

## ENVIRONMENTAL & SOCIAL POLICY STATEMENT

LECC's Mission is to provide reliable optic fibre and other communications infrastructure, maintaining value adding relationships with our stakeholders and achieve the country's ICT developmental agenda.

**LEC Communications (PTY) Ltd** aims to ensure that the highest standards of Environmental and Social performance, that are reasonably practicable to attain, are achieved in all our activities.

**LEC Communications (PTY) Ltd** also aims to uphold the highest standards of environmental sustainability while ensuring that the communities in which we operate are not negatively affected by our operations. This includes fostering inclusive development that benefits all, regardless of gender.

This policy outlines LECC's commitment to:

1. **Commitments:** The policy sets minimum requirements for managing environmental and social risks associated with our projects including those financed by external sources.
2. **Assessment and Monitoring:** It describes how LECC will assess and monitor the environmental and social impacts of its projects.
3. **Sustainability:** The policy is a key document guiding the LECC's commitment to promoting environmentally sound and sustainable development.
4. **Enhanced Measures:** The policy outlines measures to mitigate environmental and social risks.

**Scope** This policy applies to all employees, contractors, and operations across all locations.

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### Environment and Social Policy Statement

#### We commit to:

At LEC Communications, we are committed to conducting our operations in an environmentally responsible and socially equitable manner. We recognize that our activities have an impact on the environment and society, and we are dedicated to minimizing those impacts while contributing positively to the communities in which we operate.

#### Environmental Commitment

We are committed to:

- **Sustainable Practices:** Integrating environmental sustainability into our operations, decision-making, and planning processes.
- **Pollution Prevention:** Reducing emissions, waste, and the use of hazardous materials through efficient resource management and sustainable technologies.
- **Compliance:** Meeting or exceeding all applicable environmental laws, regulations, and standards.
- **Continuous Improvement:** Regularly assessing our environmental performance and seeking opportunities for improvement.
- **Awareness and Training:** Educating employees and stakeholders about environmental responsibilities and encouraging eco-conscious behaviour.

#### To meet our Environmental policy objectives, LEC Communications shall:

- Mandate environmental considerations into the decision-making processes across all our activities
- Continually improve environmental performance, supported by adequate resources and environmental governance

- Comply with all relevant national environmental legislation and align with best international industry practices.
- Communicate environmental responsibilities to all our staff and suppliers, providing appropriate support and training to enable them to meet these responsibilities and fulfil their roles
- Set environmental performance objectives and targets and regularly monitor and report our environmental performance to the LEC Communications Board and relevant stakeholders
- Ensure systems are in place to identify, assess, manage and control all environmental impacts, providing appropriate offsets where required
- Ensure water use efficiency and water conservation measures are considered in our operations
- Enable timely environmental incident reporting to and from all our operations
- Undertake periodic audits, reviews and evaluations for measuring compliance with this policy

### Social Responsibility

We strive to:

- **Respect Human Rights:** Uphold the rights and dignity of all individuals, both within our organization and in our supply chain.
- **Diversity and Inclusion:** Promote an inclusive and diverse workplace, free from discrimination and harassment.
- **Community Engagement:** Foster positive relationships with local communities through open dialogue, engagement, and support for local initiatives.
- **Health and Safety:** Ensure a safe and healthy working environment for all employees, contractors, and visitors.
- **Ethical Conduct:** Operate with integrity, transparency, and accountability in all aspects of our business.

### To meet our social objectives, LEC Communications shall:

- Mandate social and sustainable considerations into the decision-making processes across all our activities
- Continually improve social performance, supported by appropriate resources and social governance
- Comply with all relevant national social legislation and align with best international industry practices
- Communicate social responsibilities to all staff and suppliers, providing appropriate support and training to enable them to meet these responsibilities and fulfil their roles
- Set social objectives and targets and regularly monitor and report our social performance to the LECC Board and stakeholders
- Promote and foster digital inclusion and equity across gender, age, and social background
- Promote involvement of youth, women, and the marginalized within the digital value chain, ensuring equal access to employment, training, and leadership opportunities
- Contribute to promoting sustainable, secure, and gender-responsive digital literacy programs within the areas where we operate
- Ensure systems are in place to identify, assess, manage and control all project related social impacts, including the preservation of cultural heritage and providing appropriate compensation mechanisms when required
- Ensure systems are in place to consider the effect of displacement and to manage and control the impact of project induced influx
- Ensure processes are in place to promote gender equality, safeguard vulnerable youths, women and girls, and prevent any form of workplace discrimination, sexual harassment or physical assault
- Ensure processes are in place for payment of at least the minimum wage to all people, and for preventing any form of forced labour
- Ensure processes are in place to verify that all people and contractors are above the age of 18, and that no people under the age of 18 are involved in hazardous work

- Undertake engagement and consultation with our stakeholders, including disclosure of information to affected communities in which we operate, and ensuring that vulnerable stakeholders (such as people with disabilities and youth) are properly represented
- Ensure an effective visible grievance redress mechanism is in place across all of our operations and within the communities in which we operate
- Avoid or minimise project induced physical resettlement or economic displacement and provide processes to minimise adverse impacts including the provision of compensation and livelihood restoration programmes
- Support and respect the rights of project affected communities and vulnerable groups
- Undertake periodic audits, reviews and evaluations for measuring compliance with this social policy

#### **Implementation and Accountability**

This Environmental and Social policy applies to all LECC employees and contractors and shall be implemented through the LEC Environment and Social Management System. It is supported by clear objectives and measurable targets. It is communicated to all employees, contractors and external stakeholders as appropriate and is reviewed regularly to ensure its effectiveness and relevance. All LECC employees and contractors have a responsibility to understand, promote and actively assist in the implementation of this environmental and social policy. Leadership at all levels is responsible for the implementation of this policy, and we encourage feedback and participation from our stakeholders to strengthen our commitments.

#### **Approved By:**

Name Tšeliso 'Mokela

Position Managing Director

Signature



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Date 18-07-2025