

Employment equity, ethics, corporate citizenship, health, safety and third-party management

EMPLOYMENT EQUITY

The directors believe that economically viable and self-sustaining employment equity is an essential and integral part of corporate governance within all Group businesses. Accordingly, the Board has approved a Group employment equity policy. In compliance with the Group policy, management of the various business units has initiated a variety of employment equity programmes. Super Group Holdings has retained its B-BBEE Level 2 Contributor status.

CODE OF ETHICS AND BUSINESS CONDUCT

Super Group is committed to high standards of honesty, integrity, behaviour and ethics in dealing with all stakeholders. All directors and employees of the Group are encouraged to subscribe to the Super Group Code of Ethics and Business Conduct, which requires them to maintain high personal ethical standards and to act in good faith and in the best interests of the Group. The code also addresses conflicts of interest, particularly relating to directors and management. This ensures that the Group's business practices are conducted in an equitable manner. Employees are surveyed annually to ensure they are both aware of and understand the Group's Code of Ethics and Business Conduct.

No director or employee of the Group may deal, either directly or indirectly, in the company's shares whilst having knowledge of unpublished price-sensitive information regarding its business or affairs. No director or officer of the Group may trade in the company's shares during the closed embargo periods determined by the Board in terms of a formal policy implemented by the Group Company Secretary. Any trading in shares by directors of Super Group and the Group Company Secretary, as well as the directors of major subsidiary companies of Super Group, must be approved in writing by the Chairman of the company or the Group Company Secretary, prior to any such trade taking place.

Periods of embargo are from the end of a reporting period to the announcement of financial results and from the date of a cautionary announcement until a terms announcement. A register of directors and officers is available for inspection at the company's registered office in Sandton, South Africa.

OCCUPATIONAL HEALTH AND SAFETY

The directors acknowledge their statutory and moral responsibility to employees and the public to comply with occupational health and safety standards. The Board is responsible for ensuring the adequacy and effectiveness of the application of the overall health, safety and environmental policies of the Group. The Group Health and Safety Manager, who reports to the Group CFO, is tasked with, inter alia, conducting compliance audits across all operating sites controlled by the Group, and reports thereon to the relevant levels of management who are obliged to undertake any required remedial actions within agreed time frames. The Group Health and Safety Manager shares best practice and other information with managers tasked with implementing compliance with the Occupational Health and Safety Act.

THIRD-PARTY MANAGEMENT

No part of the Group's business was managed during the 2017 financial year by any third party in which any director had an interest.