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1. POLICY STATEMENT

Bovua Holdings (Pty) Ltd is committed to **respecting, protecting, and promoting human rights** across all operations, supply chains, and business relationships.

The organisation recognises that certain groups require enhanced protection and attention. In particular, Bovua Holdings is committed to advancing the rights of women, migrant workers, and persons with disabilities by promoting equality, inclusion, and protection from discrimination, exploitation, and harassment.

This commitment aligns with the South African Constitution, the UN Guiding Principles on Business and Human Rights, and International Labour standards.

In addition to this, the policy reflects our adherence to:

- South African Labour Law
- International Bill of Human Rights
- ILO Declaration on Fundamental Principles and Rights at Work
- OECD Guidelines for Multinational Enterprises
- IFC Performance Standards
- Stockholm, Minamata, and Basel Conventions for environmental protection

This policy is publicly available on our website and communicated to employees, suppliers, contractors, investors, and community stakeholders.

2. SCOPE AND OBJECTIVES

This policy applies to all Bovua Holdings entities, including employees, contractors, suppliers, and communities.

The objective is to ensure fair labour practices, safe working conditions, and responsible environmental and social performance across all operations.

- Ensure non-discrimination, equal opportunity, and freedom of association.
- Protect vulnerable groups: women, children, indigenous peoples, persons with disabilities, migrant workers.
- Uphold safe working conditions, fair wages, and maximum working hours in line with South African and international standards.
- Prevent child labour, forced labour, and human trafficking.
- Respect land rights, water access, and community engagement principles including Free, Prior, and Informed Consent (FPIC).

3. GOVERNANCE AND ACCOUNTABILITY

Oversight is provided by the Executive Committee (EXCO). The Human Rights Working Group supports EXCO by monitoring performance, coordinating human rights initiatives, and ensuring accountability across HR and SHEQ structures.

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4. RISK ANALYSIS AND DUE DILIGENCE

Bovua Holdings (Pty) Ltd adopts a structured and systematic Human Rights Due Diligence (HRDD) process to identify, assess, prevent, mitigate, monitor, and remediate actual and potential human rights impacts arising from its operations, business relationships, and supply chain activities.

This process is aligned with the United Nations Guiding Principles on Business and Human Rights (UNGPs) and is fully integrated into the Company's Human Resources (HR) and Safety, Health, Environment and Quality (SHEQ) management systems.

The HRDD process is implemented across all business units, including employees, contractors, suppliers, and affected communities, ensuring a proactive and risk-based approach to safeguarding human rights.

5. ROLES AND RESPONSIBILITIES

Role	Responsibility
CEO & The Executive Committee	Oversight and approval of HRDD results; resource allocation
SHEQ Manager	Drives implementation; leads risk assessments; ensures environmental and safety compliance
Managing Director / Human Resources Manager	Ensures labour rights compliance; manages grievances
Operations Director	Ensures transport and depot activities comply with HRDD requirements
Procurement	Conducts supplier due diligence and compliance checks
Human Rights Working Group	Oversees cycle, reports to EXCO quarterly
All employees	Report concerns and follow policies

6. HUMAN RIGHTS DUE DILIGENCE PROCEDURE (HRDD)

Identification of Human Rights Risks

Bovua Holdings conducts periodic, and at a minimum annual, Human Rights Risk Assessments to identify actual and potential human rights risks and impacts.

This process includes the review of:

- Labour practices, including working hours, wages, and contractor conditions
- Occupational health and safety (OHS) risks and incidents
- Environmental impacts such as pollution, spills, and emissions
- Security operations and the conduct of security personnel
- Supplier and contractor performance
- Existing policies, procedures, and operational controls

The Company actively engages with key stakeholders, including employees, contractors, suppliers, regulators, and local communities, to identify risks and ensure that vulnerable groups (including women, migrant workers, youth, and persons with disabilities) are adequately considered.

Outputs of this stage include:

- A documented Human Rights Risk Register
- Identification of high-risk operations, locations, and suppliers

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1.1 Assessment and Prioritisation of Risks

Identified risks are assessed and prioritised using a structured risk assessment methodology aligned with SHEQ systems, including the use of a 5x5 risk matrix (likelihood vs severity).

The assessment considers:

- Severity and scale of potential harm to individuals or communities
- Likelihood of occurrence
- Legal and regulatory compliance requirements
- Reputational impact
- Environmental and community safety risks

This process enables the Company to prioritise the most severe human rights risks, including but not limited to:

- Workplace injuries and unsafe conditions
- Forced or child labour risks
- Discrimination and harassment
- Environmental harm affecting communities
- Misuse of security personnel

Prevention and Mitigation Measures

Bovua Holdings implements appropriate controls and mitigation measures to address identified risks. These measures are integrated into HR, SHEQ, and operational processes.

Key mitigation actions include:

- Implementation of occupational health and safety controls, including PPE and safe work procedures
- Monitoring of working hours, wages, and labour conditions
- Driver fatigue management in logistics operations
- Environmental protection measures, including spill prevention and waste management
- Human rights training for employees, managers, and security personnel
- Integration of human rights requirements into procurement processes and supplier contracts
- Conducting internal and external audits

Mitigation actions are documented in **Human Rights Action Plans**, which are tracked and reviewed regularly.

1.2 Monitoring and Performance Tracking

The Company continuously monitors the effectiveness of its human rights management through defined Key Performance Indicators (KPIs) and reporting processes.

Performance monitoring includes:

- Monthly tracking of OHS incidents and safety performance
- Monitoring of working hours and overtime compliance
- Tracking of environmental incidents and near misses
- Recording and analysis of grievances, harassment cases, and complaints
- Supplier performance evaluations and compliance assessments

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Monitoring activities are supported by:

- Internal and external audits
- Management reviews and SHEQ reporting structures
- Regular reporting to the Executive Committee (EXCO)

Outputs include:

- Human Rights Performance Reports
- Grievance and incident reports
- Audit findings and corrective action tracking

1.3 Communication and Reporting

Bovua Holdings ensures transparency and accountability by communicating human rights performance internally and externally where appropriate.

This includes:

- Reporting to EXCO and management structures (e.g. MANCO)
- Communication to employees through training, toolbox talks, and awareness sessions
- Engagement with external stakeholders, including communities and regulators
- Inclusion of human rights performance in sustainability and annual reports

1.4 Remediation and Corrective Action

Where Bovua Holdings identifies that it has caused or contributed to adverse human rights impacts, or where such impacts are directly linked to its operations, the Company is committed to providing for or cooperating in remediation.

Remediation measures include:

- Prompt and thorough investigation of reported incidents
- Implementation of corrective and preventive actions
- Provision of appropriate remedy, which may include compensation or other forms of support to affected individuals
- Strengthening of controls to prevent recurrence

All cases are documented and tracked to closure, with a target resolution timeframe of **ninety (90) days**, where reasonably practicable.

1.5 Continuous Improvement

The Human Rights Due Diligence process is subject to continuous improvement through:

- Regular reviews of policies and procedures
- Lessons learned from incidents and investigations
- Feedback from stakeholders
- Benchmarking against international standards and best practices

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This ensures that Bovua Holdings maintains an effective, responsive, and evolving approach to managing human rights risks.

7. ENVIRONMENTAL COMMITMENTS

Our company is committed to environmental stewardship and compliance with South African and international standards. The following measures form part of our environmental policy:

1.6 Maintain ISO 14001 certification

Bovua conducts regular internal audits and management reviews, prepares for annual surveillance audits and a re-certification audit every three years, and continuously works on improving the Environmental Management System (EMS).

1.7 Environmental Impact Assessments (EIAs)

We conduct comprehensive environmental impact assessments before commencing any exploration or production activities to identify potential environmental risks and propose mitigation measures.

1.8 Pollution Control and Waste Management

We ensure strict adherence to regulations that control and minimise the release of pollutants into the air, water, and soil is mandatory. This includes:

✓ *Air Emissions:*

Compliance with strict limits on emissions of greenhouse gases (GHGs) like methane and CO₂, as well as other pollutants like nitrogen oxides (NO_x) and sulfur oxides (SO_x). Measures include preventing methane leaks and minimising gas flaring.

✓ *Water Management:* Obtaining water use licenses and implementing measures to manage produced water, prevent contamination of groundwater, and treat all wastewater and sewage effluent to meet regulatory standards, sometimes aiming for zero liquid discharge (ZLD).

✓ *Waste Disposal:* Adhering to regulations for the safe and proper disposal of hazardous waste and drill cuttings.

1.9 Oil Spill Prevention and Response

Mandatory measures and contingency plans for the detection, containment, and cleanup of oil spills are put in place to ensure compliance and avoid risk of heavy penalties for non-compliance.

1.10 Ecosystem and Biodiversity Protection

As per our legal obligations, we ensure that we protect local biodiversity and ecosystems where operations take place, including land reclamation and restoration programs for areas affected by our operating activities.

1.11 Regulatory Reporting and Transparency

Bovua Holdings complies with mandatory reporting requirements regarding our environmental performance, emissions, and waste management practices. These are reported to regulatory bodies and affected stakeholders.

1.12 Adherence to National and International Legal Frameworks

Bovua Holdings operates within the frameworks set by the National Environmental Management Act of South Africa and international agreements, such as those related to the Paris Agreement and the International Finance Corporation (IFC) Performance Standards for companies seeking international funding.

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8. OCCUPATIONAL HEALTH & SAFETY

Bovua Holdings is committed to maintaining the highest levels of Occupational Health and Safety across all petroleum, property, logistics, and related operations. To demonstrate this commitment, the Company maintains ISO 45001 Occupational Health and Safety Management System (OHSMS) certification through an accredited third-party certification body.

The ISO 45001 certification confirms that Bovua Holdings:

- Implements proactive risk identification, assessment, and mitigation measures.
- Ensures compliance with South African legislation including the Occupational Health and Safety Act (OHS Act), Regulations and Industry Codes of Practice.
- Maintains documented processes for emergency preparedness, incident response, hazard communication, and continuous improvement.
- Actively works towards reducing and eliminating workplace injuries, illnesses, and unsafe conditions across all operational sites, including depots, construction projects, fuel facilities, and property assets.
- Conducts regular internal and external audits to ensure ongoing compliance with ISO 45001 standards and improvement of safety culture within the organisation.

1.13 Employee Training

Bovua Holdings recognises that training and competency development are essential to protecting the health, safety, dignity, and rights of all workers involved in the Company's activities.

The Company therefore provides regular, structured training that covers:

- Human Rights Awareness
 - ✓ Training on employee rights, labour standards, ethical conduct, and respect for individual dignity, aligned with the UN Guiding Principles on Business and Human Rights.
- Anti-Discrimination
 - ✓ Workshops addressing diversity, equal opportunity, harassment prevention, gender sensitivity, and inclusion of vulnerable groups.
- Safety Protocols
 - ✓ Instruction on safe work procedures, hazard identification and reporting, personal protective equipment (PPE), safe lifting, confined spaces, and site-specific safety rules.
- Fuel Handling and Hazardous Materials
 - ✓ Specialised training covering safe handling, transfer, storage, and transport of petroleum products; hazardous chemical management; spill prevention; and emergency shutdown procedures.
- Emergency Response
 - ✓ Training in evacuation processes, firefighting equipment use, first aid, spill response, and crisis communication protocols.
- Security Conduct
 - ✓ Training of security personnel in accordance with the Voluntary Principles on Security and Human Rights, including proportional use of force, conflict de-escalation, and respectful treatment of community members and visitors.
- Environmental Management
 - ✓ Training on pollution prevention, waste segregation, hazardous waste handling, water and energy conservation, and environmental reporting obligations.
 - ✓ Employees receive refresher training annually or whenever operational changes, incident learnings, or legislative updates require it.

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1.14 Preventing Child & Forced Labour

Bovua Holdings strictly prohibits child labour, forced labour, bonded labour, human trafficking, and all forms of exploitative employment.

To ensure adherence to international standards and South African law, the Company implements the following measures:

- Age Verification
 - ✓ The minimum age for employment is the age of completion of compulsory schooling, but never less than 15 years, in line with the Basic Conditions of Employment Act (BCEA).
 - ✓ Bovua Holdings commits not to employ any person under the age of 18, given the hazardous nature of petroleum, construction, and property operations.
 - ✓ All employees must present original identity documents or legally recognised proof of age.
- Employee Contract Audits
 - ✓ Regular reviews of employment contracts ensure:
 - ✓ No forced or coerced employment terms.
 - ✓ No indebtedness or withholding of identity documents.
 - ✓ All contracts are voluntary and legally compliant.
- Supplier Screening

Suppliers, contractors, security providers, cleaning companies, transporters, and labour brokers are required to undergo due diligence checks including:

 - ✓ Labour practice compliance
 - ✓ Worker age verification
 - ✓ Evidence of legal employment contracts
- Prohibition Clauses in Procurement Contracts

All supplier and contractor agreements include clear clauses prohibiting:

 - ✓ Child labour
 - ✓ Forced or trafficked labour
 - ✓ Bonded labour
 - ✓ Involuntary overtime
 - ✓ Retention of personal documents

Any supplier found violating these standards may be suspended or removed from the supply chain.

1.15 Health & Safety Integration in Procurement

To ensure a safe and rights-respecting supply chain, Bovua Holdings incorporates Health and Safety criteria into procurement processes, tender evaluations, and supplier performance monitoring. Procurement Teams Evaluate:

- Supplier Safety Performance

Suppliers must demonstrate strong safety records, including compliance with safety legislation, safe work practices, and adherence to industry standards.

- Historical Incidents

The Company Reviews:

- ✓ Past workplace accidents
- ✓ Previous environmental spills
- ✓ Enforcement actions
- ✓ Corrective actions taken

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✓ Improvement plans implemented by suppliers

- Safety Certifications

Preference is given to suppliers with:

- ✓ ISO 45001 certification
- ✓ ISO 9001 or ISO 14001 where relevant
- ✓ Industry-specific HSE certifications or audit results (e.g., SMETA, SQAS, RTMS, Tfs)

- Labour Practices

Supplier labour practices must comply with:

- ✓ South African labour law
- ✓ ILO conventions
- ✓ Human rights standards
- ✓ Zero tolerance for discrimination, harassment, or unsafe work conditions
- ✓ Suppliers must commit to maintaining ethical and safe labour practices throughout their operations.

1.16 Health & Safety Metrics Tracked

To ensure continuous improvement and alignment with best practice, Bovua Holdings systematically tracks and reports key health and safety performance indicators. These include:

- Lost Time Injury Frequency Rate (LTIFR)

Measures the number of injuries resulting in time off work per million hours worked.

- Total Recordable Incidents (TRI)

Tracks all incidents including medical treatment cases, restricted work cases, and lost-time injuries.

- Contractor Safety Incidents

Contractors are held to the same safety standards as employees, and all contractor incidents are recorded and reviewed.

- Near Misses

Near misses are tracked to help identify hazards before they result in harm. Reporting is encouraged to strengthen proactive safety culture.

- Environmental Spills

All spills involving petroleum products, chemicals, or hazardous materials are recorded, investigated, and addressed through corrective and preventative action plans.

These metrics are reviewed monthly by management and quarterly by the EXCO Committee.

9. EQUALITY AND LABOUR RIGHTS

Bovua Holdings is committed to promoting and protecting the principles of equality, fairness, and decent work. The Company ensures that all employees, contractors, and stakeholders are treated with dignity and respect and that labour rights are upheld in accordance with South African legislation, international human rights conventions, and recognised industry best practice.

Bovua Holdings strives to create and maintain a work environment that is free from discrimination, harassment, exploitation, and any form of unfair treatment.

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1.17 Eliminating Discrimination Against Women

Bovua Holdings is committed to advancing gender equality and removing barriers that may disadvantage women in the workplace. Measures implemented include:

- Ensuring **equal pay for equal work**, aligned with employment equity and fair discrimination principles.
- Providing **maternity protection** in accordance with South African law and international labour standards.
- Monitoring **career development and progression** to promote equitable opportunities for women at all organisational levels.
- Offering accessible **anti-harassment reporting channels** and ensuring prompt response to all gender-based complaints.
- Implementing additional gender equality initiatives aimed at fostering an inclusive and supportive workplace culture.

1.18 Non-Discrimination

Bovua Holdings prohibits discrimination in any form and upholds equal opportunity for all. This commitment applies to all protected characteristics under South African law and relevant international standards, including:

- Gender, gender identity, gender expression
- Age
- Nationality, race, ethnicity, cultural background, or skin colour
- Religion or belief
- Disability
- Social origin
- Genetics or health information, including pregnancy and medical status
- Sexual orientation
- Union membership or participation

Bovua Holdings maintains a zero-tolerance approach to humiliating, degrading, or physical punishment. No employee may be subjected to verbal, psychological, physical, or sexual harassment, violence, or abuse. Any such conduct will result in disciplinary action consistent with company procedures and applicable law.

1.19 Working Hours, Rest Periods, and Fair Compensation

The Company complies fully with the Basic Conditions of Employment Act (BCEA) and relevant sectoral determinations. This includes:

- Respecting statutory working hour limits, rest periods, and overtime requirements.
- Regular assessment of workload feasibility to prevent excessive or unsafe working hours.
- Ensuring all employees receive at least the statutory minimum wage and working towards living wage commitments aligned with responsible business practice.

1.20 Freedom of Association and Collective Bargaining

Bovua Holdings recognises and respects the right of every employee to:

- Lawfully form, join, or choose not to join a labour union.
- Participate in collective bargaining processes.
- Seek representation or join workers' councils.

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Employees must be free to communicate concerns, raise issues, and engage with management on working conditions without fear of intimidation, reprisal, discrimination, or any form of retaliation.

10. GRIEVANCE MECHANISM

Bovua Holdings (Pty) Ltd is committed to ensuring that all employees, contractors, suppliers, and external stakeholders have access to fair, transparent, and effective grievance mechanisms.

These mechanisms are designed to enable the early identification, reporting, and resolution of human rights concerns and are a fundamental component of the Company's Human Rights Due Diligence (HRDD) process.

The grievance mechanisms are aligned with the United Nations Guiding Principles on Business and Human Rights and are structured to ensure accessibility, confidentiality, non-retaliation, and timely resolution of all reported concerns.

- Accessible complaint channels for employees, contractors, and communities.
- Covers issues such as labour rights, discrimination, security force misuse, and environmental harm.
- Anonymous reporting option available.

1.21 Guiding Principles

All grievance mechanisms implemented by Bovua Holdings are guided by the following principles:

- **Accessibility:** Mechanisms are available to all employees, contractors, suppliers, and affected communities, including vulnerable groups such as women, migrant workers, and persons with disabilities.
- **Confidentiality and Anonymity:** Individuals may raise concerns confidentially or anonymously without fear of exposure.
- **Non-Retaliation:** No individual shall suffer retaliation, discrimination, or disciplinary action for raising a genuine concern.
- **Transparency and Fairness:** All grievances are handled objectively, consistently, and in accordance with established procedures.
- **Timeliness:** All complaints are addressed within defined timeframes, with a target resolution period of ninety (90) days where reasonably practicable.
- **Remedy-Focused:** The process is designed to ensure appropriate and effective remediation where adverse impacts are identified.

1.22 Internal Grievance Mechanisms

Internal grievance mechanisms are available to all employees, contractors, and temporary workers.

Reporting Channels - Employees may report concerns through multiple channels, including:

- Direct reporting to line management or supervisors
- Human Resources (HR) department
- SHEQ representatives or safety officers
- Anonymous whistleblowing channels (where available)
- Formal grievance submission processes

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Types of Complaints Covered - Internal mechanisms address, but are not limited to:

- Labour rights violations (e.g. unfair treatment, excessive working hours, wages)
- Discrimination, harassment, or abuse
- Occupational health and safety concerns
- Environmental or workplace hazards
- Ethical misconduct or policy breaches

Management and Oversight

- The HR Department - responsible for managing labour-related grievances
- The SHEQ Function - manages health, safety, and environmental complaints
- The Human Rights Working Group (HRWG) - provides oversight, ensures consistency, and monitors trends

1.23 External Grievance Mechanisms

External grievance mechanisms are made available to stakeholders outside the organisation, including:

- Local communities
- Suppliers and contractors
- Community representatives and NGOs
- Customers and other affected parties

Access Channels - External stakeholders may raise concerns through:

- Community engagement forums and consultations
- Dedicated grievance email addresses or hotlines
- Project site offices or complaints registers
- Supplier and contractor reporting systems
- Written submissions to company representatives

Scope of External Complaints - External mechanisms are designed to address:

- Environmental impacts (e.g. pollution, spills, emissions)
- Community health and safety concerns
- Land use, access, and property-related issues
- Security-related concerns, including conduct of security personnel
- Supply chain human rights issues

1.24 Grievance Handling Process

All grievances, whether internal or external, are managed through a structured and consistent process:

Step 1: Receipt and Registration

- All complaints are formally logged in a grievance register
- Acknowledgement of receipt is provided within a defined timeframe (e.g. 5 working days)

Step 2: Assessment and Classification

- The grievance is assessed based on severity, risk, and potential impact

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- Responsibility for investigation is assigned (HR, SHEQ, Legal, or management)

Step 3: Investigation

- A fair, impartial, and thorough investigation is conducted
- Relevant evidence, documentation, and stakeholder input are considered

Step 4: Resolution and Corrective Action

- Appropriate corrective and preventive actions are implemented
- Remedies may include:
 - ✓ Workplace adjustments
 - ✓ Disciplinary action
 - ✓ Compensation or support to affected persons
 - ✓ Environmental or operational corrective measures

Step 5: Feedback and Closure

- The complainant is informed of the outcome (where appropriate)
- The case is formally closed once actions are completed

Step 6: Escalation

- Unresolved or high-risk grievances are escalated to Senior Management and the Executive Committee (EXCO)
- The HRWG monitors escalated cases and systemic issues

1.25 Communication and Awareness

Bovua Holdings ensures that grievance mechanisms are effectively communicated to all stakeholders:

Internal Communication

- Employee induction and onboarding programmes
- HR and SHEQ training sessions
- Toolbox talks and safety briefings
- Internal communications (e.g. intranet, policies, noticeboards)

External Communication

- Community engagement meetings and forums
- Supplier onboarding and contractual requirements
- Publicly available policies and communication materials
- Stakeholder consultations and sustainability reporting

Communication is tailored to ensure accessibility for all individuals, including those with language barriers, literacy challenges, or disabilities.

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1.26 Monitoring and Continuous Improvement

The effectiveness of grievance mechanisms is regularly monitored and reviewed through:

- Tracking of grievance trends and recurring issues
- Analysis of resolution times and outcomes
- Internal and external audits
- Management reviews and reporting to EXCO
- Feedback from employees, communities, and stakeholders

Lessons learned are used to strengthen systems, improve responsiveness, and prevent recurrence of human rights impacts.

11. OTHER ASPECTS

1.27 Misuse of Security Forces

Security is trained under the Voluntary Principles on Security and Human Rights.

1.28 Unlawful Evictions

Bovua Holdings respects housing and property rights and follows legal eviction processes only when necessary.

1.29 Implementation of Corrective Measures

Based on risk analysis, Bovua Holdings implements controls such as:

- Policy updates
- Supplier remediation
- Community engagement
- Environmental mitigation

1.30 Human Rights Training

Regular training is provided to:

- Senior Management
- Human Resources Team
- Security personnel
- HSE staff
- Procurement teams
- Contractors

1.31 Remediation

Bovua Holdings provides remediation where negative impacts occur, in line with the United Nations Guiding Principles on Business and Human Rights.

1.32 Organisational Aspects Considered

- Corporate Governance
- Accountability
- Availability of Resources

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- Worker engagement
- Community feedback

1.33 Monitoring Effectiveness

Effectiveness is monitored by:

- Key Performance Indicators - KPIs
- Audits & Site reviews
- Stakeholder dialogue/feedback

1.34 Frequency

Checks occur **annually** or more frequently for high-risk operations.

1.35 Stakeholder Dialogue

Bovua Holdings consults affected parties, which include employees, unions, suppliers, contractors, investors, and community stakeholders.

9.10 Human Rights in Procurement

All procurement contracts must meet human & labour rights standards.

12. REPORTING AND TRANSPARENCY

Annual Human Rights Due Diligence Report covering:

- Risk analysis results
- Preventive and corrective actions
- Stakeholder engagement outcomes

13. CONTINUOUS IMPROVEMENT

- Regular policy reviews to align with evolving South African legislation and global standards.
- Engage with International Petroleum Industry Environmental Conservation Association (IPIECA), United Nations (UN) Global Compact, and industry best practice forums.



CHIEF EXECUTIVE OFFICER

22 May 2026

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