



**AFRICAN EQUITY EMPOWERMENT INVESTMENTS LIMITED**  
**("AEEI")**

**HUMAN RIGHTS POLICY**

## **1. COMMITMENT**

1.1. African Equity Empowerment Investments Limited (“AEEI” or the “Company”) and its subsidiaries recognise human rights as a fundamental value. It is committed to upholding, protecting and promoting the human rights of its employees and people within the communities and sphere of influence within which it operates. This commitment is enshrined in the AEEI’s Code of Conduct, Code of Ethics and The Way We Work Policy, by which all Group companies are bound.

## **2. PURPOSE**

2.1. This Policy aims to stipulate the Company’s stance in ensuring responsible business practices in upholding human rights within all our operations.

2.2. The Company is committed to respecting, protecting, and promoting human rights and avoiding complicity in human rights abuses.

2.3. This Policy sets out the various areas that impact human rights and the perspective of the Company in this regard.

## **3. OBJECTIVE**

The primary objectives of this Policy are:

3.1. To guide employees on the behaviours expected in accordance with the Company’s culture and/or values, as set out in the Code of Conduct, Code of Ethics and The Way We Work Policy;

3.2. To promote fair and sound human rights practices within the Company and;

3.3. Give effect to the United National Global Compact Principles insofar as it relates to human rights.

## **4. DEFINITIONS**

4.1. In accordance with the Universal Declaration of Human Rights compiled by the United Nations, “Human rights are rights that belong to an individual or group of individuals as a consequence of being human.”

4.2. According to the Constitution of South Africa, “Human Rights are considered inalienable fundamental rights to which a person is inherently entitled simply because he/she is a human being regardless of nationality, location, language, religion, ethnic origin or any other status.”

## 5. **SCOPE**

This Policy applies to all employees, contractors, service providers and customers of the Company.

## 6. **RESPONSIBILITY**

6.1. The leadership of the Company oversees the Human Rights Policy.

6.2. The Executive Management Team, General Managers and Senior Managers are responsible for ensuring that this Policy is implemented and adhered to at each operational workplace and within the various functions and disciplines.

## 7. **CORE HUMAN RIGHTS**

### 7.1. **Ethics**

The Company expects all employees, contractors and suppliers to share its commitment to high moral, ethical and legal standards and creates conditions where all can work with dignity.

We require our suppliers to respect human rights and act in full accordance with our policies and guidelines concerning social responsibility, labour standards, and human rights and commit to openly and transparently reporting on human rights violations within our value chain, should these occur.

### 7.2. **Diversity and Inclusion**

AEEI takes a zero-tolerance approach to Harassment & Discrimination. With regard to employment status and treatment, no employee or partner will be discriminated against due to factors such as race, religion, colour, ethnicity, national origin, disability, sexual orientation, gender, gender identity, gender expression, marital status or other arbitrary means. We place diversity at the heart of what we do and build a work environment and Company culture that celebrates tolerance and difference. Our priority is the safety and well-being of our employees, and we work together to identify and eliminate harassment in all its forms.

### 7.3. **No Forced Labour and/or Compulsory Labour**

We do not permit any form of forced or compulsory labour within our operations and supply chain. Work must always be freely chosen and employees fairly remunerated. We also commit to upholding the due diligence of employment agencies, recognising that individuals should never pay to work.

#### **7.4. No Child Labour**

We respect the rights of young people as stated in the UN Convention on the Rights of the Child, whereby all children have the right to an education, play, and have their basic needs met. To this end, AEEI operates as a business prohibiting all forms of child labour and exploitation. Accordingly, AEEI only employs those who are 18 years old and above and, in all cases, takes reasonable steps to verify the age of workers upon employment.

#### **7.5. Workplace Health & Safety**

The safety, health and well-being of our employees are a top priority. The Company aims to provide and maintain a safe, healthy and productive work-place throughout our operations and supply chain that complies with applicable laws, regulations and internal standards. We work within a framework of zero harm and strive to mitigate and remedy risk wherever we find it. We commit to providing appropriate protective equipment, training and agreed to procedures that meet health and safety risks across the business and consider the specific needs of different facilities and job functions.

#### **7.6. Working Hours, Pay and Benefits**

The Company complies with applicable labour and employment legislation and strives to remunerate employees competitively relative to the comparable industry and market norms.

#### **7.7. Freedom of Association and Collective Bargaining**

The Company respects the employees' right to join, form or not join a labour union. It is committed to establishing a constructive dialogue with organised labour and the freely chosen representatives of employees and to bargain in good faith within the appropriate national legal frameworks.

#### **7.8. Conducting Business as a Responsible Member of Society**

The Company respects the rights of people in the communities impacted by its activities. It seeks to identify risks and adverse impacts that may potentially affect local communities. It finds ways to consult and engage with communities to craft workable solutions to address/avoid/minimise, and or mitigate concerns.

#### **7.9. Access to Water & Sanitation**

AEEI recognises the link between employee health and access to clean water and sanitation

facilities as a basic human right. Acknowledging and providing for our employees' inherent dignity and basic needs is vital to their well-being. We work to ensure safe and easily accessible access to clean water, sanitation, and hygiene.

#### **7.10. Environment**

We monitor and take measures to mitigate the impact of our business activities on the environment. In addition, we comply with all applicable local laws regarding the environment, resources, and waste disposal. Protecting the environment is a collective responsibility involving all elements of our business and engagement with local communities to ensure that our operations do not negatively impact their livelihoods and human rights.

### **8. REDUCING HUMAN RIGHTS VIOLATIONS ACROSS OUR SUPPLY CHAIN**

AEEI works within a responsible sourcing framework, integrates human rights compliance within its procurement and awarding processes and is an integral element of supplier relationship development. In order to do business with us, our suppliers are required to commit to adherence to our Human Rights Policy in its entirety and communicate the Policy to its workforce and own supply chain.

### **9. IMPLEMENTATION PROCEDURES**

- 9.1. In fulfilling their daily tasks and activities, managers and employees are expected to observe and respect human rights and continuously assess opportunities to improve processes to prevent human rights violations to people within the business and the value chain.
- 9.2. Where necessary, the Company shall ensure that employees, contractors and service providers are familiarised with human rights issues relevant to their activities.
- 9.3. Where relevant, the Company will conduct awareness and communication campaigns for contractors, service providers and employees.
- 9.4. The Company undertakes to provide for and cooperate in reasonable, fair and/or equitable remediation where adverse human rights impacts have been caused by or resulted from its business activities.

## **10. NON-COMPLIANCE**

10.1. Non-compliance with this Policy and its procedures may result in disciplinary action and even dismissal.

10.2. Any transgressions by contractors, service providers and suppliers will result in appropriate corrective and remedial action.

## **11. REPORTING ETHICAL AND HUMAN RIGHTS RISKS**

While we strive through our policies and procedures to identify breaches of human rights throughout our supply chain, we also rely on our managers, employees, business partners, and other stakeholders to bring evidence of human rights risk or infringement to our attention.

We foster a culture of safety and empowerment around speaking against human rights abuse throughout our operations and those of our suppliers. Employees, contractors and service providers are encouraged to report any suspected violations of this Policy by the Company, its representatives or suppliers and service providers to the relevant executives or senior managers or through the anonymous email address or hotline.

Dedicated email address and phone number to report ethical and human rights breaches:

Email: [info@aeei.co.za](mailto:info@aeei.co.za)

Telephone: 021 427 1469

**Date approved:** 25 May 2022

**Approved by:** The Social, Ethics & Transformation Committee & The Board of Directors