

MEDIA24 HUMAN RIGHTS STATEMENT

Last reviewed and approved on 16 November 2021

Introduction

The Universal Declaration of Human Rights sets out the minimum standards that are necessary for individuals to live with dignity. The responsibility of business to uphold and support the rights of every individual, is set out in the UN Guiding Principles on Business and Human Rights. In this document, Media24 shares our commitment to human rights and our approach to fulfilling our responsibility to contribute to their advancement.

Our approach

Media24 is a leading media company in South Africa focusing on digital and print media, book publishing, television production and ecommerce. In addition to our indirect impact across the communities in which we invest and operate, our direct impact extends to:

1. Our workforce

We unequivocally respect the human rights and protect the fundamental dignity of our workforce. We are committed to providing a respectful, safe and secure environment that is free from any form of human rights abuse. We expect everyone to behave in a way that supports this commitment wherever they work, and in all situations directly related to work.

This commitment extends to the board and all people who work at Media24, including permanent and temporary employees, contractors, consultants, agents, trainees and / or job applicants. Where an individual is employed by an operating company, this group commitment supports any local policies that may be in place.

2. Companies that we invest in

Our associates and investees (non-controlled entities) are required to comply with applicable laws and regulations. In addition, we encourage them to adopt appropriate governance standards (for example, codes of business ethics and conduct, and policies relating to anti-bribery and anti-corruption, competition compliance, privacy and sanctions and export controls).

3. Suppliers

Mindful of the opportunity that we have to influence our supply chain partners through our supplier and purchase decisions, we expect a commitment compatible with our own, to minimum human rights standards by companies who seek to qualify as a supplier to Media24.

APPROVED by Media24 board at 16 November 2021 meeting

Our commitment

Our commitment to Human Rights is guided by key international standards: the United Nations (UN) Guiding Principles on Business and Human Rights, the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises, and the UN Global Compact. Specifically, our Code of Business Ethics and Conduct clearly defines our policies and approach to Fair Employment, Health and Safety, Privacy and Employee Confidentiality.

We are committed to complying with applicable laws and to respecting internationally recognised human rights, wherever we operate. Guided by the UN Global Compact, in the rare situation that national law conflicts with international standards, we comply with national law and seek ways to respect the principles of internationally recognised human rights.

Our workforce

We have set out our approach to respecting and promoting principles that safeguard the rights of our workforce including the categories defined by the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work.

- **Fair employment, free from discrimination**

We know that our people, with their diverse talents and views, are crucial to our success in creating and implementing new business opportunities. We therefore strive to have a workplace where teamwork and mutual trust are promoted and where our people are treated with dignity and respect, free from any form of discrimination. To this end, we expect all our people (including directors and employees) to be fair and honest in their business dealings with colleagues and business partners, and to comply with the following principles, which are set out in detail in the Code of Business Ethics and Conduct:

- To avoid relationships or interests, whether direct or indirect, that could adversely influence or impair their capacity to act with integrity and objectivity;
- To treat clients, customers, colleagues, competitors and third parties with dignity, integrity and respect;
- To observe a high standard of business ethics in all commercial operations;
- To comply with laws, regulations and the group's rules relating to dishonesty, corruption and/or breach of the director's or employee's duty of good faith towards the group; and
- To respect the diversity of people and avoid victimisation, harassment, bullying or abuse of fellow employees whether due to gender, gender identity, gender expression, transgender status, sexual stereotypes, sexual orientation, class, race, religion, creed, colour, marital or family status, age, nationality, political association or disability.

- **Dignity at work**

Our Anti-harassment Policy supported by our "Dignity at Work" program, sets out our zero-tolerance approach to harassment and discrimination (including sexual harassment and bullying) and underscores our commitment to diversity, inclusion and belonging, and ensuring dignity at work.

- **Privacy & employee confidentiality**

We recognise privacy as an important value, and as an essential element of public trust. We strive to be a trusted company and expect all our businesses to seek the same. Our Data Privacy Governance Policy sets out our approach to data privacy generally, and our Human Resources Privacy Policy sets out our approach to the data privacy of our workforce.

We respect the confidentiality of employees' personal data and acquire and keep only such employee personal information as is required either for the group's effective operation or by law wherever the group conducts business.

- **Forced labour, including human trafficking**

We recognise the fundamental human rights of freely chosen employment. We do not condone any form of forced labour (work or service which is exacted under the menace of any penalty and for which the person has not offered themselves voluntarily). All work directly or indirectly undertaken should be voluntary and employees should be free to end their employment at any time. All employees should be provided with a written agreement describing the employee's terms of employment in a language that the employee understands. No person commencing employment will be deprived of identity papers.

- **Child labour**

We do not condone labour by people younger than the relevant legal minimum age requirements in the countries in which we operate and do not tolerate child labour (work that deprives children of their childhood, their potential and their dignity, and that is harmful to their physical or mental development, including by interfering with their education).

- **Equal opportunity**

We promote respect for diversity as well as diversity itself. To ensure that all people are treated equally in the professional environment, we support the elimination of bias and promote equal opportunity for recruitment, skills development, advancement and promotion, and for remuneration.

- **Health & safety**

We aim to provide our people with a safe and healthy work environment. To this end, our people must maintain safe and healthy workplaces by following environmental and health and safety rules and practices, and promptly reporting accidents, injuries and unsafe equipment, practices, or conditions. Our people are expected to perform their company-related work in a safe manner, free of the influences of alcohol or controlled substances. The use of illegal drugs, violence or threatening behaviour in the workplace will not be tolerated.

- **Fair remuneration**

We want to attract and retain skilled and talented people. We have [fair remuneration systems](#) in place which are:

- Rational – easy to explain;

- Equitable – free from discrimination; and

- Relevant – linked to the country of operation, our competitive markets and personal and company performance.

We believe that fair remuneration should be provided to all permanent (and temporary) employees, contractors, consultants, trainees and/or job applicants.

- **Freedom of association and collective bargaining**

We operate within the framework of locally applicable labour laws, regulations, and employment practices. We respect the freedom of our employees to establish or join organisations of their choice, and we will not make employment subject to the condition that an employee should accept or relinquish trade union membership.

We regularly engage with our employees to understand their priorities and concerns and we take appropriate action to address their feedback.

Governance, monitoring, reporting and accountability

The Media24 board oversees and is ultimately responsible for sustainability, including all topics that we have included in this Human Rights Statement. The Naspers Social, Ethics and Sustainability committee and the Media24 Human Resources and Remuneration committee assist the Media24 board in discharging its responsibility in relation to Human Rights.

Action will be taken to investigate any reported violations and based on the outcome of the investigation appropriate remediation measures will be taken within the governance framework described above.

Human Rights will be reported on through the reporting framework set out in the Media24 Sustainability Policy and, where relevant, the Media24 Remuneration Policy.