

VGR-MAN-GDE-0023	Declaration on Human Rights at Work Guide			Ver.2
<b>Applicable areas Vodacom Group</b>				
<b>Approval</b>	<b>Name</b>	<b>Job Title/ Role</b>	<b>Signature</b>	<b>Date</b>
Owner	Mpho Nkeli	Chief Human Resource Officer	<i>Mpho Nkeli</i>	2012-08-06
Approved by	Thomas Beale	Chief Ethics and Compliance Officer	<i>Thomas Beale</i>	2012-10-15
Approved by	Claire Lapham	Managing Executive:Legal	<i>Claire Lapham</i>	2012-08-01

## 1. PURPOSE

To guarantee that Vodacom Group Limited (“**the Group**”) exhibits its commitment to internationally acceptable human rights standards in its employment practices at all of its operations across the globe. Ethical best practice and internationally accepted human rights principles are to be adhered to as a minimum at all times, subject only to national laws. The Group’s management of human rights issues is based on the totality of our efforts and not on a single activity as the Group is committed to the highest standards of business integrity, ethical values and professionalism in all its activities.

## 2. SCOPE, RESPONSIBILITY AND ENFORCEMENT

This policy will apply to employees at every level of the Group. The Group’s Chief Officer: Human Resources and Chief Ethics and Compliance Officer will be accountable for adherence to the policy. The Group’s Chief Corporate Communications Officer will be responsible for dissemination of the policy. Failure to comply with the guiding principles outlined herein could result in disciplinary action being instituted. We have a procedure for protected disclosures should an employee suspect non-adherence to any of our business principles.

## 3. GUIDING PRINCIPLES

In order to protect the inherent dignity of its employees, the Group subscribes to guiding principles. These guiding principles will foster greater awareness of human rights issues throughout the group. This will heighten our abilities to identify and manage human rights issues in our business.

## 4. HUMAN DIGNITY & EQUALITY

We will commit to protecting employees’ right to have their dignity respected. Working conditions and practices will not infringe on the inherent dignity of employees. We condemn harassment in any form, without distinction of any kind. We will prevent manifestations of unacceptable forms of

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harassment whether expressed verbally, in gesture, or behaviour. We value freedom and security of the person. We do not encourage, tolerate or support inhuman or degrading treatment or punishment, coercion and abuse. We will recognise the imperatives for change and transformation in some of the countries in which we operate.

## 5. **NON-DISCRIMINATION**

We condemn unfair discrimination in employment on the basis of race, gender, sex, pregnancy, marital status, ethnic or social origin, colour, sexual orientation, age, disability, religion, conscience, belief, culture, language, national extraction, social origin and political opinion. We will develop and provide training on procedures to ensure best recruitment practices to guarantee adherence to this policy. Employees will be coached, trained and educated which will enable them to perform in line with our standards, values and principles.

## 6. **FREEDOM OF ASSOCIATION**

Employees and employers are free to form and join associations for protection of their interests and to bargain collectively – they will not be compelled. We will engage with such collective bargaining forums within the framework of national laws.

## 7. **FAIR LABOUR PRACTICES**

We will not subject our employees to forced labour. We adhere to internationally recognized practices and principles regarding the employment of young persons imposed by local legislation. No children under the age of 16 will be employed. Employees will have reasonable freedom of movement. Termination of an employees' services will conform with requirements of lawfulness and fairness, and subject to the prescripts of local legislation.

## 8. **UNDERLYING POLICIES**

This policy reinforces our existing policies, processes and activities that support our human rights values and commitments, which include specific policies on labour relations, corporate governance, ethical conduct, social responsibility, stakeholder involvement and security.



RELEVANT POLICY, LEGISLATION OR CODE		RESPONSIBLE CHIEF OFFICERS
Document Number	Description	
<a href="#">VGR-MAN-POL-0085</a>	<a href="#">Vodacom Whistle Blowers Protection Policy</a>	<a href="#">Chief Risk Officer</a>
<a href="#">VGR-MAI-POL-0002</a>	<a href="#">Physical Security Policy</a>	<a href="#">Chief Risk Officer</a>
<a href="#">VGR-GOV-POL-0006</a>	<a href="#">Vodacom Code of Conduct</a>	<a href="#">Chief Ethics and Compliance Officer</a>
<a href="#">VSA-PRC-MAN-0001</a>	<a href="#">Procurement Business Policy and Processes</a>	<a href="#">Chief Financial Officer</a>
<a href="#">VGR-GOV-POL-0007</a>	<a href="#">Conflicts of Interest Policy Vodacom Group</a>	<a href="#">Chief Ethics and Compliance Officer</a>
<a href="#">VGR-GOV-POL-0005</a>	<a href="#">Vodacom Group Policy, Standard and Procedure Relating to the Giving and Receiving of Gifts and Hospitality</a>	<a href="#">Chief Ethics and Compliance Officer</a>
<a href="#">VGR-MAN-POL-0066</a>	<a href="#">Occupational Health and Safety Policy</a>	<a href="#">Chief Human Resources Officer</a>
<a href="#">VGR-MAN-POL-0031</a>	<a href="#">Corporate Environmental Policy</a>	<a href="#">Chief Human Resources Officer</a> <a href="#">Chief Executive Officer</a>
<a href="#">VGR-LEA-POL-0006</a>	<a href="#">Charter for the Vodacom Foundation Board of Trustees</a>	<a href="#">Chief Human Resources Officer</a> <a href="#">Chief Operating Officer</a>
<a href="#">VSA-ITB-POL-0002</a>	<a href="#">Vodacom Group: Information Technology Security Policy</a>	<a href="#">Chief IT Officer</a>
<a href="#">VGR-HUM-POL-0039</a>	<a href="#">Sexual Harassment Policy</a>	<a href="#">Chief Officer: Legal and Regulatory Affairs</a>
<a href="#">VGR-HUM-POL-0042</a>	<a href="#">Employment Equity Policy</a>	<a href="#">Chief Human Resources Officer</a>
<a href="#">VGR-MAN-POL-0093</a>	<a href="#">Vodacom Group Information Classification Policy</a>	<a href="#">Chief Risk Officer</a>
<a href="#">VGR-MAN-PPR-0006</a>	<a href="#">Corporate Communications Policy</a>	<a href="#">Chief Officer: Corporate Affairs</a>
<a href="#">VOD-IMP-PPR-0009</a>	<a href="#">Intellectual Property Rights Strategy, Policies and Procedures</a>	<a href="#">Chief Officer: Legal and Regulatory Affairs</a>
<a href="#">VGR-HUM-PPR-0015</a>	<a href="#">Disciplinary Policy and Procedure</a>	<a href="#">Chief Officer: Legal and Regulatory Affairs</a>
<a href="#">VGR-HUM-PPR-0016</a>	<a href="#">Grievance Policy and Procedure</a>	<a href="#">Chief Human Resources Officer</a>
<a href="#">VGR-MAN-POL-0086</a>	<a href="#">Policy to Govern Relationship between Vodacom and Employees who are union members</a>	<a href="#">Chief Officer: Legal and Regulatory Affairs</a>
<a href="#">VSA-GOV-POL-0001</a>	<a href="#">VSA CMT Policy and Procedure,</a>	<a href="#">Chief Risk Officer</a>
UNU Declaration	The United Nations Universal Declaration of Human Rights	Chief Officer: Legal and Regulatory Affairs / Legal Affairs: Employment Law
	International Labour Organisation (ILO) Conventions: <ul style="list-style-type: none"> <li>• Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87)</li> <li>• Right to Organise and Collective Bargaining Convention, 1949 (No. 98)</li> <li>• Forced Labour Convention, 1930 (No.29) and the Abolition of Forced Labour Convention, 1957 (No. 105)</li> <li>• Minimum Age Convention, 1973, (No.138) and</li> </ul>	Chief Officer: Legal and Regulatory Affairs / Legal Affairs: Employment Law

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	<ul style="list-style-type: none"> <li>• Worst Form of Child Labour Convention, 1999 (No. 182)</li> <li>• Equal Remuneration Convention, 1951 (No. 100)</li> <li>• Discrimination (Employment and Occupation) Convention, 1950 (No. 111)</li> </ul>	
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Version History		
Date	Rev	Description of Revision
2 Aug 2012	1	New
15 Oct 2012	2	These two links removed –instruction from Chief Compliance Officer Thomas Beale. Content included in the Vodafone Code of Conduct. VGR-GOV-POL-003 Anti Corruption Policy – Vodacom VGR-GOV-POL-004 <a href="#">Anti Corruption Policy – Vodacom Group</a> , <a href="#">Anti-Money Laundering Policy – Vodacom Group</a>