



FirstRand

HUMAN RIGHTS FRAMEWORK

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1 FOREWORD

FirstRand Limited (FirstRand or the group) respects internationally recognised human rights and recognises that it can contribute to positive human rights outcomes for society.

This human rights framework contains the group's overarching commitment to respect human rights in its business operations and supply chain. This means that the group undertakes to avoid infringing on human rights.

2 PURPOSE

The purpose of this framework is to:

- demonstrate the group's commitment to respecting human rights in its business operations and supply chain;
- provide a basis for embedding the responsibility to respect human rights throughout the group's business operations;
- acknowledge that the group operates in several jurisdictions with diverse human rights issues. The framework will be used to provide guidance to internal stakeholders on leadership and management of human rights issues, and to understand and address the human rights concerns of group constituents on a prioritised, risk-based basis;
- provide a consolidated view of existing policies and processes which address the management of various human rights obligations; and
- provide an overview of the governance, areas of responsibility and management structures for the effective management and respect of human rights obligations applicable to the group.

This document is a governance framework that establishes group-wide human rights responsibilities that must be embedded in business operations. It also sets out the overarching risk management processes to be adopted to enable a risk-based approach to managing the impact of human rights. Operational requirements that are necessary to implement these standards are included in separate group position statements, policies, operating standards and procedures. These documents provide further guidance on controls and processes that should be implemented to manage human rights risks, some of which are listed in Annexure A.

The Group Ethics Office, as custodian of this framework, will assist business to incorporate the requisite human rights standards. This is also relevant where the responsibility for related policies and standards sits with a function other than the Group Ethics Office.

3 SCOPE

This framework applies to all of FirstRand's legal entities, subsidiaries, divisions, segments and operating businesses, collectively referred to as the group.

The framework applies to all of the group's business activities. All business relationships with suppliers, vendors and customers are expected to comply with this framework and with the provisions of the FirstRand supplier code of conduct and related documents referred to in Annexure A.

The level of application of this framework within an entity or business operation will be determined using a risk-based approach. The level of application must be agreed upon in consultation with the Group Ethics Office and approved by the relevant governance structures.

4 INTERNATIONAL HUMAN RIGHTS STANDARDS

The group is committed to respecting human rights in accordance with internationally accepted standards. In formulating the commitment adopted in this framework, regard has been given to the following binding and voluntary standards, laws and codes, amongst others (refer to Annexure C for more detail):

- the International Bill of Human Rights (including the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights);
- local laws, regulations and prevailing codes of best practice on human rights;
- the United Nations Guiding Principles on Business and Human Rights;
- the United Nations Global Compact;
- the United Nations Principles for Responsible Banking;
- the United Nations Principles for Responsible Investment;
- the African Charter on Human and Peoples' Rights;
- the International Labour Organization Declaration on Fundamental Principles and Rights at Work; and
- the Organisation for Economic Co-operation and Development Guidelines for Multinational Enterprises on Responsible Business Conduct.

5 HUMAN RIGHTS COMMITMENT

The group builds trust by respecting the human rights of people in broader society as well as those of its customers, employees, suppliers and other stakeholders across the jurisdictions where it operates. The group's reputation relies on a culture of integrity and accountability.

FirstRand's commitment to respecting human rights is integrated into its ethics, governance, human capital, lending, transactional, and financial crime risk and other risk management business processes and practices, as well as its social impact activities.

This commitment includes seeking to avoid causing, contributing to, or being directly or indirectly complicit in adverse human rights impacts. FirstRand's employees and suppliers are similarly expected to respect the human

rights of others. Where adverse impacts are identified, the group will investigate the matter promptly and institute remedial measures as appropriate and within the group's sphere of influence.¹

FirstRand follows a risk-based approach that prioritises human rights risk management in its operations. Appropriate processes will be applied proportionate to the level of human rights risk exposure presented by or to operations.

Whilst the group respects all human rights, it has made the following commitments in relation to its stakeholders:

5.1 Employees

FirstRand commits to:

- valuing diversity and promoting inclusion whilst not tolerating discrimination and/or harassment;
- providing fair remuneration;
- not supporting child labour, forced labour or modern slavery;
- promoting employee wellness; and
- encouraging a culture of continuing learning and development.

5.2 Suppliers (including vendors and business partners)

FirstRand commits to:

- communicate its human rights expectations to suppliers at the inception of the relationship and on an ongoing basis for the duration of the business relationship;
- support or direct suppliers to mitigate the risk of adverse human rights impacts identified, or terminate the supplier relationship, as appropriate;
- conduct due diligence, including identifying potential adverse human rights and modern slavery practices by suppliers, to verify if the group's expectations of suppliers are met. Due diligence is also carried out to mitigate any actual or potential adverse human rights impacts and will be carried out using a risk-based approach. Sources of information may include site visits, sanction screening, media coverage analysis, country risk and other elements in isolation or in combination; and
- take all reports of misconduct seriously.

5.3 Clients and customers (individuals, companies)

FirstRand commits to:

- identify and manage sensitive or excluded activities in financing and investment decisions which may adversely affect human rights;
- holistically evaluate its financing and transactional activities per the group's due diligence, risk assessment and other relevant processes;

¹ Whilst the UN Global Compact 10 Principles do not define "sphere of influence", this sphere refers to individuals to whom the company has a certain political, contractual, economic and geographic proximity. FirstRand's sphere of influence encompasses its employees, customers, third-party service providers (suppliers, vendors, agents), business partners, investors and society.

- engage with clients, where practicable and within business processes, to arrive at practical solutions to manage potential sensitivities and risks;
- assess customer desirability through due diligence measures and take appropriate measures where findings reveal an adverse human rights impact; and
- take all reports of misconduct seriously.

5.4 Vulnerable groups

FirstRand commits to respect and support the rights of vulnerable groups, including its vulnerable customers. This is in recognition of the fact that these groups may, in certain circumstances, warrant heightened consideration due to being previously marginalised or otherwise rendered particularly vulnerable to adverse human rights impacts. Vulnerable groups may include, but are not limited to:

- children;
- minority groups;²
- indigenous people;
- persons with disabilities; and
- women.

6 REPORTING AND REMEDY

FirstRand recognises the right to remedy as an important tool to ensure respect for human rights. FirstRand provides grievance mechanisms, including the group's independent ethics line, where people can report human rights issues related to the group's conduct and activities anonymously, partly anonymously or confidentially. Further information on the ethics line can be found in Annexure B.

Where the group has caused, contributed to or was complicit in adverse human rights impacts, it will assess all reports of harm for investigation and, where appropriate, address the reported harm within a reasonable time frame.

FirstRand further expects its suppliers to adopt measures to respect human rights in their supply chains, to adopt fair and confidential grievance mechanisms, and to remedy instances where they have caused or contributed to an adverse human rights impact.

7 MONITORING PROGRESS AND GOVERNANCE REPORTING

Embedment of the standards set out in this framework will be monitored through tracking qualitative and quantitative data. This will include data gathered from training and awareness programmes, risk assessments and ethics line incident reporting and remediation data.

² Article 1 of the UN Declarations on the Rights of Minorities defines minorities based on national, ethnic, cultural, religious and linguistic identity within their respective territories. However, which groups constitute a minority group is a question of fact and will be determined by considering objective (existence of shared identity) and subjective factors (individuals must identify themselves as part of a minority) advanced by international guidance.

Internal reporting on human rights will occur through the FirstRand sustainability and governance executive committee and the FirstRand social, ethics and transformation committee (Setcom), which is a subcommittee of the board. Human rights risk prevention and mitigation measures will be published on the group's website in appropriate reports and other appropriate disclosure documents, such as the group's annual statement on modern slavery in terms of section 54 of the UK Modern Slavery Act.

8 ROLES AND RESPONSIBILITIES

The FirstRand board is responsible for overseeing and ensuring effective management of human rights impacts and risks. The board has delegated authority for oversight to Setcom and executive responsibility for human rights risk management to the FirstRand sustainability and governance executive committee.

The Group Ethics Office:

- is the custodian of this framework and is responsible for coordinating implementation of the human rights capability across the group;
- reports on human rights risk management to the relevant board subcommittees and management committees; and
- provides strategic direction on human rights focus areas and prioritised risk identification through collaboration with business.

The responsibilities of the group's segments and operating businesses are outlined below:

- Segment chief risk officers, ethics officers and heads of compliance or their delegates are responsible for the development of segment-level operating standards and programmes to support the implementation of this framework.
- Framework implementation will remain the responsibility of the first line of defence in each segment or operating business. As such, all business owners must embed risk-based human rights management in their business processes and systems, and ensure that these are supported by appropriate training and awareness interventions. Business owners will also ensure that this framework is distributed to all employees who are affected by this framework.
- Segments/operating businesses will also identify and escalate areas of elevated human rights risk, as well as inadequate or ineffective controls, to the Group Ethics Office. Remedial mechanisms to address identified risks must be supported by business.

9 FRAMEWORK REVIEW

The framework must, at a minimum, be reviewed every two years to ensure it continues to reflect current, sound human rights practices and is appropriate for managing the group's human rights risks.

This framework is reviewed and recommended to Setcom for approval by the FirstRand sustainability and governance executive committee.

10 ADHERENCE

Wilful and deliberate non-adherence with the human rights framework and its supporting policies, standards and operating procedures can expose the group to significant fines, criminal liability and adverse impacts. The reputational risk arising from alleged non-compliance with human rights obligations and its commitments can negatively affect the group's ability to attract and retain clients, source funding and participate in certain markets.

Non-adherence by group employees may therefore result in disciplinary action in terms of the group's disciplinary code and relevant procedures.

ANNEXURE A – RELATED FRAMEWORKS, POLICIES AND PROCESSES

The following codes, policies, frameworks, standards and processes support and are used to manage human rights and operationalise FirstRand's commitments, as articulated in this framework:

1. FirstRand's business philosophy as captured in the FirstRand Promises: https://www.firstrand.co.za/the-group/firstrand-philosophy/
2. FirstRand's code of ethics: https://www.firstrand.co.za/media/investors/policies-and-practice/pdf/code-of-ethics.pdf
3. FirstRand health and safety framework and policy: https://www.firstrand.co.za/media/investors/policies-and-practice/pdf/FirstRand-group-occupational-health-and-safety-policy-statement.pdf
4. FirstRand ethics line policy statement: FirstRand-ethics-line-policy-statement.pdf
5. The FirstRand human capital manual provides for various policies relating to working conditions, including hours of work, overtime, occupational health and safety matters, employment equity, employee benefits, staff assistance, leave of absence, learning and development, and employee wellbeing.
6. FirstRand supplier code of conduct: https://www.firstrand.co.za/media/investors/policies-and-practice/pdf/2022-supplier-code-of-conduct.pdf
7. FirstRand position statements relating to restrictions on the financing of certain sectors/activities: https://www.firstrand.co.za/media/society/risk/policy-statements-restrictions-on-financing.pdf
8. Data privacy and protection: https://www.firstrand.co.za/media/investors/policies-and-practice/pdf/FirstRand-privacy-policy-statement.pdf https://www.firstrand.co.za/media/investors/policies-and-practice/pdf/group-data-protection-policy-for-suppliers-and-business-partners-2022.pdf https://www.firstrand.co.za/media/investors/policies-and-practice/pdf/group-customer-privacy-notice-2023.pdf
9. FirstRand anti-bribery and corruption framework: https://www.firstrand.co.za/media/investors/policies-and-practice/pdf/firstrand-anti-bribery-and-corruption-policy.pdf https://www.firstrand.co.za/media/investors/policies-and-practice/pdf/firstrand-anti-bribery-and-corruption-programme-annual-update.pdf
10. Environmental and social risk assessment process: https://www.firstrand.co.za/media/investors/policies-and-practice/pdf/firstrand-ESRA-report-2023.pdf
11. The group's employment equity policy statement: https://www.firstrand.co.za/media/investors/policies-and-practice/pdf/FirstRand-employment-equity-policy-statement.pdf

12. FirstRand's modern slavery statement is an annual statement issued by the group in accordance with S54 of the UK Modern Slavery Act:

<https://www.firstrand.co.za/media/investors/policies-and-practice/pdf/firstrand-modern-slavery-act-statement.pdf>

13. FirstRand fair market conduct policy statement:

<https://www.firstrand.co.za/media/investors/policies-and-practice/pdf/FirstRand-fair-market-conduct-policy-statement.pdf>

ANNEXURE B – FIRSTRAND ETHICS LINE CONTACT DETAILS AS FROM NOVEMBER 2024

FirstRand ethics line websites (all countries excluding Ghana, Lesotho and Mozambique):	
NAVEX Web Intake Site URL	firststrandbank.ethicspoint.com
NAVEX Mobile Intake Site URL	firststrandbankmobile.ethicspoint.com
NAVEX One Compliance Hub	firststrandbank.navexone.eu/peoplehub
FirstRand ethics line websites (only for Ghana, Lesotho and Mozambique):	
Deloitte website	www.firstrandethicsoffice.com
Deloitte e-mail	report@firstrandethicsoffice.com
FirstRand ethics line toll free numbers (All countries):	
South Africa (Navex)	080 001 0744
United Kingdom – Aldermore, including Guernsey and Jersey (Navex)	0800 031 8252
Botswana (Navex)	000269 800 4800 125 (BTC users)
Eswatini (Navex)	011 833 789 2491 (US call forward)
Ghana (Deloitte)	544 315 491 (local) +27 31 571 5077(RSA underpinning number) +27 11 929 3332 (call back)
India (Navex)	022 5097 2944
Lesotho (Deloitte)	80022055 (Econet) +226 31 571 5077 (International call rates) +27 11 929 3332 (call back)
Mauritius (Navex)	8020490076
Mozambique (Deloitte)	+800 333 312 (Vodacom) +27 11 929 3332 (call back)
Namibia (Navex)	083 380 0102
Nigeria (Navex)	02 01 227 9235
United States of America (USA) (Navex)	8337892491
Zambia (Navex)	011 833 789 2491 (US call forward)
Note: Kenya, Angola, China, Singapore and other countries not listed above:	Kindly use the NAVEX web intake, mobile intake and One Compliance Hub above to submit an ethics line report.
Other contact details	
FirstRand ethics office – General queries	ethicsfirst@firstrand.co.za

ANNEXURE C – INTERNATIONAL HUMAN RIGHTS INSTRUMENTS

Instrument	Available at
Universal Declaration of Human Rights	Universal Declaration of Human Rights United Nations
International Covenant on Civil and Political Rights	International Covenant on Civil and Political Rights OHCHR
International Covenant on Economic, Social and Cultural Rights	International Covenant on Economic, Social and Cultural Rights OHCHR
United Nations Guiding Principles on Business and Human Rights	guidingprinciplesbusinesshr_en.pdf (ohchr.org)
United Nations Global Compact	The Ten Principles UN Global Compact
United Nations Principles for Responsible Banking	About the Principles – United Nations Environment – Finance Initiative (unepfi.org)
United Nations Principles for Responsible Investment	What are the Principles for Responsible Investment? PRI Web Page PRI (unpri.org)
African Charter on Human and Peoples' Rights	African Charter on Human and Peoples' Rights African Union (au.int)
International Labour Organization Declaration on Fundamental Principles and Rights at Work	ILO Declaration on Fundamental Principles and Rights at Work (DECLARATION)
Organisation for Economic Co-operation and Development Guidelines for Multinational Enterprises on Responsible Business Conduct	OECD Guidelines for Multinational Enterprises on Responsible Business Conduct en OECD