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DEFINITIONS

Term	Description
Information	When data is processed, interpreted, organized, structured or presented so as to make them meaningful or useful
HR	Human Resources
Legal Entity or Subsidiaries	Defined as separate legal entities where Tiger Brands has a controlling interest
User	Any individual accessing or consuming Tiger Brands' information assets or resources

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1 Introduction

Tiger Brands Limited believes that business can only flourish in societies where human rights are protected and respected. Tiger Brands recognises that business has the responsibility to respect human rights and the ability to contribute to positive human rights impacts.

This is an area of growing importance to our employees, workers, shareholders, investors, customers, consumers, the communities where we operate and civil society groups globally. There is therefore both a business and a moral case for ensuring that human rights are upheld across our operations and our value chain (supply chain and service providers). This Human Rights Policy contains overarching principles which we embed into our policies and systems. It defines our commitment to respecting human rights as set out in the Constitution of the Republic of South Africa, the United Nations (UN) Guiding Principles on Business and Human Rights, the International Bill of Human Rights and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work.

2 Purpose

The purpose of this policy is to establish the principles, accountabilities and responsibilities for implementing, monitoring, reviewing and reporting Human Rights abuses within Tiger Brands. The policy has been developed to protect Tiger Brands, its employees, assets, information, operations and reputation in the environment in which it operates and to ensure the respect for Human Rights.

3 Scope of the Policy

This Policy applies to all employees, temporary employees, contractors, suppliers, service providers and consultants of Tiger Brands, including all Tiger Brands subsidiaries.

4 **Objective and Outcomes**

Our intent is to ensure that:

- We will conduct periodic human rights due diligence reviews of our activities and new business opportunities with the aim of avoiding adverse human rights impacts on our workforce, suppliers, service providers and the communities in which we operate.
- We aim to make a positive and constructive contribution to the reduction and elimination of human rights abuses within our sphere of influence,



POLICY Human Rights Policy

and expect our suppliers, service providers, partners and customers to uphold the same standards.

Due to the nature, location and scale of our activities, our commitment, based on international best practice principles on human rights, extends to:

- non-discrimination and respect of diversity;
- freedom of association and the right to collective bargaining;
- the right to a safe and healthy working environment;
- the prohibition of forced and child labour;
- establishing fair and competitive wages and benefits;
- respecting the rights of our local communities;
- security arrangements;
- protecting the environment; and
- ethical sourcing in our supply chain.

5 **Policy Statement**

We prohibit all forms of forced or compulsory labour within our operations and the operations of those who we conduct business with. We do not tolerate the use of child labour and ensure that all our employees are above the legal employment age in the country of their employment. When operating in areas or countries with high levels of conflict, poor human rights records or weak governance, we strive to follow international best practice principles.

6 Accountabilities and Responsibilities

6.1 Accountability

Our Chief Corporate Affairs Officer is responsible for the day-to-day human rights function and resources.

6.2 Tiger Brands Board of Directors

Although ultimate accountability for the Human Rights Policy resides with the Tiger Brands Board of Directors, the Board of Directors has granted authority to the Chief Executive Officer to act on its behalf in matters relating to Human Rights. The Social, Ethics and Transformation (SET) Committee monitors and reviews performance on Human Rights.

6.3 Tiger Brands Executive Committee

Management are responsible to ensure their staff and third parties are aware and comply with this policy and other related policies, and are trained accordingly at least once in two years.





6.4 Functional Areas within Tiger Brands

Responsibilities

Each employee and service provider is responsible for respecting Human Rights.

6.5 Internal Audit and Risk Director, Commercial Audit Enterprise Services

Responsibilities

DUE DILIGENCE

Our due diligence consists of risk identification (usually in the form of risk mapping), the identification of **where** potential human rights issues could occur in our own operations, the identification of **what** actual or potential human rights issues could be of concern and a systematic periodic review of the risk mapping of potential issues.

6.6 Forensics and Internal Audit

Internal Audit will be responsible for the investigation of any Human Rights cases reported through the Ethics Line, or directly to the company, or identified through other means such as whistle blowing or the media.

6.7 Human Resources

Human Resources will ensure that all employees receive training at least once every second year, as part of the Ethics training. Training will be documented.

They will assist Management in enforcing the disciplinary process for noncompliance to Human Rights abuses.

Corporate Affairs will get reports from each of Tiger Brands' own operations on a quarterly basis.

6.8 Employees and Third Parties

All employees and third parties have a Human Rights responsibility, and must comply with the principles defined in this policy, respect Human Rights appropriately and responsibly and report violations and / or non-compliance with this policy.

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7 Related Policies and Standards

- Tiger Brands Code of Ethics
- Tiger Brands Supplier Code of Conduct
- Tiger Brands Disciplinary Code
- Tiger Brands Diversity Policy
- Tiger Brands Ethical Sourcing Policy

8 Compliance, Monitoring and Reporting

ASSESSMENT

We will proactively conduct an assessment of potential human rights issues over the last 3 years and report publicly on this. This will include:

Our Own Operations, our Contractors/Tier 1 Suppliers and our Joint Ventures and will cover the following:

- % of total assessed in last three years
- % of total assessed where risks have been identified
- % of risk with mitigation or remediation process implemented
- Basis for reporting % (Full Time Employees (FTEs), number of suppliers)

It will also cover the following groups:

- Own employees
- Children
- Indigenous people
- Migrant labour
- Third party contracted labour
- Local Communities
- Others (where applicable)

DISCLOSURE

The Chief Corporate Affairs Officer in Tiger Brands Limited will be informed about any Human Rights cases on a quarterly basis, with a full report prepared by the Sustainability and External Reporting Director on an annual basis, together with any actions taken against employees or service providers. Tiger Brands will publicly disclose on their commitment, the



process to identify and mitigate risks, the number of sites with mitigation plans in place (where applicable), the main human rights issues, vulnerable groups identified and any remediation actions taken. Where remediation is required, this will follow globally acceptable protocols.

9 Document Control Information

Document Details

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Document Approval

Policy Owner	Chief Corporate Affairs Officer	
Policy Approver	Tiger Brands - Board	
Approval Committee	Board	
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	21 / 11 / 2018		Board	N/A

I confirm that the HUMAN RIGHTS POLICY was approved by the TIGER BRANDS BOARD OF DIRECTORS on 21st November 2018

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HUMAN RIGHTS MANAGEMENT GUIDELINE

1. Awareness on Human Rights will be incorporated in the Ethics Training and will be provided to all employees on a yearly basis. The number of employees trained will be reported on an annual basis to the SET committee.

The reporting organization shall report the following information:

- **a.** Total number of hours in the reporting period devoted to training on human rights policies or procedures concerning aspects of human rights that are relevant to operations.
- b. Percentage of <u>employees</u> trained during the reporting period in human rights policies or procedures concerning aspects of human rights that are relevant to operations.

Human Resources (HR) responsibility, report to Sustainability and External Reporting Director on a quarterly basis

2. The need to adhere to Tiger Brands' Human Rights policy will be included in all supplier contracts, starting with the Tier 1 suppliers.

The reporting organization shall report the following information:

a. Total number and percentage of significant investment agreements and contracts that include <u>human rights clauses</u> or that underwent human rights screening.

b. The definition used for 'significant investment agreements'.

Due diligence will be conducted on any new operations or on potential mergers and acquisitions.

Supply Chain responsibility, report to Sustainability and External Reporting Director on a quarterly basis.

- 3. Monitoring will be conducted through:
 - a. Tracking of any media releases mentioning Tiger Brands and Human Rights issues
 - b. Any calls made through the Ethics Line or through our whistle blowing mechanism, will be reported to the Operational Risk and Sustainability Committee and the SET Committee, by the Internal Audit and Risk Director through the Sustainability and External Reporting Director.
 - c. Any suppliers/joint venture partners must inform Tiger Brands' Supply Chain should any human rights issues surface within their sphere of influence
 - d. Annual declaration to Supply Chain by all suppliers and joint ventures that they were not complicit in any human rights abuses.
 - e. Our own operations will report on a quarterly basis to the Supply Chain Chief Office, the Sustainability and External Reporting Director and the Operations Risk and Sustainability Committee.



4. Reporting at the group level will be done on an annual basis through a review by the SET Committee. Data will be reported in the annual Integrated Report and/or Sustainability Report.

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