



Employment Equity,
Workplace Diversity &
Workplace Harassment Policy

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1. EMBRACING DIVERSITY

Super Group respects and embraces diversity and is committed to ensuring equal opportunities and eradicating discriminatory practices whilst considering all relevant legislative imperatives and objectives in this regard. We have zero tolerance for discrimination based on race, colour, religion, belief, birth, gender, sex, sexual orientation, age, disability, conscience, language, culture, nationality, ethnic or social origin, trade union affiliation, political opinion, sexual orientation or health status. Super Group does not tolerate humiliating or physical punishment or allow any Employee to be subject to verbal, psychological, physical or sexual harassment or abuse.

2. SCOPE OF APPLICATION

This policy:-

- a. applies to all companies and business units that are part of the Super Group group of companies in South Africa (referred to herein as "the Company", "the Group" or "Super Group");
- b. prevails in the event of a conflict between it and the current policies in place;
- c. may be amended by the Company from time to time to have regard to any changes in legislation or regulations issued by the Government, in which event the most current policy will replace the previous one.

3. TRANSFORMATION AND WORKPLACE DIVERSITY

Super Group is of the firm belief that a more equitable economy will benefit all South Africans and that B-BBEE is key to sustainable economic growth and social development. The Group places economically viable and self-

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sustaining transformation at the heart of numerous people practices deliberately designed to promote the greater inclusion of employees across a variety of backgrounds. Individual development, equality and performance-based advancement are the cornerstones of these transformation initiatives and are aimed at progressing and maintaining a balanced and highly skilled workforce.

Super Group furthermore considers the focused and active promotion of gender equality as both an economic and strategic imperative. The Group understands that unlocking women's potential will improve life for both genders as empowering women to become active participants in their economy boosts productivity, enhances growth prospects and facilitates a rise out of poverty. Super Group is therefore committed to achieving gender equality and strongly rejects any form of unfair discrimination based on gender.

Super Group is committed to equal opportunity practices and non-discrimination in the workplace. The Group's policy is to employ and promote individuals who best meet the requirements of available positions and who have the best potential for advancement. It is our policy to provide equal employment opportunity in full compliance with all applicable laws. In keeping with this policy, decisions with regard to applicants for employment, recruitment, hiring, training, transfer, promotion, pay, benefits, lay-off, demotion or discharge will be made without regard to race, colour, religion, gender, sex, marital status, family responsibility, ethic or social orientation, national origin, age, handicap or disability, unless in line with appropriate Affirmative Action initiatives and plans as permissible in law. Persons who believe that they have not been afforded equal treatment in accordance with this policy may lodge a grievance in accordance with this policy. All complaints of unequal treatment will be fully investigated, and corrective action taken where required. It is accordingly a core service requirement of

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all managers and employees not to engage in any conduct that conflicts with this policy.

4. DEFINITIONS AND TERMS

'Affirmative Action' means measures developed in response to barriers identified in the analysis report (EEA12) to ensure that suitably qualified persons from Designated Groups have equal employment opportunities and are equitably represented in all occupational categories in the workforce.

'Barriers' means any obstacle to the implementation of EE and Affirmative Action as identified by the institutional barrier analysis and set out in the objectives of the Group's various EE Plans.

'Designated Groups' mean black (i.e. African, Coloured and Indian) people, women and people with disabilities who are citizens of South Africa by birth or descent; or became citizens of the Republic of South Africa by naturalisation: before 27 April 1994; or after 26 April 1994 and who would have been entitled to acquire citizenship prior to that date but were precluded by apartheid policies. It also include Chinese employees who are citizens of South Africa by birth or descent; or became citizens of the Republic of South Africa by naturalisation: before 27 April 1994; or after 26 April 1994 and who would have been entitled to acquire citizenship prior to that date but were precluded by apartheid policies.

'Employee' means any person other than an independent contractor who works for Super Group, and who receives, or is entitled to receive, any remuneration; and in any manner assists in carrying on or conducting the business of the employer.

'Employment Equity Committees' refers to the various forums at Company/Subsidiary and/or Business Unit Level for consultation on Employment Equity matters as required by the Employment Equity Act, as amended.

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'Employment policies', practises and procedures' refers to, but is not limited to, recruitment procedures, advertising and selection criteria, appointments (and the appointment process), job classification and grading, remuneration, employment benefits and terms and conditions of employment, job assignments, the working environment and facilities, training and development, performance evaluation systems, promotion, transfer, demotion, and disciplinary measures other than dismissal.

'Executive Officer', refers to the Managing Director of a Subsidiary or Chief Executive Officer of a Business Unit.

'Group Exco', Group Executive Committee ultimately responsible for the implementation of Employment Equity and ensuring Workplace Diversity.

'Inherent Requirements of the job' means tasks which are essential to perform a job and without which the position or the job cannot successfully function. It is a characteristic which must be necessary for effectively carrying out the duties attached to a position.

'Manager' means any employee of Super Group with managerial or supervisory responsibilities.

'Occupational Levels' means or refers to occupational levels within organisations as determined using different job evaluation or grading systems. Guidelines on 'Occupational Level' are provided in EEA9 Annexure of the EE Regulations, 2014, as amended.

'Persons with disabilities' Persons are considered as 'Persons with disabilities' if they have a physical or mental impairment which is long-term (i.e. the impairment that has lasted or is likely to persist for at least twelve months) or recurring, which substantially limits their prospects of entry into, or advancement in employment.

'Reasonable Accommodation' means any modification or adjustment to a job or to the working environment that will enable a person from a Designated Group to have access to or participate or advance in employment.

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'Recognition of Prior Learning' (RPL) means a process by which individuals who had gained skills and knowledge through informal, non-formal or experiential learning can be assessed, recognised and awarded credits for such learning if it meets the requirements of an National Qualification Framework registered qualification or part qualification.

'Registered Trade Union Representative' means a representative of a trade union as defined in section 213 of the Labour Relations Act and registered in terms of section 96 of the Labour Relations Act, and as recognised by the Group's recognition agreements with these trade unions.

'Reporting Entity', the subsidiary or business unit responsible for implementing Employment Equity measures including but not limited to compiling Employment Equity plans, submitting Employment Equity Reports to the Department of Employment and Labour.

'Suitably Qualified' means someone that may be suitably qualified based on the formal qualifications, prior learning, relevant experience or capacity to acquire, within a reasonable time, the ability (attributes, skills and competencies necessary) to perform a job. A person may be deemed to be "suitably qualified" for a job as a result of any one of or a combination of the aforementioned.

5. GUIDING PRINCIPLES

The Group realises the objective of creating an equitable work environment for all its employees, by interpreting and implementing this policy in accordance with the following principles:

- a. The Group's employment policies and its implementation will be fundamentally aimed at matching the staffing resources to the strategic and operational needs of the Group and ensuring the full utilisation and continued development of all employees.
- b. Each employee-related decision must be rationally and objectively justifiable.

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- c. The strategic and operational needs of the Group and the relevant reporting and managerial structures are determined by the Group Chief Executive Officer, together with the Divisional MDs and Subsidiary MDs / Business Unit CEOs. The Group's Employment Equity strategies are developed in consultation with employees and their representatives via the various consultative fora.
- d. All aspects of talent management (the employment, structuring, recruitment, selection, interviewing, appointment, development, promotion, retention and termination) of employees will be non-discriminatory, except as provided in this policy with reference to Employment Equity and will afford employees equal opportunity to grow and develop in the Group.
- e. The equitable representation of Designated Groups in all occupational levels shall be fulfilled in a fair and equitable manner, by taking into account:
 - 1) relevant interests and legitimate aspirations of all employees;
 - 2) the Group's commitment to its strategic and operational objectives; and
 - 3) the need for balancing efficiency and representivity.

Special weight shall be applied to progressively address under-representation of Designated Groups and the Group shall not adopt any employment policy or practice that will establish unfair barriers to the prospective or continued employment or advancement of people who are not from Designated Groups.

- f. The Group shall promote an organisational culture of respect for the dignity, inclusivity and non-marginalisation of all its employees, and barriers to the full utilisation of the potential of all employees shall be removed.
- g. The Group is an Employment Equity employer, and as such, preference will be given to suitably qualified candidates who are members of Designated Groups as defined.
- h. Transparency: All Employment Equity measures and decisions shall be taken in a transparent and justifiable manner.
- i. Communication and consultation: In line with its commitment to transparency, the Group shall ensure that all policies, programmes and procedures relating to Employment Equity are developed on a consultative basis with all relevant stakeholders. All relevant stakeholders shall be afforded a reasonable

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opportunity to participate in relevant decision-making.

- j. Resources: The Group shall ensure that adequate financial and other relevant resources are made available to ensure the support and realisation of this Policy, subject to affordability and financial sustainability.
- k. The Group recognises that all the people that have been appointed should have met the criteria of suitably qualified as defined in this policy.
- l. The Group furthermore shall promote and maintain an environment that empowers all its employees to achieve their highest potential without fear of prejudice or bias.
- m. The Group will, through its policies, ensure that effort will be made to appoint suitable internal and external candidates from the Designated Groups to vacant positions. The Group will also implement succession planning and retention strategies to identify and develop the potential of internal and external candidates from the Designated Groups.

6. IMPLEMENTATION

6.1 AFFRIMATIVE ACTION

The Group will implement Affirmative Action measures designed to ensure that suitably qualified people from Designated Groups have equal employment opportunities and are equitably represented in all occupational levels in the Group.

Affirmative Action measures include, but are not limited to, the following:

- a. measures to identify and eliminate employment barriers, including unfair discrimination, which adversely affect people from Designated Groups;
- b. measures designed to further diversity in the workplace based on equal dignity and respect of all people;
- c. making reasonable accommodation for suitably qualified people from Designated Groups including persons with disabilities;
- d. measures to recruit, promote, retain and develop people from Designated Groups, including skills development and skills transfer; and,
- e. measures that include preferential treatment, numerical goals and measures other

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than numerical goals, but exclude quotas or the creation of absolute barriers.

6.2 EMPLOYMENT EQUITY

In terms of Employment Equity:

- a. The Group is defined as a “designated employer” in terms of section 1 of the Employment Equity Act as amended, and, as such, the provisions of Chapter 3 of the Employment Equity Act, dealing with Affirmative Action, are directly applicable to the Group.
- b. The Group shall take steps to promote equal opportunity in the workplace by eliminating unfair discrimination in any employment policy or practice.
- c. Unfair discrimination is prohibited where no person may unfairly discriminate, directly or indirectly, against an employee in any employment policy or practice, on one or more grounds, including race, gender, sex, pregnancy, marital status, family responsibility, ethnic or social origin, colour, sexual orientation, age, disability, religion, HIV status, conscience, belief, political opinion, culture language and birth.
- d. It will not constitute unfair discrimination to take Affirmative Action measures consistent with the purposes of the Employment Equity Act as amended as set out in this policy or to distinguish, exclude or prefer any person on the basis of an inherent requirement of any job.
- e. Victimization and harassment of an employee, including racial and sexual harassment of any form, constitutes unfair discrimination and such conduct shall attract disciplinary action against any employee found to have committed such acts.
- f. Pay disparity based on unjustifiable and arbitrary grounds constitutes unfair discrimination and the Group shall ensure that the principle of equal pay for work of equal value shall be upheld for all appointments as stipulated in section 2 in the Employment Equity Regulations, 2014, as amended.

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6.3 CAREER ADVANCEMENT

The Group recognises upward mobility and lateral transfers as having the potential to impact and accelerate equitable representation of all groups in occupational levels within a workplace, including acting in a more senior position for a specific period of time.

The advancement and transfers processes shall be informed by the Group Human Resources Policies and are considered as key drivers for Employment Equity in that they can involve fast tracking the advancement towards achieving numerical goals and targets through structured and targeted capacity building programmes including succession planning, career development and leadership development.

6.4 EMPLOYEE LEARNING AND DEVELOPMENT

The Group is committed to development of all its employees and its objective of encouraging learning and development of employees while prioritising Designated Groups.

Employee learning and development processes shall be informed by the Group Human Resources Policies, which will be guided by the Group's Employment Equity Policy and which will grant preference in access to training and development opportunities, including recognition for prior learning, for Designated Groups until their representation in all occupational levels has reached the desired targets and long-term goals.

6.5 REASONABLE ACCOMMODATION

The Group shall ensure reasonable accommodation for job applicants and employees, from Designated Groups including persons with disabilities, where applicable.

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6.6 COMMUNICATION

It is the Group's objective for all employees understand their role in terms of creating a work environment and culture which is free from any form of harassment and unfair discrimination. Communication and training structures shall ensure effective communication by and consultation of all employees.

6.7 ADDITIONAL EMPLOYMENT EQUITY COMPLIANCE MATTERS

The Group shall take reasonable steps to consult and reach agreement on matters listed in section 17 of the Employment Equity Act, as amended (which deals with matters for consultation) with its employees or representatives nominated by the employees, subject to the provisions of section 16 of the Employment Equity Act as amended (which deals with consultation with employees).

The Group will collect information and conduct an analysis in the prescribed form, of its employment policies, practices, procedures and the working environment in order to identify employment barriers which adversely affect people from Designated Groups in terms of the provisions of section 19 of the Employment Equity Act as amended (which deals with the barrier analysis).

The Group shall prepare and implement an Employment Equity plan, which will achieve reasonable progress towards Employment Equity in the reporting entity's workforce, and such plan shall contain, at the very least, the information listed in section 20(2) of the Employment Equity Act as amended (which deals with the preparation of the Employment Equity Plan).

The Group shall comply with the provisions of section 21 (which deals with the reporting to the Department of Labour), section 23 (which deals with the preparation of successive Employment Equity Plans) and all other provisions of Chapter III of the Employment Equity Act as amended, dealing with Affirmative Action measures.

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6.8 IMPLEMENTATION STRUCTURE

The Executive Officer of the Reporting Entity is primarily responsible for the implementation and monitoring of this Policy.

The Executive Officer of the Reporting Entity shall be responsible for establishing the appropriate organisational structures, compliance procedures and monitoring mechanisms, including the regular collation of information, workforce data and analysis, the conducting of equity audits regarding any aspects of employment at the Reporting Entity and reporting of findings to the Group Exco on a monthly basis.

The Reporting Entity's Human Resources Department shall be responsible for overseeing and implementing all staff related policies, procedures, processes and practices from entry to exit, and ensure integration with Employment Equity legislative requirements.

6.9 EMPLOYMENT EQUITY COMMITTEES

The Executive Officer of the Reporting Entity shall be responsible for establishing an Employment Equity Committee (EEC) for consultation on its employment policies, procedures and practices, including preparation and implementation of an Employment Equity Plan these and other matters pertaining to Employment Equity as required by the Act.

The role of the Group Human Resources is to ensure legislative compliance is always maintained and that the implementation of Employment Equity processes and reporting is properly facilitated and reported upon, thereby contributing to the achievement of Employment Equity targets and objectives.

The EEC is a forum for Employment Equity representatives and for the registered trade union representatives to share experiences, as well as being a communication channel between employees on the ground and the senior executive.

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6.10 ACCOUNTABILITY

The Group Chief Executive Officer, together with the Reporting Entity's Executive Officer are jointly responsible for implementation of Employment Equity, taking Affirmative Action measures and ensuring compliance with the provisions of the Employment Equity Act, as amended.

Each Reporting Entity's Executive Officer shall appoint Employment Equity Manager/s as stipulated in section 24 of the Employment Equity Act, as amended.

All Line Managers are responsible for the implementation of the Employment Equity Policy and Plan and as stipulated in their respective annual Performance Agreements and Job Descriptions which is to include an Employment Equity Key Performance Area.

7. DISPUTES

All disputes arising from the implementation of this Employment Equity Policy, whether individual or collective, will be dealt with in accordance with the Group's Grievance Procedure.

General complaints concerning unfair discrimination in Group policies, practices and procedures must be directed to the Group Human Resources Executive for investigation and monitoring.

8. WORKPLACE HARASSMENT POLICY

The Department of Employment and Labour's Code of Good Practice on the Prevention and Elimination of Harassment on the Workplace described "Harassment" as:

- a. unwanted conduct, which impairs dignity;
- b. which creates a hostile or intimidating work environment for one or more employees or is calculated to or has the effect of, inducing submission by actual or threatened adverse consequences; and

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c. is related to one or more grounds in respect of which discrimination is prohibited in terms of section 6(1) of the EEA.

The Code continues by stating that:

a. Harassment includes violence, physical abuse, psychological abuse, emotional abuse sexual abuse, gender-based abuse and racial abuse. It includes the use of physical force or power, whether threatened or actual, against another person or against a group or community.

b. Harassment against all employees in the workplace is an abuse of power. This Code recognises that harassment particularly affects employees in vulnerable employment who, while covered by labour legislation, may have in practice poor access to the exercise of labour rights such as freedom of association collective bargaining, decent work, protection from discriminatory practices and access to dispute resolution forums.

c. Sexual harassment of an employee is a form of unfair discrimination and is prohibited on the grounds of sex, gender, or sexual orientation. Same-sex harassment can amount to discrimination on the basis of sex, gender, sexual orientation, and gender-based harassment. Any form of sexual harassment in the workplace will not be tolerated by the Group, including in relation to clients and suppliers.

The Group has a zero tolerance policy against any form of harassment and will not permit, tolerate or condone the following in the workplace:

a. any form of harassment, including sexual harassment or any acts of violence;

b. any form of harassment on any prohibited grounds is a form of unfair discrimination which infringes the rights of the complainant and constitutes a barrier to equality in the workplace;

The Group will investigate acts of harassment in a confidential manner, take appropriate action base on the outcome of the investigation; and take disciplinary action against any employee that victimises or retaliates against an

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employee who in good faith lodges a grievance about harassment, whether in respect of themselves or another employee.

Complainants in harassment matters have the right to follow the procedures in this policy.

8.1 REPORTING HARASSMENT

Every Subsidiary/Business Unit shall appoint a designated Complaints Officer (usually, it's HR representative) who shall act as central point of contact for all harassment related complaints of the Subsidiary /Business Unit's employees.

The Complaints Officer shall receive harassment related complaints on behalf of the Subsidiary /Business Unit's MD/CEO and keep such complaints confidential. The Complaints Officer shall on receipt of any such complaint arrange a meeting with the complainant to discuss the following on a confidential basis:

- a. That no victimisation or disciplinary action shall be taken against the complainant for making a complaint in good faith, as it would be a disciplinary offence for any manager or other employee to retaliate in such manner.
- b. Determine the nature of the alleged harassment incident/s.
- c. Informing the complainant of counselling, treatment, care or other options available.
- d. Advising the complainant of the formal and informal procedures available to deal with the harassment, including a detailed explanation of both procedures and contents of the Code of Good Practice.
- e. Advising the complainant of the choice for either the formal or informal process, but that Subsidiary /Business Unit retains the right to follow the formal process if deemed appropriate based on specific circumstances.
- f. Advising the complainant on formulating a formal written complaint with a clearly articulated desired outcome.
- g. Assisting the complainant during any formal disciplinary hearing procedures that may follow in terms of the formal process.
- h. Discuss and explore any immediate means of mitigating the risk of further harassment within the workplace or department, until such time as the

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complaint has been fully investigated and procedures in terms of this policy concluded.

i. The Complaints Officer shall in consultation with the relevant MD/CEO, discuss and implement the appropriate course of action concerning any good faith harassment complaints reported. The investigation phase of the complaint procedures should be finalised expeditiously, with due regard of the specific circumstances and complexities of a complaint.

j. Measures shall be enforced to ensure confidentiality of the parties involved, as may be required with due regard to the sensitivity of any said complaint.

k. At the conclusion of any harassment complaint procedures, the MD/CEO and Complaints Officer shall review the effectiveness of the existing procedures and protocols and implement appropriate amendments, including training initiatives for line managers, if considered necessary to mitigate a repeat of similar harassment incidents in the workplace.

8.2 DISCIPLINARY SANCTIONS FOR PERPETRATORS OF HARASSMENT

Disciplinary sanctions for proven/established incidents of harassment on any prohibited grounds, shall be determined in line with the particular circumstances of every case, such as the severity and seriousness of the harassment in question. Sanctions may include counselling, written warnings, transfers or dismissals.

8.3 FRIVOLOUS OBJECTIONS AND FALSE INFORMATION

Where any Employee disseminates false information in relation to harassment claims or complainants, or victimises a complainant who registered a bona fide complaint, or discloses confidential information concerning a concealed complaint to unauthorised parties, such Employee shall be disciplined in line with the Group/Subsidiary/Business Unit disciplinary Code and Procedure.

Furthermore, Where an Employee makes frivolous and unfounded allegations which are not made with the bona fide believe that it constituted harassment, or aimed at ulterior motives against a specific employee or group of employees,

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such complaint shall be rejected and the Subsidiary/Business Unit retains the right to discipline said employee in line with the Group/Subsidiary/Business Unit disciplinary Code and Procedure.

8.3 SERVICE PROVIDERS, VENDORS, VISITORS AND OTHER THIRD PARTIES

All service providers, vendors, visitors or other third parties (including but not limited to contract security, contract cleaning, labour broker staff, etc) must refrain from any form of harassment.

The Subsidiary/Business Unit employees must treat people from service providers, vendors, visitors or other third parties with respect and refrain from any form of harassment towards such people.

9. MONITORING AND EVALUATION

The Group Chief Executive Officer and the Group Human Resources Executive are jointly responsible for conducting a comprehensive review of this policy at a minimum of every three years or as required, to stay current with applicable legislation and the Group's strategic objectives.

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