

Telkom SA SOC Ltd

Human Rights Policy

2023

Telkom



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1 Purpose and objectives

The purpose of this policy is to document Telkom's position and intent regarding the protection of the Human Rights of its employees and people within the Company's sphere of influence, and in the communities in which it operates. This policy also sets out guidelines to regulate the management of all matters in relation to protection of Human Rights.



The objectives of this policy are:



1.1. To ensure that Human Rights are clearly articulated and understood throughout the organisation



1.2. To ensure that the position of the company regarding Human Rights protection is clearly understood by all its stakeholders



2 Applicability and scope

This policy is applicable to Telkom SA SOC Limited and its Group of Companies, and in the communities in which it operates.

3 Contextual background

The proliferation of initiatives, tools and guidelines on sustainability is evidence of the growing awareness of sustainability issues globally and in South Africa. Sustainability issues have gained importance locally through the publication of South Africa's King IV Code on Corporate Governance (King IV) as well as the launch of the FTSE4GOOD ESG Index Rating as a tool for investors to identify companies incorporating sustainability practices into their business activities. The United Nations has published the Global Compact and the Principles for Responsible Investment as well as the Sustainable Development Goals of which South Africa is a signatory. In addition, there are the OECD Guidelines for Multinational Companies among many other regulatory and reporting frameworks to guide sustainability activities.



Telkom is integral to society and thus must act and operate as a responsible corporate citizen in terms of it's:

- Social
- Environmental
- Economic impacts

4 Policy

4.1 Management Intent

4.1.1 Human rights of it's employees

Telkom is committed to prohibit all forms of discrimination based on:

- gender
- age
- sexual orientation
- disability
- race
- colour
- ethnicity
- religion
- marital status
- language
- nationality
- union membership
- political affiliation



The Company also prohibits physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation. The use of child, compulsory or forced labour in any of the Company's operations is forbidden and the Company will strive to ensure a safe and healthy work environment. The right of employees to compensation that at least meets basic needs is recognised.



4.1.2 Human rights of people in communities



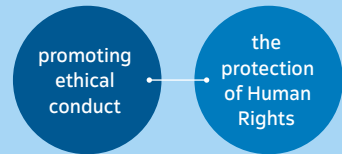
Telkom's commitment extends to persons and entities within communities in which the Company operates.

In terms of this policy, the Company commits doing this through, *inter alia*:

- observing the laws of the land
- respecting the cultural values of societies
- seeking to identify and address indigenous people's interests
- giving appropriate regard to the self-sufficiency
- sustainability
- health
- safety
- the environment of communities within the Company's area of operation
- conducting business as a responsible corporate citizen

4.1.3 Human rights of people in our value chain

With respect to our contractors and suppliers, Telkom's commitment includes:



Throughout the value chain and providing preference to those who share and demonstrate the values of Telkom.

4.2 Commitment to Human Rights Protection

Telkom respects all fundamental Human Rights and is committed to support and promote universally recognised Human Rights entrenched in the Universal Declaration of Human Rights adopted by the United Nations in 1948:

[the International Bill of Rights](#)

[the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work](#)

[the Voluntary Principles on Security and Human Rights](#)

[the Global Sullivan Principles](#)

[the Constitution of South Africa and relevant legislation](#)

The Constitution of South Africa and relevant legislation (collectively hereinafter referred to as "the Principles"). The Company is committed to ensure that systems are in place to observe, respect and promote the Human Rights articulated in the Principles throughout the Company's sphere of influence.



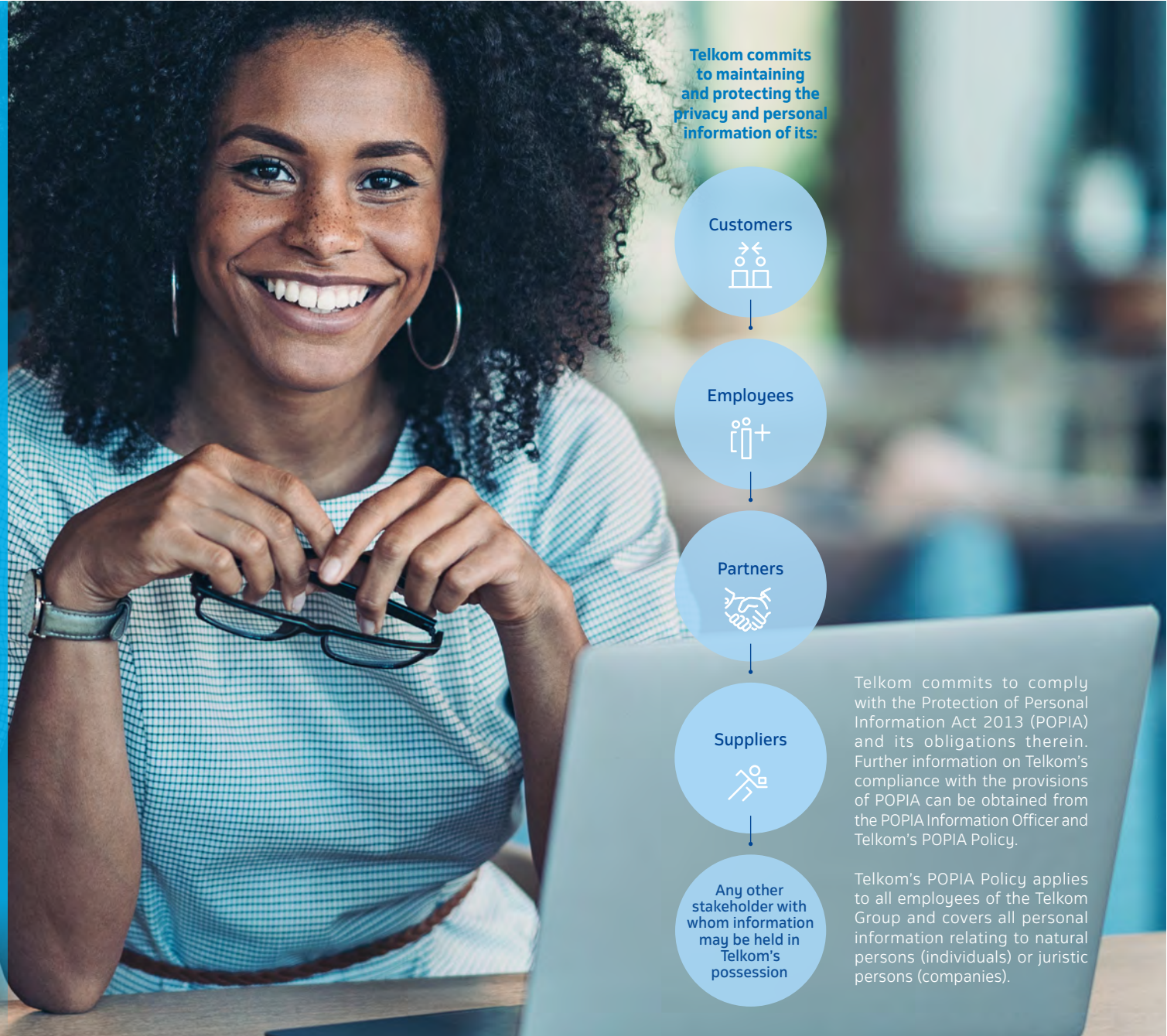
4.2.1 Employees



Telkom in particular expresses support for the universal Human Rights of its employees the communities in which it operates and the parties with whom they do business.

Telkom will strive to protect these rights which include, but are not limited to:

- the right to **human dignity**
- the right to **life**
- the right not to be **unfairly discriminated against**
- the right to **freedom and security of person**
- the right to **privacy**
- the right to **freedom of religion, belief and opinion**
- the right to **freedom of expression**
- the right to **freedom of association**
- the right to **freedom of movement**
- the right to **peacefully assemble**
- the right to **make political choices**
- the right to **fair labour practices**
- the right to **an environment that is not harmful to their health or well-being,**
- the right not to be **arbitrarily deprived of property or possessions**
- the right to **freely participate in the cultural life of their choice**
- **Data Privacy**



Telkom commits to maintaining and protecting the privacy and personal information of its:



Telkom commits to comply with the Protection of Personal Information Act 2013 (POPIA) and its obligations therein. Further information on Telkom's compliance with the provisions of POPIA can be obtained from the POPIA Information Officer and Telkom's POPIA Policy.

Telkom's POPIA Policy applies to all employees of the Telkom Group and covers all personal information relating to natural persons (individuals) or juristic persons (companies).

4.2.2 Children's Rights



Telkom recognises, respects and supports children's rights and will endeavour to:

- I. Meet our responsibility to respect and support children's rights
- II. Contribute to the elimination of child labour, in all supply chain activities
- III. Provide decent work for young workers, parents and caregivers
- IV. Ensure protection and safety of children in all business activities and facilities
- V. Ensure products and services are safe and seek to support children's rights through them
- VI. Use marketing and advertising that respect and support children's rights
- VII. Consider the environment, land acquisition and land use in relation to children's rights
- VIII. Consider children's rights in terms of security arrangements as applicable
- IX. Help protect children affected by emergencies
- X. Reinforce community and government efforts to protect and fulfil children's rights

4.2.3 Local Employment and Sourcing

Telkom commits to procuring products and services from local suppliers, wherever possible in line with its B-BBEE and Preferential Procurement Policy.

All suppliers are expected to comply with:

the Supplier Code of Conduct

and in relation to this Human Rights Policy are equally expected to commit to respect international human rights and standards

In alignment with developmental plans in the place of our operations, Telkom commits to procure goods and services from local suppliers, in so far as all other requirements are met.

Likewise, Telkom commits to the employment of people in the country of operation.

4.3 Training and Awareness



Telkom commits to implementing the following initiatives, where necessary, relevant and/or possible:

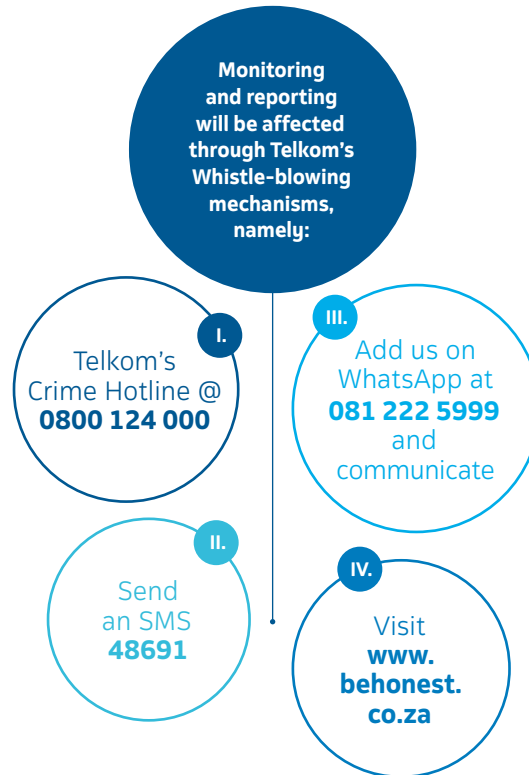
- I. Ensure that employees and contractors receive training in Human Rights issues that are relevant to their activities.
- II. Conduct Human Rights awareness campaigns.
- III. Ensure that where training on any issue is provided to local communities around its operations that local cultures, traditions and other sensitive issues are considered.

5 Pre-investment risk analysis

Telkom shall ensure that key community risks and opportunities are systematically identified and prioritised through Human Rights assessments in new areas of potential operation and mitigating strategies shall be implemented to reduce negative impacts. All possible mergers and acquisitions shall undergo Human Rights assessments as part of the due diligence process.

6 Enforcement and violation

Compliance to this policy will be monitored on a regular basis and the results reviewed by designated forums. Any breach will be treated as a serious disciplinary offence and may be subject to disciplinary in accordance with the provisions of the relevant Group HR policy.



Instances of non-compliance or suspected or reported human rights violations, will be addressed in accordance with the related policies in the Group Ethics handbook and remediation dealt with on a case-by-case basis.

7 Laws and regulations

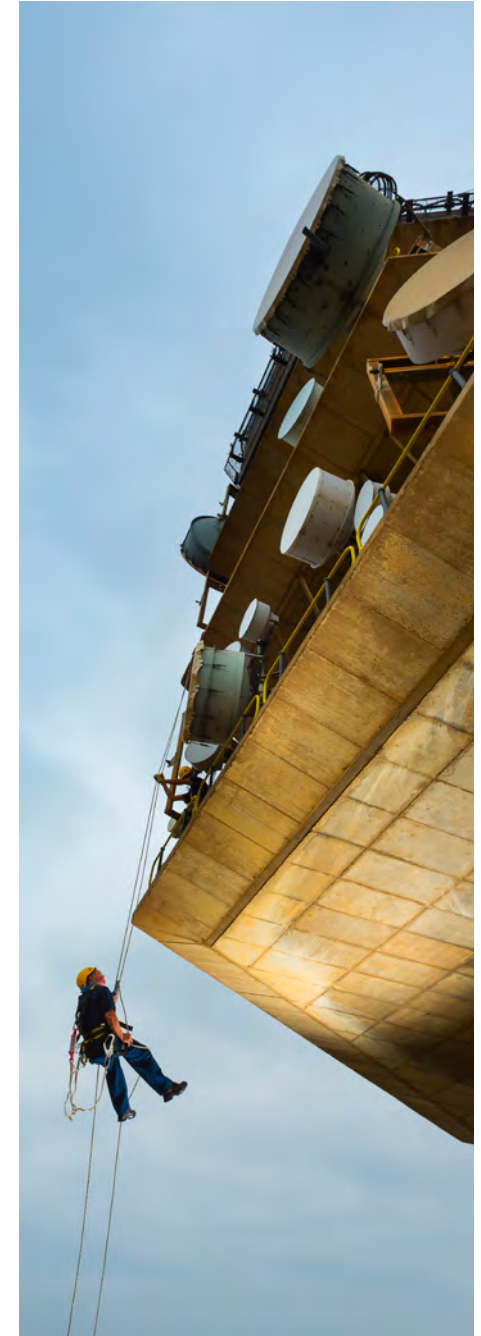
For the laws and regulations applicable to this policy refer to Appendix A of this document.

8 Definitions, abbreviations and acronyms

For definitions, acronyms and abbreviations refer to Appendix A of this document.

9 Exceptions

There are no exceptions allowed for this Policy.





10 Appendix A: definitions, acronyms, reference documents, laws & regulations

10.1 Definitions

Definitions	Description
Board	Board means the board of directors of Telkom
Discrimination	Discrimination means unfair, unjust, or prejudicial treatment of people or groups based on certain characteristics
Human Rights	Human Rights means the basic rights and freedoms to which all humans are entitled

10.2 Acronyms

Acronyms and Abbreviations	Description
B-BBEE	Broad-Based Black Economic Empowerment
ESG	Environmental, Social and Governance
EXCO	Executive Committee of Telkom
FTSE	Financial Times Stock Exchange
OECD	Organisation for Economic Co-operation and Development
UNICEF	United Nations International Children's Emergency Fund

10.3 Reference Documents

This policy should be read in conjunction with the following policies and frameworks of Telkom, aimed at addressing various elements of Human Rights.

This policy should be read in conjunction with the following policies:

- I. Group Ethics Handbook
- II. Employment Equity Policy
- III. Preferential Procurement Policy
- IV. B-BBEE Policy
- V. Prohibition of Unfair Discrimination Policy
- VI. Supplier Code of Conduct
- VII. Employee Relations Policy
- VIII. Protection of Personal Information Policy

10.4 Laws and Regulations

- I. The South African Constitution and Bill of Rights
- II. The South African Employment Equity Act
- III. The South African Companies Act (Regulation 5 (a) (i) and (ii))



This Human Rights Policy Statement should be read in conjunction with our Environmental Policy Statement, Corporate Citizenship Policy Statement and Climate Change Policy Statement as we believe that all these areas of sustainability are inextricably linked.

Telkom
Consumer

open serve

BCX

swiftnet

Gyro