HUMAN RIGHTS POLICY

Ethical Conduct, Dignity and Responsible Business Commitment

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4. POLICY STATEMENT

ROADRAK GROUP (PTY) LTD ("ROADRAK") is committed to respecting, promoting, and upholding fundamental human rights across all facets of our operations. We believe that business success is inseparable from the dignity and worth of the people who make it possible.

As a private South African entity, we align ourselves with the Bill of Rights as enshrined in the Constitution of the Republic of South Africa. We do not tolerate human rights abuses, modern slavery, child labour, or any form of degrading treatment. We seek to maintain fair, safe, and respectful working conditions and expect our suppliers and partners to mirror these values.

> "At ROADRAK, we view human rights not just as a legal obligation, but as a foundational pillar of our corporate culture and operational excellence."

5. PURPOSE

The purpose of this Policy is to:

- Establish a clear framework for the protection of human dignity and equality within the Group.
- Ensure compliance with South African labour laws and international best practices.
- Manage operational and reputational risks associated with human rights impacts.
- Embed a culture of respect that protects our workers, communities, and business partners.
- Provide a basis for stakeholder assurance and transparent governance.

6. SCOPE OF APPLICATION

This policy applies to all ROADRAK GROUP operations including ROADRAK CORPORATE HOLDINGS and its subsidiaries. It is binding upon:

- The Board of Directors and Executive Leadership.
- All permanent, temporary, and fixed-term employees.
- Site-based labour, interns, and trainees.
- Independent contractors, consultants, and subcontractors.
- Suppliers, service providers, and joint venture partners.

7. DEFINITIONS

Human Rights: Fundamental rights and freedoms to which all humans are entitled, including civil, political, economic, social, and cultural rights.

Dignity: The inherent right of every person to be valued and respected for their own sake, and to be treated ethically.

Modern Slavery: Includes forced labour, debt bondage, and human trafficking where individuals are coerced into providing labour or services.

Vulnerable Persons: Individuals who may be at higher risk of abuse or exploitation due to their socio-economic status, age, gender, or disability.

8. GUIDING PRINCIPLES

Our approach is guided by the following core tenets:

- **Zero Tolerance for Discrimination:** No unfair treatment based on race, gender, sex, pregnancy, marital status, ethnic or social origin, colour, sexual orientation, age, disability, religion, conscience, belief, culture, language, or birth.
- **Fair Labour Practices:** Adherence to the Basic Conditions of Employment Act and the Labour Relations Act.
- **Safe Environments:** Commitment to the Occupational Health and Safety Act to ensure a risk-free workspace.
- **Accountability:** Every level of management is responsible for upholding these rights.

9. HUMAN RIGHTS COMMITMENTS

9.1 Equality, Dignity and Respect

ROADRAK treats every individual with professional courtesy and respect. We foster an environment free from intimidation and hostility.

9.2 Prohibition of Forced and Child Labour

We strictly prohibit the use of forced, bonded, or compulsory labour. No person under the legal working age (as per South African law) shall be employed. We verify age and legal right to work during recruitment.

9.3 Health, Safety and Wellbeing

Health and safety are paramount, especially in construction and infrastructure project sites. We provide necessary PPE, training, and supervision to prevent accidents and health hazards.

9.4 Privacy and POPIA

We respect the privacy of our employees and stakeholders, ensuring personal data is handled in accordance with the Protection of Personal Information Act (POPIA).

11. COMMITMENTS ON PROJECT SITES

Given our operations in construction and infrastructure delivery, we specifically commit to:

- Ensuring subcontractors provide humane treatment and lawful wages to their labour force.
- Maintaining control over site discipline to ensure no corporal punishment or abusive language is used.
- Providing access to clean drinking water, adequate sanitation, and shaded rest areas for site workers.
- Ensuring security personnel on site act with restraint and respect for human rights.

12. SUPPLIER AND SUBCONTRACTOR EXPECTATIONS

ROADRAK expects its supply chain to adhere to the same high standards. Suppliers must:

- Comply with all local labour and safety laws.
- Disclose any risks of human rights violations within their own supply chains.
- Cooperate with ROADRAK's due diligence requests.

Non-compliance may lead to the termination of the business relationship.

14. REPORTING, GRIEVANCES AND WHISTLEBLOWING

Any person who suspects a breach of this policy should report it via the following channels:

- Immediate Supervisor or Manager.
- The Human Resources Department.
- Email: report@roadrak.co.za (Monitored for confidential reports).

We guarantee that no person will suffer retaliation for raising a genuine concern in good faith.

20. APPROVAL SECTION

The Board of Directors and Executive Management of ROADRAK GROUP (PTY) LTD hereby approve this Human Rights Policy.

Approved By (Name)	
Position	Executive Management / Board Member
Signature	
Date	16 March 2026

Human Rights Commitment Summary

ROADRAK GROUP (PTY) LTD

ROADRAK GROUP is committed to the highest standards of ethical business conduct. Our Human Rights Policy underpins our promise to provide a workplace and project sites where dignity, equality, and safety are guaranteed. We pledge to:

- **Uphold the Constitution:** Support the SA Bill of Rights and King IV principles.
- **Fair Labour:** No forced labour, child labour, or modern slavery.
- **Equal Opportunity:** Zero tolerance for discrimination and harassment.
- **Safety First:** Prioritise the health and wellbeing of our workforce.
- **Ethical Sourcing:** Influence our supply chain toward responsible human rights practices.

"Excellence in infrastructure, anchored in human dignity."

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22. NOTES