



# HUMAN RIGHTS POLICY

## GRPPOL - 00031

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## I. STAKEHOLDER LIST

Cassava Technologies business function	Category of stakeholder
Group Chief Risk & Compliance Officer	B, E
Group Executive Environmental, Social and Governance Officer	B, E
Group Corporate Social Investment Officer	A, E, F
Group People Officer	B, C, 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. GRPPOL – 00031
- b. Group Human Rights Policy
- c. Employee Code of Conduct
- d. Supplier Code of Conduct
- e. Ethics Code

## 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	14 May 2024	Group ESG	New Policy
Version 2	1 September 2025	HR and ESG	Document Standards Applied Added definitions and updated human rights reporting process
Version	1 March 2026	HR and ESG	Included unlawful access to information / updated reporting process

#### IV. RELATED DOCUMENTS

Document no.	Description	Location

#### V. ABBREVIATIONS, ACRONYMS AND DEFINITIONS

Term / Abbreviation / Acronym	Definition
HIV	Human Immunodeficiency Virus
ILO	International Labour Organization
UK	United Kingdom
GARF	Group Audit, Risk and Forensics

## 1 INTRODUCTION

This Human Rights Policy (the “Policy”), covering all relevant forms of human rights abuse including modern and anti-slavery, forced labour and human trafficking, discrimination, unfair labour practices, child labour and unlawful access to private information, applies throughout all Cassava Technologies controlled entities (the Group or Company). The Policy applies to all employees at the Company, whether permanent, full time, part time, fixed term, or home workers. It also applies to all persons working for us or on our behalf in any capacity, including agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

The Policy does not form part of the Company’s contracts of employment but is available on both our internal and external company platforms. The Company reserves the right to withdraw or modify this Policy at any time and reserves the sole right of interpretation.

## 2 PURPOSE

Respecting human rights is important. The Group has a zero-tolerance approach to all forms of human rights abuse, and we are committed to acting ethically and with integrity in all our business dealings and relationships. We do this by implementing and enforcing effective systems and controls to ensure human rights abuse is not taking place anywhere in our own business or in any of our supply chains. We respect human rights throughout our operations, and we expect our business partners to do the same.

Any human rights abuse is a crime and takes various forms, such as modern slavery, child labour, servitude, forced and compulsory labour, unfair labour practices, human trafficking and unlawful access to private information, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

The company positively welcomes and aims to support the growing diversity of the community we serve and the people we employ. Our diversity is our strength and we are committed to providing services to our many different communities, by a workforce that reflects the diversity of the society we operate in. We also acknowledge that we live in an unequal society in which many people face discrimination and / or unfair treatment. The company believes that equality of opportunity and freedom from discrimination are fundamental human rights and should form part of all our business dealings including those people and companies that represents or act on behalf of the company.

We actively oppose all forms of discrimination and are committed to the principle that no person shall face discrimination by being treated unfairly or being denied access to services or employment opportunities. We will not discriminate (indirectly or directly) on the grounds of race, gender, gender reassignment, marital status, sexual orientation, age, religious beliefs, HIV status, or disability (covering sensory and physical disabilities, learning disabilities and mental health status).

In addition to this Human Rights Policy the Company also has the following Policies that support the fight against any form of human rights abuse including but not limited to:

- Equality, Diversity and Inclusion Policy
- Bullying, Harassment and Victimisation Policy

- Grievance Policy
- Child Labour Policy
- Fair and Unfair Labour Practice
- Unlawful access to Information

We strive to respect and promote human rights in accordance with the UN Guiding Principles on Business and the International Labour Organization (ILO) Conventions by ensuring that Human Rights is at the forefront of in all our business relationships, interactions and operations. We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations in the UK under the Modern Slavery Act 2015 and relevant disclosure obligations in other countries.

We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, child labour or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

### 3 SCOPE AND RESPONSIBILITY

The President and Group CEO and in country CEOs have overall responsibility for ensuring this policy complies with our legal and ethical obligations across all business operations, and that all those under our control also comply with this policy. The CEOs have primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with and reporting any queries about possible human rights abuse (as stipulated above). In addition, they need to support and ensure that internal control systems and procedures are regularly audited to ensure they are effective in countering and identifying any human rights abuse.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on what constitutes human rights abuse. Training and awareness should also extend to our own supply chains.

### 4 COMMUNITY AND STAKEHOLDER ENGAGEMENT

We recognise that we are part of the communities in which we operate. We engage with communities including indigenous people, vulnerable and disadvantaged groups (where relevant) on human rights matters that are important to them.

Our aim is to ensure through dialogue that we are listening to, learning from and considering their views as we conduct our business. We believe that local issues are most appropriately addressed at the local level with the Group being part of the discussions and solutions if and when required.

To ensure we remain relevant and up to date with any new developments on human rights, we engage with a wide range of civil society and stakeholders on human rights issues related to our business. This includes issues in our Company, across our value chain and with our various business partners, through which we seek to promote respect for human rights.

## 5 TYPES OF HUMAN RIGHTS ABUSE

The following are some of the human rights abuses we aim to prevent and where identified, ensure we manage, report and create awareness:

- **Discrimination:**  
Unfair treatment based on race, gender, age, religion, sexual orientation, or disability
- **Modern Slavery:**  
This is a term used to describe a modern method of exploitation includes forced labour, forced marriage, human trafficking, debt bondage, and other slavery-like practices.
- **Harassment**  
Bullying, sexual harassment, or creating a hostile work environment.
- **Unsafe Working Conditions**  
Exposure to hazardous materials, lack of proper safety equipment, or failure to follow safety protocols
- **Forced Labour**  
Coercing employees to work against their will, often under threat of punishment.
- **Child Labour**  
Employing underage workers in violation of labour laws.
- **Wage Theft**  
Not paying workers for all the hours worked, withholding wages, or not paying minimum wage.
- **Excessive Work Hours**  
Forcing employees to work excessive hours without proper compensation or rest breaks.
- **Lack of Benefits**  
Denying legally mandated benefits such as health insurance, paid leave, or retirement benefits.
- **Retaliation**  
Punishing employees for reporting abuses or unsafe conditions, or for attempting to unionize.
- **Privacy Violations**  
Intruding on employees' privacy, such as monitoring personal communications without consent.
- **Denial of Freedom of Association**  
Preventing employees from forming or joining trade unions.
- **Unlawful access to Information**  
Preventing any third party from unlawfully accessing and obtaining personal and/or confidential company information or blocking and preventing sharing of content.

### 5.1 Discrimination

We value and advance the diversity and inclusion of the people with whom we work. We are committed to equal opportunity and are intolerant of any discrimination and harassment. We

work to maintain workplaces that are free from discrimination or harassment on the basis of race, sex, colour, national or social origin, ethnicity, religion, age, disability, sexual orientation, gender identification or expression, political opinion or any other status protected by applicable law.

The basis for recruitment, hiring, placement, development, training, compensation and advancement at the Company is qualifications, performance, skills and experience. We do not tolerate disrespectful or inappropriate behaviour, unfair treatment or retaliation of any kind. Harassment is not tolerated in the workplace and in any work-related circumstance outside the workplace.

## 5.2 Unfair and Unsafe Labour Practices

Unfair and Unsafe Labour Practices refer to violations of workers' rights including excessive work hours, inadequate wages or benefits, denial of freedom of association, and unsafe working conditions. It also includes failure to comply with labour laws and not providing a healthy, secure, and respectful work environment.

### 5.2.1 Work hours, wages and benefits

We compensate employees competitively relative to the industry and local labour market, and in accordance with terms of applicable collective bargaining agreements. We work to ensure full compliance with applicable wage, work hours, overtime and benefits laws in the countries in which we operate.

### 5.2.2 Freedom of association and collective bargaining

We respect our employees' right to form, join not to join a labour union without fear of reprisal, intimidation or harassment. Where employees are represented by a legally recognised union, we are committed to establishing a constructive dialogue with their freely chosen representatives. The Company is committed to bargaining in good faith with such representatives.

### 5.2.3 Safe working environment and physical protection

The safety and health of our employees is of paramount importance. As a company we are committed to provide a safe and healthy workplace and comply with applicable safety and health laws and regulations, as well as internal policies and procedures. We do this in consultation with our employees, by addressing and remediating identified risks of accidents, injury and health impacts.

We are committed to maintaining a workplace that is free from violence, harassment, intimidation and other unsafe or disruptive conditions due to internal and external threats. Security safeguards for employees are provided, as needed, and are maintained with respect for employee privacy and dignity.

The Group also has a Physical and Environmental Security Policy that provide additional information on what measures each subsidiary must implement and manage.

## 5.3 Modern Slavery

Modern slavery is a pervasive issue affecting approximately 50 million people globally. This form of exploitation includes forced labour, forced marriage, human trafficking, debt bondage,

and other slavery-like practices. Unlike historical forms of slavery, modern slavery is often hidden in plain sight and intertwined with many aspects of the global economy.

Organizations like Anti-Slavery International and initiatives such as the Global Slavery Index are working to raise awareness and drive legislative and social changes to combat modern slavery. These efforts include pushing for stricter laws to hold businesses accountable for exploitative practices within their supply chains and advocating for stronger protections for vulnerable populations. By understanding and addressing the complex factors that contribute to modern slavery, we aim to ensure Cassava Technologies does not fall foul to this pervasive issue and ensure none of our employees are affected by exploitation.

### **5.3.1 Forced Labour and Human Trafficking**

We prohibit the use of all forms of forced labour, including prison labour, indentured labour, bonded labour, military labour, modern forms of slavery, child labour (see below for more details) and any form of human trafficking. This includes the use of these types of labour practices by our own customers, suppliers and contractors.

### **5.3.2 Child Labour**

It is the policy of the company not to employ children in any situation or scenario or through any forced labour or willing labour. With reference to the company's supply chain, assurance will be obtained from the suppliers that child labour is not employed. Responsible sourcing questionnaires are submitted to any new major supplier and contractor. Where there is any doubt that child labour may be employed we conduct investigations through our internal Group Audit Risk and Forensic (GARF) team.

We prohibit the hiring of any individuals that are under 18 years of age or older where national legislation stipulates otherwise.

## **5.4 Unlawful Access to Information**

Unlawful access to information refers to the unauthorized or illegitimate acquisition, use, or dissemination of data, particularly personal, confidential, or sensitive information, without the consent of the data subject or in violation of legal safeguards. This includes accessing restricted databases or systems without proper authorization, using legally obtained access for purposes beyond what is permitted, and circumventing privacy protections to obtain information for political, financial, or coercive gain.

## **6 COMPLIANCE AND REPORTING**

The prevention, detection and reporting of any form of human rights in any part of our business or supply chains, is the responsibility of all those working for us or under our control. We also expect our customers and the public at large to report any form of human rights abuse encountered or observed in any of our operations.

We expect all employees and those working on our behalf, to read, understand and comply with this policy, and where issues might arise report any incidents via one or more of the following methods:

- Directly to a line manager or your HR representative
- Confidential e-mail to the Group Audit, Risk and Forensics (GARF) department at [ethics@liquid.tech](mailto:ethics@liquid.tech)

- Direct engagement with the GARF team;
  - The whistleblowing hotline managed by Deloitte at: +27 31 571 5307
  - [ethics@cassavatechnologies.com](mailto:ethics@cassavatechnologies.com)
- [cassava@tip-offs.com](mailto:cassava@tip-offs.com)
- [www.tip-offs.com](http://www.tip-offs.com)
- External grievance procedure:
- <https://liquid.tech/wp-content/uploads/2023/06/External-Grievance-Procedure.pdf>

All relevant stakeholders are encouraged to raise concerns about any issue or suspicion of human rights abuse in any parts of our business or supply chains as early as possible. Where appropriate, and with the welfare and safety of workers as a priority, we will also give support and guidance to our suppliers to help them address coercive, abusive and exploitative work practices in their own business and supply chains.

If an employee is unsure about whether a particular act, the treatment of workers more generally, or the working conditions within any tier of our supply chains constitutes any of the various forms of human rights abuse, they can raise it with their line manager. We support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be irrelevant or misleading.

We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that human rights of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

Before working with contractors for projects, a risk assessment needs to be completed in order to assess all relevant ESG risks including the risk of any human rights abuse. This will include:

- Mapping the supply chain to assess product or geographical risks of any form of human rights.
- Assess the human rights risks of each new contractor and ensure they have policies in place to encourage the reporting of concerns and the protection of whistle blowers.
- Engage with the contractors both to conform to the human rights policy and to gain an understanding of the measures taken by them to ensure no human rights are occurring in their businesses.

In the event that any prospective contractor or subcontractor, represents an unacceptable risk, the Group considers it our responsibility to work with such company's representatives (as far as is reasonably practical) to assist them in implementing measures to mitigate and prevent future risks. Alternatively if the potential risk can't be mitigated or prevented, the company will not continue procuring services from such contractor and/or subcontractor

## 7 INVESTIGATIONS AND FEEDBACK

All reported cases of alleged human rights abuse will be investigated by our internal GARF team and will involve all necessary departments and line managers. Any and all allegations of abuse of this policy will be investigated and feedback will be provided to the relevant persons that reported the incident

## 8 COMMUNICATION AND AWARENESS

Operations within the Group can adopt this Group Policy or develop an operational specific policy and/or working procedure that is aligned to this Group Policy. Operational specific policies and procedures must address relevant issues similar to the Group Policy and needs to be reviewed and approved by the Group Head of Environmental and Social Governance before being approved by the operational structure. This will ensure that operational policies and procedures do not deviate from the Group requirements.

Training on this policy, and on the risk our business faces from any form of human rights abuse in its own operations and in those of our supply chains, forms part of the induction process for all individuals who work for us, and additional training will be provided as necessary.

Our zero-tolerance approach to human rights abuse must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate on an ongoing basis.

## 9 DOCUMENT AUTHORISATION

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

<b>Approved by (Sign)</b>	
<b>Name</b>	Leonard Bore
<b>Capacity</b>	Chief Risk and Compliance Officer
<b>Date Approved</b>	

<b>Approved by (Sign)</b>	
<b>Name</b>	Nanda Scott
<b>Capacity</b>	Chief Commercial Services Officer
<b>Date Approved</b>	

**END OF DOCUMENT**