



HUMAN RIGHTS (including freedom of association) POLICY

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| Policy owner | Executive Committee |
| Document owner | Chief Executive Officer |
| Approvals | Board |
| Date | 2022/02/10 |
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| Next review date | July 2023 |

DEFINITIONS

For the purposes of this policy, the following terms shall carry the following meanings:

“Bill of Rights” means the International Bill of Human Rights that consists of the Universal Declaration of Human Rights and the main instruments through which it has been codified: the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights;

“Board” means Board of Directors of the Company from time to time;

“Company or Redefine” means Redefine Properties Limited, registration number 1999/018591/06, a limited liability public company incorporated in South Africa and listed on the stock exchange operated by the JSE Limited;

“Designated Officer” means the Chief Executive Officer;

“Employee” means an individual who works part- or full-time under a contract of employment and includes executive directors, senior and middle management and junior Employees;

“Exco” means the executive directors of the Company;

“South African Constitution” means the Constitution of the Republic of South Africa, Act No.108 of 1996;

“Unfair Discrimination” means the intentional or unintentional conduct which adversely affects employment opportunities based on race, colour, culture, language, gender, generation/age, sexual orientation, gender identification or expression, religion, disability, marital status, origin, mental and/or physical health status including HIV/AIDS, political opinion, or any other item that undermines human dignity or any other status protected by applicable laws.

1. PURPOSE

1.1. This policy is guided by international human rights principles encompassed by the Universal Declaration of Human Rights, including those contained within the International Bill of Rights and the International Labour Organization's 1998 Declaration on Fundamental Principles and Rights at Work, the South African Constitution and all applicable laws and regulations.

1.2. The Company's Code of Business Conduct sets the framework for our approach to human rights. Respect for human rights is a fundamental value of Redefine with the aim to better and uphold human rights throughout all stakeholder groups impacted by the business, as it relates to the rights of:

1.2.1. Employees

- Promote freedom of association and the abolition of forced and child labour;
- Unfair Discrimination based on race, culture, language, gender, generation/age, sexual orientation (LGBTQI+), religion, disability, marital status, origin, mental and/or physical health status including HIV/AIDS, or any other item that undermines human dignity;
- Forbid physical abuse, sexual or other harassment, bullying, verbal abuse and any other forms of intimidation;
- Strive to ensure a safe and healthy work environment and, in the case of incidents, provide compensation that at the very least meets basic needs; and
- Commit to complying with both the letter and the spirit of our legal obligations in redressing historical issues of inequality in South Africa.

1.2.2. Communities, Shoppers

- Observe legislation and respect the cultural values of societies;
- Seek to identify and address historical issues of inequality in South Africa and to promote the interests of people;
- Strive to promote the wellbeing, safety, and the environment of communities within or in close proximity to our operations; and
- Consult with communities to identify traditional and cultural heritage values that may potentially be affected by our operations, and to reach consensus on strategies to address these concerns.

1.2.3. Tenants, Investors, Funders, Suppliers and Property Brokers

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| | <ul style="list-style-type: none"> • Require our stakeholders to respect human rights and act in full accordance with our policies and guidelines concerning social responsibility, labour standards and human rights; and • Commit to openly and transparently reporting on human rights violations within our value chain, should these occur. |
| 2. | <p>SCOPE</p> <p>2.1. This policy applies to Redefine, its Employees and its subsidiaries, the properties it owns as well as the entities in which the Company holds a majority interest and the facilities it manages.</p> <p>2.2. Third parties who have business dealings with Redefine, including tenants, investors, funders, suppliers and property brokers, are expected to uphold the principles and we urge them to adopt similar policies within their own businesses.</p> |
| 3. | <p>AUTHORITY AND RESPONSIBILITY</p> <p>3.1. The Board of Redefine oversees this policy.</p> <p>3.2. The Designated Officer has the responsibility to monitor the objectives of this policy and to provide feedback to the Board.</p> <p>3.3. Exco has the authority and responsibility to monitor the achievement of this policy.</p> <p>3.4. All Employees have the responsibility and duty to ensure that they uphold the principles set out in this policy.</p> |
| 4. | <p>DIVERSITY, EQUITY AND INCLUSION</p> <p>4.1. Redefine's Employees are the driving force of its success, we harness their creativity and realise their full potential by accepting and appreciating their unique perspectives to engender diversity of thought.</p> <p>4.2. The Company values and advances the diversity, equity and inclusion of the people with whom we work, is committed to equal opportunity and is intolerant of discrimination, harassment and bullying.</p> <p>4.3. It is the aim of the Company to work towards maintaining workplaces that are free of Unfair Discrimination, harassment or bullying.</p> <p>4.4. The basis for recruitment and selection, development, training, remuneration and benefits as well as advancement at the Company is: qualifications, performance, skills and experience.</p> <p>4.5. Disrespectful or inappropriate behaviour and unfair treatment or retaliation of any kind are not tolerated.</p> <p>4.6. Harassment, including sexual harassment, is not tolerated in the workplace and in any work-related circumstance outside the workplace.</p> |

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| <p>5.</p> | <p>FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING</p> <p>5.1. The Company respects its Employees’ right to join, form or not to join a labour union without fear of reprisal, intimidation or harassment.</p> <p>5.2. 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.</p> |
| <p>6.</p> | <p>SAFE AND HEALTHY WORKPLACE</p> <p>6.1. The safety and health of our Employees is of paramount importance. The Company’s policy is to provide a safe and healthy workplace and comply with applicable safety and health laws and regulations, as well as internal requirements.</p> <p>6.2. The Company strives to provide and maintain a safe, healthy and productive workplace, in consultation with its Employees, by addressing and remediating identified risks of accident, injury and health impacts.</p> |
| <p>7.</p> | <p>WORKPLACE SECURITY</p> <p>7.1. Redefine is committed to maintaining a workplace that is free of violence, harassment, intimidation and other unsafe or disruptive conditions that may arise due to internal and external threats.</p> <p>7.2. Security safeguards for Employees are provided, as needed, and are maintained with respect for Employee privacy and dignity.</p> |
| <p>8.</p> | <p>FORCED LABOUR AND HUMAN TRAFFICKING</p> <p>8.1. The use of all forms of forced labour is strictly prohibited, including prison labour, indentured labour, bonded labour, military labour, modern forms of slavery and any form of human trafficking.</p> |
| <p>9.</p> | <p>WORKING HOURS, REMUNERATION AND BENEFITS</p> <p>9.1. Redefine is committed to the concept of fair and responsible remuneration for all Employees. The Remuneration Committee approaches the internal wage gap issue from a sustainability, fairness and inclusiveness perspective. Internal pay differentials are monitored to identify out-of-line remuneration compared to similar or the same jobs, and whether these differentials are justifiable, in line with the principle of Equal Pay for Work of Equal Value as required by the Employment Equity Act No.55 of 1998, as amended from time to time. Redefine is committed to taking steps to address internal disparities identified.</p> <p>9.2. The Company upholds and ensures full compliance with the Basic Conditions of Employment Act No.75 of 1997 which gives effect to the right to fair labour practices referred to in section 23(1) of the Constitution by establishing and making provision for the regulation of basic conditions of employment, such as working hours, leave, overtime payment and deductions.</p> |

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| <p>10.</p> | <p>GUIDANCE AND REPORTING OF EMPLOYEES</p> <p>10.1. The Company strives to create a culture of respect in which open and honest communication among all Employees is valued. The Company is committed to complying with applicable labour and employment laws and to ensuring Employees are aware of the Human Rights policy through training and awareness campaigns.</p> <p>10.2. Any Employee who believes a conflict arises between the language of the policy and the laws, customs and practices of the workplace, or who has questions about this policy or would like to confidentially report a potential violation of this policy, should raise those questions and concerns with Exco, human resources, the legal department, internal audit or the risk and compliance department.</p> <p>10.3. Employees and other stakeholders can also report suspected policy violations anonymously through the Whistle Blowers hotline www.whistleblowing.co.za or by emailing or calling the appropriate toll-free number, of which the detail is available on the Company's website or intranet. 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 of Employees and will take appropriate corrective action in response to any violation.</p> |
| <p>11.</p> | <p>PUBLIC REPORTING</p> <p>11.1. The Company publicly reports on our human rights-related commitments, efforts and statements, consistent with this Human Rights policy, as part of its annual Environmental, Social and Governance report.</p> |
| <p>12.</p> | <p>RELATED POLICIES AND OTHER REFERENCES</p> <p>12.1. This policy must be read in conjunction with:</p> <p>12.1.1. Code of Business Conduct</p> <p>12.1.2. Employment Equity policy</p> <p>12.1.3. Remuneration policy</p> <p>12.1.4. Whistle-blowing policy</p> <p>12.1.5. Diversity Equity and Inclusion policy</p> |
| <p>13.</p> | <p>NON-COMPLIANCE</p> <p>13.1. Failure to comply with this policy may result in disciplinary action.</p> |
| <p>14.</p> | <p>REVIEW AND ASSESSMENT</p> <p>14.1. This policy will be reviewed by the Social, Ethics and Transformation Committee and presented to the Board for their approval on an annual basis.</p> <p>14.2. Employees will attend training and an annual certification process to ensure they are aware of the Human Rights policy.</p> |

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| | 14.3. All and any changes to this policy will be formally communicated. |
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