



# MOMENTUM METROPOLITAN HOLDINGS LIMITED HUMAN RIGHTS POLICY

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## 1. INTRODUCTION

Momentum Metropolitan Holdings Limited (MMH) is committed to building an inclusive society where the inherent rights of all people regardless of race, sex, language, religion or any other status is recognised. Respect for human rights and the establishment of fair labour practices underpinned by the Constitution of the Republic of South Africa are fundamental values of MMH. We strive to respect and promote human rights in accordance with the United Nations Guiding Principles on Business and Human Rights in our relationships with our stakeholders. We do this both as an Employer and as a service provider within the financial sector creating value for a broad range of stakeholders including shareholders, clients, and society at large.

## 2. PURPOSE

The purpose of this statement is to clarify, unequivocally, MMH's overall intent to the advancement and protection of human rights in all it does, and the coherence between overlapping policies it has already embedded throughout the organisation. We understand that to achieve this, we must conduct our business in an ethical, accountable, and transparent way, where we uphold and enhance human rights. Our values reflect this commitment and underpin every aspect of our business.

Thus, the following policies should be read in conjunction with this statement:

- *MMH Code of Ethics and Standards of Conduct Policy*. This represents our statement of intent as a values-based organisation to do what is right, fair, reasonable, and lawful, to the benefit of all in the countries where we operate.
- *MMH Disciplinary Policy and Grievance Procedure*. This includes a statement of our commitment to fair labour practices, in conjunction with support of the right to collective bargaining and our statement on eliminating excessive working hours, in accordance with the relevant employment laws impacting the employee-employer relationship in South Africa.
- *MMH Corporate Social Investment Policy*
- *MMH Responsible Investment Policy*
- *MMH's Whistle-blower Policy*
- *MMH Ethics and Fraud report lines*

## 3. SCOPE

This policy applies to MMH and all its subsidiaries, full-time and part-time employees, contractors, service providers, governance and oversight bodies or any legal entity acting on behalf of the Group across all its business operations and supply chains.

## 4. DEFINITIONS

For purposes of this policy, the following definitions apply:

- **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

Economic, Social, and Cultural Rights, the eight core International Labour Organisation Conventions, and various covenants and treaties that implement these principles.

- **International Labour Organization (ILO):** 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.
- **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.
- **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.
- **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.

## 5. PRINCIPLES

MMH is committed to respecting peoples' rights related to freedom of expression and access to information. While we look to Government to honour the promise of our Constitution by creating a just, free, and fair society, corporate citizens such as MMH have a responsibility to use the strength of business to realise these ideals. This is reflected in our corporate purpose to "enable businesses and people from all walks of life to achieve their financial goals and life aspirations" in addition to our values i.e., 1) *Accountability*; 2) *Integrity*; 3) *Excellence*; 4) *Diversity*; 5) *Teamwork*; 6) *Innovation* direct us to uphold and support this commitment underpinned with the view that:

- MMH should be an Employer for all where everyone is allowed to show up as their wholesome selves without fear of judgement or discrimination.
- As an insurer, we believe in treating our clients with dignity and respect, taking due care to protect their right to privacy.
- As a responsible investor we integrate the environmental, social and governance impacts of our decisions, engage and influence others to do better, including human rights considerations, while we ourselves comply to the highest international standards on responsible investment such as the United Nations Principles for Responsible Investment.
- As a partner to shareholders, we believe in ethical business practices that will create value in a transparent way over the long term, adhering to the standards of good corporate governance.
- As a member of society, we believe in enabling marginalised, underserved, and under-resourced communities to improve socio-economics outcomes for themselves and their families, supported by our social investments.

- MMH encourages employees to report any act of human rights violation through a grievance mechanism.

### **5.1. Alignment to International Standards**

The MMH position on human rights aligns to international standards on human rights, derived from the relevant principles provided by the United Nations Global Compact. Our application of the United Nations Global Compact Principles, include upholding the Universal Declaration of Human Rights and the International Labour Organizations' Declaration on Fundamental Principles and Rights at Work, the internationally recognised standards from which it is derived. These include the following:

- Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights.
- Principle 2: Businesses should make sure that they are not complicit in human rights abuses.
- Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.
- Principle 4: Businesses should uphold the elimination of all forms of forced and compulsory labour.
- Principle 5: Businesses should uphold the effective abolition of child labour.
- Principle 6: Businesses should uphold the elimination of discrimination in respect of employment and occupation.

### **5.2. Constitutionally Driven**

Above all, our stance on human rights is built on the foundation of the Constitution of the Republic of South Africa – the guiding document for all our laws. We further regard the Bill of Rights – Chapter 2 of our Constitution – as the foundation for our position on human rights as it “enshrines the rights of all people in our country and affirms the democratic values of human dignity, equality and freedom”.

## **6. COMMITMENTS**

Directed by the international standards, our Bill of Rights, and own organisational policies referenced in this policy, we commit to:

- Make all parties covered by the scope of this policy in Section 3 aware of our expectations to uphold the rights and dignity of everyone we engage with.
- Ensure to provide employees with relevant training on human rights.
- Driving organisational awareness of human rights issues, including programmes on diversity and inclusion to ensure that MMH progresses further on the journey to becoming a comprehensively transformed organisation.
- Ensuring that non-compliance with this policy and any obligation in terms of legislation is dealt with appropriately by the policy owner and relevant oversight bodies, in accordance with legal and ethical prescripts.
- Ensuring that employees understand and have access to information on where and how to report non-compliance with this policy (*See MMH's Whistle-blower Policy*).
- MMH views any non-compliance to this policy and its obligations in terms of legislation in a serious light.

- Fostering a culture of honesty and accountability that encourages everyone to speak out against human rights abuses without fear of victimisation.
- That our business operations, business strategies, and choices take cognisance of our impact on human rights.

### **6.1. Diversity and Inclusion**

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 discrimination and harassment. We work to maintain workplaces that are free from discrimination or harassment based on 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. The bases for recruitment, employee development, training, compensation, and advancement at MMH are qualifications, performance, skills, and experience. We do not tolerate disrespectful or inappropriate behavior, unfair treatment, or retaliation of any kind. Harassment is not tolerated in the workplace and in any work-related circumstance outside the workplace.

### **6.2. Freedom of Association and Collective Bargaining**

We respect our employees' right to join, form or not to join a trade union without fear of reprisal, intimidation, or harassment. Where required 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.

### **6.3. Safe and Healthy Workplace**

The safety and health of our employees are of paramount importance. Our policy is to provide a safe and healthy workplace and comply with applicable safety and health laws and regulations, as well as internal requirements. We work to provide and maintain a safe, healthy, and productive workplace, in consultation with our employees, by addressing and remediating identified risks of accidents, injury and health impacts.

### **6.4. Workplace Security**

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.

## **7. GUIDANCE AND REPORTING**

We strive to create workplaces in which open and honest communications among all employees are valued and respected and we are committed to comply with applicable labour laws. The Company also ensures employees are aware of this Policy through driving organisational awareness, including programs on diversity and inclusion to ensure that MMH progresses further on the journey to becoming a truly transformed organisation. Any employee who believes a conflict arises, or who has questions about this policy or would like to confidentially report a potential violation of this policy, should raise concerns with their immediate management, or the Human Capital Department, or the Group Employment Relations and Labour Law Department or Group Forensic Services. Where an anonymous disclosure is required, this could be done via the toll free [MMH Ethics and Fraud Lines](#).



No reprisal or retaliatory action will be taken against any employee for raising concerns under this policy. The Company will investigate, address, and respond to the concerns and will take appropriate corrective action in response to any violation.

## 8. GOVERNANCE AND APPROVAL

Ownership of this policy is held by the MMH Group Human Capital Division and is approved by the MMH Group Executive and the Social Ethics and Transformation Committees. As part of the operationalisation of this policy, compliance therewith will be ensured and monitored, and reported on.

## 9. POLICY RETENTION

To ensure accessibility this policy will be made available on the Momentum Metropolitan Intranet, internally and will also be publicly available via the MMH website (<https://www.momentummetropolitan.co.za/en>)

## 10. DOCUMENT CONTROL

### Key Document Summary

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