



The Bidvest Group Limited

Harassment Policy

This Policy is issued under the Employment Equity Act 55 of 1998 (“EEA”) – Code of Good Practice on the Prevention and Elimination of Harassment in the Workplace (“Code”)

The Bidvest Group Limited and its subsidiaries (“Bidvest” or “Group” or “Company”) are committed to fostering workplaces and environments where all individuals are treated with dignity and respect, and where harassment, bullying, and victimisation are not tolerated. Such conduct constitutes unfair discrimination and creates barriers to equality in the workplace.

In accordance with this commitment, this Policy sets out the minimum Bidvest Group standards and guidelines for identifying, preventing, reporting, and addressing workplace harassment, and must be complied with by all Group employees and third-party stakeholders.

1. Purpose

The purpose of this Policy is to:

- 1.1. outline the Bidvest zero tolerance stance on harassment (as set out in the Code) to ensure common understanding throughout the Group about behaviour of this nature which must be complied with by all employees and stakeholders, without exception.
- 1.2. set out the procedures to be adhered to ensure that incidents of harassment are reported and dealt with expeditiously and confidentially.

2. Legal Framework

This Policy is guided by the following legal precepts and laws:

- 2.1. The International Labour Organisation (ILO) Conventions 190 and Recommendation 206 concerning the elimination of Violence and Harassment in the World of Work, 2019.
- 2.2. Section 23 (1) of the Constitution which provides that everyone has the right to fair labour practices. This has been interpreted to include the right of Employees to be protected from harassment at work by persons who are not co-Employees such as independent contractors, customers, or visitors to the employers’ premises.
- 2.3. Promotion of Equality and Prevention of Unfair Discrimination Act, 4 of 2000 (PEPUDA).
- 2.4. The Labour Relations Act, 66 of 1995
- 2.5. The Occupational Health and Safety Act 85 of 1993
- 2.6. Protected Disclosures Act 26 of 2000
- 2.7. Protection from Harassment Act 17 of 2011

- 2.8. The Employment Equity Act 55 of 1998 (“**EEA**”) and The Code of Good Practice on the Prevention and Elimination of Harassment in the Workplace (“**Code**”).

The Code serves as a guiding framework for identifying, preventing, managing, and resolving all forms of workplace harassment and Group Companies align to the Code in the implementation of the related measures and procedures.

See: [South African Code of Good Practice on the Prevention and Elimination of Harassment in the Workplace](#)

3. **Definition of Harassment**

A wide range of behaviours in the work environment may constitute harassment.

Harassment includes

- 3.1. any unwanted conduct (whether physical, verbal, visual, or digital) which impairs dignity;
- 3.2. which creates a hostile or intimidating work environment for one or more persons or is calculated to, or has the effect of, inducing submission by actual or threatened adverse consequences; and
- 3.3. is related to one or more grounds in respect of which discrimination is prohibited in terms of section 6(1) of the **EEA** (“Protected grounds”).

4. **Application**

This Policy applies to all Group companies, its directors and employees (full time or part time or casual staff, contractor(s), student or volunteer(s) (“**employee(s)**”) and where applicable, the perpetrators and victims of harassment, who may include, the aforesaid but are not limited to also include: owners of entities who provide services and goods to Bidvest companies, managers; supervisors; part-time, fixed term or casual employees personnel, job seekers and applicants; person in training including interns, apprentices and persons on learnerships; volunteers; clients and customers; suppliers; contractors; and others having dealings with a Bidvest business (“**stakeholder(s)**”).

The protection of employees and stakeholders against harassment applies in any situation or context in which the employee or stakeholder is working, or which arises from their employment, notwithstanding that it could be through a 3rd party or stakeholder outside of the Group. This includes situations where employees are working, but is not limited to: The workplace (public and private spaces, where work is performed; work related trips, travel, training or social events; work related communications, including those enabled by information and communication technology and internet-based platforms.

Harassment should be reported through the **Reporting Procedures** (below) in a sensitive, confidential and efficient manner.

5. **The Bidvest Approach to Harassment**

Bidvest is a responsible employer and will seek to resolve incidents of harassment, bullying and victimisation in a sensitive, effective and confidential manner.

When an incident of such a nature has been brought to the attention of the Company, the Company should investigate the complaint, consult with all the relevant parties, take steps to

address the complaint in terms of this policy and the applicable laws and take all necessary steps to eliminate the behaviour.

All care should be taken not to disadvantage or victimise the person who lodges the complaint in good faith whether in respect of themselves or another employee or stakeholder.

It is considered a disciplinary offence to victimise or retaliate against an employee who in good faith makes a complaint or harassment, bullying or victimisation.

Depending on the circumstances and gravity of the incident, an employee accused of such behaviour may be required to attend a disciplinary hearing in terms of the particular Bidvest Company's internal disciplinary policy/ies and procedures.

Sanction for disciplinary actions should be proportionate to the gravity of the behaviour and may include warnings or dismissal.

Bad faith or malicious reporting may lead to disciplinary action. This however does not include reporting that is made in good faith and subsequently is not supported by evidence.

Consideration of employee assistance programmes and interventions may be required and provided by the Company in certain circumstances.

6. Roles and Responsibilities

- 6.1. **Group Companies** must ensure implementation of this policy in their company internal procedures and processes.
- 6.2. **Management** must lead by example, address incidents promptly, and ensure fair processes.
- 6.3. **Employees** and **Stakeholders** must refrain from harassment and report concerns promptly and in good faith.

7. Reporting Procedures

Any allegation of harassment or unwanted conduct must be reported without delay.

The report can be made through one of the following reporting procedures:

- Through the Bidvest Company internal grievance procedures
- Contacting the direct line Manager or Human Resources Executives/Manager
- The Bidvest Ethics Tip-offs facility – contact details on the Bidvest website

<https://bidvest.co.za/group-governance>

All reports will be treated **confidentially** and investigated without bias.