



Santova Limited		Doc no:	
Anti-Slavery and Human Trafficking Policy and Disclosure Statement		Page 1 of 3	Rev:
		08/10/2020	I
Global Responsibility:	Santova Limited Board, Santova Limited Executive Committee, Respective Human Resource Management	Initial:	
Regional Responsibility:	All other Directors, Business Unit Leaders, Regional Head / Branch Manager and all employees	Initial:	

I. Policy

- 1.1. The Santova Limited Board of Directors (“Santova Board”) is committed to promoting an equitable workplace which respects and upholds human rights. The Santova Board supports the need to eliminate and prosecute violations of human rights in all instances such as the use of child or forced labour, slavery or human trafficking and all related conduct.

The Santova Group of Companies (“Santova Group”) maintains a strict ‘zero tolerance’ towards the promotion, use of and/or engagement with any form of modern slavery as defined by the Modern Slavery Act 2015 (“MSA”) and as further outlined under any applicable international law conventions and treaties and/or any other applicable Act worldwide on the subject (relevant laws).

- 1.2. The Policy shall focus on the following key areas:

- 1.2.1 Slavery, Servitude and Forced/Compulsory Labour
- 1.2.2 Human Trafficking
- 1.2.3 Exploitation

These collectively shall be referenced throughout this Policy as ‘Modern Slavery’ which each constitute a separate and punishable violation of human rights in terms of the relevant laws.

- 1.3. This Policy shall apply to all entities within the Santova Group worldwide. This Policy shall be binding and applicable:

- 1.3.1 internally to all Santova employees, including both permanent and fixed term contract (temporary) employees, as well as to the Santova Board and all Committees; and
- 1.3.2 externally to Santova’s subcontractors and their employees, suppliers and third party contractors within their respective supply chain.

- 1.4. This policy further represents Santova’s Statement which it may be required to produce in terms of its disclosure requirements, as stipulated under section 54 of the MSA or any other applicable Act worldwide, to evidence compliance with the MSA and other applicable Acts worldwide.

2. Purpose

The purpose of this Policy is to:

- 2.1. uphold the overall objective of eradicating the disregard for human rights within the industry by conducting business in accordance with the highest standard of ethical commercial practices which are also further encapsulated in Santova’s Culture, Philosophies and Values;
- 2.2. ensure compliance with all anti-slavery and human trafficking laws and regulations (including disclosure requirements) across all jurisdictions within the Santova Group;
- 2.3. create a formal documented approach to Santova’s compliance with the MSA;
- 2.4. stipulate Santova’s process for responding to any concerns which may arise and need to be addressed;
- 2.5. ensure employees of Santova are aware of the compliance requirements in terms of this policy; and
- 2.6. hold accountable all subcontractors and their employees, suppliers and third party contractors within their respective supply chain, to compliance with this Policy and Santova’s Supplier Code of Conduct.

3. Procedure

The following measures collectively address Modern Slavery risk management procedure within the Santova Group’s business operations:

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3.1. Risk Assessment:

The Santova Group is a non-asset based supply-chain solution's service provider and therefore considers any subcontractors, as key role players and stakeholders. As such each entity within the Santova Group shall monitor and evaluate each subcontractor appointed to ensure that the principles contained in this Policy are respected.

Regional Heads and Management within the Santova Group shall ensure that the following is adhered to:

- 3.1.1. any prospective subcontractor to be appointed shall be the subject of a thorough supplier evaluation;
- 3.1.2. after the supplier evaluation has been concluded and confirmed, the subcontractor shall be required to complete and sign Santova's Supplier Code of Conduct to contractually bind the subcontractor to these provisions; and
- 3.1.3. the subcontractor shall, upon request and where necessary, be trained by a representative of the Santova Group on the principles contained in the Santova Supplier Code of Conduct and this Policy,

3.2. Audits

Each entity within the Santova Group shall, in conjunction with the above Risk Assessment, conduct *ad hoc* internal audits on subcontractors at appropriate intervals to ensure:

- 3.2.1. compliance with the Supplier Code of Conduct and this Policy;
- 3.2.2. implementation of these requirements in the subcontractor's business by their employees, suppliers and third party contractors;
- 3.2.3. any non-compliance with the Supplier Code of Conduct and/or this Policy is immediately reported; and
- 3.2.4. awareness of any updates to this Policy and the principles contained therein.

3.3. Training

Where required, external training shall be conducted with the subcontractor by a representative of the Santova Group.

Internal training shall be provided to Senior Management who in turn shall train their respective regions within the Santova Group as required. Training may include:

- 3.3.1. one on one engagement sessions confirming on the principles of this Policy and the Supplier Code of Conduct;
- 3.3.2. group sessions with multiple employees; or
- 3.3.3. ongoing evaluation of individuals or teams by Management.

3.4. Query / Concern Escalation

Any query or concerns regarding compliance with this policy shall be addressed in the following manner:

- 3.4.1 Employees, Management, the Santova Board, subcontractors and any other party shall report any non-compliance with this Policy by either internal or external parties to the Santova Group's designated whistleblowing inbox at whistle@santova.com;
- 3.4.2 any such concerns shall be investigated as per the process used within the Whistleblowing Policy which may involve the Social & Ethics Committee where appropriate; and
- 3.4.3 the outcome of any investigation shall be provided to the Santova Board, the Social & Ethics Committee and any other relevant party, including but not limited to, any relevant government authority.

3.5. Roleplayers

- 3.5.1 The Santova Board maintains oversight over Santova's Social and Ethics Committee which shall ensure the implementation and management of this Policy.
- 3.5.2 The Social & Ethics Committee manages risk within the areas of social and economic development, good corporate citizenship, the environment, health and public safety, labour, ethics and human resources and

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shall be responsible for the implementation of this Policy including addressing any concerns, raised internally or externally, in respect of compliance with this Policy.

3.5.3 Regional Heads and Management shall be responsible for the day to day communication, implementation, monitoring and training in their respective region within the Santova Group.

3.5.4 Employees shall ensure they are familiar with and comply with this Policy and immediately escalate any concerns in accordance with Query / Concern Escalation above. Any failure to comply with this Policy shall be addressed in terms of Santova's Disciplinary Policy.

4. Amendments to this Policy

This Policy is subject to change to ensure it relevant in terms of current laws, regulations and practices. Employees are requested to refer to the Intranet for the latest version of this Policy.

5. Master Documents

- The Santova Group's Culture, Philosophies and Values
- The Santova Supplier Code of Conduct
- The Whistleblowing Policy
- The Risk Management Policy
- The Disciplinary Policy