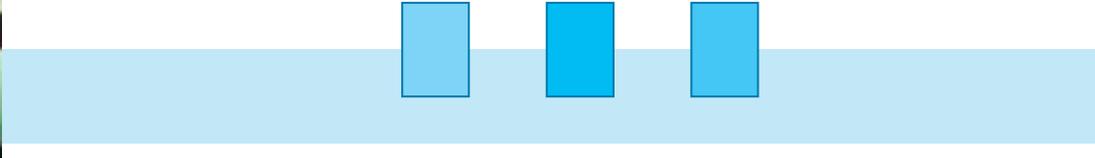




NEW
CLICKS HOLDINGS
LIMITED

REG. NO. 1996/000645/06



EMPLOYMENT EQUITY POLICY



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CONTEXT

New Clicks is committed to shaping an organisational environment which supports the development of each employee to his/her fullest potential regardless of race, gender, disability, religion, sexual orientation and political persuasion.

POLICY STATEMENT

New Clicks recognises the importance of diversity in the workplace, that Employment Equity is an imperative business driver and therefore supports the principles and intent of the Employment Equity Act of 1998.

PURPOSE OF THE POLICY

The purpose of the Employment Equity Policy is to:

- ▶ Promote the empowerment and advancement of previously disadvantaged employees in order to create racial and gender equity;
- ▶ Improve the level of representation of black senior management and in core skills groups; and
- ▶ Identify and explore opportunities for employing people with disabilities.

GOVERNANCE

BOARD TRANSFORMATION COMMITTEE

The Board Transformation Committee is composed of two independent Non-executive Directors, a Non-executive Director and two Executive Directors.

The role of the Board Transformation Committee is to:

- ▶ Monitor progress on strategic empowerment, including employment equity and affirmative procurement, as well as compliance with the transformation codes of good practice;
- ▶ Ensure that appropriate short and long term targets are set by management;
- ▶ Monitor progress against targets; and
- ▶ Monitor changes in the application and interpretation of empowerment charters and codes.
- ▶ The committee meets twice a year and the Group Human Resources Director attends the meetings along with other members of Operational Management.

INTERNAL TRANSFORMATION COMMITTEE

The Internal Transformation Committee is composed of the Group CEO, Group HR Director, Group Skills Development Manager and the designated Business Unit focal points.

Role of the Internal Transformation Committee is to:

- ▶ To review progress made by business units towards achieving employment equity goals against business unit transformation roadmaps
- ▶ To provide considered input and recommendations to the business units consultation forums
- ▶ To finalise presentations for the Board Transformation Committee
- ▶ To make recommendations to the Board Transformation Committee
- ▶ To meet quarterly

BUSINESS UNIT CONSULTATION FORUMS

Each business unit will be responsible for setting up its own consultative forum to facilitate compliance with the Employment Equity Act requirements. Members of the business unit consultation forum will be elected from employees across:

- ▶ all occupational categories and levels of the workforce;
- ▶ designated groups (Africans, Coloureds, Indians, Women and people with disabilities);
- ▶ non-designate groups; and trade union representatives.

Role of the Business Unit Consultation Forums is to:

- ▶ To audit and analyse the application and implementation of all employment policies and practices in the business unit;
- ▶ To assist in preparing and implementing the employment equity plan for the business unit
- ▶ To report on progress made on the implementation of the business unit employment equity plan for consolidation into the Group EE Report

STATUTORY REPORTING

Each business unit is required to:

- 1) Complete an Employment Equity Report and Plan
- 2) Consult with the Consultation Forum and document consultation process
- 3) Submit the minutes, action items and attendance register of the Consultation Forum meeting to the Group HR Director
- 4) Submit an EE Report and Plan to the Group HR Director, duly signed by the business unit MD and HR Executive by the 12 September annually.

Group HR

Group HR is required to:

- 1) Consolidate the Business Unit EE reports and plans
- 2) Submit the Group EE Report and Plan to the Group CEO for sign-off
- 3) Submit the signed Group EE Report and Plan to the Department of Labour within prescribed time limits (by the 1 October annually)
- 4) Ensure compliance with legislative and board committee requirements

DEFINITION OF TERMS

Designate groups means Black people, i.e. Africans, Coloureds, Indians, women and people with disabilities who are natural persons and:

- ▶ Are citizens of the Republic of South Africa by birth or descent; or
- ▶ Are citizens of the Republic of South Africa by naturalisation before the commencement date (27 April 1994) of the Constitution of the Republic of South Africa Act of 1993; or
- ▶ Became citizens of the Republic of South Africa from the commencement date of the Constitution of the Republic of South Africa Act of 1993, but who, not for apartheid policy that had been in place prior to that date, would have been entitled to acquire citizenship by naturalisation prior to that date.

People with disabilities means people who have long-term or recurring physical or mental impairment which substantially limits their prospects of entry into, or advancement in, employment;

Reasonable accommodation means any modification or adjustment to a job or to the working environment that will enable a person from a designated group to have access to or participate or advance in employment;

Suitably qualified person means a person who is suitably qualified for a job as a result of any one of, or any combination of that person's formal qualifications, prior learning, relevant experience, or capacity to acquire - within a reasonable time - the ability to do the job.