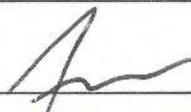
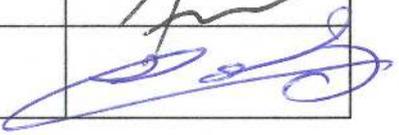




HUMAN RIGHTS POLICY

Corporate Services

Approvals

Name	Position	Signature
Stuart Ausmeier	Group Finance Executive	
Andrew Naude	Chief Financial Officer	
Wray Carvelas	Chief Executive Officer	

Document Control			
Document Number:	DRA-00-CS-POL-008	Issue Date:	15 February 2018
Document Name:	Human Rights Policy	Revision:	1
Author	Leanne Kirsten	Status	Issued

REVISION RECORD

Page	Revision	Description	Date
All	0	Issued for Approval and Distribution	07 April 2017
	1	Recirculated for Approval and Distribution	15 February 2018

REFERENCES AND EXAMPLE DOCUMENTS

Document Number	Document Description
DRA-00-CS-POL-002	DRA Code of Conduct
DRA-00-CS-POL-009	DRA Code of Ethics
-	DRA Values Statement

ABBREVIATIONS, TERMS AND DEFINITIONS

Abbreviations/Terms	Definition
DRA	DRA Group Holdings Proprietary Limited and all its subsidiaries.

APPLICABLE LEGISLATION AND BEST PRACTICE STANDARDS

Act No. / Document or Date Ref	Legislation/Standard Description
11 October 1996	The Constitution of the Republic of South Africa, 1996
10 December 1948	Universal Declaration of Human Rights
1998	ILO Declaration on Fundamental Principles and Rights at Work
-	UN Global Compact
2011	United Nations Guiding Principles on Business and Human Rights

TABLE OF CONTENTS

1	REASON FOR A HUMAN RIGHTS POLICY	4
2	RESPECT FOR HUMAN RIGHTS	4
3	OUR GOALS	4
4	IMPLEMENTATION OF THE POLICY	4
5	COMMUNITY AND STAKEHOLDER ENGAGEMENT	4
6	FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING	5
7	HEALTH AND SAFETY IN THE WORKPLACE	5
8	WORKPLACE SECURITY	5
9	WE VALUE DIVERSITY	5
10	FORCED LABOUR, CHILD LABOUR AND HUMAN TRAFFICKING	5
11	WORK HOURS, WAGES AND BENEFITS	5
12	RAISING CONCERNS AND SEEKING GUIDANCE	6

1 REASON FOR A HUMAN RIGHTS POLICY

Respect for human rights is fundamental to the sustainability of DRA and the communities within which we operate. In accordance with the DRA Code of Conduct and our DRA Values, we are committed to ensuring that people are treated with dignity and respect.

This policy is guided by international human rights principles encompassed in the Constitution of the Republic of South Africa, the Universal Declaration of Human Rights, the International Labor Organization's Declaration on Fundamental Principles and Rights at Work, the United Nations Global Compact and the United Nations Guiding Principles on Business and Human Rights.

This policy applies to DRA, its subsidiaries, affiliates and all global operations and facilities managed by DRA. DRA is committed to working with and encouraging third parties with which it works to uphold the principles in this policy and to adopt similar policies within their businesses. DRA will endeavour to ensure that such third parties are aligned with the expectations and commitments contained in this policy.

2 RESPECT FOR HUMAN RIGHTS

DRA respects human rights. We are committed to identify, prevent and mitigate adverse human rights impacts resulting from or caused by our business activities before or if they occur through human rights diligence and mitigation processes.

3 OUR GOALS

It is DRA's goal to embed human rights in all aspects of our business. All of our employees, and the communities within which we work, around the world deserve to be treated with integrity and respect, and we all have a responsibility, both individually and collectively, to bring this policy and our commitments to life.

As a globally operating company, we understand that a diverse and inclusive workplace is critical to our success. We want to foster an inclusive culture in which every employee, person, client, customer and any other stakeholder is treated with respect.

4 IMPLEMENTATION OF THE POLICY

As a global company, we may from time-to-time be faced with situations where local laws conflict with international human rights standards. Should such circumstances arise, DRA will comply with all applicable laws while seeking solutions that are in the spirit of respect for human rights and this policy.

5 COMMUNITY AND STAKEHOLDER ENGAGEMENT

DRA recognises its impact on the communities within which it operates. We commit to engage with all stakeholders in these communities to ensure that we are listening to, learning from and taking into account the views of the community as we conduct our business.

Where appropriate, we are committed to engaging in open dialogue with all relevant stakeholders on human rights issues related to our business. We are of the opinion that local issues are most appropriately addressed at the local level.

We commit ourselves to creating economic opportunity and fostering goodwill in the communities within which we operate, through locally relevant initiatives.

6 FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

Where appropriate, DRA respects our employee's rights to join, form or not to join a labour union without fear of reprisal, intimidation or harassment. Where employees are represented by a legally recognised union, we commit ourselves to establishing a constructive dialogue with their freely chosen representatives. DRA commits itself to bargain in good faith with such representatives.

7 HEALTH AND SAFETY IN THE WORKPLACE

DRA provides a safe and healthy workplace and complies with all applicable health, safety and environmental legislation, laws, regulations and internal requirements. We dedicate ourselves to maintaining a productive workplace by minimising the risk of accidents, injury and exposure to health risks. We strive for zero-harm, one hundred percent of the time. We commit ourselves to engaging with our employees to continually improve health and safety in the workplace, including the identification of hazards and where appropriate, to redress any health and safety issues.

8 WORKPLACE SECURITY

DRA commits itself to maintaining a workplace that is free from violence, harassment, intimidation and any other unsafe or disruptive conditions and/or practices due to both internal and external threats. Security safeguards are provided for employees, as needed, and are maintained with respect for employee privacy and dignity.

9 WE VALUE DIVERSITY

DRA values the diversity of the people with whom we work and the contributions they make. We commit ourselves to equal opportunities and zero-tolerance to discrimination and harassment. We dedicate ourselves to workplaces that are free from discrimination or harassment on the basis of race, sex, religion, age, disability, sexual orientation, political opinion, marital status, pregnancy, ethnic or social origin, conscience, belief, culture, language and birth. The basis on which we recruit, hire, place, train, compensate or advance is qualifications, performance and experience.

Regardless of personal characteristics or status, DRA does not tolerate disrespectful or inappropriate behaviour, unfair treatment or retaliation of any kind. Harassment is unacceptable in the workplace and in any work-related circumstance outside the workplace. These principles apply not only to DRA, but also to any third party with which we engage or with whom we work.

10 FORCED LABOUR, CHILD LABOUR AND HUMAN TRAFFICKING

DRA prohibits the use of all forms of forced labour, including prison labour, indentured labour, bonded labour, military labour and slave labour.

DRA prohibits any form of human trafficking. DRA will not tolerate or condone human trafficking or slavery in any part of our business.

DRA shall comply with all relevant legislation, laws and regulations appropriate to our business operations and the jurisdictions in which we work regarding the minimum age for employment.

11 WORK HOURS, WAGES AND BENEFITS

DRA compensates its employees competitively, in relation to the industries within which it does business and in accordance with the requirements of local labour markets. We operate in full compliance with all legislation, laws and regulations relating to working hours, wages, overtime and benefits.

12 RAISING CONCERNS AND SEEKING GUIDANCE

DRA has created a workplace in which open and honest communication is encouraged, valued and respected. DRA commits itself to following all applicable labour and employment laws wherever we operate.

If any employee and/or person becomes aware of a circumstance or action that violates or appears to violate the provisions of this policy, they are encouraged to contact their supervisor/manager. In the event that this does not resolve the issue, they can report such circumstance or action to the Manager, Compliance. Should an employee and/or person not feel comfortable reporting this to a person within the DRA group, they can contact the tip-offs anonymous line, the details of which are contained in the Whistle-Blowing Policy.

The tip-offs anonymous line is an independent and confidential system for reporting allegations of unethical behaviour, illegal actions or actions that violate the DRA Code of Conduct.

DRA is committed to ensuring that no employee suffers any occupational detriment as a result of reporting a genuine concern in good faith.