

Adcorp Group

Human Rights Statement

adcorp

Connecting Human Potential

The Adcorp Group is committed to using its capabilities and market position to improve socio-economic conditions in our communities by increasing employability and connecting people with opportunities

Human Rights Statement

Process Area	Group Corporate Citizenship	**Statement Owner**	Head: Sustainability
Statement Title	Human Rights Statement	**Revision No.**	1.1
Statement No.	CC- STA-001	**Approved by**	Chief Executive Officer
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This statement is applicable to the Adcorp Group of companies, its affiliates and subsidiaries in all geographies in which it operates hereinafter referred to as "Adcorp".

Approved by

Statement Owner: Brandon Urdang **Head: Sustainability**	Signature: Date: 18 September 2026
Approved By: Dr John Wentzel **Chief Executive Officer**	Signature: Date: 27 October 2026

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1. Scope

This statement applies to all Adcorp operations globally and must be adhered to by all employees and suppliers. The scope includes the management of all Adcorp employees and any suppliers or service providers providing services to Adcorp.

2. Introduction

Adcorp is committed to upholding the human rights of all stakeholders involved in our operations and supply chain, including but not limited to employees, contractors, clients, learners, candidates for employment and other stakeholders. We recognise that human rights are fundamental and universal rights that underpin each person's inherent freedom, dignity and equality as outlined in the:

- United Nations Universal Declaration of Human Rights
- International Labour Organisation Declaration on Fundamental Principles and Rights at Work
- Organisation for Economic Cooperation and Development Guidelines for Multinational Enterprises, including Human Rights Practices
- Ethical Trading Initiative (ETI) Base Code

These aim to ensure that economic development and prosperity are achieved in a manner that respects and promotes human rights for all.

As a responsible corporate citizen, we acknowledge our responsibility to respect human rights and to promote their protection. We believe that respect for human rights is essential to building a sustainable and successful business, and we strive to integrate human rights considerations into all aspects of our operations and supply chain. This includes proactively identifying potential human rights risks, implementing effective measures to mitigate these risks, and continuously improving our practices.

3. Understanding human rights

Human rights: These are fundamental rights and freedoms inherent to all human beings, regardless of race, gender, disability, religion, age, sexual orientation, ethnic origin, social origin, political opinion or any other protected characteristic. They are universal, inalienable, and indivisible, forming the basis for a just and equitable society.

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Child labour: This refers to work performed by a child below the legal minimum age for employment, or work that is hazardous and exploitative, jeopardising a child's health, safety, and education. Adcorp strictly prohibits child labour in all its operations and supply chains.

Forced labour: This encompasses all forms of work or service that is extracted from any person under the menace of any penalty and for which the person has not offered themselves voluntarily. This includes modern slavery and human trafficking, which are strictly prohibited.

Freedom of association and collective bargaining: This is the right of employees to form or join trade unions of their own choosing without prior authorisation, and to bargain collectively through their chosen representatives to negotiate terms and conditions of employment. This right is essential for ensuring fair labour practices and empowering employees to voice their interests.

Non-discrimination and harassment: Every individual has the right to be treated with dignity and respect, free from any form of discrimination based on protected characteristics such as race, gender, disability, religion, age, sexual orientation, ethnic origin, social origin, or political opinion. Harassment, including any unwelcomed behaviour that creates a hostile work environment is strictly prohibited.

4. Our commitment

We are committed to upholding human rights by ensuring dignity, fairness, and non-discrimination for all. We respect freedom of association and collective bargaining, prohibit all forms of modern slavery and child labour, ensure fair remuneration and benefits, regulate working hours and provide safe and healthy working conditions. We are dedicated to continually looking for ways to improve labour conditions across our operations and supply chain.

5. Core principles

5.1 Child labour and young workers

Adcorp strictly prohibits child labour in any form. We comply with ILO Conventions 138 and 182, the ETI Base Code, and applicable local legislation. The minimum age for employment

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within our operations is 15 years, or the higher age required by local legislation. We require the same standard of our suppliers.

No worker under the age of 18 may be employed at night or in hazardous conditions, or in work that harms their health, safety or development or interferes with their schooling or their ability to obtain an education. Working hours, rest periods and conditions must comply with the legislation governing young workers, and age must be verified before engagement. Where local legislation permits employment below the age of 15 in line with the exceptions in ILO Convention 138, a supplier may apply that lower age only where these protections are met in full.

Where child labour is identified in our operations or supply chain, we will act in the best interests of the child, including supporting their transition into education, and will not terminate the engagement without remediation.

5.2 Ethical recruitment

Adcorp is committed to transparent and ethical recruitment practices. We ensure that recruitment processes are fair, objective, and free from coercion or deception. Recruitment charges are not paid by job seekers.

5.3 Fair, equitable and responsible remuneration

We ensure that all employees receive fair and equitable remuneration that complies with all applicable laws and regulations, including local minimum wage laws and industry standards. Our wages and benefits packages are competitive and support employee wellbeing and financial security. We are committed to the principle of equal pay for work of equal value, regardless of gender, ethnicity or any other protected characteristic. Remuneration is reviewed regularly to ensure fairness and sustainability across our operations.

5.4 Freedom of association and collective bargaining

Adcorp respects employees' rights to freely associate, form and join trade unions of their choice, and bargain collectively to negotiate terms and conditions of employment. We recognise the importance of constructive dialogue between employees and management

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and are committed to engaging in good faith with employee representatives. We ensure that employees can exercise these rights without fear of discrimination, intimidation, or reprisal.

5.5 Health and safety

We are committed to providing a safe and healthy working environment in line with local and international standards. We comply with all applicable occupational health and safety laws and regulations. We implement measures to prevent workplace hazards, provide necessary safety equipment and training (including safety, health, environment and quality (SHEQ), first aid, SHEQ representative, firefighting, evacuation procedures and job specific SHEQ risk), and establish systems for reporting and addressing health and safety concerns. Regular risk assessments and promotion of sustainability practices are integral to our operations.

5.6 Land, forest, and water rights and forced evictions

Adcorp is committed to respecting the rights of individuals and communities related to land, forests, and water. We will not contribute to or be complicit in forced evictions or activities that negatively impact these rights.

5.7 Modern slavery and human trafficking

Adcorp strictly prohibits all forms of modern slavery, forced labour, and human trafficking. We are committed to ensuring that all employment is voluntary and that workers are free to leave their employment at any time. We do not retain workers' original identification documents. More information can be found in our Modern Slavery Statement.

5.8 Non-discrimination and harassment

Adcorp is committed to a workplace free from discrimination and harassment, promoting equality, and inclusion regardless of race, gender, disability, religion, age, sexual orientation, ethnic origin, social origin, political opinion or any other protected characteristic. We strive to create an environment where everyone feels valued, respected, and has equal opportunities.

5.9 Regular employment for contingent employees

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Adcorp recognises the valuable contributions of our contingent employees and is committed to providing them with opportunities for stable and ongoing employment. We continually look for opportunities to transition contingent employees to regular employment where feasible and aligned with business needs and individual career aspirations. To support the careers of our contingent employees, we have established a "Contractor for Life" programme. This initiative aims to provide contingent employees with access to career development resources, training opportunities, employee assistance programmes and pathways for potential conversion to regular employment, fostering long-term engagement and growth within Adcorp.

5.10 Use of private or public security forces

Adcorp is committed to ensuring the safety and security of our employees and operations while respecting human rights. When engaging private or public security forces, we will ensure they operate in accordance with international human rights standards and our own policies.

5.11 Women's rights, diversity, equity, inclusion and belonging, and rights of minorities and Indigenous Peoples

Adcorp is committed to promoting gender equality and empowering women in the workplace. We strive to create a diverse and inclusive environment where all individuals, including those from minority groups and Indigenous Peoples, are treated with dignity and respect and have equal opportunities. We recognise and respect the rights and cultural heritage of minorities and Indigenous People in the communities where we operate.

5.12 Working hours and rest period

Adcorp is committed to fair and transparent working hours that comply with all applicable laws and regulations. In South Africa, this includes the Basic Conditions of Employment Act (BCEA) and Labour Relations Act. In Australia, this includes the Fair Work Act and its associated National Employment Standards and relevant awards. The standard limit on overtime is 10 hours per week, consistent with the BCEA in South Africa. Overtime work is voluntary and not systemic or rostered. We support work-life balance ensure employees

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receive adequate rest periods as mandated by the respective labour laws in each jurisdiction.

5.13 No harsh or inhumane treatment

Adcorp prohibits physical abuse or discipline, the threat of physical abuse, sexual or other harassment, verbal abuse and any other form of intimidation, in our operations and across our supply chain. Disciplinary and grievance processes must be fair, documented, applied consistently and aligned with applicable labour legislation. Employees may raise concerns through the channels set out in section 7.3 without fear of retaliation.

6. Managing human rights risks and continuous improvement

Adcorp is committed to proactively identifying, assessing, and addressing potential human rights risks across our operations and supply chain. This includes, but is not limited to, risks related to labour practices, non-discrimination, freedom of association, and the prevention of child labour and modern slavery.

To effectively manage these risks, we will implement appropriate due diligence processes, which may include risk assessments, audits, and engagement with stakeholders. Where risks are identified, we will develop and implement effective measures to mitigate and remediate them. These measures will be proportionate to the severity and likelihood of the potential impact and will be regularly reviewed for their effectiveness.

We are dedicated to a culture of continuous improvement in our human rights practices. We will regularly review our policies, procedures, and performance against relevant international standards and best practices. We will invest in training and awareness programmes for our employees and relevant stakeholders to foster a culture of human rights awareness and responsibility.

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7. Governance and ethical business practices

7.1 Protection of personal information

We are committed to protecting employee and stakeholder privacy by handling personal data lawfully, transparently, and securely, in line with data protection laws. We prevent unauthorised access, misuse, or disclosure through regular reviews and safeguards.

7.2 Stakeholder engagement

We engage with our stakeholders, including but not limited to clients, suppliers, trade unions and communities, to promote respect for human rights and to understand their perspectives and concerns.

7.3 Reporting and monitoring

We encourage Individuals and stakeholders to report any potential human rights violations or concerns, and we take appropriate action to address those reports. We also monitor our operations to ensure that we are meeting our human rights commitments. We encourage all stakeholders to utilise the whistleblower hotline as listed below:

Independent, anonymous, Deloitte managed: whistleblowers hotline

Adcorp Group ethics line

Free call: 0800 22 32 11 (South Africa); 1 800 633 293 (Australia)

Website: https://tip-offs.com/

Email: advalue@tip-offs.com

To protect those speaking up, every report is treated confidentially and thoroughly investigated. For Guidance, please contact us on CorporateCitizenship@adcorpgroup.com

8. Conclusion and outlook

We believe that respect for human rights is not just a legal obligation, it is a moral imperative and a cornerstone of responsible business. Our commitment to upholding human rights extends across all levels of our organisation and throughout our value chain. Adcorp remains committed to continuously strengthening its human rights practices. We will enhance training, engage proactively with partners, and regularly review our processes

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to identify and address risks. By fostering transparency, collaboration, and accountability, we aim to promote dignity, fairness, and respect across all areas of our business.

9. Glossary of terms

Child: For the purposes of employment, any person under the age of 15, unless local legislation or the local compulsory school-leaving age specifies a higher age, in which case the higher age applies. Where local legislation permits a lower age in line with the exceptions provided for in ILO Convention No. 138, the conditions set out in section 5.1 apply. The United Nations Convention on the Rights of the Child defines a child as every person under the age of 18, and no person under the age of 18 may be employed at night or in hazardous conditions.

Child labour: Work performed by a child below the minimum age specified by national law or international conventions (e.g., ILO Convention No. 138 concerning minimum age for admission to employment). This includes the prohibition of hazardous work for children, and the worst forms of child labour as set out in ILO Convention No. 182. No person under the age of 18 may be employed at night or in hazardous conditions.

Collective bargaining: A process of negotiation between employers and a group of employees, usually represented by a trade union, aimed at reaching agreements to regulate working conditions, wages, benefits, and other aspects of the employment relationship.

Diversity: The presence of a wide range of human qualities and attributes within a group, organisation, or society, encompassing differences in characteristics such as race, gender, disability, religion, age, sexual orientation, ethnic origin, social origin, political opinion or any other protected characteristic.

Equity: The fair treatment, access, opportunity, and advancement for all people, while striving to identify and eliminate barriers that have prevented the full participation of some groups. Equity recognises that different individuals have different needs and may require different levels of support to achieve equal outcomes.

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Ethical recruitment: Recruitment processes that are fair, transparent, and free from coercion, deception, or the imposition of fees on job seekers. It ensures that candidates are treated with respect and provided with accurate information about the job and its terms and conditions.

ETI Base Code: The labour code of the Ethical Trading Initiative, made up of nine clauses drawn from the conventions of the International Labour Organisation and used internationally as the benchmark for labour practice in operations and supply chains. Annexure A sets out how this statement aligns to each clause.

Forced eviction: The removal of individuals, families, and/or communities against their will from the homes and/or land which they occupy, without the provision of, and access to, appropriate forms of legal or other protection.

Forced labour: All work or service extracted from any person under the menace of any penalty and for which the person has not offered himself or herself voluntarily (based on ILO Convention No. 29). This includes various forms of modern slavery and human trafficking.

Harassment: Any unwelcome conduct that is offensive, humiliating, or intimidating and creates a hostile work environment. This can include verbal, non-verbal, or physical behaviour and can take various forms, such as sexual harassment, bullying, and other offensive actions based on protected characteristics.

Human trafficking: The recruitment, transportation, transfer, harbouring, or receipt of persons, by means of threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices like slavery, servitude or the removal of organs. This is in support of the UN Palermo Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children.

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Inclusion: A culture where all individuals feel valued, respected, and supported, and are empowered to fully participate and bring their whole selves to work. An inclusive environment embraces diversity and ensures equitable access to opportunities and resources.

Indigenous peoples: Distinct social and cultural groups who share ancestral ties to the lands and natural resources where they live or from which they have been displaced. They often have their own unique languages, cultures, customs, and political structures.

Modern slavery: An umbrella term encompassing slavery, servitude, forced and compulsory labour, and human trafficking. It refers to situations where individuals are coerced to work through violence, intimidation, deception, or abuse of power and are treated as commodities.

Minorities: Groups within a population who are different from the majority in terms of race, ethnicity, religion, language, or other characteristics, and who may experience discrimination or marginalisation because of their difference.

Trade union: An organisation of workers who come together to achieve common goals such as protecting and improving their working conditions, wages, benefits, and other terms of employment through collective action and negotiation with employers.

Young workers: Workers who are above the applicable minimum age for employment but under the age of 18. Young workers may not be employed at night or in hazardous conditions, and their work must not harm their health, safety or development or interfere with their education. Their working hours, rest periods and conditions must comply with the applicable legislation for young workers.

10. Changes to the statement

Adcorp reserves the authority, at their discretion and in compliance with applicable laws, to modify the content of this document without prior notice.

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11. Document history

The following table lists the changes made to this document:

Version	Date	Author	Change
0	03 April 2023	Brandon Urdang	Original Document
1	5 May 2025	Brandon Urdang	Added specific human rights clauses and updates
1.1	18 September 2026	Brandon Urdang	Minimum age for employment updated to 15 years for Adcorp employees and the ETI Base Code incorporated.

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Annexure A: Alignment with the ETI Base Code

Adcorp applies the ETI Base Code across its operations and supply chain. The table below shows where each of the nine clauses is addressed in this statement.

ETI Base Code clause	**Where it is addressed in this statement**
1. Employment is freely chosen	5.7 Modern slavery and human trafficking; 5.2 Ethical recruitment
2. Freedom of association and the right to collective bargaining are respected	5.4 Freedom of association and collective bargaining
3. Working conditions are safe and hygienic	5.5 Health and safety
4. Child labour shall not be used	5.1 Child labour and young workers
5. Living wages are paid	5.3 Fair, equitable and responsible remuneration
6. Working hours are not excessive	5.12 Working hours and rest period
7. No discrimination is practised	5.8 Non-discrimination and harassment; 5.11 Women's rights, diversity, equity, inclusion and belonging, and rights of minorities and Indigenous Peoples
8. Regular employment is provided	5.9 Regular employment for contingent employees
9. No harsh or inhumane treatment is allowed	5.13 No harsh or inhumane treatment

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