

HUMAN RIGHTS POLICY

EPSIDON TEHCNOLOGY HOLDINGS (PTY) LTD

Risk and Compliance Division

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This document (including but not limited to manuals, policies, procedures, forms) applies to all Affiliated Companies of Epsidon Tehcnology Holdings (PTY) LTD.

“Affiliated Company(ies)” means, in relation to Epsidon Tehcnology Holdings (PTY) LTD (“Epsidon Tehcnology Holdings (PTY) LTD”), a subsidiary of this entity, or any division or operating branch of each subsidiary of this entity and all of its subsidiaries. Including but not limited to:

- First Distribution (Pty) Ltd
- Even Flow Distribution (Pty) Ltd
- Epsidon Management and Marketing Consultancy (Pty) Ltd
- First Device Management Technology (Pty) Ltd
- Nology (Pty) Ltd
- Dax Data (Pty) Ltd
- Dolos (Pty) Ltd
- Technogistics (Pty) Ltd
- Cloud Brokerage Services (Pty) Ltd
- The Linux Warehouse (Pty) Ltd

This list is subject to amendment at the sole discretion of the Epsidon Tehcnology Holdings (PTY) LTD and will include all affiliates whether listed or not.

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1. INTRODUCTION

Epsidon Tehcnology Holdings (PTY) LTD is dedicated to fostering an inclusive society that acknowledges the inherent rights of all individuals, irrespective of race, gender, language, religion, or any other status. Fundamental values of Epsidon Tehcnology Holdings (PTY) LTD include a commitment to human rights and the establishment of equitable labor practices, as enshrined in the Constitution of the Republic of South Africa. We are devoted to upholding and promoting human rights in alignment with the United Nations Guiding Principles on Business and Human Rights in our interactions with stakeholders. This commitment applies both to our role as an employer and as a service provider in the financial sector, creating value for a diverse range of stakeholders, including shareholders, clients, and society at large.

2. PURPOSE

This Policy sets out Epsidon Tehcnology Holdings (PTY) LTD's clear purpose regarding human rights: to advance and protect human rights in all aspects of our operations. To achieve this, Epsidon Tehcnology Holdings (PTY) LTD's business is conducted ethically, accountably, and transparently, with a steadfast commitment to upholding and enhancing human rights. These principles are integral to Epsidon Tehcnology Holdings (PTY) LTD's values, shaping every facet of its operations.

3. APPLICABLE PRINCIPLES AND ORANISATIONS

- 3.1. Human Rights:** Human rights are rights that everyone should have simply because they are human; the fundamental rights, freedoms, and standards of treatment that are internationally recognised as belonging to all human beings by virtue of being human. Fundamental human rights are found in the United Nations Declaration on Human Rights, the International Covenant on Civil and Political Rights, the International Covenant on Page 4 of 7 Economic, Social, and Cultural Rights, the eight core International Labour Organisation Conventions, and various covenants and treaties that implement these principles.
- 3.2. International Labour Organization:** The International Labour Organization (ILO) is the international organization under the United Nations responsible for developing and overseeing international labor standards. It is the only United Nations agency that brings together representatives of governments, employers, and workers to jointly shape policies/programs promoting decent work for all.
- 3.3. ILO Conventions (ILO):** The Freedom of Association and Protection of the Rights to Organize Convention, 1948; the Right to Organize and Collective Bargaining Convention, 1949; the Forced Labour Convention, 1930; the Abolition of Forced Labour Convention, 1957; the Minimum Age Convention, 1973; the Worst Forms of Child Labour Convention, 1999; the Equal Remuneration

Convention, 1951; and the Discrimination (Employment and Occupation) Convention, 1958.

3.4. United Nations Global Compact (UNGC): The UN Global Compact is a strategic policy initiative for businesses that are committed to aligning their operations and strategies with ten universally accepted principles in the areas of human rights, labor, environment, and anti-corruption. The Global Compact exists to assist the private sector in the management of increasingly complex risks and opportunities in the environmental, social and governance realms, seeking to embed markets and societies with universal principles and values for the benefit of all.

3.5. Universal Declaration of Human Rights (UDHR): The Universal Declaration of Human Rights was proclaimed by the United Nations General Assembly in 1948. It contains thirty human rights that are expected to be universally respected and protected.

4. PRINCIPLES

Epsidon Tehcnology Holdings (PTY) LTD is dedicated to upholding people's rights concerning freedom of expression and access to information. Acknowledging the Government's role in honoring the commitments of our Constitution to establish a just, free, and fair society, corporate entities like Epsidon Tehcnology Holdings (PTY) LTD carry the responsibility of leveraging business influence to actualize these ideals. First upholds the following principles:

- a. Epsidon Tehcnology Holdings (PTY) LTD prioritizes treating clients, business associates, partners and ith dignity and respect, ensuring their right to privacy is carefully safeguarded
- b. Epsidon Tehcnology Holdings (PTY) LTD integrates environmental, social, and governance impacts into decision-making, influencing others to uphold higher standards, including considerations for human rights.
- c. In its partnership with shareholders, Epsidon Tehcnology Holdings (PTY) LTD upholds ethical business practices to create transparent and lasting value, adhering to the principles of good corporate governance.
- d. As a contributing member of society, Epsidon Tehcnology Holdings (PTY) LTD is dedicated to empowering marginalized, underserved, and under-resourced communities to enhance socio-economic outcomes for themselves and their families, supported by strategic social investments.
- e. Epsidon Tehcnology Holdings (PTY) LTD actively encourages employees to utilize a grievance mechanism for reporting any incidents of human rights violations.

5. PROHIBITION OF MODERN DAY SLAVERY, FORCED LABOUR, AND CHILD LABOUR

5.1. Modern Day Slavery and Forced Labour:

We strictly oppose any form of modern day slavery, including human trafficking, forced, bonded, or involuntary labour. All work must be voluntary, and employees shall have the

freedom to terminate their employment at any time without facing threats or coercion. We will not engage in, support, or tolerate any practices that may constitute slavery or forced labour.

5.2. Child Labour

We are committed to protecting the rights of children and preventing child labour in all our operations and supply chain. We adhere to the minimum age requirements for employment as stipulated by applicable national laws and international standards. We will ensure that no person under the age of 18 is employed in any hazardous work.

5.3. Reporting

We encourage all employees, suppliers, and stakeholders to report any concerns related to modern day slavery, forced labour, or child labour. Epsidon Tehcnology Holdings (PTY) LTD will investigate all reports promptly and take appropriate action, including terminating relationships with any party found to be in violation of this policy.

6. DIVERSITY AND INCLUSION

Epsidon Tehcnology Holdings (PTY) LTD places a high value on and actively promotes diversity and inclusion among its workforce. The company is unwaveringly committed to equal opportunity and steadfastly opposes any form of discrimination or harassment. Epsidon Tehcnology Holdings (PTY) LTD is dedicated to cultivating workplaces that are void of discrimination or harassment based on various factors, including race, sex, color, national or social origin, ethnicity, religion, age, disability, sexual orientation, gender identification or expression, political opinion, or any other status protected by applicable law.

Recruitment, employee development, training, compensation, and advancement at Epsidon Tehcnology Holdings (PTY) LTD are grounded in qualifications, performance, skills, and experience. The company maintains a zero-tolerance policy for disrespectful or inappropriate behavior, unfair treatment, or any form of retaliation. Harassment is strictly prohibited in the workplace and in any work-related circumstances outside the workplace.

7. FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

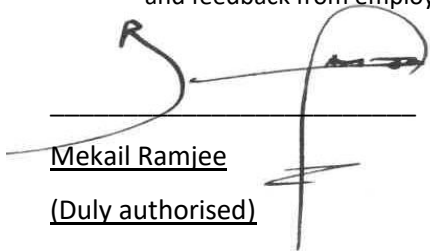
Epsidon Tehcnology Holdings (PTY) LTD upholds the right of its employees to join, form, or choose not to join a trade union, and this choice is respected without any fear of reprisal, intimidation, or harassment. When necessary, Epsidon Tehcnology Holdings (PTY) LTD is dedicated to fostering a constructive dialogue with the freely chosen representatives of employees. Furthermore, Epsidon Tehcnology Holdings (PTY) LTD is committed to engaging in good-faith bargaining with these representatives.

8. HEALTH AND SAFETY

Epsidon Tehcnology Holdings (PTY) LTD prioritizes the safety and health of its employees as a matter of utmost importance. The company's policy is to ensure a safe and healthy workplace, adhering to relevant safety and health laws, regulations, and internal requirements. Through collaboration with employees, Epsidon Tehcnology Holdings (PTY) LTD actively works to establish and sustain a workplace that is both safe and healthy, addressing and remedying identified risks related to accidents, injuries, and health impacts.

9. GOVERNANCE AND APPROVAL

Ownership of this Policy lies with the Head of Group Risk and Compliance at Epsidon Tehcnology Holdings (PTY) LTD. In the operationalization of this Policy, there will be a dedicated effort to ensure compliance, including rigorous monitoring and reporting mechanisms. The Head of Group Risk and Compliance will oversee the implementation of this Policy. Any necessary adjustments or enhancements to this Policy will be made in response to monitoring outcomes and feedback from employees.


Mekail Ramjee
(Duly authorised)
Head of Group Risk and Compliance