



# EXTERNAL GRIEVANCE PROCEDURE

## GRPPRO – 00001

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## I. STAKEHOLDER LIST

Cassava Technologies Stakeholders	Category of stakeholders*
Group Executive: Environmental and Social Governance	A, C, E, F
Group Risk and Compliance Officer	B, C, E
Senior Manager: Group Forensic Investigations	C, D, F
Group Ethics Officer	C, D
Operations CEOs	C, D
ESG Managers	C, D
Group Chief Corporate Services Officer	E

NOTE: Categories of level of responsibility:

- A. Document owner (with Manager and or SM responsibility)
- B. Deputy Document owner
- C. Must be consulted
- D. Must be notified
- E. Must approve (sign-off)
- F. Document author

## II. CONTROLLED DISTRIBUTION

Once updated, a copy of the latest revision will be published in the document management system as available on the Cassava Intranet. Please use the following as search terms to trace the most recent copy of this document:

- a. GRPPRO – 00001
- b. External Grievance Procedure
- c. Internal Grievance Procedure

## III. DOCUMENT CHANGE

This document has to be updated regularly. An update can be required if related processes, organisation or documents (see IV) are changed. This policy will be reviewed every 24 months by the Policy Owner.

Version No	Date Changed	Changed by	Change Description
Version 1	October 2020	Group Health and Safety Manager	New Document
Version 2	November 2020	Group Health and Safety Manager	Included GBVH grievance process
Version 3	April 2021	Group Health and Safety Manager	Rebranding updates

Version No	Date Changed	Changed by	Change Description
Version 4	June 2024	Group Health, Safety and Environmental Manger	Cassava rebranding / roles and responsibility updates / process updates / contact details update
Version 5	March 2026	Group Health, Safety and Environmental Manger	Cycle review / roles and responsibility / contact detail / update / consolidated grievance register and tracking / appeal process inclusion

#### IV. RELATED DOCUMENTS

Document	Description	Location
Employee Code of Conduct	Conduct to be upheld by all Cassava employees	Obtain copies of this Code from the local HR employee.
Supplier Code of Conduct	Conduct of any and all business partners include security service providers	Obtain copies of the Code from the local procurement team and / or on the Cassava website <a href="https://www.cassavatechnologies.com/wp-content/uploads/2024/09/Cassava-Supplier-Code-of-Conduct.pdf">https://www.cassavatechnologies.com/wp-content/uploads/2024/09/Cassava-Supplier-Code-of-Conduct.pdf</a>
Internal Grievance Procedure	Provide guide to any employee on how to log a compliant or concern.	Obtain copies of this grievance procedure from the local HR employee.
Stakeholder engagement framework	Provides an overview of our internal and external stakeholders and how to engage with stakeholders	Obtain copies of framework from the Group Executive: Environmental and Social and Governance

#### V. ABBREVIATIONS, ACRONYMS AND DEFINITIONS

Abbreviation	Definition
EGMP	External Grievance Management Procedure
GARF	Group Audit Risk and Forensic team
GBVH	Gender-based violence and harassment
HSE	Health Safety and Environmental
ILO	The International Labour Organisations (ILO)

# 1 INTRODUCTION

Cassava Technologies (“the Group”) places a high priority on establishing open and transparent dialogue and ongoing communication with contractors, suppliers, communities, customers and other stakeholders affected by the Group’s products, services and activities. We aim to respect, inform and respond to people’s concerns and queries in a responsible and constructive manner that is mutually beneficial. One of the methods we use to support and encourage engagement is through our well-managed internal and external grievance mechanisms.

This procedure, the Group’s External Grievance Management Procedure (EGMP), is designed to outline the process for communicating, reporting, assessing, resolving and monitoring external grievances from all external stakeholders. The EGMP extends to all Group business units, including Liquid Intelligent Technologies (Liquid), Africa Data Centres (ADC); Telrad; Sasai Fintech and Vaya Technologies (whereon referred to as “operating companies”).

Grievances may range from minor concerns to significant or long-term issues. They might be felt and expressed by a variety of parties including individuals, groups, communities, or other parties affected or likely to be affected by the operational, social or environmental impacts of the Group’s activities. It is essential to have a robust mechanism to systematically handle and resolve any complaints that might arise to prevent escalation and pose a risk to successful operations within the Group.

# 2 PURPOSE

The EGMP provides a simple means for stakeholders to express their concerns and for the Group to take corrective actions as required, to ensure project and service commitments are effectively implemented, while addressing and improving relationships with all external stakeholders.

The outcomes of the EGMP includes but are not limited to:

- Making the EGMP readily available to all stakeholders including but not limited to online downloads, soft copies and where relevant provide hardcopies to affected stakeholders.
- Making contractors, suppliers and communities aware of the EGMP and how to access this procedure (e.g. part of onboarding packs, contractor’s meetings, project notification letters, community engagements, etc).
- Were required establishing a formal mechanism for capturing and responding to grievances in a clear, transparent and sustainable manner.
- Ensuring effective dialogue and transparent open lines of communication with all affected stakeholders.
- Aiming to build trust and continue to address any unrealistic expectations and/or negative perceptions from the local communities towards Cassava and any of its operating companies.
- Establishing a system of investigation, response, grievance resolution, appeal process and transparent feedback.
- Improving social performance through the analysis of grievances and refinement of work practices.
- Ensuring that non-compliances with project environmental and social commitments are adequately corrected in a timely fashion and are subsequently monitored; and
- Reducing the number of grievances received over time.

To maximise the effectiveness of the EGMP, all operating companies will apply the following factors during the development, implementation and management of operational grievance procedures:

- Commitment to fairness in both process and outcomes.
- Clear and transparent grievance management rules, accountability and feedback.
- Validation of all complaints submitted by actively engaging with the complainant to fully understand and address their concerns and needs.
- Handle all grievances with the necessary confidentiality especially where requested; and
- Ensure a formal appeal process is in place, should it be required.

The EGMP is expected to assist in improving all operating companies' environmental and social performance over time. An indication of ongoing improvement is closely linked to the number and nature of grievances received by external stakeholders. This EGMP has been designed to meet the requirements of the International Finance Corporation (IFC) Performance Standards in relation to grievance management.

The Group Audit, Risk and Forensics team monitors each grievances, and where required, institutes a formal investigation.

## 3 PROCEDURE REQUIREMENTS

### 3.1 Corporate Objectives

The corporate objectives of the Group are set out in the Health, Safety and Environmental (HSE) Policy which states that "Cassava undertakes to safeguard its employees, contractors and the communities through providing and maintaining, as far as reasonably practicable, a working environment that is safe and without risk to the health of its employees, contractors and the communities". We aim to be a proud employer, corporate citizen and neighbour with a focus on sustainable development of the organisation through continuous improvement.

### 3.2 International Guidelines

The main international guidelines considered and applied in the development of the EGMP, are the International Finance Corporation (Performance Standard [PS] 1 and 2) and the Equator Principles.

IFC PS1 requires that a grievance mechanism be established "designed to receive and facilitate resolution of concerns and grievances about the group's operating companies' environmental, health, safety and social performance". IFC PS2, Labour and Working Condition, also requires that the group provides a grievance mechanism for contractors (and their organisations where they exist) to raise workplace concerns. This procedure should be made available during onboarding of contractors, communities affected by group projects, and any other external stakeholder that wants to raise a grievance against any of the Group's operating companies. The procedure should be easily accessible to them throughout the duration of a project, with no

retribution, and should not restrict access to judicial or administrative remedies through legislation or substitute any grievance mechanism through collective agreements.

## 4 ROLES AND RESPONSIBILITIES

Following best practice, responsibility for the management and resolution of grievances ultimately rests with the implicated operating company. Each operating company needs to implement the necessary operational procedures to effectively capture, report and resolve any external grievance, in line with this policy.

### 4.1 Group and Operating Company Responsibilities

Both the Group and its operating companies shall ensure that sufficient and qualified resources are allocated on an ongoing basis to achieve effective implementation of the EGMP.

The Group's responsibilities include:

- Developing, reviewing and approving a Group EGMP.
- Making the EGMP publicly available to relevant external stakeholders.
- Continually update and ensure all reported grievances are addressed and formally closed out.
- Centralising external grievance tracking and monitoring.
- Annually reporting on Key Performance Indicators (KPIs) applicable to this procedure based on information provided by each operating company and its contractors; and
- Contributing to the resolution and sign-off of any grievances which have international repercussions.

Each operating company is responsible for:

- Implementing and overseeing the Group EGMP or develop an operational specific EGMP for their respective operations and projects.
- Actively share and communicate the existence of the EGMP to relevant external stakeholders as well as providing access to the EGMP.
- Ensuring all grievances (verbal, telephonic, in writing or via e-mail) are formally captured in accordance with the EGMP.
- Taking appropriate actions to address any grievances raised against the operating company and/or their contractors.
- Coordinating with relevant parties and management teams in the resolution of a grievance.
- Reviewing and approving, where relevant, contractors' Grievance Management Procedures.
- Annually reporting feedback obtained from stakeholders' grievances to the Group's management team.
- Ensuring that the EGMP is applied across all departments and levels in each operating company and related Group projects.
- Continually review grievances and ensure management apply necessary controls to minimise risks that could result in a repeat or similar stakeholder grievances; and

- Ensuring that all grievances are closed out and formally communicate resolution to the affected party.

## 4.2 Contractors Responsibilities

Before any project can commence, contractors must be made aware of the EGMP and understand and adhere to the procedure. If the contractor has its own Grievance Procedure, a copy of the procedure should be made available to the operating company and ensure it complies with the requirements of the group's own EGMP. The operating company and the contractor responsible for the EGMP implementation, will liaise regularly to discuss the status of construction activities and any grievance issues.

If the received grievance was caused by the activities of the contractor, the operating company's project manager will discuss it with the contractor and appropriate solutions identified and carried out. The contractor will report formally to the operating company on the resolution of the grievance and what additional actions might need to be implemented for the grievance to be closed.

Contractors will also need to provide sufficient resources to achieve effective implementation of their own External Grievance Procedures or compliance with the Group's EGMP. Contractors need to provide relevant monitoring data/reports to the operating company as indicated in their contracts.

Contractors' specific responsibilities for external grievance management include:

- Adhering to the Group's relevant operating policies and plans, including the EGMP.
- Where applicable, execute their own grievance mechanism, in accordance and aligned with the Group's EGMP.
- Informing the operating company's Community Liaison person and/or Project Manager in writing of any external grievances received, including those immediately resolved in the field.
- Receiving grievances directly from any individuals or groups concerned, including community members, employees and workers, or through sub-contractors, and reporting it formally to the operating company.
- Handling grievances resolution through their own Community Liaison teams but in close coordination with the operating company's Community Relations team and/or Project Manager.
- Reporting progress relating to outstanding grievances (received, registered, in process and resolved) on monthly basis.
- Proposing alternative approaches to activities which may result in an impact of concern to stakeholders, in order to avoid and to reduce the number of grievances received; and
- Reporting to the operating company's Community Relations team on a monthly basis or as needed to manage social risks, potential incidents and other community relations issues in an attempt to prevent and/or reduce any external grievances.

## 5 EXTERNAL GRIEVANCE MANAGEMENT PROCEDURE

This EGMP is designed to facilitate the lodging, mitigation, appeal and closure of grievances coming from contractors, affected communities, and any other interested stakeholders and project workers, including sub-contractors.

The procedure is available to any party that wishes to communicate a grievance to an operating company or the Group, irrespective of whether they reside externally or internally from the Group or operating company. It should however be noted that the Group does have an internal grievance procedure that employees are encouraged to use when they have a complaint.

The EGMP is available on a voluntary and non-excluding basis. It does not affect anyone's rights to use the specific country's judiciary systems in any way, nor does it replace the public mechanisms of grievance and conflict resolution.

Operating companies must ensure the implementation of the contractor's own Grievance Procedures (in the case where they have one, alternatively they will accept this procedure), which are aligned with this EGMP and are fully enforced. Operating companies must review and approve the contractor's Grievance Procedures, ensuring their Community Liaison Officers and/or Project Manager understand their responsibilities, and always comply with the requirements. The Group and its operating companies retain the right to intervene if a contractor has not closed out any reported grievances within a reasonable period of time.

## 5.1 Communicating the External Grievance Management Procedure

At least seven (7) days prior to the start of any construction and/or major upgrades or maintenance work, the operating company's Community Relations Team Leader / Project Manager, will proactively publicise the grievance mechanisms and inform, if and where relevant, local communities and the wider stakeholder group of the details and availability of the EGMP. This information shall be widely and regularly made available (both by the operating company and contractors), throughout the duration of the project.

Specific grievances in relation to wage disputes and labour or procurement contracts are beyond the scope of the EGMP and should be reported through the Group's Contractor Procurement or Human Resource Departments, as applicable.

Grievances will be handled through the Community Relations team or the relevant Project Manager. They will be responsible to deliver grievances to the appropriate departments in the relevant operating company or contractor organisations, implement systems to organise, track and document all responses and deliver summary reports to management and the operating company. Contractors and/or the operating company will aim to resolve all grievances within 30 days from receipt.

The Project Manager and/or Community Relations team will propose means to resolve grievances, monitor the process, and hold regular meetings to discuss and follow up on grievances in the field and provide feedback to communities. Grievances may also be raised during formal stakeholder meetings which will be reported in line with this procedure.

Relevant stakeholders can log a grievance using one or more of the following methods:

- Verbally: via the Community Relations team and/or relevant Project Manager
- E-mail: [ethics@cassavatechnologies.com](mailto:ethics@cassavatechnologies.com) and/or [ethics@liquid.tech](mailto:ethics@liquid.tech)
- Electronic report: [www.tip-offs.com](http://www.tip-offs.com)
- Application: Expose It, a mobile phone app available in major app stores.

- Direct engagement: Ethics officer

## 5.2 Publicising this Procedure

The EGMP will be publicised and communicated in a manner appropriate to the scope and nature of the project, and in a manner appropriate to the audience (i.e. method of delivery, language, etc.). Notification may include:

- A summary of the procedure and how it can/should be used.
- Details of the process, such as who is responsible for receiving and responding to grievances.
- When stakeholders can expect a response.
- The appeal process; and
- Safeguards to ensure confidentiality.

All contact details and means of submitting a complaint will be publicised, throughout the duration of the project. This is to be done through the following channels:

- Contractor's onboarding information and training of contractor workers on this procedure.
- Including a link to this procedure on the operating company's website and/or the contractors website.
- Communicating this procedure during all project-related stakeholder engagement activities.
- Communicating this procedure to all project-related community representatives, where applicable; and
- Placement of signage with contact details at all project sites for the duration of the project.

## 5.3 Contact Details

All contractors or stakeholders with internet access should be able to report a grievance through the operating company's online website. A copy of the Group EGMP can also be accessed through the following link <https://liquid.tech/wp-content/uploads/2023/06/External-Grievance-Procedure.pdf>

Where a contractor or stakeholder does not have access to the internet, details (name and contact details) of contractor and/or the operating company's representatives will be provided for each project, where grievances can be reported. Appendix A should be used to report a verbal or written grievance.

## 5.4 Grievance Handling and Resolution

Grievances should be handled according to the following steps:

- For all grievances not reported via the Digital Grievance Report function, the Community Relations team and/or Project Manager will learn as much as possible about the grievance as soon as it has been brought to their attention.

- Each operating company must acknowledge receipt of any grievance as soon as possible, but not longer than two (2) working days from the date it was submitted and shall inform the complainant about the timeframe in which a response can be expected.
- The findings of all investigations must be entered into a grievance register (see example of a Grievance Register in **Appendix B**) and used to determine eligibility (see below grievances to be directed outside of the EGMP).
- If during the first engagement the grievance is resolved, the case is considered closed but still needs to be recorded as such. To close out the grievance a formal response or reported verbal notification must be provided to the relevant party.
- Should a grievance not be resolved during the first meeting, the operating company and/or contractor shall fully investigate all grievances received, and will involve other departments, contractors and senior management as required in the process.
- All investigations should be performed in a timely manner to avoid delaying the resolution of a grievance. The operating company will aim to resolve any grievances within 30 days from the date of receipt of this grievance. This timeframe may be extended should it be found that the grievance is more complex in nature and further investigations are required.
- The Community Relations team and/or Project Manager will consult other departments to determine the practical corrective action(s) or mitigation of the grievance:
  - nature of the corrective action
  - time in which it must be implemented
  - person responsible for implementation
  - log information in the Grievance Registry
  - If the complainant accepts the corrective actions, they should confirm this in writing or verbally to the respective company representatives and/or investigation team; and
- If the proposed solution or executed solution is not accepted by the complainant, the grievance must be elevated to a Grievance Review Committee (Section 5.5) where after an appeal can also be logged (Section 6).

## 5.5 Grievance Review Committee

The Grievance Review Committee (GRC) will be set up by each operating company to address complaints not resolved with the first feedback provided to the complainant. The GRC will include the complainant (if not anonymous), representatives from the operating company, relevant contractor(s) and at least one other non-bias party, preferable one of the GARF team members. A coordination of resolutions within the GRC will be the Community Relations team's responsibility.

Documentation pertaining to an unresolved grievance will be given to the Chair of the Committee, who will seek and give opinion about how to resolve the case and who will attempt to resolve the case through conciliation.

As a last resort, aggrieved parties have a right to appeal the outcome or take legal action. The latter is a more formal rights-based approach that shall only be taken if all other approaches have failed or when there are serious conflicts about facts and data. The final decision will be taken by

the arbitrator or courts based on compliance with laws, policies, standards, rules, regulations, procedures, past agreements or common practice.

## 6 GRIEVANCE APPEAL PROCESS

Where a complainant is not satisfied with the proposed resolution, corrective actions, or outcome of a grievance, they have the right to formally appeal the decision. The appeal process provides an additional level of review to ensure fairness, transparency, and consistency in the application of the External Grievance Management Procedure (EGMP) and is aligned with the International Finance Corporation (IFC) Performance Standard 1 requirements for effective grievance mechanisms.

The appeal mechanism does not limit or replace the complainant's right to access judicial or administrative remedies where applicable.

### 6.1 Ground for Appeal

An appeal may be lodged on one or more of the following grounds:

- The complainant does not agree with the findings of the investigation.
- The complainant considers the proposed corrective actions or mitigation measures to be inadequate or inappropriate.
- The grievance was not addressed within the communicated or reasonable timeframe.
- New information has become available that may materially affect the outcome of the grievance.

### 6.2 Appeal Submission

An appeal must be submitted within a reasonable period following communication of the grievance outcome. Appeals may be lodged using the same reporting channels as the original grievance (refer to Section 5.1) including:

- Verbal submission via the Community Relations Team or Project Manager.
- Written or electronic submission via the established ethics and reporting channels.
- Any other reporting mechanism outlined in the EGMP.

All appeals must be formally recorded in the Group's External Grievance Register under the original grievance reference number, clearly marked as an appeal, to ensure traceability and continuity.

### 6.3 Appeal Review and Escalation

Upon receipt of an appeal:

- The grievance shall be escalated to the Grievance Review Committee (GRC), as established by the relevant operating company.
- The GRC will review all documentation relating to the grievance, including investigation findings, corrective actions proposed or implemented, and the basis for the appeal.

- The GRC may seek additional information, request further investigation, or engage relevant internal or external subject-matter experts as required.
- The complainant (unless anonymous) may be invited to participate in the appeal process to clarify concerns and provide additional context.

The Grievance Review Committee will aim to resolve the appeal through dialogue, conciliation, and agreement on appropriate corrective actions, consistent with the principles of fairness, confidentiality, and non-retaliation outlined in the EGMP.

## 6.4 Communication of Appeal Outcome

The outcome of the appeal, including any revised corrective actions shall be formally communicated to the complainant in writing or verbally, as appropriate. The decision and rationale shall be documented in the External Grievance Register and reflected in the close out status of the grievance.

Where the appeal results in additional actions, responsibilities and timelines for implementation it shall be clearly defined and monitored until completion.

## 6.5 Final Recourse

If the grievance remains unresolved following the appeal process, the complainant retains the right to pursue external remedies, including legal or administrative processes, in accordance with applicable laws and regulations. This represents a rights based approach and is considered a measure of last resort after all internal grievance resolution options have been exhausted.

# 7 GRIEVANCES OUTSIDE OF THE EGMP

Following best practice, all grievances and claims from contractors, local communities and other stakeholders should be accepted and no judgment made prior to investigation, even if complaints are minor. However, several types of grievances deserve special consideration and possible redirection to other grievance resolutions channels, such as:

- Complaints constituting criminal activity and violence: In these cases, complainants should be referred to the formal legal and justice system although the Grievance should still be logged in the Group's Grievance Register
- Commercial disputes: (e.g. contractor not paying third parties): Commercial matters should be stipulated for in contractual agreements and issues should be resolved through a variety of commercial dispute resolution mechanisms or civil courts and not necessarily using the External Grievance Process.
- Issues related to Governmental policy and Government institutions: It is not uncommon for communities to use Group grievance mechanisms to bring complaints related to aspects of project implementation that are a responsibility of, and implemented by, public institutions and their officials. It is not the responsibility of the operating company and/or the contractor to resolve a government related grievance.

## 7.1 Safeguarding Grievances

Safeguarding grievances relate to sensitive and high-risk matters, including gender-based violence and harassment and modern slavery, which require a survivor-centred, confidential, and precautionary response. This section outlines the Group's approach to receiving, managing, and responding to safeguarding grievances in a manner that prioritises the safety, dignity, and wellbeing of affected individuals, while ensuring compliance with applicable laws, international standards, and the Group's ethical commitments.

### 7.1.1 Gener-based violence and harassment

Gender-based violence and harassment (GBVH) is an umbrella term that covers a range of behaviours, including sexual, physical, psychological and economic abuse. What sets it apart from other types of violence and harassment is that it is directed at people because of their sex or gender or disproportionately affects people of a particular sex or gender.

The International Labour Organisations (ILO) adopted Convention No. 190 and Recommendation No. 206 to combat violence and harassment, including GBVH, in the world of work.<sup>25</sup> Convention No. 190 recognises that GBVH can constitute a human rights violation or abuse, that it is a threat to equal opportunities and is incompatible with decent work. Violence and harassment are also explicitly referenced in UN Sustainable Development Goal (SDG) 5 on achieving gender equality.

Gender-related grievances include, but are not limited to, those of:

- discrimination, harassment or unfair treatment on the basis of sexual orientation or gender identity
- bullying of a nature to ridicule a person's masculine or feminine identity
- sexual abuse
- sexual exploitation.

### 7.1.2 Modern Slavery

Modern slavery covers a set of specific legal concepts including child and forced labour, debt bondage, forced marriage, slavery and slavery-like practices, and human trafficking. Although modern slavery is not defined in law, it is used as an umbrella term that focuses attention on commonalities across these legal concepts. Cassava recognise two types of modern slavery that could occur as part of their normal operating practices, which includes child and forced labour.

### 7.1.3 Child Labour

Child labour, as defined by the ILO Convention is "work by children under the age of 12; work by children under the age of 15 that prevents school attendance; and work by children under of age of 18 that is hazardous to the physical or mental health of the child. In conducting its business, an operating company:

- Will not employ children that falls into the definition as stipulated by the ILO Convention, notwithstanding any national law or local regulation.
- Will comply with all other applicable child labour laws, including those related to wages, hours worked, overtime and working conditions.

- Will not partake in any form of exploitation of children. The Group and its operating companies will not provide employment to children before they have reached the legal age to have completed their compulsory education, as defined by the relevant authorities; and
- The Group's expects its business partners to have and uphold similar standards and abide by country-governing laws in countries wherein they operate. Should violation of these principles become known to Cassava or any of its operating companies and not be remediated immediately, the group will take action including discontinuation of the business relationship.

#### 7.1.4 Forced Labour

Cassava expressly prohibits any form of work or service, not voluntarily, obtained under threat of any punishment or that is requested as a way of cancelling a debt. Moreover, it is not required, under any circumstances, that employees leave any kind of deposit during the working relationship maintained.

## 7.2 Anonymous Grievances

If an aggrieved stakeholder wishes to report a grievance anonymously, such a grievance can be reported as such using one of the following reporting methods:

- [ethics@cassavatechnologies.com](mailto:ethics@cassavatechnologies.com)
- [ethics@liquid.tech](mailto:ethics@liquid.tech)
- [www.tip-offs.com](http://www.tip-offs.com)

## 8 GRIEVANCE TRACKING

Upon receipt of a grievance (verbal and/or written), the grievance is formally recorded in the Group's External Grievance Register and allocated a unique grievance reference number. This reference number is used to systematically track the grievance, document actions taken, and record feedback provided throughout the lifecycle of the case until formal closure.

The External Grievance Register serves as the central record of all grievances and reflects the current status of each case, as well as the final outcome once the grievance has been resolved and closed. In line with the Group's governance and oversight requirements, the register is maintained as a living document and is updated on an ongoing basis to ensure accuracy and completeness.

Data captured in the External Grievance Register is used to analyse grievances collectively in order to identify recurring issues, emerging trends, and potential areas of risk. Insights derived from this analysis inform the development of appropriate mitigation measures and continuous improvement actions.

A consolidated summary of reported grievances, together with identified trends and risk areas, is reported on a quarterly basis to the Group Audit and Risk Committee for noting, in accordance with the Group's established reporting and assurance processes.

Grievances can be categorised as follows:

- Social issues:

- Job issues (safety, security, unfair treatment, forced labour, human rights abuse, etc)
- Cultural sensitivities and community requirements
- Health, safety and wellbeing issues:
  - Infringement on any stakeholder’s health, safety and wellbeing
  - Third party injuries or conflicts
  - Unsafe working conditions
- Environmental issues:
  - Nuisance caused by noise, dust, odour or lighting
  - Contamination or impact on soil and water contamination, erosion, damage to wildlife or vegetation, illegal hunting and fishing, illegal dumping and/or waster disposal
- Governance:
  - Theft, corruption, illegal activities etc
  - Behaviour of personnel not in line with the group’s Code of Conduct or the Supplier Code of Conduct
  - Non-compliance with any local and/or national legislation relevant to the specific project and/or region of the Group’s activities
  - Unplanned use / damage / loss of land, infrastructure, property, livestock or income
- Operational:
  - Damage and temporary interruption of services, access roads and / or road congestion
  - Operational planning, communication and delivery failures
  - Site management and contractor performance issues
- Other:
  - Any grievance that is not covered by the above categories and/or that includes two or more of the above categories are grouped under other grievances

The categorisation of grievances allows the Group and the operating company to establish trends and adapt its own, and contractor’s management system where needed to improve prevent and eliminate possible future grievances.

## 9 VERIFICATION AND MONITORING

It is the responsibility of the operating companies to monitor and ensure that contractors and sub-contractors are adhering to the requirements and commitments contained in this EGMP, and the conditions of the contractor’s appointment contract that is contained in the group’s onboarding documentation.

Contractors should ensure that effective record keeping of grievances raised throughout the life of a project, are kept and communicated to the relevant operating company on a weekly basis. On receipt

of grievances, electronic notification to the Project Manager must be distributed. Grievance records must be made available to management immediately upon request.

Once a grievance has been logged, monthly internal reports will be compiled by the relevant Group representative, and distributed to the operating company’s management team, the HSE manager as well as the Group Executive Head of ESG. These reports must contain, as far as possible:

- The number of grievances logged by level and type, both by the company and grievances received by relevant project contractors (with further details of the location of the incident/issue).
- The number of grievances closed during the period and grievances still open.
- The number of grievances requiring Grievance Committee intervention, legal or third-party mediators, by type; and
- The operating company’s engagement process and response to grievances.

Cassava will report, annually, the number and type of external grievances reported by each operating company and its contractors, including the close-out status of each grievance. More detail on each grievance might be required by shareholders as per the shareholder agreements.

## 10 DOCUMENT AUTHORISATION

Approved by (Sign)	
Name	Jannette Horn
Capacity	Group Executive Environmental & Social Governance
Date Approved	

Approved by (Sign)	
Name	Leonard Bore
Capacity	Chief Risk and Compliance Officer
Date Approved	

Approved by (Sign)	
Name	Nanda Scott
Capacity	Chief Commercial Officer
Date Approved	

## APPENDIX A: Grievance Form -Example

GRIEVANCE ACTION FORM					
PART A					
Location:		Complaint No:		Date Received:	
Name :		Method of Response:		Verbal (in person)	
Address:				Verbal (telephone)	
				Written /Email	
Contact Details:					
PART B					
Description of Grievance:					
PART C					
Liquid Telecom Response					
PART D					
Verification of Response and Corrective Action:					

## APPENDIX B: External Grievance Register – Example

Grievance #	Date grievance received	Reporting method of grievance	Grievance Category	Grievance details	Project related to Grievance	Internal Responsible Person	Affected Party(ies)	Resolution timeframe	Close-out status	Appeal detail if applicable
EGR 01/23/2026	12 Jan 2023	Verbal	Operational	Damage to infrastructure	Yes	Johan Smit	Mr T Nthabo	30	Ongoing	N/A

External Grievance Register - Example