

## 1 INTRODUCTION

As a third-party service provider (“you” or “Operator”) to BetterHome Group Limited (including any entity whose financial results are consolidated in BetterHome Group Limited’s annual financial statements)(collectively known as “BetterHome”), you are required to comply with the minimum standards set out below.

## 2 STANDARDS

### 2.1 Protection of Personal Information Act, 2013 (“POPIA”)

2.1.1 Chapter 3 of POPIA sets out eight conditions for lawful processing of personal information, including accountability, processing limitation, purpose specification, and security safeguards. BetterHome must ensure that any personal data handled by it and/or any operator (as that term is defined in POPIA) (“Operator”) appointed by it is processed lawfully.

2.1.2 If you process personal information for or on behalf of BetterHome as an Operator, you must comply with the following technical requirements to ensure compliance with POPIA -

<p>Registration of Information Officer &amp; publication of Privacy Policy:</p>	<p>Appoint the relevant Information Officer and/or Deputy Information Officer (usually at management level) and ensure that the appointments are registered with the Information Regulator.</p> <p>Publish a Privacy Policy on public facing websites that clearly explains how you collect, store, use, and protect personal information. These principles must align with the requirements of POPIA and with BetterHome’s privacy policy insofar as it pertains to personal information that you process as an Operator of BetterHome.</p>
<p>Data Collection, Storage &amp; Use:</p>	<p>Implement secure data storage practices. As a minimum, you must –</p> <ul style="list-style-type: none"> <li>• ensure that any personal and/or sensitive information is stored in an encrypted database;</li> <li>• data is backed up at least once weekly and is stored offsite at a secure location;</li> <li>• Any transfer of data must be done by using recognised transfer protocols that protect the security of the data; and</li> <li>• All data must only be collected and used for the purpose for which it was collected and may not be retained for longer than necessary. Where possible, de-identify the personal information to keep records if needs be.</li> </ul>
<p>Data Security:</p>	<p>Establish strong information security policies including-</p> <ul style="list-style-type: none"> <li>• Restricting access to personal data only to employees who need it to perform their duties;</li> </ul>

	<ul style="list-style-type: none"> <li>• Access to systems must be protected through the use of strong passwords that are changed on a regular basis and two-factor authentication;</li> <li>• the utilisation of industry-standard software or third party suppliers for data management and backup; and</li> <li>• regularly updating software and anti-virus software to protect against vulnerabilities. All software should not be older than 2 versions prior to the current version of the software.</li> </ul>
Cybersecurity Practices:	<p>Conduct regular risk assessments to identify potential threats to the personal information you handle by assessing the risk of data breaches or unauthorised access and implementing measures to mitigate these risks, including –</p> <ul style="list-style-type: none"> <li>• installing firewalls;</li> <li>• regularly updating antivirus software;</li> <li>• training staff on cybersecurity best practices;</li> <li>• access control to your systems (both physically and digitally);</li> <li>• regular monitoring of your network(s) for vulnerabilities; and</li> <li>• the implementation of a clear incident management plan which must be tested regularly.</li> </ul>
Cyber Insurance:	<p>Obtain cyber insurance that covers data breaches, cyberattacks, and other incidents involving personal information. This insurance should be sufficient to cover the costs of a potential breach, including legal fees, notification costs, and compensation for affected individuals.</p>

2.1.3 Refer to BetterHome’s Privacy Policy available on [www.betterhome.co.za](http://www.betterhome.co.za), [www.BetterBond.co.za](http://www.BetterBond.co.za); [www.MortgageMax.co.za](http://www.MortgageMax.co.za) or [www.BetterSure.co.za](http://www.BetterSure.co.za) ;

## 2.2 Anti-Bribery and Corruption Legislation (“ABC Laws”) -

2.2.1 You must ensure you have clear policies prohibiting bribery and corruption. This means avoiding any form of payment or receipt or giving of any gift or donation which creates undue influence or perceived undue influence.

2.2.2 You must ensure that you are familiar with the BetterHome Anti-Bribery and Corruption framework, including the duties of suppliers set out in the following policies (which are available on request) -

2.2.2.1 Anti-bribery and Corruption and Sanctions Policy, (in particular the anti-bribery and corruption principles);

2.2.2.2 Gifts, Entertainment and Hospitality Policy, (in particular the guiding principles of allowed and prohibited gifts, entertainment and hospitality);

2.2.2.3 Due Diligence Policy, (in particular the onboarding principles)

2.2.2.4 Whistleblowing Policy (in particular the reporting obligations as set out);

2.2.3 Avoid situations where personal interests conflict with those of BetterHome. For example, if you stand to benefit from a decision relating to your business relationship with BetterHome which is to be made by an

employee of BetterHome that you have a family or personal relationship with, you must disclose this immediately. Always act transparently to prevent any perception of impropriety.

### 2.3 **United Nations Global Compact's Ten Principles -**

You must comply with the United Nations Global Compact's Ten Principles which are as follows:

- 2.3.1 Support and Respect Human Rights: implement policies that protect human rights, such as non-discrimination policies and fair labour practices;
- 2.3.2 Avoid Complicity in Human Rights Abuses: ensure that your operations and supply chains do not engage in or support activities that harm individuals, such as forced labour or child labour;
- 2.3.3 Uphold Freedom of Association: allow employees to form or join unions and bargain collectively;
- 2.3.4 Eliminate Forced and Compulsory Labor: ensure that all work is voluntary and that employees can leave after giving reasonable notice;
- 2.3.5 Abolish Child Labor: do not employ children in a manner that is exploitative or harmful. Follow legal age restrictions for employment;
- 2.3.6 Eliminate Discrimination: foster an inclusive work environment where employees are hired and promoted based on merit, not on characteristics such as race, gender, or religion;
- 2.3.7 Support a Precautionary Approach to Environmental Challenges: even though not directly applicable, if this does become applicable in the future, BetterHome will adopt proactive measures to prevent environmental harm and promote sustainability;
- 2.3.8 Undertake Initiatives to Promote Greater Environmental Responsibility: implement and advocate for sustainable practices that reduce environmental impact;
- 2.3.9 Encourage the Development and Diffusion of Environmentally Friendly Technologies: invest in and use technologies that minimize environmental damage;
- 2.3.10 Work against Corruption in all its forms, including Extortion and Bribery: commit to ethical business practices by rejecting corrupt practices and ensuring transparency and accountability in all operations

### 2.4 **Labour Laws**

- 2.4.1 You must adhere to fair labour practices, including minimum wage, working hours, leave, and other employee rights.
- 2.4.2 You must comply with all labour regulations, ensuring that their employees are treated fairly and in accordance with the law.

### 2.5 **Broad-Based Black Economic Empowerment Act, 2003 ("B-BBEE")**

- 2.5.1 Encourages economic transformation by promoting black ownership, management, and control within companies.
- 2.5.2 Suppliers should support B-BBEE initiatives and demonstrate their contribution to economic transformation through their business practices.

## 3 **APPLICATION**

- 3.1 This Supplier Obligations Policy applies to all third-party service providers, contractors, and suppliers (collectively referred to as "suppliers") who engage in business with BetterHome and its subsidiaries. The policy outlines the minimum legislative and regulatory requirements that all suppliers must adhere to while conducting business on behalf of or in partnership with BetterHome.
- 3.2 Suppliers are expected to comply with all applicable South African laws and regulations, as well as international standards where relevant, including but not limited to the Protection of Personal Information Act, 2013 (POPIA), Anti-Bribery and Corruption Legislation (PRECCA), and the Constitution of the Republic of South Africa, 1996.

- 3.3 This policy forms an integral part of the contractual relationship between BetterHome and its suppliers and is deemed to be incorporated in all agreements concluded by BetterHome and its subsidiaries with their respective suppliers. It is the responsibility of each supplier to ensure that they understand and comply with the requirements set out in this policy, and to seek guidance from BetterHome's Compliance Team where necessary.
- 3.4 By engaging with BetterHome, suppliers acknowledge their commitment to upholding the principles outlined in this policy and agree to cooperate fully with any compliance monitoring, auditing, or investigations conducted by BetterHome to ensure adherence to these obligations.

#### **4 NON-COMPLIANCE**

- 4.1 Any non-compliance with this policy may result in the termination of the supplier relationship, legal action, or other appropriate measures as deemed necessary by BetterHome.
- 4.2 Where an employee is in violation of this policy, the employee may be subject to internal disciplinary sanctions.

#### **5 REVIEW**

The Compliance Team will review this policy from time to time and may make amendments to this policy as required. Please go to our websites to regularly review this policy.