

Naspers Anti-Harassment Policy

(including sexual harassment and bullying)

Naspers Group Employees

Approved by the board on 30 November 2018



NASPERS

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INTRODUCTION

“We strive to have a workplace where teamwork and mutual trust are promoted and where employees are treated with dignity and respect.”¹¹

Workplace harassment can have a serious and damaging impact on those who experience it. This policy sets out our zero-tolerance approach to any form of workplace harassment (including sexual harassment and bullying) (“Harassment”). It also provides details on what to do if you have concerns that you have been subjected to this kind of behaviour in the workplace or a work-related situation. This policy applies to everyone who works at the Naspers Group level. (Subsidiaries are required to adopt equivalent policies.)

CORE COMMITMENTS

- We are committed to providing a respectful, safe and secure environment that is free from all forms of Harassment, and we expect everyone to behave and act in a way that is consistent with this commitment.
- We have zero-tolerance for any kind of Harassment, and we will treat all allegations and complaints seriously.
- We make sure that any complaint raised will be investigated carefully, and with appropriate confidentiality. Any person who has experienced Harassment will be supported.
- Any person found to be guilty of Harassment will face appropriate disciplinary action, up to and including dismissal.
- In case of a criminal offence, we encourage the victim immediately to report the incident to local authorities or to the police.

POLICY SCOPE

- This policy applies to all people who work in Naspers Group roles including temporary and permanent employees, contractors, consultants, trainees and / or job applicants. (Where an individual is legally employed by an operating company, this policy applies alongside any similar local policies that may be in place.)
- This policy applies in all work locations and in all situations directly related to work. These include all premises Naspers and those of subsidiary companies, company-sponsored events (including sponsored social events), business trips, training sessions and conferences or other events sponsored by Naspers or attended by Naspers employees.

1 1 Naspers Code of Business Ethics and Conduct

WE DO THE RIGHT THING

We apply the following fundamental principles:

- We do not tolerate Harassment or any mistreatment in the workplace or situations directly related to work. This includes Harassment related to
- gender, gender identity, gender expression, transgender status, sexual stereotypes, sexual orientation, class, race, religion, creed, colour, marital or family status, age, nationality, political association or disability.
- We treat others with the respect that we ourselves would like to receive.
- We are not afraid to speak out: if we see or experience conduct that is Harassment then we are encouraged to report this in the appropriate way.

WHAT IS HARASSMENT?

- Harassment is any conduct (whether direct or indirect, whether verbal, physical or otherwise) which has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual. (Accordingly, conduct may violate this policy even if it is not illegal under the law that applies.)
- For example, Harassment may include the following types of conduct. This list of examples is not exhaustive, and other behaviours may constitute Harassment under this policy:
 - ridiculing, derogatory or demeaning teasing, jokes, pranks or comments;
 - inappropriate non-verbal behaviour such as staring, leering, or gestures;
 - intentionally and inappropriately excluding someone from normal workplace interactions;
 - displaying or sharing offensive images;
 - offensive comments about appearance, or other personal or physical characteristics, such as sexually charged comments or comments on someone's physical disability.
- Harassment includes Sexual Harassment which is Harassment based on sex. This includes any form of inappropriate and unwelcome conduct of a sexual nature that violates a person's psychological or physical dignity. Examples of behaviour that constitute sexual harassment include, but are not limited to:
 - displaying or sharing offensive sexual images;
 - inappropriate sexual advances or sexual advances in circumstances where it has been made clear that such advances are not welcome or are not reciprocated;
 - unnecessary or unwelcome physical contact such as groping or massaging, blocking normal movement, or physically interfering with the work of another individual; and
 - threats or demands that a person submit to sexual requests as a condition of continued employment and offers of employment-related benefits in return for sexual favours.
- Harassment also includes bullying, abusive conduct or other intimidating or aggressive behavior which undermines an individual's right to dignity at work.
- Harassment does not include:
 - day to day pleasantries or cross-cultural misunderstandings except where such behaviour is repeated after it has been highlighted as inappropriate; and
 - a negative performance review or discussions about poor performance. (We recognise that we need to be able to have direct and robust discussions about performance as long as they are respectful.)

MAKING AN INTERNAL COMPLAINT

- If you believe you have experienced any kind of Harassment, you may, at any time, talk to your supervisor, manager or Human Resources partner to seek initial advice, information or guidance.
- If you want to make a formal complaint, you can make this to your supervisor, manager or human resources partner.
- Supervisors, managers and members of the human resources team will act expeditiously and fairly in response to all allegations of Harassment.
- When possible, a complaint should include details of the incident or incidents, names of individuals involved, and names of any witnesses.

PRINCIPLES FOR INTERNAL COMPLAINTS

- All formal complaints will be fully investigated, carefully, discretely and promptly.
- All complaints will be kept strictly confidential to the extent that we are able to do so while still fulfilling our commitment to investigate and to end any Harassment.
- Regardless the outcome of an investigation, any individual who has made a complaint in good faith will be protected from any form of retaliation for making such complaint.
- We will not dismiss or downplay a complaint that has been made in good faith.
- Allegations of Harassment are extremely serious. This means that we will take appropriate disciplinary action, up to and including dismissal, against anyone who makes a complaint other than in good faith.
- If we determine that a person's conduct has violated this policy, we will take steps to ensure the conduct is addressed, and any person found to have engaged in Harassment may be subject to disciplinary action, up to and including dismissal.
- When we determine whether conduct has violated this policy, we will consider whether a reasonable person would conclude that the conduct created an intimidating, hostile, degrading, humiliating or offensive environment.

MAKING AN EXTERNAL COMPLAINT

- Anyone who believes that they have experienced Harassment, and who does not feel comfortable making an internal complaint, may use the independent Naspers external whistleblower facility "OpenLine" (operated by Deloitte's "Tip-offs Anonymous", contact details below).
- Once you have contacted OpenLine, Deloitte will provide the information you have shared to a designated Senior Executive at Naspers for further action and investigation. The information that you provide is reviewed and anonymised by Deloitte prior to being sent to Naspers. This means that any detail that could reveal your identity is removed (unless you specifically authorise Deloitte to reveal your identity in the report that is forwarded). Further information on how OpenLine works can be found here:

<https://www.openline.naspers.com/HowItWorks>

Contact details to OpenLine, the Naspers Whistleblower facility is:

Website: www.openline.naspers.com

Email: Openline@tip-offs.com

Tel: +27 31 571 5695 (*calls charged at international rates*)