



**Barloworld**  
*Leading brands*

## Barloworld Human Rights Policy

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<b>Version</b>	V 1.0	<b>Contact</b>	Andiswa Ndoni
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### PREAMBLE

Barloworld Group believes that business can only flourish in societies where human rights are protected and respected. “Barloworld Group” means Barloworld Limited and its subsidiaries, divisions and business units. The Barloworld Group does not include joint ventures or other independent entities governed by independent boards of trustees. 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 our employees, shareholders, investors, customers, consumers, the communities where we operate and civil society groups globally.

There is therefore both a business and an ethical case for ensuring that human rights are upheld across our operations and our value chain (supply chain and service providers). This Human

Rights Policy (Policy) contains overarching principles, which we embed into our Barloworld Worldwide Code of Conduct (Code of Conduct), policies and systems. It defines our 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 Declaration on Fundamental Principles and Rights at Work.

## **PURPOSE**

The Barloworld Group 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, we support 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 and responsibilities for implementing, monitoring, reviewing and reporting Human Rights abuses 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 the respect for Human Rights.

## **SCOPE OF POLICY**

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

## **OBJECTIVE AND OUTCOMES**

Our intent is to ensure that:

- We will conduct periodic human rights reviews of our activities and new business opportunities with the aim of not giving rise to adverse human rights impacts on our workforce, suppliers, service providers and the communities in which we operate.
- We aim to make a positive and constructive contribution to the reduction and elimination of human rights abuses within our sphere of influence, and expect our suppliers, service providers, partners and customers to uphold the same standards.

Due to the nature, location and scale of our activities, our commitment, based on international best practice principles on human rights, extends to:

- the prohibition of forced and child labour;
- non-discrimination and respect of diversity;
- the right to a safe and healthy working environment;
- freedom of association and the right to collective bargaining;
- establishing fair and competitive wages and benefits;
- respecting the rights of our local communities;
- respecting the rights of indigenous people;
- protecting the environment; and
- ethical sourcing in our supply chain.

## UNDERLYING PRINCIPLES

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

- The UN Universal Declaration of Human Rights.
- The eight fundamental labour standards of the International Labour Organisation (ILO). These cover:
  - Freedom of association.
  - Collective bargaining.
  - Equality of opportunity and treatment.
  - Tripartite consultation.
  - Labour administration.
  - Labour inspection.
  - Employment policy.
  - Vocational guidance and training
- The UN Convention on the Rights of the Child (UNCRC). We believe that everyone throughout our organisation is responsible for having due regard for human rights. In particular:
  - There is an overall responsibility for ensuring that human rights considerations are integral in the way in which existing operations and new opportunities are developed and managed;
  - Managers and supervisors will provide visible leadership that promotes human rights as an equal priority to other business issues. They also have a responsibility for identifying human rights violations that occur;
  - 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 that they may have about human rights violations.

We recognize that from time to time we will encounter challenges on human rights that are bigger than the Barloworld group is able to tackle alone. Many human rights violations are systemic in their host communities. We are therefore committed to working with other organisations who can help us implement this Policy effectively over time and who can ensure that we are not complicit in human rights violations.

## **POLICY PRINCIPLE**

The Barloworld Group requires that all its operations comply with the following:

### **Child labour**

We will not employ employees under the legal minimum age, of 18 for hazardous work, for admission to work stipulated by the laws of the countries where we 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, we support the use of legitimate workplace apprenticeship, internship and other similar programmes that comply with all laws and regulations applicable to such programmes.

### **Forced labour**

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

### **Health and safety**

We will provide a safe and healthy work environment and take all reasonable steps to prevent death or injury to anyone on our sites. Regular training to all our employees on health and safety issues will be provided. All employees will have access to bathroom facilities and potable water. Most aspects of health and safety are covered by existing Barloworld policies, which are available on the Barloworld Intranet.

### **Freedom of association and the right to collective bargaining**

We 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. The Barloworld Group shall 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.

### **Discrimination**

In accordance with ILO Convention 111 on Discrimination, we will not, subject to domestic (i.e. South African) legislation which may provide otherwise, 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). We will not tolerate sexual harassment or racism or bullying, and aim to ensure that our 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 the Barloworld group and on the Barloworld Intranet.

## **Discipline**

We will not employ, or allow to be employed, on any of our 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.

## **Working hours**

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

## **Compensation**

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

## **Respect of local communities**

We 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. We will, where practicable, consult with local communities and take into account their opinions and concerns when creating new developments.

We will ensure that our 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.

We will seek to avoid complicity in human rights abuses in those countries and territories where we conduct or intend conducting business.

## **IMPLEMENTATION, COMPLAINTS AND MONITORING**

### **Implementation**

Responsibility for the implementation of this Policy lies with the Group Human Capital is required to develop procedures and guidelines relevant to the operations within the various territories where Barloworld Group operates and conduct business, or intend operating and conducting business.

### **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.

## Compliance

Responsibility for the compliance of this Policy by each business operation of the Barloworld Group lies ultimately with the relevant operational boards. Performance will be reported by the operations to the Barloworld board via the relevant risk management committees.

### RAISING CONCERNS AND SEEKING GUIDANCE

If any person becomes aware of a circumstance or action that violates or appears to violate this Policy, they are encouraged to contact the Executive: Ethics & Compliance or alternatively the Barloworld Ethics Line at [www.tip-offs.com](http://www.tip-offs.com)

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

### HUMAN RIGHTS MANAGEMENT GUIDELINE

1. Awareness on Human Rights will be incorporated in the Ethics Training and will be provided to all employees on a yearly basis. The number of employees trained will be reported on an annual basis to the Social, Ethics and Transformation Committee. The reporting organization shall report the following information:
  - a. Total number of hours in the reporting period devoted to training on human rights policies or procedures concerning aspects of human rights that are relevant to operations.
  - b. Percentage of employees trained during the reporting period in human rights policies or procedures concerning aspects of human rights that are relevant to operations.
2. Barloworld requires its suppliers and service providers to support the UN Universal Declaration on Human Rights 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 all supplier contracts, starting with the Tier 1 suppliers. The reporting organization shall report the following information:

  - a. Total number and percentage of significant investment agreements and contracts that include human rights clauses or that underwent human rights screening.
  - b. The definition used for 'significant investment agreements'. Due diligence will be conducted on existing and new operations or on potential mergers and acquisitions.
3. Monitoring will be conducted through:

- a Tracking, by the Group Communications and Divisional Communications teams, of any media releases mentioning Barloworld and Human Rights issues.
- b Any calls made through the Ethics Line or through our whistle blowing mechanism, will be reported to the Social, Ethics and Transformation Committee (SETC).
- c Any suppliers/joint venture partners must inform Barloworld's procurement should any human rights issues surface within their sphere of influence.
- d Annual declaration 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 to the Procurement Chief Office and the SETC.

## 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.

## 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.

## RELATED DOCUMENTS

This policy should be read in conjunction with the following policies:

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

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

## APPROVAL AND OWNERSHIP

Owner	Title	Date
Andiswa Ndoni	Group Company Secretary	/2020
Approved By	Title	Date
Group Executive Committee		2020/10/26

Social, Ethics and Transformation Committee		2020/11/11
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## REVISION HISTORY

Version	Revision Date	Description	Next review Date
V1.0	October 2020		