

### 1. Introduction

Tsebo Solutions Group (Proprietary) Limited, its holding companies and its subsidiaries (collectively referred to as the "Group" and/or "Tsebo") is committed to upholding and promoting human rights in alignment with our Code of Ethics and Good Business Practices Policy, the Constitution of South Africa, the United Nations Global Compact Principles and legislation pertaining to human rights in the countries where we operate. We recognise the importance of respecting and protecting the fundamental rights and freedoms of all individuals, both within and outside our organisation. This Human Rights Policy serves as a guiding framework for our commitment to human rights.

### 2. Objectives

The objectives of the Human Rights Policy:

- promote a culture of human rights, the observance, respect and protection thereof inside Tsebo;
- develop an awareness of human rights among Tsebo, its employees and external stakeholders through training and awareness;
- monitor and assess compliance with human rights inside Tsebo; and
- investigate any alleged violation of human rights within Tsebo and its external stakeholders and assist any person adversely affected thereby in order to secure redress.

### 3. Guiding Principles

In developing this Policy, we are guided by the principles of the following human rights standards.

#### 3.1 Tsebo Code of Ethics and Good Business Practices

Tsebo is committed to the highest standards and strives to discharge its duties with conscience, competence, commitment and courage and with an inclusive approach to all stakeholders. We expect all employees, contractors and suppliers to share its commitment to high moral, ethical and legal standards and create conditions where all can work with dignity.

#### 3.2 Constitution of South Africa

Tsebo recognises that the Bill of Rights encompassed in our Constitution is the foundation of freedom, justice and peace in South Africa and accordingly subscribes to the principles laid out therein.

#### 3.3 United Nations Global Compact Principles

Tsebo is proud to be a signatory/member of the UN Global Compact, and we are committed to upholding its principles. We actively align our business operations with the ten universally accepted principles. Through this commitment, we contribute to the promotion of sustainable and responsible business practices globally.

#### 3.4 Other Applicable Legislation

While Tsebo is primarily subject to South African legislation due to its primary operations being located in South Africa, our commitment extends to meeting the diverse regulatory demands of the various jurisdictions in which we operate. We will make every effort to adhere to the pertinent laws and regulations within the regions where we conduct our operations.

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## **4. Tsebo's Human Rights Commitment**

We recognise that respecting and promoting human rights is not only a legal obligation but also a moral imperative. This policy serves as a reflection of our dedication to these principles and our ongoing commitment to the well-being of all individuals affected by our operations, including the communities affected by our operations. The manner in which Tsebo seeks to give effect to its commitment is illustrated but not limited to the areas listed below:

### **4.1 Diversity and Inclusion**

Tsebo is dedicated to ensuring equal treatment and opportunities for all individuals, regardless of their race, gender, age, religion, disability, sexual orientation, HIV/AIDS status or any other characteristic protected under the South African Constitution. We will not tolerate discrimination, harassment, or any form of unfair treatment within our organisation.

### **4.2 Protection of Human Dignity**

We are committed to upholding the inherent dignity of every person and will not engage in or support activities that violate human dignity, such as forced labour, human trafficking, or any form of exploitation.

### **4.3 Freedom of Association and Collective Bargaining**

Tsebo recognises the importance of freedom of association and the right to collective bargaining in accordance with applicable legislation, practice and the terms of any union agreements applying in our operations. We will ensure that these rights are respected within our workplace and in our interactions with stakeholders.

### **4.4 Health and safety in the Workplace**

Tsebo is committed to as far as is reasonably practicable, establishing, implementing and maintaining processes to promote a working environment that is safe and without risk to the health of his employees.

### **4.5 Labour Protection**

#### **4.5.1 Working Hours, Pay and Benefits**

Tsebo seeks to comply with applicable labour and employment legislation and strives to remunerate employees competitively relative to comparable industry and market norms.

#### **4.5.2 Modern Day Slavery**

Tsebo prohibits all forms of forced and/or compulsory labour and does not use or benefit from forced labour, including physical punishment, coercion, imprisonment, threats, human trafficking or violence.

#### **4.5.3 Child labour**

Children up to and below 18 years of age are forbidden from employment at any of our operations.

### **4.6 Business Support and Supply Chain Management**

Tsebo will integrate the responsibility to respect human rights throughout our operations, including our supply chain and business relationships. We will conduct due diligence to identify and mitigate any potential human rights risks associated with our activities.

#### **4.6.1 Business Ethics**

Tsebo is committed to conducting its affairs with the highest standards of integrity and transparency. We will not engage in corrupt practices or unethical behaviour that could infringe upon human rights.

#### **4.6.2 Security**

Tsebo will ensure security procedures are in place to protect employees and assets to provide a safe and secure environment in which the business can operate.

## **5. Implementation**

In the fulfilment of their daily tasks and activities managers and employees are expected to observe and respect human rights and continuously assess opportunities to improve processes in order to prevent human rights violations to people within the business and the value chain.

## **5.1 Training and Awareness**

Where necessary Tsebo must promote awareness of human rights principles and its Human Rights Policy among all employees, suppliers, and stakeholders through regular training programs and communication efforts and ensure that they are familiarised with human rights issues that are relevant to their activities.

## **5.2 Non-Discrimination**

Ensure that all recruitment, hiring, and promotion processes are non-discriminatory and based on merit, skills, and qualifications, irrespective of gender, race, religion, disability, or other protected characteristics.

## **5.3 Supply Chain Responsibility**

Implement due diligence measures, including the collection of self-declarations, to identify and address potential human rights risks within our supply chain and take steps to enhance the ethical practices of our suppliers.

## **5.4 Reporting Mechanism**

Utilise our existing confidential reporting line, 'Tip Offs Anonymous,' to enable employees and external stakeholders to report any human rights violations or concerns. We will ensure that all reports are promptly and thoroughly investigated, providing regular written updates on the progress of investigations and any actions taken in response to the disclosure.

## **5.5 Whistleblower Protection**

In accordance with our Whistleblower policy, we will ensure the protection of whistleblowers from retaliation and the effective and confidential handling of their concerns.

## **5.6 Monitoring and Audit**

Conduct regular human rights impact assessments and audits to evaluate our performance in relation to our Human Rights Policy, UN Global Compact Principles, and Code of Ethics.

## **5.7 Legal Compliance**

Continuously monitor and ensure compliance with all relevant human rights laws and regulations in South Africa and other jurisdictions where we operate.

## **6. Management and Responsibility for Human Rights**

Immediate responsibility in ensuring respect for human rights lies with all of our management and employees. They need to be familiar with the Human Rights Policy and supporting documentation. They need to be able to demonstrate how they are actively preventing or responding to human rights risks and abuses, and how they are deliberately managing operations that respect people's human rights and contribute to their realisation.

Ultimate responsibility for Tsebo's human rights performance lies with the Board and Management team who will actively ensure corporate accountability to this Policy and its related documents.

## **7. Non-compliance**

Non-compliance with this policy and the procedures associated with it may result in disciplinary action which may result in the termination of employment. Any transgressions by contractors, service providers and suppliers will result in the implementation of appropriate corrective and remedial action, which may result in the termination of any dealings.

## **8. Other Policies and Documents**

This Policy should be read in conjunction with other Group Policies and documents such as the:

- Code of Ethics and Good Business Practices Policy
- Whistle-blower Policy and Procedures
- Human Resources Standards and Policies
- Occupational Health and Safety Policy
- Group Procurement Policy
- Child Labour Policy
- Human Rights Risk Assessment Checklist