

Workplace Harassment Policy	
Type of Policy:	Sanlam Group
Scope of Policy:	Group
Governance Area Addressed:	People Management
Approving Authority:	Sanlam Group Executive Committee
Group Exco Sponsor:	Group HR Director
Policy Owner	Group Transformation, ER and Compliance
Other Related Policies	Code of Ethics and Conduct Diversity, Equity & Inclusion Framework Group Employee Relations Policy
Frequency of review or update:	Biennial
Date of next review	05/2024
Version number:	01/2022
Policy Effective Date	1 June 2022

Workplace Harassment Policy

1. Strategic context

Sanlam's vision is to distinguish itself as the most admired financial services player in Africa, with a focused purpose on empowering generations to be financially confident, secure and to prosper. Sanlam acknowledges that everyone deserves an equal chance to live a better life, and to have confidence in their financial future.

Sanlam strives to attract the best people with diverse backgrounds, empower them to learn, lead and live our shared purpose in a workplace that values and embraces diversity, which will be achieved through an inclusive organisational culture where everyone belongs.

Sanlam understands that harassment in the workplace, however it manifests, is a form of unfair discrimination and can limit or counter the goal of building inclusive workplaces where everyone is valued and can belong. As such, harassment in the workplace will not be tolerated and should be prevented or rooted out. To this end, Sanlam adopts this policy.

2. Scope

This policy applies to all Sanlam Group companies in all the jurisdictions or countries in which the Group operates. The policy applies specifically to the following categories:

- all employees of the Sanlam Group;
- Job applicants and interns;
- Volunteers;
- Clients;
- Independent contractors;
- Suppliers / business partners and/or their employees; and
- Other stakeholders who deal with Sanlam.

Where necessary and appropriate, different companies in the Group may develop their own procedures to give effect to this policy.

3. Legal Framework

This policy is influenced by a number of legal instruments, including:

3.1 International standards, particularly the *ILO Convention 190 on Elimination and Prevention of Violence and Harassment in the World of Work*, 2019; and

3.2 National laws of each country in which the Group operates, including:

3.2.1 In South Africa:

- The Constitution of the Republic South Africa, 1996
- Employment Equity Act, 1998
- Code of Good Practice on the Prevention and Elimination of Harassment in the Workplace, 2022
- Promotion of Equality and Prevention of Unfair Discrimination Act, 2000

- Labour Relations Act, 1995
- Occupational Health and Safety Act, 1993
- Protected Disclosures Act, 2000
- Protection from Harassment Act, 2011

3.2.2 In other countries:

- Similar legislation and regulations that deal with prevention and elimination of harassment in the workplace.

4 Definitions

Harassment – unwanted conduct related to a prohibited ground which impairs dignity and creates a hostile or intimidating work environment for one or more employees or is calculated to or has the effect of inducing submission by actual or threatened adverse consequences.

Prohibited grounds – grounds based on which discrimination is considered unfair, including race, gender, sex, pregnancy, marital status, family responsibility, ethnic or social origin, colour, sexual orientation, age, disability, religion, conscience, belief, political opinion, culture, language, birth or any other arbitrary ground.

Workplace – place where services for Sanlam are rendered, including Sanlam offices; designated workspaces in the case of remote work or ‘work from home’ arrangements; work-related functions, conferences and accommodation; and work-arranged transport to and from work.

5 Principles and Policy statements

- 5.1 Sanlam has a zero-tolerance stance towards any form of harassment in the workplace, whether committed by or against employees. Consequences for violations may include termination of services, contracts or relationships, depending on whether the perpetrator is an employee or a non-employee.
- 5.2 Workplace harassment based on a prohibited ground is regarded as a form of unfair discrimination, which not only undermines an employee’s rights to fair treatment but also subverts the company’s efforts at building an inclusive culture.
- 5.3 Sanlam encourages everyone to promptly report incidents of harassment and undertakes to have them investigated expeditiously and confidentially as far as possible. Procedures to report harassment will recognise the nature and circumstances harassment complaints, which often have an imbalance of power in the relationships.
- 5.4 Retaliation against a complainant will not be tolerated where a complaint of harassment has been made in good faith. Sanlam will take appropriate action against anyone who subjects a complainant in good faith to retaliatory conduct.
- 5.5 Sanlam will offer the necessary assistance and support to any complainant of harassment, including cooperation in any process or proceeding to protect or enforce the complainant’s rights.

6 Types of Harassment

There are various types of harassment in the workplace, which can also manifest in different forms. While this policy only highlights the main types or forms of harassment, all harassment is unacceptable and can be addressed through this policy.

6.1 Sexual harassment

6.1.1 Sexual Harassment is a form of unfair discrimination, which is prohibited on the grounds of sex, gender, or sexual orientation (inclusive of same-sex harassment).

6.1.2 For conduct to be seen as sexual harassment, it must be unwanted, of a sexual nature, be offensive to the complainant, and constitutes a barrier to equality in the workplace.

6.1.3 The test for sexual harassment considers the following factors:

- whether the harassment is linked to the prohibited grounds of sex, gender or sexual orientation;
- whether the sexual conduct was unwanted or unacceptable;
- the nature and extent of the sexual conduct; and
- the impact of the sexual conduct on the complainant.

6.1.4 The perpetrator must also have known or should reasonably have known that the conduct was unwelcome or offensive. One way is to tell the perpetrator that the conduct is unwelcome and/or offensive. However, such a direct approach is not always possible or necessary, depending on the circumstances. For example, where the power relationship favours the perpetrator, they may be regarded as having been aware that their conduct would be unwelcome and/or offensive, even if the person complaining of harassment has not actually said so.

6.1.5 Sexual harassment may be physical, verbal, or non-verbal, e.g. rape, sexual assault, inappropriate touching or fondling, inappropriate enquires, suggestions or advances, and the sending of explicit sexual material via electronic communication channels.

6.1.6 Sexual harassment may take various forms, including:

- *victimisation* (the employee being victimised or intimidated for not submitting to sexual advances or attention or for complaining about gender-insensitive conduct);
- *quid pro quo* harassment (coercing an employee to submit by offering employment-related incentives in return, such as a promotion); and
- *sexual favouritism* (a person using their authority to reward those subordinates who positively respond to sexual demands).

6.1.7 Although sexual harassment may occur over a period, a single incident may equally impair the dignity of a complainant and, as such, constitutes sexual harassment.

6.2 Gender-based harassment

6.2.1 Sanlam recognises that an inclusive culture must embrace the concept that gender identity is dynamic and fluid. While most people are male or female, there are other genders and gender identities, such as trans-gender, gender-neutral, non-binary,

agender, pangender, etc. Gender-based harassment occurs when an individual is harassed because of their gender or gender identity, and the conduct does not need to be sexual in nature.

6.2.2 Gender-based harassment usually involves stereotypes based on the roles and functions associated with a particular gender or gender identity and may include, among others:

- Offensive remarks or comments or jokes that are gender-degrading
- Interference or physical contact with or assault of a person due to gender issues
- Generalised sexist slurs
- Degrading anecdotes
- Gender-derogatory nicknames
- Demeaning or insulting conduct that conveys negative attitudes about a particular gender or gender identity
- Gender-based belittling or patronising comments
- Insults or derogatory actions directed at a person based on their gender or gender identity
- Transmission or display of gender-degrading / inappropriate material

6.2.3 Gender discrimination at work occurs whenever an individual is treated differently on account of their gender or gender identity and may affect anything from appointment decisions to promotions.

6.3 **Racial / ethnic / social origin harassment**

6.3.1 This is a form of unfair discrimination based on a prohibited ground related to the complainant's membership or presumed membership of a group linked by one or more of the characteristics relative to such a group.

6.3.2 Racial harassment is unwanted conduct, which may be persistent or a single incident, that is hurtful, degrading, demeaning or creates a hostile or threatening environment. It is not required for actual adverse consequences to have occurred. The conduct may be physical, verbal or non-verbal based on race and undermines the complainant's dignity and creates a hostile working environment.

6.3.3 The conduct is generally assumed to be offensive if it is reasonably capable of carrying a racist meaning to a reasonable audience.

6.3.4 Examples of racial harassment include, among others:

- hostility towards a person of a specific race;
- racist, abusive language and jokes that may amount to hate speech;
- negative stereotyping;
- exclusion from interaction and activities; and
- display or distribution of racially oppressive or demeaning objects, pictures, literature, magazines, cartoons, posters or images;
- display or distribution of objects or items historically or stereotypically associated with a particular race

- 6.3.5 Consideration must be given to factors such as whether the conduct or language is abusive, impairs the dignity of the complainant, is directed at specific employees, the extent and degree of abuse or the impairment to the person's dignity and the impact of the conduct.
- 6.3.6 The test for racial harassment requires consideration of the following factors:
- an objective assessment of the reaction of a reasonable person in the context of the constitutional order;
 - whether the conduct complained of is related to the grounds of race, ethnic or social origin;
 - how the perpetrator treats people other than those that are part of the race of the complainant; and
 - whether the conduct was harmful, demeaning and calculated to induce submission by threatened or actual adverse consequences.
- 6.3.7 Racial harassment interferes with a victim's human rights and may also constitute a criminal offence in terms of relevant national laws.

6.4 **Workplace Bullying**

- 6.4.1 Workplace bullying entails verbal, physical, social or psychological abuse of a person by another person or group of people at work. Workplace bullying can be direct or indirect and can be actions by a senior person towards a more junior person, or actions towards a colleague / peer, or it can be actions by a subordinate (i.e. by a more junior person) towards a senior person.
- 6.4.2 Direct bullying is behaviour that happens on a face-to-face, interpersonal level. It includes acts of verbal abuse like belittling remarks, public humiliation, criticism, inaccurate accusations as well as threatening behaviour and intimidation.
- 6.4.3 Indirect bullying is more subtle. It causes harm to people on an emotional level and often aims to manipulate relationships intentionally.
- 6.4.4 Bullying can include tactics such as verbal, non-verbal, psychological, physical abuse and humiliation.
- 6.4.5 Bullying can take many forms, including name-calling, ridicule, unwarranted micro-management, insults, social isolation, ignoring people, or unfair work practices.
- 6.4.6 Bullying can lead to clearly unlawful practices when the person being bullied must endure the offensive conduct or face dismissal, or where the conduct leads to a workplace that is hostile and is based (directly or indirectly) on discriminatory grounds.

- 6.4.7 Bullying can also take place online or via the use of information and communication technology (ICT) systems. This is also known as cyber-bullying. Where the ICT infrastructure used to harass or bully is supplied by Sanlam to facilitate work, the perpetrator of harassment or cyber-bullying would also be in breach of the company's ICT policies.

7 **Roles and Responsibilities**

- 7.1 Maintaining a workplace free of harassment and building an inclusive culture will require the cooperation of all parties in the workplace.

7.2 Management will:

- 7.2.1 maintain this policy and ensure that its content is shared with all employees;
- 7.2.2 disseminate information and provide education about workplace harassment to raise awareness;
- 7.2.3 investigate all complaints of alleged harassment expeditiously, impartially and, to the extent possible, confidentially; and
- 7.2.4 provide advice to complainants of harassment on internal reporting channels and make counselling available where required.

7.3 Employees will:

- 7.3.1 report any incident of observed or suspected harassment within a reasonable time;
- 7.3.2 refrain from committing any acts of harassment in the workplace;
- 7.3.3 refrain from making false claims of harassment; and
- 7.3.4 cooperate with investigations into alleged harassment.

8. **Assistance to employees**

- 8.1 In addition to provision of advice and support, the company will consider additional paid sick leave where a complainant of harassment has already exhausted their sick leave due to such harassment.
- 8.2 The company's Employee Assistance Programme offers a range of confidential support services to employees, including those who may have been subjected to workplace harassment.

9. **Other policies and documents**

This policy must be read in conjunction with the Group's other policies, including but not limited to the Code of Ethical Conduct, Diversity, Equity & Inclusion Framework and Employee Relations Policy, as well as the various laws that govern the Group, especially in respect of workplace harassment.

10. **Review**

The policy will be reviewed biennially, unless circumstances necessitate an earlier review.

11. **Procedures**

11.1 By their very nature, incidents of harassment are sensitive and should be handled with the utmost care and understanding, especially of the dignity of the complainant(s).

11.2 Allegations of harassment must be attended to as swiftly as possible in order to clear up any misunderstandings and/or restore the dignity of the complainant(s). To this end, the policy contemplates both informal and formal procedures for handling harassment allegations.

11.3 Depending on the seriousness of the allegations of harassment involved, the complainant may elect to pursue informal or formal procedures. The complainant will also indicate the desired outcome from any ensuing investigation.

11.4 While the complainant may generally elect informal or formal procedures, the company reserves the right to follow formal procedures where alleged harassment is so serious as to warrant it. In some cases, the company would have a legal duty to formally investigate harassment allegations and take appropriate action.

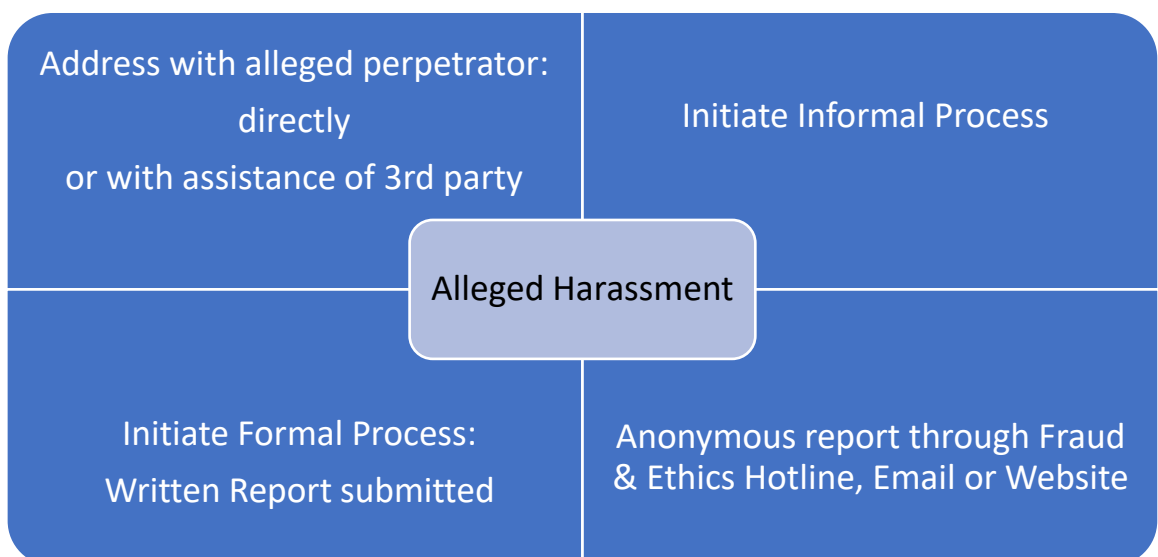
11.5 An employee who is found guilty of harassment will be subjected to appropriate corrective or disciplinary action, including warnings or dismissal from employment. Non-employees who are guilty of harassment will be liable to other consequences, including termination of contracts or loss of business.

11.6 Guidelines on reporting procedures are included hereunder, which may be adopted or adapted as appropriate for each business in the Group.

GUIDELINES: REPORTING PROCEDURES

12. WAYS TO ADDRESS OR REPORT HARASSMENT

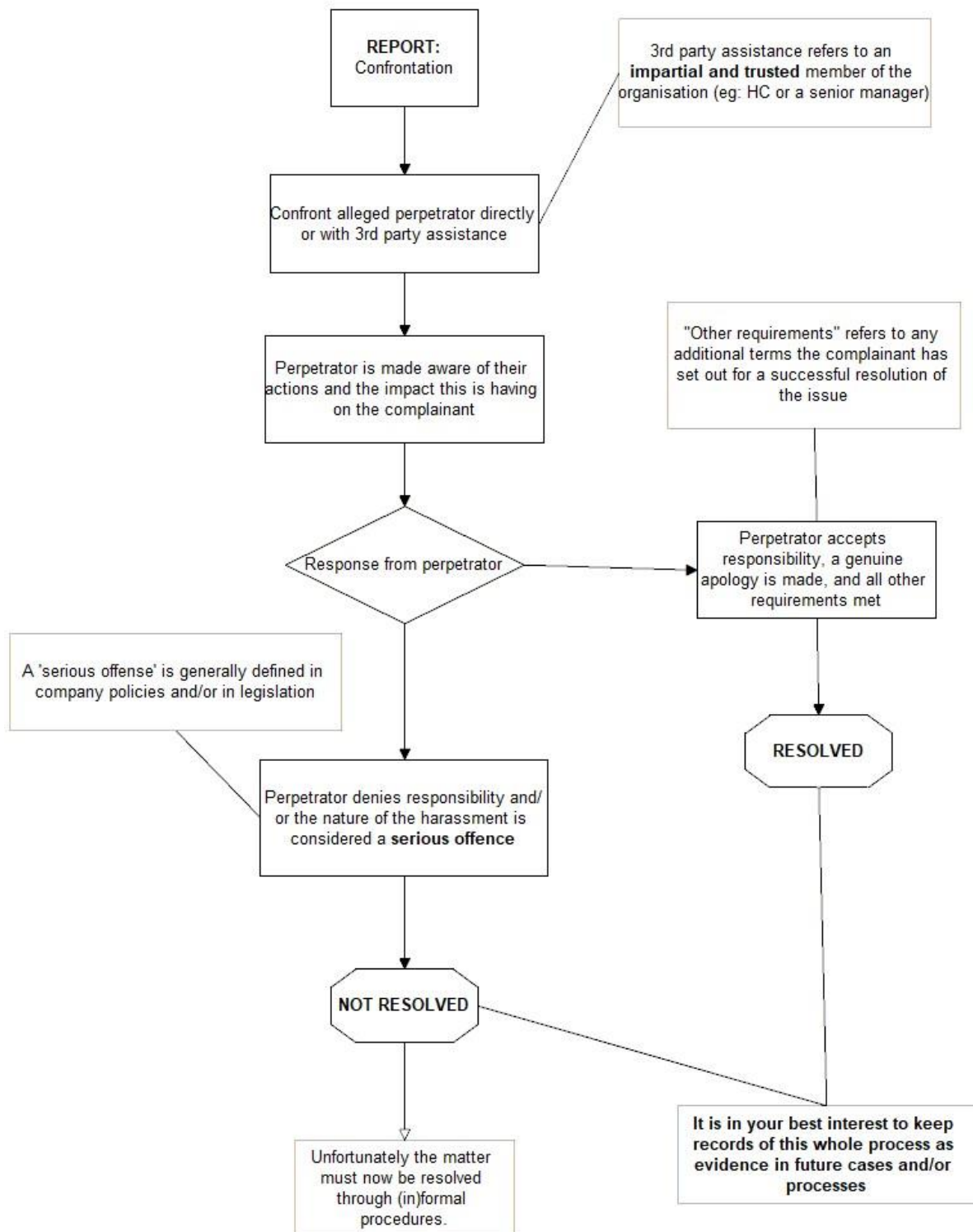
1. Harassment has a serious and negative impact on people who are harassed, or who witness harassment. This can mean that it is difficult to report. Sometimes the alleged perpetrator is senior in the Sanlam Group, and often people who are harassed think that they will not be believed or taken seriously, or that the harasser will retaliate.
2. Sanlam has a legal duty to investigate and address harassment, irrespective of the identity, seniority or relative importance of the alleged perpetrator. Harassment cannot be eradicated if the company does not know about it.
3. This Reporting Procedure serves as a guideline to the businesses that fall within the Sanlam Group, to ensure that harassment is reported and properly addressed.
4. It sets out a few different channels for persons to report harassment. The person reporting it can select which process to follow. In some instances, one process may lead to another; for example, if the complainant decides to raise the matter with the alleged harasser, either directly or with the assistance of another person, and this is unsuccessful, the complainant can then initiate an informal process or report a formal complaint. The processes available for addressing or reporting harassment are:



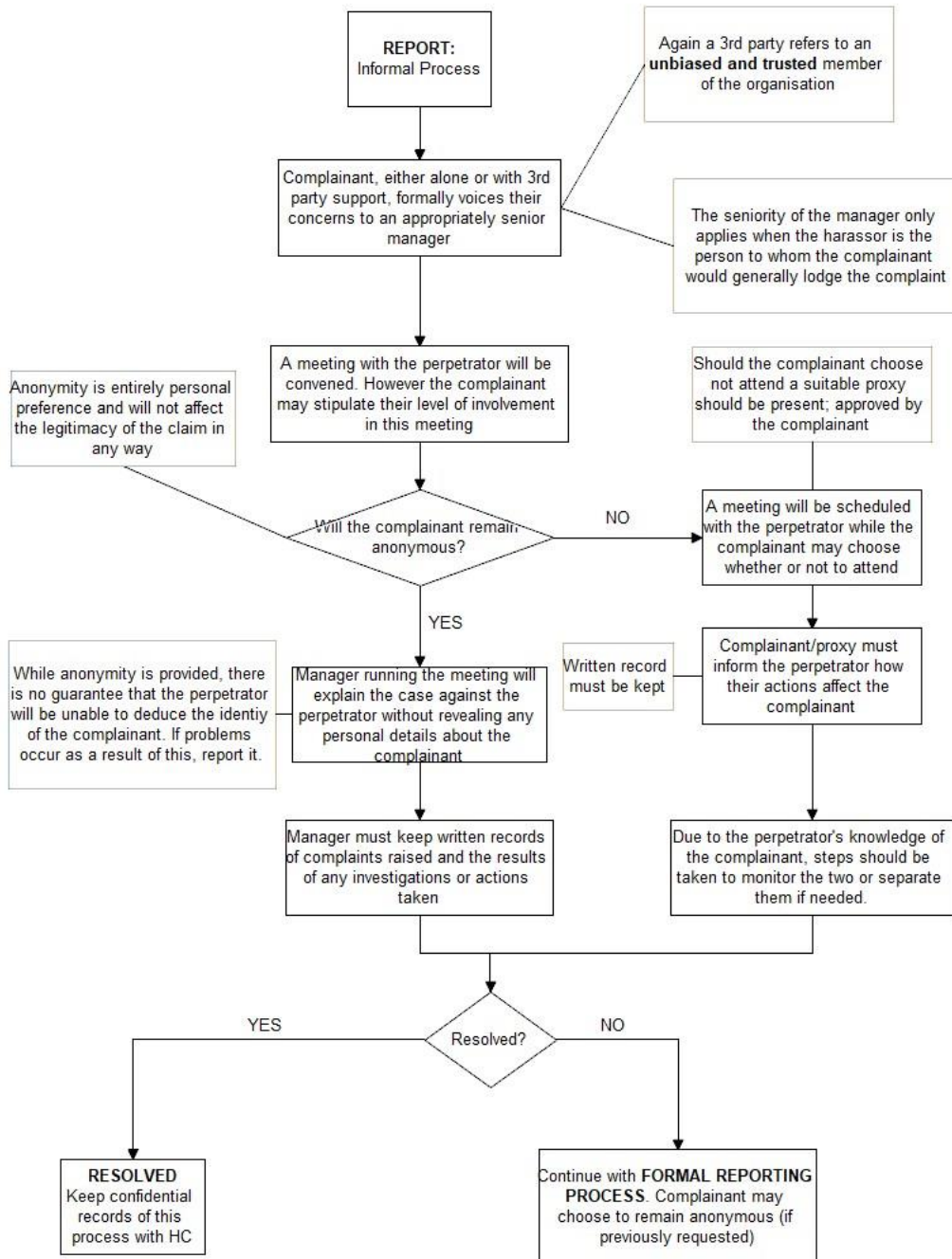
13. ADVICE ON HOW TO ADDRESS THE HARASSMENT

- 1 The person affected by harassment may confidentially, with or through a third party, speak to a trusted person in the Company to establish what options are available in respect of addressing or reporting the harassment.
- 2 The person who the complainant approaches should advise the complainant of the different procedures available to deal with the harassment as set out in this policy. The complainant should be under no duress to accept one or the other option.
- 3 The complainant should be offered advice, assistance and counselling or be referred to an appropriate person/service provider and should be reassured that they will not be prejudiced or victimised in their work, conditions of service or personally as a result of the complaint, and that the matter will be treated as confidential.
- 4 The different procedures that Group Businesses may provide to deal with harassment are set out below.

14. CONFRONTING THE ALLEGED PERPETRATOR



15. INFORMAL REPORTING

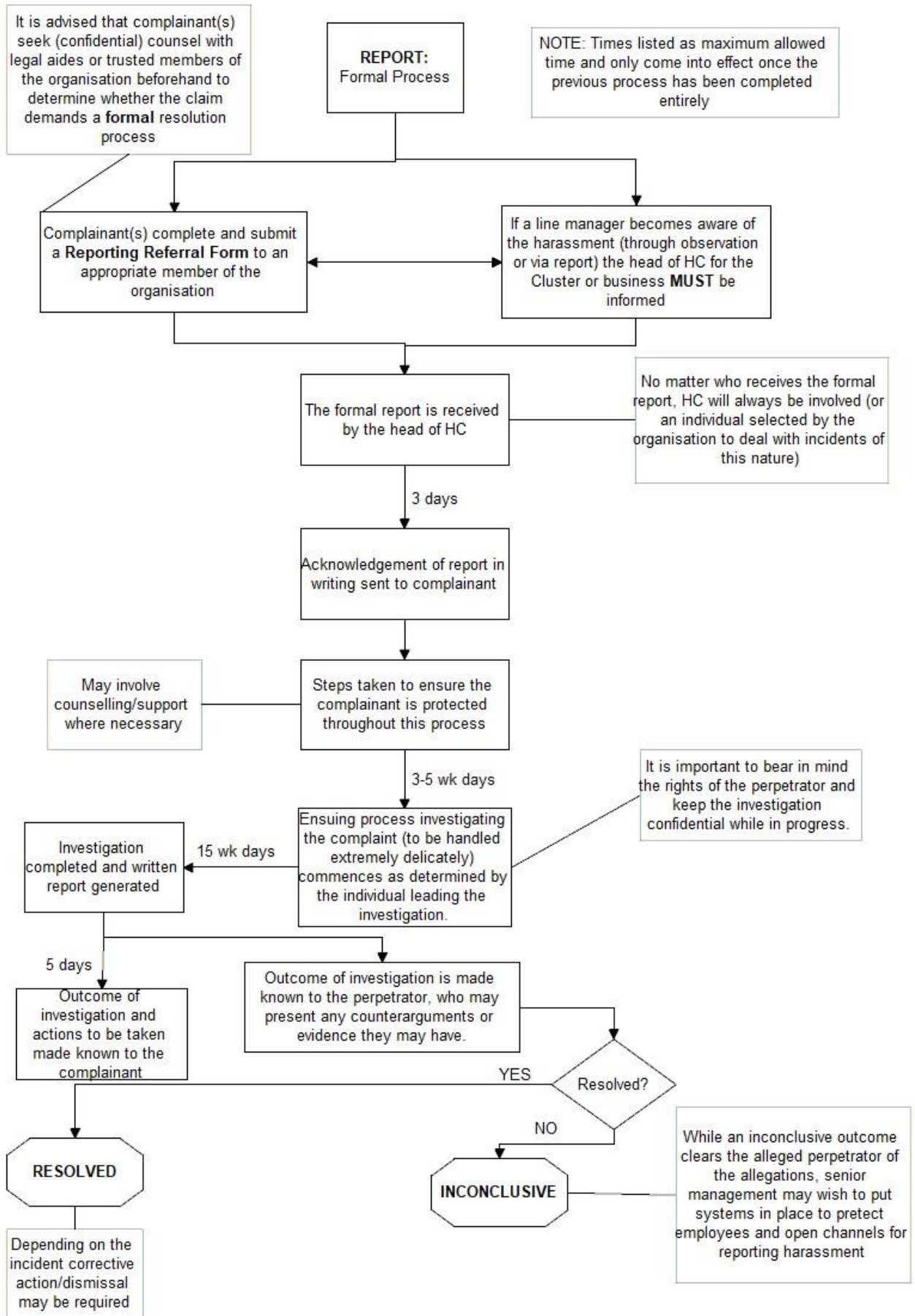


16. GUIDELINE: FORMAL REPORTING PROCESS

- 16.1 This Formal Reporting Process serves as a possible guideline for the Sanlam Group businesses, should they decide to implement a customised reporting process for harassment complaints.
- 16.2 The relevant Business will ensure that complainants / persons reporting the acts of harassment are treated with sensitivity, care, respect and dignity. The Business should ensure that employees are offered counselling and provided with support.
- 16.3 The Business should ensure that all aspects of the procedure are addressed / handled confidentially to the extent reasonably possible. The identities of persons reporting harassment will not be disclosed or revealed *without their express permission*. If this is not granted, their identities will not be revealed.

Specific Procedure for formally reporting harassment

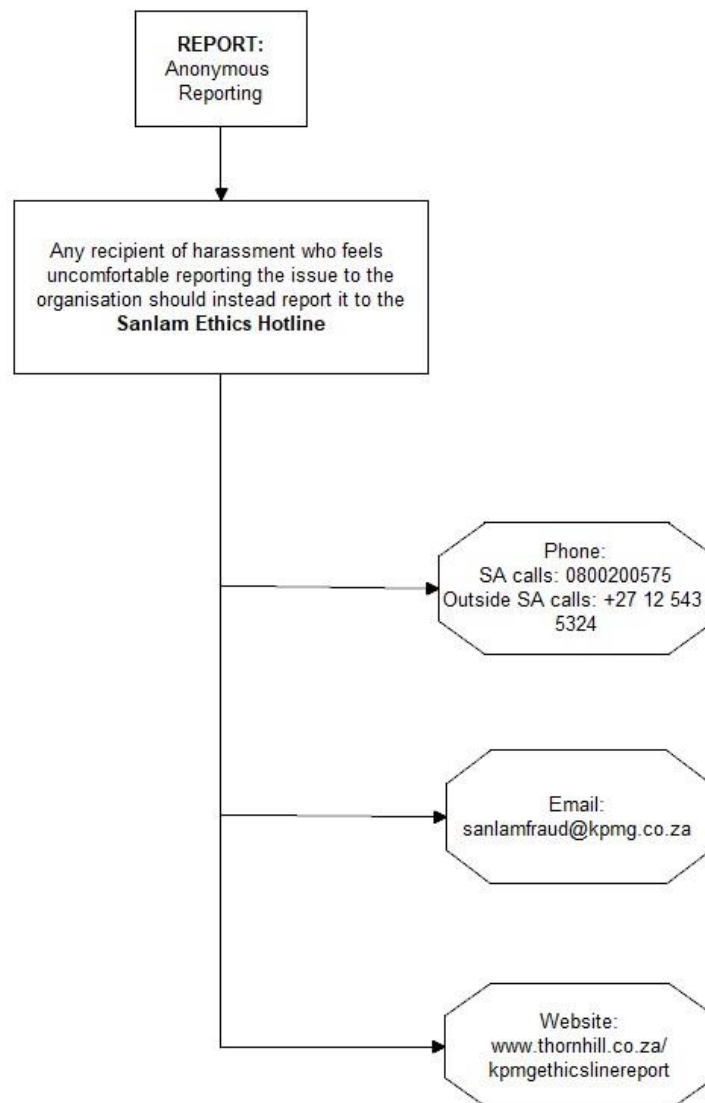
- 16.4 An individual or a group of individuals who feel harassed, discriminated or retaliated against may initiate this reporting process by completing the attached [Reporting Referral Form](#) and submitting it directly (hand delivery / email etc) to one / more of the following persons:
- Their business's Head of Human Capital;
 - Their line manager or a senior manager in their own business;
 - An executive in the [Business / Company] that the complainant / reportee trusts;
 - The Sanlam Ethics Committee; and / or
 - The Head of Human Capital for the Sanlam Group.
- 16.5 In order to properly investigate the complaint and take any form of action against any person, the company needs a written and signed complaint containing sufficient details to determine if the policy may have been violated.



Formal Reports and the role of the Head of Human Resources

16.6 This part of the Guideline is premised on the need to involve a senior person in the Company, with a view to ensuring that the harassment complaint is managed in a sufficiently serious manner, and that it is addressed properly. The different businesses may choose to follow a different approach.

17. ANONYMOUS REPORTING



ADDENDUM – Formal Reporting Form

SANLAM GROUP [INSERT SPECIFIC BUSINESS'S DETAILS] REPORTING REFERRAL FORM - HARASSMENT

Name (“complainant”):

Contact Number:

E-mail:

Please complete the details requested below, where possible:

1. Name of the person/s who allegedly committed the harassment / bullying:

2. Department / Business / Company:

3. Relationship of the person/s to you (for example manager, colleague, client, etc.):

4. Date/s of Incident/s:

5. Where did the specific event/s occur?

6. Please explain the events that occurred (add more pages as necessary).

7. What has been the impact on you of the event/s / conduct?

8. Were there any witnesses to this specific event / these events? (If yes, please provide their names and details where possible)

9. Do you have any other information that you would like to make the company aware of? (if you have documents you can attach them to this form)

10. What outcome would you like from this process (you do not need to complete this question should you prefer not to)?

Acknowledgement

The information provided in this written report is true and correct to the best of my/our knowledge.

Signature

Date

Please submit this form to the relevant person/s – via email / hand delivery / other form of submission