



Human rights Policy

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DEFINITIONS AND ABBREVIATIONS

Table 1: Definitions

Terminology	Description
Barloworld	means Barloworld Limited and its subsidiaries, divisions and business units in all countries in which it does business, or any individual subsidiary in its own capacity. It does not include joint ventures, other than those where Barloworld exercises management control, nor does it include investments where Barloworld owns less than 50%.
Code of Conduct	means the Barloworld Worldwide Code of Conduct

Table 2: Abbreviations

Abbreviation	Description
LBGTQ+	Lesbian, Gay, Bisexual, Transgender, Queer, Intersex and others

1 Preamble and Policy Summary

Barloworld recognises that business has the responsibility to respect human rights and the ability to contribute to positive human rights impacts. This is an area of growing importance to its employees, shareholders, investors, customers, consumers, local communities and civil society groups globally.

There is therefore both a business and an ethical case for ensuring that human rights are upheld across Barloworld operations and its value chains (supply chain and service providers). This Human Rights Policy (**Policy**) contains overarching principles, which are embedded into the Barloworld Worldwide Code of Conduct (Code of Conduct), policies and systems. It defines the Barloworld commitment to respecting human rights as set out in the Constitution of the Republic of South Africa, the United Nations (**UN**) Global Compact and its Guiding Principles on Business and Human Rights, the International Bill of Human Rights and the International Labour Organization’s (**ILO**) Declaration on Fundamental Principles and Rights at Work.

2 Purpose & Objective

Barloworld is committed to protecting the human rights of everyone who works for the group and all those who have dealings with it. As a responsible group of companies, it affiliates its business approach with the UN Universal Declaration of Human Rights that sets “common standards of achievement for all people and all nations”.

The purpose of this Policy is to establish the principles, accountabilities, minimum standards, and responsibilities for implementing, monitoring, reviewing and reporting on Human Rights issues within Barloworld. The Policy has been developed to protect Barloworld, its employees, assets, information, operations, and reputation in the environment in which it operates and to ensure continued respect for Human Rights.

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The objective of this Policy is to ensure that:

- a) Barloworld conducts periodic human rights reviews of its activities and new business opportunities with the aim of avoiding adverse human rights impacts on labour, suppliers, service providers and the communities where Barloworld operates.
- b) Barloworld aims to make a positive and constructive contribution to the reduction and elimination of human rights abuses within its sphere of influence and will require its suppliers, service providers, and partners to uphold the same standards.

Due to the diverse nature, location and scale of Barloworld's activities, the following, which is based on international best practice principles on human rights will form the basis of all Barloworld business activities and decision-making:

- i. the prohibition of forced and child labour;
- ii. non-discrimination and respect of diversity (including the protection of women's rights and LBGTQI+);
- iii. the right to a safe and healthy working environment;
- iv. freedom of association and the right to collective bargaining;
- v. establishing fair and competitive wages and benefits;
- vi. respecting the rights of our local communities;
- vii. respecting the rights of indigenous people;
- viii. respecting our workforce;
- ix. prevention of modern slavery and human trafficking;
- x. protecting the environment; and
- xi. ethical sourcing in our supply chain.

3 Scope

This Policy applies to all employees, temporary employees, contractors, suppliers, service providers and consultants of Barloworld Group.

4 Roles and Responsibilities

Executive management has the responsibility to ensure compliance with this policy and the discretion to define the processes, procedures, and other mechanisms by which the policy is implemented.

4.1 Implementation and Compliance

Responsibility for the implementation and compliance of this Policy by each division and legal entity of Barloworld lies ultimately with the relevant divisional and operational boards. Status of compliance

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against key performance indicators will be reported by the divisions to the Barloworld Limited board via the relevant risk management committees, in formats and templates as prescribed by the Group.

4.2 Training

Each division will be responsible for conducting, tracking, and reporting on training for human rights that focusses on key points such as modern slavery and human trafficking.

4.3 Monitoring

Each division will be responsible for ensuring that it has in place the necessary arrangements to, on an annual basis, monitor and report compliance with this Policy and to develop specific policies and guidelines appropriate to the local markets and cultures where they operate and conduct business.

5 Regulatory Background

This Policy on human rights and labour conditions has been developed with reference to the following prescripts:

- 5.1** The UN Universal Declaration of Human Rights;
- 5.2** The eight fundamental labour standards of the International Labour Organisation (ILO), being:
 - a) Freedom of association
 - b) Collective bargaining
 - c) Forced Labour
 - d) Child Labour
 - e) Equality of opportunity and treatment
 - f) Tripartite consultation
 - g) Labour administration
 - h) Labour inspection.
- 5.3** The UN Convention on the Rights of the Child (UNCRC).
- 5.4** The UK Modern Slavery Act of 2015.
- 5.5** United Nations (UN) Global Compact and its Guiding Principles on Business and Human Rights
- 5.6** International Bill of Human Rights
- 5.7** International Labour Organization's Declaration on Fundamental Principles and Rights at Work

6 Policy Statement

We believe that everyone throughout our organisation is responsible for having due regard for human rights.

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There is an overall responsibility for ensuring that human rights considerations are integral to the way in which existing operations and new opportunities are developed and managed.

Managers and supervisors must provide visible leadership that promotes human rights as an equal priority to other business issues. They also have a responsibility for identifying any human rights violations that occur, which must be duly reported, and all employees are responsible for ensuring that their own actions do not impair the human rights of others. They are also encouraged to bring forward, in confidence, any concerns or reports that they may have about human rights violations.

Barloworld may encounter challenges on human rights that may require collective interventions together with other stakeholders, as many human rights violations are systemic in their host communities. Barloworld is committed to collectively working with other organisations to ensure that it is not complicit in any human rights violations.

The Barloworld Group requires that all its divisions and operations comply with the following principles and practices relating to:

6.1 Child Labour

Not to employ persons under the legal minimum age of 18 for hazardous work, for admission to work stipulated by the laws of the countries where they conduct business and will operate in accordance with ILO conventions No. 138 on the minimum age for admission to employment and No. 182 on the banning of the worst forms of exploitation of child labour. Further, Barloworld supports the use of legitimate workplace apprenticeship, internship and other similar programmes that comply with all laws and regulations applicable to such programmes.

6.2 Forced Labour

In accordance with ILO Conventions 29 on Forced Labour and 105 on the Abolition of Forced Labour, not to make any use of forced labour, including prison labour, slave labour or other forms of compulsory labour.

6.3 Health and Safety

To provide a safe and healthy work environment and take all reasonable steps to prevent death, occupational injury or disease to anyone on our sites. Regular training to all employees on health and safety issues must be provided. All employees must have access to bathroom facilities and potable water. All Barloworld policies supporting occupational health and safety must be available on the Barloworld or divisional intranet.

6.4 Freedom of association and the right to collective bargaining

To respect the principles of freedom of association and collective bargaining as defined in ILO convention No. 87 on the freedom of trade unions and the protection of trade union law and No.

98 on the right of organisation and collective bargaining. Barloworld will facilitate open communication and direct engagement between employees and management in those situations where the right to freedom of association and collective bargaining is restricted under law. No employee shall be subject to dismissal, discrimination, harassment, intimidation or retaliation due to his/her membership of a lawful trade union or workers association.

6.5 Discrimination

In accordance with ILO Convention 111 on Discrimination, and subject to domestic legislation which may provide otherwise, not to discriminate against any person based on race, ethnicity, sex, caste, origin, religion, disability, gender, sexual orientation, union or political affiliation or age (within statutory limits). Barloworld will not tolerate sexual harassment, racism or bullying and aims to ensure that its employees have access to training, development, and promotion opportunities, given their ability to perform their job in an effective manner. Barloworld has specific policies on discrimination and harassment, which are available from the Human Capital departments of Barloworld and on the Barloworld intranet.

6.6 Discipline

Not to employ, or allow to be employed, on any of its employees, any form of corporal punishment, physical, sexual or verbal abuse in the workplace. Any disciplinary matter will be dealt with fairly and in accordance with our transparent disciplinary and grievance procedures.

6.7 Working Hours

To comply with relevant legislation and regulations relating to the working standards of our employees, including those regarding working hours, leave and holidays.

6.8 Compensation

Wages paid for standard working hours must meet local legally mandated minimum wage levels.

6.9 Respect of local communities

To respect the rights of local people when creating new business developments, aim to undertake our activities in a manner that is considerate, and in keeping with the surrounding community. Where practicable, consult with local communities and take into account their opinions and concerns when creating new developments.

Ensure that all operations and work practices are respectful of and encourage tolerance towards differences between individuals or groups within the societies and environments in which we conduct business and to respect the culture of those societies and environments.

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Seek to avoid complicity in human rights abuses in those countries and regions where Barloworld conducts or intends conducting business.

6.10 Modern Slavery

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, including slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. Barloworld will not permit or engage in any activity under the umbrella of modern slavery and will ensure that it only conducts business with organisations that can provide evidence that they have the same commitment. Barloworld will adhere to the requirements of the UK Modern Slavery Act of 2015 in combatting modern slavery.

6.11 Human Trafficking

Ensure that our operations do not engage in the recruitment, transport, transfer, harbouring or receipt of a person by such means as threat or use of force or other forms of coercion, abduction, fraud or deception for the purpose of exploitation. Barloworld will only conduct business with organisations that can demonstrate the same commitment.

7 Communication

This policy must be communicated to all employees by the respective divisional communications department.

8 Related Policies & Other Documents

Document Name
Barloworld Worldwide Code of Conduct
Global Whistle-blowing Policy
Supplier Code of Conduct

9 Raising Concerns and Seeking Guidance

If any person becomes aware of a circumstance or action that violates or appears to violate this policy on bribery and corruption, they are encouraged to contact their manager, the Group General Counsel, the Group Compliance Manager, or alternatively the Barloworld Ethics Line at www.tip-offs.com.

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The Barloworld Ethics Line is an independent and confidential system for reporting allegations of unethical behaviour, illegal actions, or actions that violate the Barloworld Worldwide Code of Conduct.

The Barloworld Global Whistleblowing Policy applies to the use of the Barloworld Ethics Line, and it contains the contact details pertaining to each company, division, or business unit.

Barloworld is committed to ensuring that no employee suffers any occupational detriment as a result of reporting a genuine concern in good faith.

10 Human Rights Management Framework

Awareness about human rights topics will be incorporated in the respective divisional Ethics and Compliance Training Programmes and will be provided to all employees on a biennial basis. The number of employees trained will be reported to the Social, Ethics and Transformation Committee.

Barloworld requires its suppliers and service providers to support the UN Universal Declaration on Human Rights, UK Modern Slavery Act of 2015 and the ILO Declaration of Fundamental Principles and Rights at Work. The need to adhere to Barloworld's Human Rights Policy will be included in the Supplier Code of Conduct.

Monitoring will be conducted through:

- a) Tracking, by the Group Communications and Divisional Communications teams, of any media releases mentioning Barloworld and its involvement in human rights issues.
- b) Any calls made through the Ethics Line or through other whistle blowing channels, will be duly investigated and reported to the Social, Ethics and Transformation Committee (**SETC**).
- c) Any suppliers/joint venture partners must inform the relevant Barloworld procurement department should any human rights issues arise within their sphere of influence.
- d) Declarations to procurement by all suppliers and joint ventures that they were not complicit in any human rights abuses.
- e) Our own operations will report on a quarterly basis the SETC.

11 Breach of Policy

Failure to comply with this Policy could amount to gross misconduct, a material breach of the contract of employment, disciplinary action in line with the applicable Barloworld disciplinary codes, and fines or penalties in terms of applicable laws.

12 Deviations from Policy

Any deviations to this Policy that amend the meaning or raise the minimum standard of this Policy requirements must be pre-approved, in writing by the Barloworld Board.

Language translations of Barloworld policies must be conducted or checked by a professional language translator to avoid translation errors that may change the meaning of the Policy requirements.

In the event of a contradiction between this Policy and a divisional policy, this Policy must be taken as authoritative and will prevail.