

Policies, Statements and Guidelines

We have a range of policies, standards and guidelines that support ethical conduct, responsible business practices and sustainable value creation across the Clicks Group. These frameworks guide our employees, suppliers and business partners, and help us meet our commitments to our stakeholders.

- **Code of Conduct**: Sets out the Group's values, ethical standards and expected behaviours for all employees. The Code promotes integrity; legal and regulatory compliance; responsible use of company resources; workplace safety; environmental responsibility; and the prevention of fraud, corruption and conflicts of interest.
- **Human Rights Policy**: Reinforces our commitment to respecting and promoting internationally recognised human rights throughout our operations and value chain. The policy provides guidance on identifying, preventing and mitigating human rights risks across our workforce, supply chain and communities.
- **Human Rights Commitment**: Affirms our commitment to non-discrimination, fair labour practices, freedom of association, ethical sourcing, customer privacy and community development. It aligns with the UN Global Compact, the Universal Declaration of Human Rights and the Sustainable Development Goals.
- **Supplier Code of Ethics**: Establishes the standards expected of suppliers and business partners, including requirements relating to labour practices, human rights, health and safety, environmental responsibility, ethical conduct and legal compliance. Suppliers are expected to uphold these principles throughout their operations and supply chains.
- **Gift Declaration Policy**: The Gift Declaration Policy promotes ethical conduct by governing the declaration and acceptance of gifts, hospitality and other benefits. By enhancing transparency, preventing conflicts of interest and safeguarding independent decision-making, the policy supports the Group's commitment to integrity, accountability and fair workplace practices as reflected in its Labour Standards Declaration.

- **Group Environmental and Climate Change Policy:** The Clicks Group Environmental and Climate Change Policy establishes the Group's commitment to responsible environmental stewardship and climate action. It focuses on reducing emissions, improving energy and water efficiency, minimising waste, embedding environmental considerations into decision-making and supply chain management, and enhancing resilience to climate-related risks, while supporting transparent reporting and alignment with national and global climate objectives.
- **Labour Standards Declaration:** The Clicks Group Labour Standards Declaration affirms the Group's commitment to protecting workers' rights, promoting diversity and inclusion, ensuring fair labour practices, supporting freedom of association, prohibiting forced and child labour, and maintaining safe and healthy workplaces in alignment with UN Global Compact principles, ILO standards and South African labour legislation.
- **The Constitution of the Transformation Forum:** This policy establishes a formal governance structure for employee and management engagement on transformation, employment equity, diversity and inclusion. It supports the commitments set out in the Labour Standards Declaration by promoting employee participation, equal opportunity, fair labour practices and an inclusive workplace culture that respects the rights and dignity of all employees.
- **Corporate Social Responsibility Policy:** The Clicks Group CSI Policy guides the Group's investment in community development initiatives that improve health, education and social well-being. The policy promotes responsible governance, measurable impact and stakeholder partnerships, ensuring that social investments contribute meaningfully to the sustainable development of the communities in which the Group operates. It provides a structured framework supporting initiatives that align with its purpose and sustainability priorities. Key focus areas for the Group's CSI investment include healthcare access and education, youth development and community well-being. The Group prioritises interventions that deliver both measurable and sustainable impact, particularly in communities where access to healthcare education and services remains limited.
- **HIV/AIDS Policy:** The Clicks Group HIV/AIDS Policy promotes a supportive, inclusive and non-discriminatory workplace for employees affected by HIV/AIDS. The policy focuses on prevention, education, confidentiality, employee well-being and equal employment

opportunities, while safeguarding the rights and dignity of all employees.

- **Whistleblowing and Ethics Reporting Mechanisms:** Employees, suppliers and other stakeholders have access to independent and confidential channels through which concerns regarding unethical conduct, fraud, corruption or policy breaches can be reported without fear of retaliation.
- **Health, Safety and Well-being Policies:** Promote a safe, healthy and inclusive working environment for employees, contractors, customers and visitors, with clear responsibilities for maintaining workplace health and safety.
- **Responsible Marketing, Advertising and Customer Responsibility:** Clicks Group's Responsible Marketing, Advertising and Promotions suite of policies supports the Group's sustainability commitments by promoting ethical, transparent and responsible communication with customers. The policies require all marketing, advertising and promotional activities to be truthful, accurate, evidence-based and compliant with applicable laws, regulations and industry codes. They reinforce the importance of clear product information, fair pricing, responsible promotions, and substantiated health, wellness and sustainability claims, including safeguards to prevent greenwashing. The policies also recognise the Group's responsibility to support informed consumer choices, healthier lifestyles and responsible consumption, particularly in relation to private-label food and beverage products and communications aimed at children. Digital marketing activities are required to respect customer privacy, data protection requirements and disclosure obligations. Through internal review and accountability across relevant functions, including Marketing, Legal, Regulatory Affairs, Sustainability and Quality Assurance, the policies help protect consumer trust, strengthen stakeholder confidence and uphold the long-term reputation of the Clicks Group brand.
- **Customer Responsibility:** Clicks Group is committed to the responsible promotion, distribution and dispensing of pharmaceutical products and healthcare services, ensuring that patients, customers and healthcare professionals have access to accurate, transparent and evidence-based information. The Group's policies require all marketing, product information, patient education materials and health-related communications to comply with applicable legislation, regulatory requirements and industry standards. This includes ensuring that

product claims are scientifically substantiated, balanced and not misleading, while promoting the safe and appropriate use of medicines and healthcare products. Through robust governance frameworks and multidisciplinary review processes, Clicks Group supports patient safety, healthcare literacy, ethical healthcare practices and informed decision-making. The Group maintains a strong focus on medicine quality, pharmacovigilance, product traceability, regulatory compliance and effective product recall management, helping to safeguard patient well-being, strengthen consumer trust and protect brand reputation.

Supported by internal frameworks, procedures and operational manuals, these policies, statements and guidelines underpin ethical conduct and responsible corporate governance. They are reviewed regularly to ensure they remain relevant, effective and aligned with evolving regulatory requirements and best-practice standards.