

ENVIRONMENTAL MANAGEMENT POLICY

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1. Approach to environmental management

The Clicks Group recognizes the significant impact of climate change. The group commits itself to strive to implement sustainable business practices within a culture of responsible environmental stewardship. This commitment is to find expression in the group's strategic and operational planning.

Environmental objectives

- To ensure compliance with the applicable regulatory framework
- To disclose information on the group's sustainability processes and practices, and on its resource utilisation;
- Engaging with our employees, customers, suppliers and other stakeholders on the group's sustainability processes and practices, and fostering environmental awareness and commitment to a sustainable future; and
- Regular assessment, continuous monitoring and evaluations of the group's sustainability initiatives and public disclosure of the group's achievements. In this regard the group understands that commitments to set targets and measures are not appropriate in light of the nature of the group's businesses and the changing nature and scope of the environmental impacts of these businesses – but this cannot deter the group from seeking to minimise its impact on the environment and to encourage business practices that promote sustainability.

Environmental management system

The Group's environmental management system is based on a 5-phase process:

Phase 1

- Gather data around our energy, water and material resource consumption; and

- Assess the applicable regulatory framework and determine what compliance with this framework entails.

Phase 2

- Identify the structures within the group that are responsible for the implementation of environmental management system;
- Define the environmental sustainability priority areas with reference to the group's areas of impact;
- Define measurable sustainability objectives to reduce the group's carbon emissions and consumption of energy, water and natural resources; and
- Define the group's disclosure requirements.

Phase 3

- Build organisational commitment to sustainable practices and appropriate disclosure on the group's sustainability processes and practices, and on its resource utilisation;
- Build sustainable partnerships with relevant stakeholders; and
- Embed sustainability into the Group's risk methodology and practices.

Phase 4

- Implement self-assessment tools to measure and analyse the impact of the group's business activities;
- To report on the group's carbon footprint relative to intensity targets;
- Obtain external verification of the group's carbon footprint and energy consumption; and
- Continuously monitor the adequacy and quality of the group's environmental management system with specific reference to measures to reduce the group's carbon footprint

Phase 5

- Seek to share information and to promote the adoption of best practice across the group and retail sector;
- Promote awareness of the need to entrench sustainability in our thinking; and
- Communicate the group's commitment to sustainable practices and its progress relative to its published goals to employees, suppliers, shareholders

and other relevant stakeholders through internal communication channels, participation in relevant surveys, in the group's annual report and via its corporate website.

Environmental focus

The group will monitor and evaluate its resource utilisation and will seek opportunities to reduce its resource utilisation and carbon footprint through consideration of its:

- Energy and water efficiency;
- Opportunities for distribution network optimisation;
- Travel;
- Waste management/recycling; and
- The effectiveness of awareness programmes amongst staff, suppliers and communities in which the group operates.

Governance

The Social and Ethics Committee has been designated to oversee the Group's environmental management agenda. The responsibility for implementing the environmental management policy and its regular review has been assigned to the Group HR Director.

6. Scope

This policy applies to all employees of the Clicks Group Limited and its subsidiaries in South Africa. It also applies to third parties who have undertaken to comply with this policy in terms of their contracts with the group.

7. Responsibilities

Any changes to the Environmental Management Policy must be approved by the Group HR Director.

8. Revision History

The Group Environmental Management Policy will be reviewed every two years.

POLICY NUMBER	POLICY OWNER	CREATION DATE	NEXT REVISION DATE
Version 3	B D Engelbrecht	22 September 2014	1 February 2020