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## HUMAN RIGHTS POLICY

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## 1. PURPOSE

Montego Pet Nutrition recognises the inherent dignity and equal rights of all employees, contractors, and stakeholders.

The purpose of this Policy is to formalise our commitment to the protection and promotion of Human Rights, both within our operations and across our value chain, in line with the *Constitution of South Africa*, the *Basic Conditions of Employment Act (BCEA)*, the *Employment Equity Act (EEA)*, the *UN Guiding Principles on Business and Human Rights*, and the *International Labour Organisation (ILO) Standards*.

## 2. SCOPE

This Policy applies to:

- All permanent, fixed-term, part-time, and temporary employees of Montego Pet Nutrition.
- All contractors, service providers, suppliers, and business partners working on Montego premises or in Montego's name.

## 3. DEFINITIONS

| TERM                   | DEFINITION                                                                                                                |
|------------------------|---------------------------------------------------------------------------------------------------------------------------|
| Human Rights           | Rights inherent to all people, without discrimination, including <i>Civil, Political, Economic, and Cultural Rights</i> . |
| Discrimination         | Any unfair treatment based on race, gender, disability, religion, sexual orientation, etc.                                |
| Forced Labour          | All work or service which is exacted under threat of penalty and not voluntarily offered.                                 |
| Child Labour           | Employment of individuals below the minimum legal working age (fifteen (15) years or as otherwise defined).               |
| Freedom of Association | The right of employees to join <i>Unions</i> , elect <i>Representatives</i> , and <i>Collectively Bargain</i> .           |
| Supplier               | Any third party providing goods or services to Montego Pet Nutrition.                                                     |

## 4. PRINCIPLES AND POLICY STATEMENT

Montego Pet Nutrition commits to the following *Principles*:

### 4.1 Dignity and Respect

All individuals must be treated with dignity and respect in accordance with the *Code of Conduct* and the *Harassment and Discrimination Policy*.

### 4.2 Non-Discrimination and Equal Opportunity

We commit to *Employment Practices* free from discrimination, and commit to transformation, equity, and inclusion aligned with the *Employment Equity Act* and *Montego's Equity Plans*.

### 4.3 Freedom of Association

Employees have the right to freely associate, form or join Unions, and engage in *Collective Bargaining*, consistent with *Section 23 of the South African Constitution* and the *Labour Relations Act (LRA)*.

### 4.4 Prohibition of Child and Forced Labour

Montego prohibits child labour, human trafficking, and all forms of forced, bonded, or involuntary labour across its operations and supply chain.

### 4.5 Safe and Healthy Working Environment

We provide a safe and hazard-free workplace in accordance with the *Occupational Health and Safety Act*, with regular *Risk Assessments* and *Wellness Initiatives*.

### 4.6 Fair Wages and Working Conditions

Montego pays at least the *National Minimum Wage* as updated on an annual basis and complies with the *Basic Conditions of Employment Act (BCEA) Standards* on hours, overtime, and rest.

### 4.7 Right to Privacy and Protection of Personal Information

All personal information is managed in accordance with the *POPIA Policy*, ensuring confidentiality, limited access, and informed consent.

### 4.6 Zero Tolerance for Harassment and Abuse

Montego enforces a **zero-tolerance** stance on harassment, abuse, bullying, or intimidation (including sexual, physical, verbal, or cyber forms).

### 4.9 Responsible Sourcing and Ethical Supply Chain

Suppliers and partners must uphold the same *Human Rights Standards*. Violations may result in the termination of business relationships.

## 4.10 Whistleblower Protection and Ethical Reporting

Montego Pet Nutrition is committed to upholding the right of every individual to report unethical, illegal, or unsafe conduct without fear of retaliation. We recognise *Whistleblowing* as a key mechanism for protecting Human Rights, strengthening ethical conduct, and enhancing legal compliance.

Whistleblowers are protected under the *Protected Disclosures Act, 26 of 2000*. Reports may be made anonymously via Montego's **independent multi-channel *Whistleblowing Hotline***. We encourage reporting of any conduct that violates Human Rights, Labour Laws, Ethical Standards, or this Policy. Montego ensures that all *Whistleblowing Reports* are treated confidentially and are acted upon promptly, with due regard for the dignity and rights of all parties involved.

## 5. ROLES AND RESPONSIBILITIES

| ROLE                       | RESPONSIBILITY                                                                                                                                                                                |
|----------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Line Managers              | Enforce this Policy, address employee concerns, support training efforts, and refer reported <i>Ethical Concerns</i> to Human Resources (HR) or the <i>Whistleblowing Hotline</i> .           |
| HR – Policies & Procedures | Develop, review, and monitor <i>Policy Implementation and Alignment with Law</i> , and ensure the <i>Whistleblowing Framework</i> is embedded in all <i>Human Rights Practices</i> .          |
| HR Officers                | Investigate <i>Complaints</i> , manage <i>Whistleblowing Disclosures</i> , ensure <i>Confidentiality</i> , and apply <i>Corrective Measures</i> .                                             |
| Employees                  | Adhere to the Policy and report any <i>Human Rights Violations</i> , <i>Unethical Conduct</i> , or <i>Safety Concerns</i> via the formal <i>Reporting</i> or <i>Whistleblowing Channels</i> . |
| Suppliers & Contractors    | Sign and comply with <i>Annexure A</i> , uphold Montego's <i>Human Rights Standards</i> , and make use of the <i>Whistleblowing Hotline</i> where necessary to report violations.             |

## 6. REPORTING PROCEDURE

Any individual may raise a concern regarding a breach of this Policy without fear of retaliation, through the internal *Human Resources Process* or the independent *Montego Whistleblowing Hotline*. Both channels guarantee confidentiality and procedural fairness.

### Reporting Channels:

- Informal Resolution – Raise the issue with a Line Manager or HR Advisor.
- Formal Complaint – Submit a signed or anonymous *Human Rights Concern Form (Annexure B)* to HR.
- *Whistleblower Hotline* – Contact Montego's multi-channel *Whistleblowing Hotline*, which includes:
  - Whistleblowing Hotline Toll-Free Number: **0800 212 689**
  - Email: [montego@whistleblowing.co.za](mailto:montego@whistleblowing.co.za)

- Website: [www.whistleblowing.co.za](http://www.whistleblowing.co.za)
- Availability: 24/7, year-round
- Languages: English, Afrikaans, isiXhosa, isiZulu

### Report Handling and Feedback:

- All *Hotline Reports* are anonymised, transcribed, and forwarded to two (2) authorised Montego recipients within twenty-four (24) hours.
- Each *Report* is quality-checked and securely stored.
- Complainants (where known) receive *Reference Numbers* and may request feedback.
- Investigations are concluded by Montego's internal team within a reasonable timeframe (aim: fourteen (14) to twenty-one (21) days), with feedback where possible.

## 7. COMPLIANCE MONITORING AND REVIEW

- *Internal Audits* to be conducted by the HR Specialist (Labour Relations), to assess *Compliance* annually.
- *Supplier Audits* are conducted every two (2) years using the *Human Rights Audit Checklist (Suppliers) (Annexure C)*.
- Reports to EXCO quarterly on *Grievances, actions taken, and Policy Improvements*.
- Bi-annual *Policy Review* by the HR Manager.

## 8. NON-COMPLIANCE AND DISCIPLINARY ACTION

Violations of this Policy may result in:

- **Employees:** Progressive discipline up to and including termination of employment.
- **Contractors/Suppliers:** Contract review, suspension, or termination.
- **Severe Violations:** Legal action or referral to relevant authorities.

## 9. RELATED POLICIES AND DOCUMENTS

- Code of Conduct
- Harassment & Discrimination Policy
- Protection of Personal Information (POPIA)
- Employee Relations & Disciplinary Guidelines Policy
- Leave Policy
- Work Time Policy
- Remuneration & Benefits Policy

## 10. NON-COMPLIANCE

This Policy forms part of the *Rules and Procedures* of Montego Pet Nutrition. Non-compliance with this Policy may result in *Disciplinary Action* in accordance with the Company's *Disciplinary Code and Procedure* and relevant provisions of *South African Labour Law*.

## 11. REFERRAL DOCUMENTS

To facilitate the consistent application of this policy, the following forms are attached:

- **Annexure A:** Human Rights Supplier Compliance Declaration
- **Annexure B:** Human Rights Concern Form
- **Annexure C:** Human Rights Audit Checklist (Suppliers)
- **Annexure D:** Appeal Request Form

All forms must be submitted to the Human Resources Department and will be handled in accordance with the *Protection of Personal Information Act (POPIA)* and relevant *Labour Legislation*.



HUMAN RIGHTS SUPPLIER COMPLIANCE DECLARATION

|                 |  |                |  |
|-----------------|--|----------------|--|
| Company Name:   |  |                |  |
| Contact Person: |  |                |  |
| Designation:    |  |                |  |
| Contact Number: |  | Contact Email: |  |

**DECLARATION:**

I, the undersigned, representing the above Company, hereby confirm:

1. We have read and understood *Montego Pet Nutrition's Human Rights Policy*.
2. We commit to upholding its principles in all dealings with Montego Pet Nutrition.
3. We do not and will not engage in:
  - Child or forced labour
  - Discrimination or harassment
  - Unsafe or exploitative working conditions
4. We will keep records and cooperate in audits.
5. We accept that non-compliance may result in termination or legal action.

Signed at \_\_\_\_\_ on this \_\_\_\_\_ day of \_\_\_\_\_ 20\_\_\_\_.

**SIGNATURE:** \_\_\_\_\_

Name & Surname: \_\_\_\_\_ ID number: \_\_\_\_\_

**CONFIDENTIAL – To be submitted to the HR Manager / Compliance Officer**

**Montego**  
—Pet Nutrition—



HUMAN RIGHTS AUDIT CHECKLIST  
(SUPPLIERS)

|                                                              |                              |                             |                     |
|--------------------------------------------------------------|------------------------------|-----------------------------|---------------------|
| Name of Auditor:                                             |                              | Audit Date:                 |                     |
| Supplier Representative:                                     |                              |                             |                     |
| Follow-up Required                                           |                              |                             |                     |
| SECTION                                                      | COMPLIANCE<br>(Y / N)        |                             | COMMENTS / EVIDENCE |
| No child labour employed                                     | <input type="checkbox"/> YES | <input type="checkbox"/> NO |                     |
| No forced/bonded labour                                      | <input type="checkbox"/> YES | <input type="checkbox"/> NO |                     |
| Working hours comply with BCEA                               | <input type="checkbox"/> YES | <input type="checkbox"/> NO |                     |
| National minimum wage upheld                                 | <input type="checkbox"/> YES | <input type="checkbox"/> NO |                     |
| Freedom of association respected                             | <input type="checkbox"/> YES | <input type="checkbox"/> NO |                     |
| Non-discrimination in hiring                                 | <input type="checkbox"/> YES | <input type="checkbox"/> NO |                     |
| Safe and hygienic work environment                           | <input type="checkbox"/> YES | <input type="checkbox"/> NO |                     |
| The privacy of workers is respected                          | <input type="checkbox"/> YES | <input type="checkbox"/> NO |                     |
| <div><div>SIGNATURE: _____</div><div>DATE: _____</div></div> |                              |                             |                     |



APPEAL REQUEST FORM

CONFIDENTIAL – To be submitted to the Human Resources Department

This form is to be completed by any Employee, Contractor, or Supplier who wishes to appeal the outcome of a Human Rights concern, investigation, or decision taken in terms of the *Montego Pet Nutrition Human Rights Policy*.

All information will be handled in accordance with the *Protection of Personal Information Act (POPIA)*.

| PERSONAL DETAILS                               |  |                |  |
|------------------------------------------------|--|----------------|--|
| Name of Appellant:                             |  |                |  |
| Employee / Supplier Number:<br>(if applicable) |  |                |  |
| Department / Site:                             |  |                |  |
| Contact Number:                                |  | Contact Email: |  |

| DETAILS OF THE DECISION BEING APPEALED                 |                                              |                                                                          |                                                    |
|--------------------------------------------------------|----------------------------------------------|--------------------------------------------------------------------------|----------------------------------------------------|
| Date of Original Decision / Outcome:                   |                                              |                                                                          |                                                    |
| Name of HR Officer / Manager who handled the matter:   |                                              |                                                                          |                                                    |
| Nature of Original Complaint:<br>(tick all that apply) | <input type="checkbox"/> Discrimination      | <input type="checkbox"/> Harassment<br>(verbal, physical, sexual, cyber) | <input type="checkbox"/> Child Labour              |
|                                                        | <input type="checkbox"/> Forced Labour       | <input type="checkbox"/> Freedom of Association Violations               | <input type="checkbox"/> Unsafe Working Conditions |
|                                                        | <input type="checkbox"/> Privacy/Data Breach | Other:                                                                   |                                                    |
|                                                        |                                              |                                                                          |                                                    |

| REASON(S) FOR THE APPEAL                                    |
|-------------------------------------------------------------|
| (Please explain in full. Attach additional pages if needed) |
|                                                             |
|                                                             |
|                                                             |
|                                                             |
|                                                             |
|                                                             |
|                                                             |
|                                                             |



#### REMEDY OR OUTCOME REQUESTED

(Explain what outcome or resolution you are seeking)

|  |
|--|
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|  |

#### DECLARATION

I confirm that the information provided in this Appeal Request is true and accurate to the best of my knowledge.

I understand that the Appeal will be reviewed fairly and confidentially, and that I may be contacted for additional information.

\_\_\_\_\_  
SIGNATURE:

\_\_\_\_\_  
DATE:

Please submit this form to the **HR Department** directly, or email it to the designated HR Officer handling Human Rights matters. You may also submit a signed, scanned copy via the ***Ethics Hotline email*** ([montego@whistleblowing.co.za](mailto:montego@whistleblowing.co.za)) if anonymity or distance is a concern.