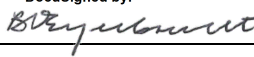




GROUP HUMAN RIGHTS POLICY

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1. Purpose

As a responsible corporate citizen, Clicks Group ('the group) is committed to upholding the fundamental human rights of its employees, customers, suppliers, and other stakeholders. This policy aligns with internationally recognized human rights frameworks, national legal obligations, and relevant domestic laws. The group's commitment to human rights reflects its mission to promote responsible business practices and ensure ethical treatment throughout its value chain.

The purpose of this policy is to:

- **Articulate commitment:** Affirm the group's dedication to respecting human rights in all operations, supply chains, and stakeholder engagements.
- **Set standards:** Establish clear expectations for the treatment of employees, customers, suppliers, and communities, ensuring compliance with international human rights principles and local laws.
- **Guide behaviour:** Provide employees, suppliers, and partners with guidance on identifying, preventing, and addressing human rights risks and violations.
- **Enhance accountability:** Promote transparency and accountability in managing human rights impacts, including reporting on progress and adherence to global standards.
- **Manage risk:** Identify, mitigate, and prevent potential human rights risks within the group's operations, supply chains, and communities.

The group recognizes that respecting human rights is integral to sustainable business operations and a fundamental responsibility. This policy supports the group's Corporate Social Responsibility (CSR) and Violence and Harassment policies, reinforcing its public commitment to protecting human rights.

2. GENERAL PRINCIPLES

The group commits to promoting and respecting human rights in line with international standards, including:

- The Bill of Rights in the Constitution of the Republic of South Africa, 1996,

- The Bill of Rights (South Africa's Constitution, 1996)
- The Universal Declaration of Human Rights (UDHR), 1948
- The ILO Declaration on Fundamental Principles and Rights at Work, 1998
- The OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, 2011
- The UN Global Compact, 2000
- The UN Guiding Principles on Business and Human Rights, 2011
- The UN Women's Empowerment Principles, 2010
- The UN Standards of Conduct for Business, 2017

By integrating these principles, group strives to foster a responsible, inclusive, and sustainable business environment that respects and protects human rights at all levels.

3. Commitments

The group is committed to respecting human rights by avoiding any activities that may cause or contribute to adverse human rights impacts and by addressing such impacts when they occur. Additionally, the group will actively seek to prevent or mitigate adverse human rights impacts directly linked to its operations, products, or services through business relationships. In doing so, the group commits to:

- **Non-discrimination:** the group does not tolerate unfair discrimination based on race, ethnicity, gender identity, religion, sexual orientation, nationality, age, disability, culture, political opinions or other factors. Ensuring equal treatment regardless of race, ethnicity, gender identity, religion, sexual orientation, nationality, age, disability, or political beliefs, promoting fair employment practices. The group adopts a zero-tolerance approach to unfair discrimination.
- **Respect for labour rights:**
 - The group adheres to all applicable labour laws in the countries in which it operates and advances general principles of fairness such as equal pay for work of equal value, aligned with the ILO Convention 100.
 - The group respects **freedom of association** and the rights of its employees to join and form trade unions, bargain collectively, and engage in peaceful protests.
 - The group is committed to the complete **eradication of child labour** in all forms and adheres to international standards to ensure that no child is exploited within our operations or supply chains.
 - The group is committed to ensuring a healthy work-life balance is enabled and ensures alignment to the applicable legislation in efforts to **reduce excessive working hours**.
- **Modern slavery and human trafficking:** The group is committed to preventing and abolishing of all forms of forced or compulsory labour and human trafficking in all aspects of its operations and supply chains. It promotes transparency, ethical sourcing, and collaboration with stakeholders to uphold the highest standards of human rights throughout all business activities.

- **Ethical sourcing:** The group contractually requires its suppliers to uphold human rights standards (including labour rights, health and safety, and environmental protection). The group does not knowingly source goods or services from suppliers who engage in human rights violations or unethical practices.
- **Customer privacy:** The group respects the privacy of its customers and protects their personal data in accordance with applicable laws and regulations as stipulated in the Protection of Personal Information Act (POPIA). The group does not disclose or sell customer data to third parties without their consent.
- **Digital security:** The group is committed to ensuring the digital security and privacy of its stakeholders. It implements robust cybersecurity measures to protect against unauthorised access, breaches, and other digital threats.
- **Community engagement:** The group engages with the communities in which it operates and respects their cultural, social, and economic rights. It supports community development initiatives and contributes to local economic growth. The group supports employee engagement and involvement with charitable partners and provides mechanisms for participation on the group CSI programmes.
- **Access to water and sanitation:** The fundamental human right to clean water and sanitation.
- **Gender equality:** The group is committed to fostering gender equality across all levels of the organisation, supply chain and communities by promoting equal opportunities, eliminating gender-based discrimination, and supporting inclusive practices that enable all to thrive, regardless of gender.
- **Women's rights:** The group is committed to empowering women and girls across its workforce, supply chain and communities. Through policies and practices that advance and protect women's rights, the group promotes fair representation in leadership, supports skills development, and fosters safe, respectful, and inclusive environments where women can achieve their full potential.
- **Rights of children:** The group supports section 28 of the South African Constitution Bill of Rights where the rights of a child are defined.
- **Rights of indigenous peoples:** The group respects the rights of indigenous peoples, including their cultural heritage and traditions.
- **Rights of refugees and migrants:** The group supports the rights of refugees and migrants, ensuring they are treated with dignity and respect. It provides equal opportunities and protection against discrimination for all individuals, regardless of their migration status.
- **Health and safety:** Ensuring a safe, healthy work environment for all stakeholders. It maintains a safe and healthy work environment and adheres to all relevant health and safety regulations and standards.
- **Freedom of expression:** The group upholds the right to freedom of expression for all individuals. It cultivates an open and inclusive environment where diverse opinions and voices are encouraged, valued, and respected.

- **Harassment:** The group is committed to maintaining a workplace free from all forms of harassment, including sexual, verbal, physical, and psychological, ensuring that everyone is treated with dignity and respect. The group adopts a zero-tolerance approach on harassment.
- **Transparency and accountability:** The group is transparent about its human rights policies and practices and reports its progress in implementing them to the Board, investors, and all relevant stakeholders. It holds itself accountable for any human rights violations that may occur and take appropriate corrective action.

The group requires its external stakeholders, including suppliers and independent contractors to respect and comply with all international human rights standards listed above in alignment with the Global UN Compact Principles and conventions.

4. Due Diligence

The group proactively identifies and addresses human rights risks through ongoing due diligence, stakeholder engagement, and risk assessments. The Group's approach is based on international frameworks, prioritising the prevention and mitigation of significant risks.

5. Grievance Mechanisms

The group provides accessible grievance mechanisms to address human rights concerns raised by employees, suppliers, customers, and other stakeholders. These channels ensure that complaints are handled confidentially, impartially, and in a timely manner, with a focus on fair resolutions and corrective action when needed. Key mechanisms include:

- **Tip-Off anonymous:** This independent, confidential whistleblowing hotline, managed by Deloitte, available for use by all employees and suppliers, allows for anonymous reporting of unethical workplace behaviour via various platforms and in various languages. Users can report incidents by calling the hotline on 0800 024 365 or by emailing clicks@tip-offs.co.za.
- **Employee Engagement Survey** to provide anonymous feedback on human rights issues.
- **Internal reporting channels** for employee concerns that includes line manager and human resources concerns, health and safety, IT security, and other business support matters.
- **Transformation Forum:** The group employees can also report human rights issues (specifically those infringing on transformation and in particular employment equity) to the group transformation forum. Employees can reach the group transformation forum through one of its members or by emailing transformation@clicksgroup.co.za.
- **Customer Contact Centre:** Our customer contact centre is available for customers to report incidents telephonically. Customers can reach the contact centre by calling 0860 254 257 (South Africa) or +27 21 460 1009 (outside South Africa).

The group supports a culture of transparency and encourages staff to approach leaders with concerns where appropriate. These mechanisms, along with continuous monitoring, help the group maintain a workplace that prioritises human rights and ethical conduct.

6. Remediation

When adverse human rights impacts are identified, the group is committed to providing or cooperating in effective remediation. The group engages with affected individuals or communities through fair and accessible processes that can be activated through the grievance mechanisms listed above.

7. Scope

This policy applies to all entities within the group, including trading divisions, brands, employees, and independent contractors. The group expects all business partners, suppliers, and relevant stakeholders to uphold and respect its principles, values, and commitment to human rights. The Group will take appropriate action in response to any human rights violations.

8. Responsibilities

The parties responsible for ensuring, and overseeing, compliance with this policy are as follows:

- All Clicks Group Limited. Employees, suppliers, service providers and stakeholders are responsible for ensuring compliance with this policy.
- The group Chief Executive Officer and the Managing Executives of the business units are accountable for implementing the policy.
- The group Limited board, through the Social and Ethics Committee (SEC), holds ultimate responsibility for overseeing and governance of the group's human rights approach.

9. Revision of History

The Human Rights Policy will be reviewed on an annual basis.