

Last reviewed and approved on
28 November 2023

Human Rights Statement



prosus

1. INTRODUCTION

The Universal Declaration of Human Rights sets out the minimum standards that are necessary for individuals to live with dignity. The responsibility of business to uphold and support the rights of every individual, is set out in the UN Guiding Principles on Business and Human Rights. In this document, we share our commitment to human rights and our approach to fulfilling our responsibility to contribute to their advancement.

2. OUR APPROACH

As a global consumer internet group and one of the largest technology investors in the world, we are mindful of the cultures of the many countries in which we operate and of the extended social impact of our business decisions and activities.

In addition to our indirect impact across the communities in which we invest and operate, our direct impact extends to:

- **Our workforce**

We unequivocally respect the human rights and protect the fundamental dignity of our workforce. We are committed to providing a respectful, safe and secure environment that is free from any form of human rights abuse. We expect everyone to behave in a way that supports this commitment wherever they work, and in all situations directly related to work.

This commitment extends to the board and all people who work at Prosus and Naspers, including temporary and permanent employees, contractors, consultants, agents, trainees and / or job applicants. Where an individual is employed by an operating company, this group commitment supports any local policies that may be in place.
- **Workers in our value chain**

We recognize the importance of protecting the human rights of workers throughout our value chain. This includes individuals who are employed by our suppliers, contractors, and other business partners. We are committed to ensuring that these workers are treated with dignity and respect, and that their rights are upheld. We expect our business partners to adhere to the same high standards of human rights that we uphold within our own operations. This includes providing fair wages, safe working conditions, and freedom from discrimination and harassment. We actively monitor and engage with our value chain partners to ensure compliance with these standards and take corrective action when necessary.
- **Companies that we invest in**

Our associates and investees (non-controlled entities) are required to comply with applicable laws and regulations. In addition, we encourage our associates and investees to adopt appropriate governance standards (for example, codes of business ethics and conduct, and policies relating to anti-bribery and anti-corruption, competition compliance, privacy and sanctions and export controls).
- **Suppliers that support our operations and infrastructure**

Mindful of the opportunity that we have to influence our supply chain partners through our supplier and purchase decisions, we expect a commitment to minimum human rights standards, that is compatible with our own commitments, by companies who seek to qualify as a supplier to Prosus and Naspers. We expect our suppliers to adhere to our Supplier Code of Conduct.
- **Consumers and end-users**

Our commitment to human rights also extends to consumers and end-users, where we have identified privacy abuses as a result of compromised customer data as a human rights issue. We aim to protect the privacy rights of the end-users of our digital platforms, by putting in place best practice data privacy and cybersecurity programs, as is covered in our Data Privacy Governance Policy.

3. OUR COMMITMENT

Our commitment to Human Rights is guided by key international standards: the [United Nations \(UN\) Guiding Principles on Business and Human Rights](#), the [OECD Guidelines for Multinational Enterprises](#), and the [UN](#)

Global Compact. Specifically, our Code of Business Ethics & Conduct clearly defines our policies and approach to Fair Employment, Health and Safety, Privacy and Employee Confidentiality.

We are committed to complying with applicable laws and to respecting internationally recognized human rights, wherever we operate. Guided by the UN Global Compact, in the rare situation that national law conflicts with international standards, we comply with national law.

4. OUR APPROACH

We have set out our approach to respecting and promoting principles that safeguard the rights of our workforce including the categories defined by the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work:

4.1 FAIR EMPLOYMENT INCLUDING NON-DISCRIMINATION

We know that our people, with their diverse talents and views, are crucial to our success in creating and implementing new business opportunities. We therefore strive to have a workplace where teamwork and mutual trust are promoted and where our people are treated with dignity and respect. To this end, we expect all our people (including directors and employees) to be fair and honest in their business dealings with colleagues and business partners, and to comply with the following principles which are set out in detail in the Code of Business Ethics and Conduct

- To avoid relationships or interests, whether direct or indirect, that could adversely influence or impair their capacity to act with integrity and objectivity;
- To treat clients, customers, colleagues, competitors and third parties with dignity, integrity and respect;
- To observe a high standard of business ethics in all commercial operations;
- To comply with laws, regulations and the group's rules relating to dishonesty, corruption and/or breach of the director's or employee's duty of good faith towards the group; and
- To respect the diversity of people and avoid victimisation, harassment, bullying or abuse of fellow employees whether due to gender, gender identity, gender expression, transgender status, sexual stereotypes, sexual orientation, class, race, religion, creed, colour, marital or family status, age, nationality, political association or disability.

4.2 Dignity at work

Our Anti-harassment policy supported by our 'Dignity at Work' program, sets out our zero—tolerance approach to harassment and discrimination (including sexual harassment and bullying) and underscores our commitment to diversity, inclusion and belonging, and ensuring dignity at work.

4.3 Privacy & employee confidentiality

We recognise privacy as an important value, and as an essential element of public trust. We strive to be a trusted company and expect all our businesses to seek that same status. Our Data Privacy Governance Policy sets out our approach to data privacy generally, and our Human Resources Privacy Policy sets out our approach to the data privacy of our workforce.

We respect the confidentiality of employees' personal data and acquire and keep only such employee personal information as is required either for the group's effective operation or by the law in those places where the group conducts business.

4.4 Forced labour, including human trafficking

We recognise the fundamental human rights of freely chosen employment. We do not condone any form of forced labour (being work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered themselves voluntarily). All work directly

or indirectly undertaken should be voluntary and employees should be free to end their employment at any time. All employees should be provided with a written agreement describing the employee's terms of employment in a language that the employee understands. No person commencing employment will be deprived of identity papers.

4.5 Child labour

We do not condone labour below the relevant legal minimum age requirements in the countries in which it is active and do not tolerate child labour (being work that deprives children of their childhood, their potential and their dignity, and that is harmful to their physical or mental development including by interfering with their education).

4.6 Equal opportunity

We promote respect for diversity and promote diversity itself. Our Diversity, Equity and Inclusion policy sets out our approach to ensure that all people are treated equally in the professional environment, support the elimination of bias and promote equal opportunity for recruitment, for skills development, for advancement and promotion, and for remuneration.

4.7 Health & safety

We aim to provide our people with a safe and healthy work environment, in line with our Occupational health and safety policy. To this end, our people must maintain safe and healthy workplaces by following environmental, health and safety rules and practices, and promptly reporting accidents, injuries and unsafe equipment, practices or conditions. Our people are expected to perform their company - related work in a safe manner, free of the influences of alcohol or controlled substances. The use of illegal drugs, violence or threatening behaviour in the workplace will not be tolerated.

4.8 Fair remuneration

We want to attract and retain skilled and talented people. We have fair remuneration systems in place which are:

- Rational - easy to explain;
- Equitable - free from discrimination; and
- Relevant - linked to the country of operation, our competitive markets and personal and company performance.

We believe that fair remuneration should be provided to all permanent (and temporary) employees, contractors, consultants, trainees and/or job applicants.

4.9 Freedom of association and collective bargaining

We operate within the framework of locally applicable labour laws, regulations, and employment practices. We respect the freedom of our employees to establish or join organisations of their choice, and we will not make employment subject to the condition that an employee should accept or relinquish trade union membership.

We regularly engage with our employees to understand their priorities and concerns and we take appropriate action to address their feedback.

5. GOVERNANCE, MONITORING, REPORTING AND ACCOUNTABILITY

The Board oversees and is ultimately responsible for sustainability, including all topics that we have included in this Human Rights Statement. The Social, Ethics and Sustainability Committee and the Human Resources and Remuneration Committee assist the Board in discharging its responsibility in

relation to human rights.

If you believe that there has been a breach of this Policy, we encourage you to Speak Up. You may raise this with (in the case of employees or other workers) their line manager, HR, or ethics and compliance officer or (in the case of persons outside the organisation) their business contact at the company. The Group's ethics and compliance team may also be contacted for advice, guidance or to formally raise a concern: [(speakup@naspers.com)][(speakup@prosus.com)].

If you do not feel comfortable raising a concern internally, you may use the independent, external Speak Up Service operated by Navex Global EthicsPoint. There are two ways to report a concern using the Speak Up Service:

- Online: <https://speakup.prosus.com>
- Telephone: (numbers available on website above)

Action will be taken to investigate any reported violations, in line with the Speak Up policy and based on the outcome of the investigation appropriate remediation measures will be taken within the governance frameworks described above.

If any potential adverse human rights impacts are identified, we are dedicated to promptly and effectively offer and facilitate remedies, in line with the Speak Up policy.

Group HR along with Group Ethics and Compliance, will monitor the design, implementation, adequacy and effectiveness of the policy across the group, with reports provided to the appropriate board committees.