedures in place not to employ nor utilise the services of a worker who is below the national working age. The minimum age specified in pursuance of this shall not be less than the age of completion of compulsory schooling and, in any case, shall not be less than 15 years. Notwithstanding this, the minimum age for admission to any type of employment or work which by its nature or the circumstances in which it is carried out is likely to jeopardise the health, safety, or morals of young persons, shall not be less than 18 years.
- 5.3.3 The Company shall also take clear steps that are required to secure the prohibition and elimination of all forms of child labour across its value chain. The term **child** shall apply to all persons under the age of 18. The term **all forms of child labour** comprises:
- (a) all forms of slavery or practices similar to slavery, such as the sale and trafficking of children, debt bondage and serfdom and forced or compulsory labour, including forced or compulsory recruitment of children for use in armed conflict.
 - (b) the use, procuring or offering of a child for prostitution, for the production of pornography or for pornographic performances.
 - (c) the use, procuring or offering of a child for illicit activities, in particular for the production and trafficking of drugs as defined in the relevant international treaties.
 - (d) work which, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety, or morals of children.

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5.4 Discrimination (Employment and Occupation)

5.4.1 The term *discrimination* includes -

- (a) any distinction, exclusion or preference made based on race, colour, sex, religion, political opinion, national extraction, or social origin, which has the effect of nullifying or impairing equality of opportunity or treatment in employment or occupation.
- (b) such other distinction, exclusion or preference which has the effect of nullifying or impairing equality of opportunity or treatment in employment or occupation as may be determined by statute of application.

5.4.2 Any distinction, exclusion, or preference in respect of a particular job based on the inherent requirements thereof shall not be deemed to be discrimination. The terms **employment** and **occupation** include access to vocational training, access to employment and to particular occupations, and terms and conditions of employment.

6. Practice

6.1 The Company shall ensure that the provisions of this policy are applied across all its activities and particularly in the following areas and practices: -

- 6.1.1 Statutory submissions: these include annual submissions on employment equity reports to the Department of Employment and Labour as well as the Workplace Skills Plan and Annual Training Report submissions.
- 6.1.2 Employment lifecycle practices: these include decisions and practices engaged in during sourcing, assessing, appointment, contracting, remunerating, training and development, labour relations, career and succession planning, retention and the like.
- 6.1.3 Practices: these include disciplinary code, grievance procedure and provisions such as codes of conduct on the elimination of harassment and violence at the workplace.
- 6.1.4 Education, training, and development: these would include foundational training on fair discrimination.