



# Metair Group Human Rights Policy

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# Document Review and Approval

## Revision history

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1	Board Chair	05 October 2023	
2	KPMG	February 2025	Format update

## This document has been reviewed by

	Reviewer	Date reviewed
1	Board Chair	05 October 2023
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## This document has been approved by

	Name	Signature	Approval Date
1	REMCO		27 February 2025
2	BOARD		14 March 2025
3			
4			
5			

## 1. Policy Statement

Metair (“the Company”) recognises human rights as a core value. The Company is committed to upholding, protecting, and promoting the human rights of its employees, contractors, suppliers, and people within the communities within which the Company operates.

## 2. Scope And Objectives

The purpose of this policy is to stipulate the Company’s multinational stance in ensuring responsible business practices in upholding human rights within all our operations.

The Company is committed to respect, protect, and promote human rights and to avoid complicity in human rights abuses, inclusive of within our supply chain.

This policy sets out the various areas that impact human rights and the perspective of the Company in this regard.

The primary objectives of this policy are:

- To provide guidance to employees on the behaviours expected in accordance with the Company’s culture and/or values, as set out in the Code of Ethics and,
- To promote fair and sound human rights practices within the Company.

This policy applies to all employees, contractors, suppliers/service providers and customers of the Company, including our partners for social development within our host communities.

## 3. Definitions

As per the United Nations Universal Declaration of Human Rights, “Human rights are the rights that belong to an individual or group of individuals as a consequence of being human.”

According to the Constitution of South Africa, “Human rights are considered to be inalienable fundamental rights to which a person is inherently entitled simply because s/he is a human being regardless of their nationality, location, language, religion, ethnic origin or any other status.”

## 4. References

This policy must be read together with and reinforces the following existing policies of the Company in which human rights are embedded:

- Code of Ethics;
- Whistleblowing;
- SHE Policy and
- HR Compliance.

The above list is not exhaustive, but illustrative of the fact that various elements of human rights have been interwoven and integrated into Company policies, practices, and standards.

## 5. Governance

The board, supported by the social and ethics committee aims to ensure that this policy complies with all legal provisions and ethical obligations, and that all Metair employees and directors adhere to it. The policy is published on the company's website, the group has a whistle-blowing mechanism to detect breaches of ethical standards and deal with such disclosures appropriately.

The managing directors of our subsidiaries, as well as their executive teams, are responsible for ensuring that this policy is implemented and adhered to within each subsidiary, within the various departments, as well as within service agreements with all contractors and suppliers.

The policy is reviewed annually by the social and ethics committee and presented to the board for approval.

## 6. Policy Statement

The manner in which the Company seeks to give effect to its commitment is illustrated but not limited to the areas listed below:

- **Ethics**

The Company expects all employees, contractors, and suppliers to share its commitment to high moral, ethical and legal standards and creates conditions where all can work in dignity.

- **Diversity and Inclusion**

The Company promotes diversity and inclusion and strives to maintain workplaces that are free from all forms of discrimination or harassment on the basis of race, sex, colour, nationality, religion, age, sexual orientation, gender, marital status, family status, HIV/AIDS status, disability or any other arbitrary grounds.

- **Freedom of Association and Collective Bargaining**

The company respects all employees' right to join, form or decline to join a labour union. Where unions exist, and within the parameters defined by local labour laws, the Company is committed to establishing constructive dialogue with organised labour and the freely chosen representatives of employees and to bargain in good faith within the appropriate national legal frameworks.

- **Safe and Healthy Workplace**

The safety, health and wellbeing of employees is a top priority. The company aims to provide and maintain a safe, healthy, and productive workplace that complies with applicable laws, regulations, and internal standards. Collaborating with employees and contractors it continually aims to proactively identify and eliminate/reduce risks of accidents, injury, and health impacts.

- **Forced and/or Compulsory Labour**

All forms of forced and/or compulsory labour are prohibited, inclusive of discriminatory labour practices that prohibit workers from exercising their right to reasonable time off for personal and/or family responsibility.

- **Child Labour**

Children up to and below 15 years of age are forbidden from employment at any Company operations and/or within our value chain. Hiring and employment of individuals between 15 years of age and less than 18 years of age for positions in which hazardous work is required is also prohibited.

- **Working Hours, Pay and Benefits**

The Company complies with applicable labour and employment legislation and strives to remunerate employees competitively relative to comparable industry and market norms and in accordance with applicable collective bargaining agreements. Issues of “Fair Wage” and/or “Living Wage” shall form a critical element of any/all wage setting discussions, with issues such as “Gender Pay Gap” will be monitored and discussed to demonstrate our commitment to equality.

- **Security**

Security procedures are in place to protect employees and assets and to provide a secure and sustainable environment in which the business can operate. The excessive use of force by security personnel in the process of conflict resolution will not be tolerated in any form.

- **Conducting Business as a Responsible Member of Society**

The Company respects the rights of people in the communities impacted upon by its activities. It seeks to identify risks and adverse impacts that may potentially affect local communities. It finds ways to consult and engage with communities with the intention of developing workable solutions to address/avoid/minimise and or mitigate concerns.

## **7. Implementation Procedures**

The procedures for ensuring that the Company effects this policy throughout the organisation are as follows:

- In the fulfilment of their daily tasks and activities, general managers, senior managers, and all other employees are expected to observe and respect human rights and continuously assess opportunities to improve processes in order to further prevent human rights risks affecting people within the business and/or its value chain.
- Where necessary the Company shall ensure that employees, contractors, and suppliers are familiarised with human rights issues that are relevant to their activities, both upon induction and on an as/when needed basis.
- Where relevant the Company will conduct communication campaigns to heighten awareness of human rights and/or to educate individuals on emerging issues.
- Employees, contractors, and suppliers are encouraged to report any suspected violations of the policy by the Company, its representatives or suppliers and service providers to the relevant executives or senior managers or anonymously through the Deloitte Anonymous Tip-Off Line, or other relevant mechanism for reporting concerns.
- The Company undertakes to provide for and cooperate in reasonable, fair, and/or equitable remediation where adverse human rights impacts have been caused by or resulted from its business activities.

## **8. Non-Compliance**

- Non-compliance with this policy and the procedures associated with it by any employee may result in disciplinary action and even dismissal.
- Any transgressions of this policy and the procedures associated with it by contractors or suppliers will result in the implementation of appropriate corrective and remedial action, up to and potentially inclusive of the cessation of all contract agreements.

## 9. Communication Of Policy

To be sustainable, this policy must be supported by structured communication, awareness, and education programmes, inclusive of, but not limited to induction procedures for all new employees, contractors, and key suppliers.

## 10.Approval

Reviewed and approved by the Social and Ethics Committee on 18 May 2023.

Reviewed and approved by the Board on 5 October 2023

Reviewed by the REMCO on the 14<sup>th</sup> February 2025