

**UN GLOBAL COMPACT & OECD**

<b>UN Global Compact &amp; OECD</b>	<b>Policy Number:</b> <b>Version Number:</b>	<b>Page 1 of 8</b>
-------------------------------------	---	--------------------

**The 10 Principles set out in the United Nations Global Compact and OECD**

Human Rights		
<b>Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights</b>		
<b>Principle 2: Make sure that they are not complicit in human rights abuses</b>		
UN Suggestions	Recommendation	Comments
<ul style="list-style-type: none"> <li>▪ Develop your company's business case for human rights ("why are human rights relevant to your company")</li> </ul>	<ul style="list-style-type: none"> <li>▪ The group advocate adherence to principles in the annual report</li> <li>▪ NO further action is required</li> </ul>	<ul style="list-style-type: none"> <li>▪ No action required</li> </ul>
<ul style="list-style-type: none"> <li>▪ Establish procedures for identifying and managing risks and opportunities related to human rights, and for addressing human rights impacts</li> </ul>	<ul style="list-style-type: none"> <li>▪ Apply the Group's risk management methodology to the identification and management of risks and opportunities insofar as it relates to human rights and consolidate reporting</li> </ul>	<ul style="list-style-type: none"> <li>▪ Subject to the point below</li> </ul>
<ul style="list-style-type: none"> <li>▪ Put in place management systems for human rights policy implementation, monitoring and reporting across the company</li> </ul>	<ul style="list-style-type: none"> <li>▪ Investigate the implementation of a human rights management system</li> </ul>	<ul style="list-style-type: none"> <li>▪ To be integrated into Employee Relations reporting as part of the SAP phase 2 Implementations</li> </ul>
<ul style="list-style-type: none"> <li>▪ Provide mechanisms to protect employees who report potential human rights concerns within the company or with business partners</li> </ul>	<ul style="list-style-type: none"> <li>▪ Integrate the grievance procedure into the Group and business unit induction programmes as well as into the management development programmes</li> </ul>	<ul style="list-style-type: none"> <li>▪ Tip-off Anonymous and integrated into the Group induction programme</li> <li>▪ No action required</li> </ul>

LABOUR		
<b>Principles 3" Business should uphold the freedom of association and the effective recognition of the right to collective bargaining</b>		
UN Suggestions	Recommendation	Comments
<ul style="list-style-type: none"> <li>▪ Ensure that company policies and procedures do not discriminate against individuals</li> </ul>	<ul style="list-style-type: none"> <li>▪ Articulate the Group policy statement on freedom of association and update the Code of Conduct</li> </ul>	<ul style="list-style-type: none"> <li>▪ Update Code of Conduct under review</li> </ul>

# CLICKS GROUP

L I M I T E D

REG. NO. 199400264506

because of their trade unions activities		
<ul style="list-style-type: none"> <li>Provide information needed for meaningful bargaining</li> </ul>	<ul style="list-style-type: none"> <li>Collective bargaining process in place- no further actions required</li> </ul>	<ul style="list-style-type: none"> <li>No action required</li> </ul>
<b>Principle 4: The elimination of all forms of forced labour</b>		
<ul style="list-style-type: none"> <li>Have a clear policy not to use, be complicit in, or benefit from forced labour</li> </ul>	<ul style="list-style-type: none"> <li>Include a policy statement in the Group Code of Conduct to reflect the principle</li> </ul>	<ul style="list-style-type: none"> <li>Updated Code of Conduct under review</li> </ul>
<ul style="list-style-type: none"> <li>Ensure that all company officials have a full understanding of what forced labour is</li> </ul>	<ul style="list-style-type: none"> <li>Code of conduct to be trained as part of induction</li> </ul>	<ul style="list-style-type: none"> <li>On track</li> </ul>
<ul style="list-style-type: none"> <li>If relying on labour providers for recruitment, ensure that no forced labour is supplied</li> </ul>	<ul style="list-style-type: none"> <li>Update the standard contractual terms with labour brokers and recruitment agencies upon the renewal of contracts</li> </ul>	<ul style="list-style-type: none"> <li>To be concluded post the implementation of the labour law amendments</li> </ul>
<ul style="list-style-type: none"> <li>Write employment contracts in language easily understood by workers, indicating the scope of and procedures of leaving the job</li> </ul>	<ul style="list-style-type: none"> <li>Update employment contracts to reflect the standard</li> </ul>	<ul style="list-style-type: none"> <li>Done, as part of the SAP implementation process foreign countries to follow</li> <li>No action required</li> </ul>
<b>Principle 5: Business should uphold the effectiveness abortion of child labour</b>		
<ul style="list-style-type: none"> <li>Adhere to minimum age provisions of national labour laws and regulations</li> </ul>	<ul style="list-style-type: none"> <li>Update the Group's Total Framework to reflect the current practice</li> <li>Report annually on the principles a part of the Sustainability report</li> </ul>	<ul style="list-style-type: none"> <li>Minimum age provisions are adhered to and included in the annual reports</li> <li>No action required</li> </ul>
<ul style="list-style-type: none"> <li>Develop and implement mechanisms to detect child labour</li> </ul>	<ul style="list-style-type: none"> <li>Include policy statement in the Group Recruitment Policy &amp; Total Rewards Framework</li> </ul>	<ul style="list-style-type: none"> <li>Policies updated for all countries in which the Group operates</li> </ul>

# CLICKS GROUP

L I M I T E D

REG. NO. 19940064506

<ul style="list-style-type: none"> <li>In communities, encourage and assist in launching supplementary health and nutrition programs for children removed from dangerous work, and provide medical care</li> </ul>	<ul style="list-style-type: none"> <li>Clicks Helping Hand Trust provides free primary healthcare services to children from disadvantages backgrounds that were born in estate hospitals – no further actions required.</li> </ul>	<ul style="list-style-type: none"> <li>No action required</li> </ul>
<b>Principle 6: The elimination of discrimination in respect of employment and occupation (LABOUR cont.)</b>		
UN Suggestion	Recommendations	Comments
<ul style="list-style-type: none"> <li>Implement policies and procedures which make qualifications, skills and experience the basis for the recruitment, placement, training and advancement of staff</li> </ul>	<ul style="list-style-type: none"> <li>Review current Human Resource and Training policies and procedures to endure adequacy</li> </ul>	<ul style="list-style-type: none"> <li>Done – Recruitment, learning and procedures have been updated</li> <li>No actions required</li> </ul>
<ul style="list-style-type: none"> <li>Establish programs to promotes access to skills development training</li> </ul>	<ul style="list-style-type: none"> <li>Continue the workplace experience programme offered to interns and unemployed graduates</li> <li>Benchmark annual skills spend and training days</li> <li>No further action requires</li> </ul>	<ul style="list-style-type: none"> <li>No further action required</li> </ul>
<ul style="list-style-type: none"> <li>Provide staff training on disability awareness and reasonably adjust the physical environment</li> </ul>	<ul style="list-style-type: none"> <li>Updates the Group Transformation policy and framework to include a focus on employees with disabilities</li> </ul>	<ul style="list-style-type: none"> <li>On-going as part of the transformation agenda</li> </ul>

## ENVIRONMENT

### Principle 7: Business should support a precautionary approach to environment challenges

No Suggestions

### Principle 8: Undertake initiative to promote greater environment responsibility

No suggestions

### Principle 9: Encourage the development and diffusion of environmentally friendly technologies

UN Suggestions	Recommendations	Comments
<ul style="list-style-type: none"> <li>Provide information to consumers and stakeholders about potential risks of products and services</li> </ul>	<ul style="list-style-type: none"> <li>Use existing communication channels to inform customers about our interventions</li> </ul>	<ul style="list-style-type: none"> <li>Included in the annual report and online sustainability report</li> <li>No further action required</li> </ul>
<ul style="list-style-type: none"> <li>Join industry-wide efforts to share knowledge and deal with issues, in particular</li> </ul>	<ul style="list-style-type: none"> <li>Participate in the Label Summit Africa on products and packaging and internalise the</li> </ul>	<ul style="list-style-type: none"> <li>The labels include recycling logos and instructions on how to</li> </ul>



# CLICKS GROUP

L I M I T E D

REG. NO. 19940024506

<p>production processes and products around which a high level of uncertainty and sensitivity exist</p>	<p>outcomes</p> <ul style="list-style-type: none"> <li>▪ Attend meetings with industry groups in the food, health and beauty sectors</li> <li>▪ Attend the Sustainability forums with other retailers</li> </ul>	<p>recycle to educate consumers</p> <ul style="list-style-type: none"> <li>▪ Attend meetings held by HPA, SMASA, SeaFost and CTFA</li> </ul>
<ul style="list-style-type: none"> <li>▪ Establish sustainable production and consumption programme with clear performance objectives to take the organisation beyond compliance in a long term</li> </ul>	<ul style="list-style-type: none"> <li>▪ Current products are reviewed to identify packaging reduction, recyclable packaging and reduce product range where possible</li> </ul>	<ul style="list-style-type: none"> <li>▪ Sustainable packaging is considered for all new ranges, with minimum packaging as recyclable as possible</li> <li>▪ Recycling logos is added to all packaging for consumer awareness</li> </ul>
<ul style="list-style-type: none"> <li>▪ Measure, track and communicate progress in incorporating sustainability principles into business practices</li> </ul>	<ul style="list-style-type: none"> <li>▪ Sustainability indicators are made public in the annual report and this is also done on a monthly basis within the company</li> <li>▪ Information on transformation is made available in the annual report</li> </ul>	<ul style="list-style-type: none"> <li>▪ No further action required</li> </ul>
<ul style="list-style-type: none"> <li>▪ Share and disseminate information illustrating the benefits using clean technologies</li> </ul>	<ul style="list-style-type: none"> <li>▪ The Group takes part in the CDP (Carbon Disclosure Project) and the JSE SRI (Social Responsibility Index)</li> <li>▪ Forums and workshops are attended by the Group like the NBI</li> </ul>	<ul style="list-style-type: none"> <li>▪ No further actions required</li> </ul>
<ul style="list-style-type: none"> <li>▪ Use life-cycle assessments (LCA) in the development of new technologies and products</li> </ul>	<ul style="list-style-type: none"> <li>▪ Materials that packaging is made off are carefully chosen to ensure new technology is continuous implemented and product development are innovative</li> </ul>	<ul style="list-style-type: none"> <li>▪ Sobert – Man, fragrances, electrical rage Clicks 1 L Family shampoos and anti-dandruff rage</li> <li>▪ Sugar free chocolate range</li> <li>▪ Clicks lager chips range</li> <li>▪ Clicks Hydrate range</li> <li>▪ Clicks men's face wash and shave foams range</li> <li>▪ Clicks body spritzer</li> <li>▪ Dental range revamp</li> <li>▪ Hairspray and heat protect range</li> <li>▪ Dried fruit, Turkish delight, popcorn etc.</li> <li>▪ Safeway new range</li> </ul>

		development
--	--	-------------

<b>ANTI-CORRUPTION</b>		
<b>Principle 10: Business should work against corruption in all forms, including extortion and bribery</b>		
UN Suggestion	Recommendations	Comments
<ul style="list-style-type: none"> <li>▪ Introduce and implement effective zero tolerance policies and programmes, and adopt a company ethics code</li> </ul>	<ul style="list-style-type: none"> <li>▪ Improve awareness and communication around the current Group policy and the consequences of non-compliance</li> <li>▪ Implement the declaration on interest and gift policy and report</li> </ul>	<ul style="list-style-type: none"> <li>▪ Done – Policy on declaration of interest and gifts implemented</li> <li>▪ Reporting requires focus</li> </ul>
<ul style="list-style-type: none"> <li>▪ Train employees to ensure that ethical culture is developed within the company and integrated in management systems</li> </ul>	<ul style="list-style-type: none"> <li>▪ Include training on the Group value as part of employee and managerial induction</li> </ul>	Done – Group values include as part of the induction process No action required
<ul style="list-style-type: none"> <li>▪ Adopt internal reporting procedures</li> </ul>	<ul style="list-style-type: none"> <li>▪ Internal reporting procedures in place – no further action required</li> </ul>	No further action required
<ul style="list-style-type: none"> <li>▪ Cooperate with authorities investigating and prosecuting cases of corruption</li> </ul>	<ul style="list-style-type: none"> <li>▪ Internal audit framework in place – No further action required</li> </ul>	No further action required
<ul style="list-style-type: none"> <li>▪ Engage in collective business action with industry peers to create a level playing field</li> </ul>	<ul style="list-style-type: none"> <li>▪ Internally review the Group's advocacy and dialogue efforts and recommend focus area(s)</li> </ul>	CFO and Head of Internal Audit will make a recommendation in this regards