



# SOCIAL AND ETHICS COMMITTEE REPORT

Sun International is committed to ethical and responsible leadership. Being a good corporate citizen includes driving an ethical culture group-wide; ensuring our customers' and employees' health, safety and wellbeing; engaging with local communities; providing opportunities for shared socio-economic value; protecting our environment; monitoring our transformation progress; and complying with relevant legislation and codes.

## COMMITTEE'S ROLES AND RESPONSIBILITIES

**Monitors** the group's social, transformation, economic and environmental performance, responsible gambling and the social impact of its reputational risk

**Reports** to the board and the group's stakeholders on social, transformation, economic and environmental developments and progress

**Reviews** the group's ethical conduct and confirms that it carries out its responsibilities in accordance with section 72(4) and Regulation 43 of the Regulations to the Companies Act as well as the JSE Listings Requirements

**Approves/supports** the group's prioritised sustainable development goals (SDGs)

**Assists** the board in assessing aspects of governance applicable to the committee's function and terms of reference

**Ensures** that Sun International remains a socially committed and responsible corporate citizen

**Ensures** gaming promotions are ethical and responsible

The social and ethics committee is constituted as a statutory committee in respect of its statutory duties in terms of section 72(4) of the Companies Act, read together with Regulation 43 of the Regulations to the Companies Act, and as a board committee in respect of its responsibilities prescribed by the board in its mandate and terms of reference.



**ZIMKHITHA ZATU MOLOI**

Chairman

### Dear stakeholders

I am pleased to present Sun International's social and ethics committee (the committee) report for the year ended 31 December 2023. The purpose of this report is to inform our stakeholders on the discharge of our duties as set out in the Companies Act and as supplemented by the committee's terms of reference. The salient matters of interest during 2023 are elaborated in this report.

We operate in a highly regulated industry and our corporate credentials and socially responsible behaviour are critical in terms of our licence to operate. To guide us in this oversight role, we task management with implementing principles contained in relevant legislation, regulations and prescribed legal requirements or prevailing codes of best practice.

**This includes the group's standing in terms of the goals and purpose of the:**

- 10 principles set out in the United Nations Global Compact (UNGC) principles.
- Organisation for Economic Cooperation and Development (OECD) recommendations regarding anti-corruption.
- International Labour Organisation Protocol and Employment Equity Act.
- B-BBEE Act and amended B-BBEE Codes of Good Practice.
- SDGs prioritised by the group.

The committee performs the requisite statutory functions on behalf of all subsidiary companies across the group, including those that score above 500 points as contemplated in Regulation 43 of the Regulations to the Companies Act. This ensures that group-wide practices are consistent and aligned, and that our ethical practices are applied irrespective of the jurisdiction we operate in. Meropa, an associate company, has its own social and ethics committee. In Nigeria, Tourism Company of Nigeria's Plc's (TCN) has its own code of conduct and regularly reports any ethical issues to the TCN nomination and governance committee as well as to the board. Furthermore, the Sun International director: corporate services, chairs the nomination and governance committee in Nigeria in his capacity as a director of TCN, which reinforces the group's governance structures framework and practices.

#### Management discharges this duty by reporting to the committee on the group's:

Good corporate citizenship, including promotion of diversity, equality and the prevention of unfair discrimination.

Progress against transformation as per the B-BBEE Act and amended B-BBEE Codes of Good Practice.

Implementation of its environmental, social and governance (ESG) strategy.

Contribution to the development and upliftment of the communities around which it operates.

Environmental, health and safety initiatives across all relevant areas.

Progress towards the group's prioritised SDGs.

Consumer relationships and marketing initiatives.

National Responsible Gambling Programme (NRGP) implementation.

Labour and employment activities, including the company's standing in terms of decent work, working conditions, fair and transparent labour practices and our relationships with our contribution towards the wellness, educational and skills development of our employees.

Gaming promotions to ensure that they are conducted ethically, fairly, and transparently.

Procurement spend, to ensure that it creates value across the group's broad supplier base and supports local procurement opportunities through enterprise and supplier development.

Management of ethics in line with best practice principles including in line with the 'Governance of Ethics Framework' that was developed by The Ethics Institute.

These reports correlate with the committee's mandate and the areas mentioned above are reported on at each meeting. As chairman of the committee, I also provide regular feedback at board meetings regarding the committee's activities and provide feedback to the shareholders at the annual general meeting (AGM). The 2023 social and ethics report will be tabled at the Sun International AGM to be held on 8 May 2024.

### Composition, meetings and assessment

Committee member	Number of meetings	Attendance
Zimkhitha Zatu Moloi	3	3
Anthony Leeming (CE) <sup>^</sup>	3	3
Dawn Marole	3	3
Nigel Payne	3	3
Tapiwa Ngara <sup>1</sup>	1	1
<b>Right of attendance</b>		
Norman Basthdaw (CFO) <sup>^</sup>	3	3
Andrew Johnston <sup>^</sup>	3	3
Verna Robson <sup>^</sup>	3	3
Muxe Mambana <sup>^</sup>	3	3

**Independence\***

**75%**

(2022: 60%)

**Attendance\*\***

**100%**

(2022: 100%)

\* Independence % is calculated as at 31 December 2023.

\*\* Attendance % is calculated based on attendance throughout the year including those who resigned.

<sup>1</sup> Tapiwa Ngara resigned from the Sun International social and ethics committee with effect from 10 March 2023.

<sup>a</sup> Executive.

The committee's current composition includes three non-executive directors, and one executive director. The committee met three times during the year, which was adequate to deal with the various matters contemplated in the Companies Act, read with Regulation 43 of the Regulations to the Companies Act, as well as the committee's mandate and terms of reference. In addition, Sun International executives whose areas of discipline are covered by the committee, and who have rights of attendance on the committee include the chief financial officer, director: corporate services, director: human resources, and director: internal audit. In addition, certain key members of management, namely the ESG manager, risk manager, and the ethics officer, attend committee meetings by invitation. As per the mandate of the committee, its terms of reference were reviewed and approved.

As part of its commitment towards complying with best corporate governance practice in terms of King IV™, Sun International conducts committee reviews every two years. The last evaluation of the committee was performed towards the end of 2022, with no adverse findings. The next evaluation of the committee will be performed towards the end of 2024.

Ongoing stakeholder participation from various areas within the group assures that appropriate feedback on all matters is provided. The mix of committee experience allows for robust debate on topics put forward to the committee. Furthermore, we are satisfied that initiatives undertaken by the group are adequately challenged when tabled at committee meetings.

## SALIENT MATTERS OF INTEREST

### Ethics and culture

Our ethical and responsible commitment is driven by the group's code of ethics (the code) which commits all stakeholders to the highest ethical conduct and standards. The board is responsible for setting the tone from the top and to lead ethically and effectively towards the achievement of an ethical culture across the group.

The executive committee, senior management and heads of departments across the group annually sign a compliance declaration confirming that they and their team members are and remain committed to carrying out their functions in a manner compliant with, among others, the code, anti-bribery and corruption, competition law, Protection of Personal Information Act (POPIA) and Financial Intelligence Centre Act (FICA) requirements. Ongoing awareness ensures all employees understand how to contribute to the group's ethical conduct, brand reputation and integrity. The group's whistle-blowing and fraud response policies, which are disseminated group-wide, contain clear guidelines for reporting any criminal, illegal, discriminatory or other unethical behaviour without fear of discrimination, intimidation or occupational detriment. Employees can contact the 24-hour anonymous tip-off hotline independently run by Deloitte Tip-off Anonymous Pty Ltd (via the portal, email and toll-free number) to report any ethical concerns or dilemmas, which are handled confidentially. The ethics office oversees ethics throughout the group and receives regular feedback on any matters of concern.

The ethics office meets with members of senior executive management, to discuss trends arising from matters reported through incident reporting facilities, and material incidents of ethical misconduct are reported to management group-wide. The ethics officer serves as a member of the combined assurance forum, which contributes to the group's enterprise risk management processes, and is also an invitee to the group risk working committee. Closed sessions are held between the social and ethics committee chairman, independent member directors, the chief executive and the ethics office after each social and ethics committee meeting, to discuss any material ethical issues reported group-wide and the investigation methodology utilised to close these out.

## Responsible gambling

**Contributed**  
**R6.3 million**  
(2022: R8 million)

**towards the NRRGP in respect of casinos,  
sports betting and LPMs collectively**

The group is committed to, and financially supports, the South African Responsible Gambling Foundation (SARGF), a leading global programme for promoting responsible gaming. The SARGF, through the National Responsible Gambling Programme (NRGP), creates awareness around public initiatives undertaken in the industry, which include prevention, treatment and counselling initiatives, training for regulators and industry employees, research audits, and life skills programmes for schools. Sun International reports progress on these NRGPs principles across all gambling operations to relevant governance committees. In addition, the group reports to relevant governance committees on matters such as crèche utilisation statistics and any attempts by minors and excluded persons to access the gambling floors, which remain strictly monitored at all units. Training employees in the different stages of the NRGPs is also reported.

Group internal audit is responsible for conducting various internal audits and reports its findings regarding responsible gambling to the social and ethics committee. Group compliance monitors the group's gaming entities for compliance with prescribed requirements and reports its observations to the social and ethics committee. SunBet performed a gap analysis to compare its responsible gambling measures against international leading practice and commenced with its action plan to align accordingly. The Western Cape Gambling and Racing Board (WCGRB) hosted the Western Cape Responsible Gambling Summit 2023 at GrandWest, that was well attended by local and international guests. The purpose of the summit was to find ways to align the South African responsible gambling regime with international standards and was the ideal platform for stakeholder and regulators to engage on the various issues relating to this topic. Subsequently, the WCGRB will be undertaking local research to better understand problem gambling in the Western Cape.

The group continues to explore ways to improve its anti-money laundering and anti-terrorism controls to identify and report related transactions and customers. These controls include identifying its customers, identifying politically exposed persons, vetting its database of customers against the UN sanctions list, and the filing of cash transaction reports and suspicious transactions. The group has implemented various intelligence reports that are investigated by its anti-money laundering personnel, which include high balances maintained by players without any gambling activity or where the gambling activity is not in keeping with the amount maintained by players. Also, the group continues to conduct integrity and competency verification of employees involved in its gaming operations, who conduct transactions with customers. The Sun International board has issued a compliance statement confirming its commitment towards preventing the group from being exploited in respect of money-laundering and terror financing. All gaming employees are trained on FICA and each gaming business has a dedicated anti-money laundering compliance officer, and the group has also appointed a group anti-money laundering compliance officer.

## Zero tolerance of bribery and corruption

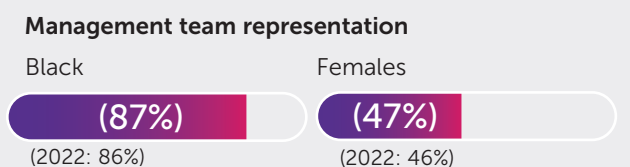
The committee continues, to review the group's standing and progress in accordance with the 10 principles of the UNGC (on a voluntary basis) and the OECD recommendations regarding anti-corruption. The company monitors compliance with its policies in relation to bribery and corruption; gifts, entertainment and tips; and responsible gambling. The committee concluded that the group substantially complied with the requirements of the UNGC principles, and that there were no material areas of concern. Sun International remains committed to improved reporting practices and transparency around activities and performance in combating corruption. The board is satisfied that sufficient APEX Risk Management Compliance Programme controls, and sufficient training were in place and that Anti-Money Laundering training had been provided to the various boards. The executive committee, senior management and heads of departments across the group completed training regarding anti-bribery and corruption, POPIA and competition law compliance. There were no tip-offs received via the whistleblowing facilities of incidents of fraud, bribery, and/or corruption in 2023.

## Board diversity

Sun International's board diversity policy recognises and embraces the benefits of having a diverse board, as increasing board diversity is essential in maintaining a competitive advantage. In accordance with the JSE Listings Requirements, Sun International's board diversity policy incorporates additional diversity elements including, over and above gender and race, skills, field of experience, field of knowledge, regional and industry experience, age and culture. Black directors comprised 40% of the total directors serving on the board (Sam Sithole and Tapiwa Ngara being excluded per the B-BBEE Codes of Good Practice). The number of female directors equalled 40% of the total board composition. The board's and committees' composition, collective skills (industry knowledge, experience, technical skills and governance competencies) and competency, are documented and monitored in terms of a board skills matrix. This assists with assessing what the future composition of the board should look like from a skills and experience perspective and assists in terms of identifying key gaps. The board skills matrix aligns with the group's strategy and complies with best international corporate governance practices.

Governance competencies are considered in terms of strategy and strategic planning, financial performance, risk and compliance oversight, gaming and hospitality strategy, commercial experience, stakeholder engagement and knowledge, ESG and experience in companies with international operations.

## People, culture and transformation



Sun International's SunWay culture and employee value proposition (EVP) continues to embed the group's culture as well as attract and retain top-performing employees. The EVP reinforces the world-class employee benefits and positive working environment in Sun International. Sun International's employee recognition programme, Sun Stars, continues to motivate employees and drive positive change in behaviour. The Sharing the Sun campaign – Changing Lives – continued to make a difference in the life of a deserving employee.

Transformation is integral to Sun International's sustainability and is rooted in our South African operations. The social and ethics committee monitors appointments, retirements and resignations to ensure we achieve a demographic workforce in line with both internal targets and commitments to legislation.



The Department of Employment and Labour finalised the Amended Employment Equity Act in April 2023, however the accompanying regulations and effective dates are expected to be gazetted by June 2024, with our baseline reporting period starting December 2024. The group continued to make good progress against its three-year employment equity targets and we confirmed our good standing with the Department of Employment and Labour as our employment equity plan was approved. We are currently undergoing our B-BBEE verification audit and the results will be made available on our website at the end of March 2024.

We achieved an overall black employee representation of 94.6% (2022: 93.9%), exceeding the distribution of the national economically active population. Sun International’s management team comprises of 87% (2022: 86%) black people, and 47% (2022: 46%) are females. Demographic representation at middle and senior management levels improved, however, challenges still remain where representation of black people, particularly black females, are lower than the economically active population statistics. We are confident that our current succession plans, talent management and extensive training programmes will have a positive outcome at these levels going forward. Our women representation at junior and middle management has improved considerably due to our women empowerment strategy and women development programmes. These will continue into 2024, with a positive impact on senior management anticipated in 2025.

Sun International’s talent acquisition strategy contributed positively to our employment equity progress, with 99% appointees (2022: 98%) from designated groups of which 90% (2022: 87%) were African appointees. Sun International’s recruitment of persons with disabilities remains challenging and the group continues to host awareness campaigns to remove the stigma and fear of victimisation experienced by employees living with disabilities.

Ongoing learning and development remains a key focus for the group and during the year we invested R84 million (2022: R84 million) in skills development. During 2023, all units increased their training initiatives and pursued a variety of courses offered by Reach Summit. There was also a drive for customer service, with the relaunch of the CLEAR (connect, listen, engage, act and reconnect) training programme at all gaming units. Online courses, especially LinkedIn learning, remained the preferred learning medium for managers as the courses were carefully tailored to meet our managers’ needs. All senior and middle managers were assigned curated content that was aligned to the Sun International leadership competencies.

We conducted an employee engagement survey in 2023 and reached a group participation rate of 75%. These results revealed that 76% of employees are engaged, which is positive in the hospitality and gaming industry.

The group continues to focus on fair, ethical and responsible remuneration in line with the Department of Labour’s amendments to regulations governing income differentials. We conduct equal pay for work of equal value analyses and assessments annually, to ensure that pay parity is retained between persons

performing similar roles and functions across the group – any anomalies identified are addressed. As part of the 2022/2023 equal pay analyses, we introduced once-off lump-sum payments for employees in respect of the 2023 financial year. This was implemented as a pro-active intervention to ensure the ongoing motivation and retention of these employees, for both non-bargaining employees and bargaining employees.

### Equal Pay for Work of Equal Value (EPWEV)

Sun International’s EPWEV exercise continues to update and improve our analysis process. The purpose of this exercise is to investigate and identify possible risks and discriminatory remuneration practices that could give rise to claims of unfair discrimination. It also serves to reinforce the message to the operations that pay-related decisions need to be justified in accordance with the Code of Good Practice (Employment Equity Act).

Differentiation is said to occur frequently at the workplace, for example, due to performance or when an employee has accumulated years of service in their current role, or they bring critical skills needed by the business. This form of differentiation is acceptable if it serves a valid purpose and is based on valid grounds. Therefore, it is permissible to treat employees differently. However, differentiation becomes discriminatory only if it is unjustifiably prejudicial or demeaning or based on arbitrary grounds.

The work around EPWEV is not a once-off project and pay equality cannot be achieved overnight. Rather, like employment equity, pay equity is a target to be achieved over a period of time. Some of the existing gaps in Sun International will take some time and greater effort to close. We are continually improving our investigative approach to better track and report EPWEV progress.

### Our sustainability journey

Sustainability at Sun International is the commitment to maintaining a harmonious equilibrium between social and environmental responsibilities, ensuring the long-term viability of our operations and enhancing the experiences provided to our customers. Sustainability integration is achieved through our ESG framework – Sustaining Sun. Drawing on internationally recognised best practice, this framework provides a structured approach to our operations, aligning with global standards and ensuring a balanced focus on ESG considerations.

The core pillars for Sustaining Sun are:



The performance against our sustainability linked loan (SLL) key performance indicators (KPIs) presented a few challenges in 2023. While we achieved our KPI on improving our black women-owned spend, we fell short by 1% in achieving our KPI on waste recycling rate of 80% and our renewable energy generated of 1 070 480 kWh was below the KPI of 3 557 188 kWh. We acknowledge that there needs to be an enhanced focus on waste separation at our operations and improved scrutiny on the service delivery from our waste management service providers. Our renewable energy project roll out was limited in 2023, however we are confident that this is being addressed by the group in 2024.

### Independent assurance

As part of our independent assurance scope, IBIS Consulting conducted a review of the group’s environmental, health, safety and wellbeing as well as socio-economic development (SED) portfolios. A Type II (moderate) assurance approach was adopted by way of onsite visits to three operations and desktop reviews for two operations, which included a review of key data indicators, with additional evidence provided and interviews conducted, to ensure a fair and transparent process. Specific units were assessed for selected individual indicators. A further review of the remaining operations’ data was undertaken to assess for anomalies or data trends. No material issues were identified during the assurance audit that needed to be brought to the attention of the committee, the board or other stakeholders.

### Enterprise and supplier development

Communities’ concerns around securing local procurement spend and local employment to provide socio-economic upliftment remains an issue. Each unit works closely with local communities to develop their local supply chain and a supplier portal is used by the various units to identify potential suppliers to be brought into the Sun International supply chain. Additionally, an upgraded e-sourcing tool is nearing completion. This tool will enable suppliers to have visibility of upcoming procurement opportunities within the group and units will be able to advertise opportunities specific to the unit’s area of operation, so that local community members can respond directly to these opportunities. This ensures a transparent procurement process and dispels potential suppliers’ fears of responses not being considered for specific services. Good progress was made during 2023 to enhance our procurement portal to ensure it is suitable for both small-scale and large-scale projects, as well as being more user friendly for suppliers. In 2023, Sun International hosted a Women in Business Conference at The Maslow Sandton for 200 female entrepreneurs in construction and facilities management, to increase the group’s supplier base. Numerous enterprise and supplier development masterclass sessions were also held where industry experts, entrepreneurs and some Sun International staff shared their knowledge, experience and insights with small businesses.

Sun International’s supplier code of conduct ensures all suppliers adhere to minimum best practice ethical standards. The group is committed to creating opportunities for all suppliers, especially B-BBEE compliant SMMEs. We maintained our B-BBEE levels across all pillars to support economic upliftment through our supply chain nationally. We continue to promote procurement spend across the provinces where we operate, while ensuring optimal strategic spend. The group implemented a new B-BBEE system to assist with information accuracy and monitor trends to optimise B-BBEE spend. One of the KPIs included in Sun International’s SLL is spend on suppliers that are at least 30% black women owned. This KPI aims to enhance value sharing and provide economic upliftment for businesses owned by some of the most marginalised within our communities. During 2023, we made good progress by achieving and exceeding this KPI target of 19.5% and there has been further engagement with suppliers to improve their black women ownership, which has yielded positive results.

### Socio-economic development

The group’s SED strategy continued to positively impact the communities with whom we interact with. Our units’ SED and corporate social investment (CSI) projects focus on addressing the needs of the community, as identified through our community stakeholder engagement process. In 2023, we completed a social engagement management module development on the IsoMetrix system, which the group will use to optimally manage our community stakeholder relations. Our SED focus areas include education, sports, and arts and culture projects, where these investments continue to make a difference in the lives of the communities where we operate.

All our selected SED programmes align closely with the following SDGs: SDG2 (zero hunger), SDG3 (good health and wellbeing), SDG4 (quality education), SDG6 (clean water and sanitation) and SDG13 (climate change). Initiatives also incorporate environmental and social elements where relevant. The majority of our SED spend is allocated to educational projects. For example, Sun International’s Eco-Schools project, in partnership with WESSA, continues to raise awareness of the importance of biodiversity and sustainability and encourages responsible behaviour in learners. The group also focused on raising awareness in the fight against gender-based violence (GBV), as well as emphasising the importance of educating girls about gender equality and sustainable development. Another educational project the group invests in, Sci-Com Foundation, develops learners from grassroots levels to university and college levels. In support of emerging artists, the group sponsored art scholarships. The Sun International festival of giving was launched during the year, which aligned to our employee volunteering programme. Over 850 employees volunteered and supported over 1 200 beneficiaries.





## Environmental

Sun International’s ENVIRO-AMBITION 2025 five-year strategy focuses on carbon emissions, water, electric energy, waste and biodiversity. It maps our journey towards being at the forefront of sustainable environmental management in the hospitality sector and outlines our KPIs and mechanisms for realising our environmental ambition. This approach also considers the group’s ESG strategy, the JSE Sustainability Disclosure guidelines, SDGs and international best practice such as the Task Force on Climate-related Financial Disclosures (TCFD) and the Sustainability Accounting Standards Board (SASB). Our various KPIs were updated to reflect our journey and assist in monitoring and evaluating progress in achieving our ambition.

The group continues to explore innovative environmental initiatives to address waste management and pressing water and energy resource concerns facing South Africa. In 2023, the group installed the first onsite solar project at Sun City and further projects are planned at Sibaya and Carnival City in 2024. By owning these types of projects, we also own the environmental attributes. Therefore we can deduct the generated kWh from our overall electricity consumption when calculating our Scope 2 emissions. Boardwalk obtained a water use licence to secure water quality and supply with the ongoing water supply issues in Gqeberha.

We have transitioned all our environmental data reporting across onto the IsoMetrix management system and while some control issues were highlighted in terms of the accuracy of the data this has been addressed with the appointment of an ESG specialist to drive data accuracy across the group.

As we reached our first milestone in our carbon management journey, the group exceeded its 2023 target of a 15% reduction by achieving an 18% reduction against a 2017 baseline. With the roll-out of renewable projects and the group addressing Scope 3 emissions, new targets for Scope 1, 2 and 3 emissions will be developed in 2024. These targets will align with our response to climate change and enable the group to map out its low-carbon transition.

Our waste management journey has progressed well. However, a challenge for the group at the operations is the proper waste sorting and segregation, which are critical for effective recycling. While we improved our 2023 recycling rate to 79% from 68% in 2022, the group was 1% below the SLL KPI target of 80%. Enhanced controls, training and awareness have been earmarked for 2024 so that the operations can achieve the 87% recycling rate in 2024.

## Health, safety and wellbeing (HSW)

Sun International’s five key focus areas include preventing stakeholder harm, proactive control and mitigation of risks, implementing innovative solutions to manage HSW, embedding a caring and vigilant culture, and maintaining compliance with legislation and the adoption of best practice. While we are pleased to report that we recorded zero penalties or fines during the year, regrettably, we had a fatality involving a service provider. The group continues to look for innovative ways to manage HSW, such as the new ESG and ERM management platform (IsoMetrix) that was launched in 2023. The roll-out of this system has highlighted opportunities for improvement in our data management controls and enables a proactive approach to risk and compliance management.

Safety health and environmental (SHE) succession was a focus during the year, to ensure a smooth transition of leadership and to address key personnel turnover. Potential successors for SHE key positions were identified, and a succession plan will be formulated and implemented in 2024. We also ensure that stakeholder feedback is considered when managing our risks and have incorporated the feedback of our customers when evaluating health and safety performance. In 2023 the group achieved an average customer satisfaction score of 88% for health and safety against a target of 85%. Ongoing compliance training and awareness took place during 2023, with 52 awareness campaigns featuring diverse sustainability initiatives including health, safety and the environment.

Through our medical surveillance programme, we continue to maintain compliance and align with best practice. The group’s medical surveillance policy was reviewed during 2023, with quarterly monitoring of policy implementation by the group health and safety specialist. There was a notable improvement of 30% in fire prevention and life safety where we achieved a 93% (2022: 63%) closure rate for high-priority findings.

## Protection of personal information

### Received zero POPIA applications

### Received three Promotion of Access to Information act, 2000 (PAIA) applications

The stewardship of customer information and data protection is paramount. During 2023, we continued to enhance our controls to ensure compliance with the Protection of Personal Information Act (POPIA) and the General Data Protection Regulation (GDPR).

## Conclusion

Based on the committee’s performance during the year, we are satisfied that it has fulfilled its mandate in terms of the Companies Act, read with Regulation 43 of the Regulations to the Companies Act. There were no known instances of material non-compliance with legislation or regulations, or non-adherence with codes of best practice in terms of the areas within the committee’s mandate, during the year under review, or repeated regulatory penalties, fines, censures or compliance orders. As such, we are satisfied that the group has operated as a socially responsible corporate citizen demonstrating an ongoing commitment to sustainable development.

During the 2023 financial year, Sun International was compliant in all material respects with the Companies Act, Regulations to the Companies Act, the JSE Listings Requirements, King IV™ and its memorandum of incorporation.

Going forward, the committee will focus on:

- ▶ **Overseeing** the group’s corporate citizenship and ensuring it continues to improve on its already embedded principles of carrying out its actions as a responsible and ethical corporate citizen, and having a positive impact on the communities in which we operate.
- ▶ **Ensuring** in conjunction with the remuneration committee that the group pays its employees fairly, ethically and responsibly in accordance with the equal pay for work of equal value principle and addresses the gender pay gap.
- ▶ **Ongoing** training and communication with employees through the Sun Talk platform and engaging with employees in terms of their wellness through the employee wellness programme.
- ▶ **Overseeing** the implementation and roll out of Sun International’s ESG strategy and addressing any concerns.

- ▶ **Monitoring** the group’s activities around responsible and transparent procurement and sustainable supply chains.
- ▶ **Monitoring** anti-money laundering and anti-terrorism controls to identify and report the related transactions and customers.
- ▶ **Monitoring** the responsible online gambling programme.
- ▶ **Monitoring** social and ethics committee trends in general.
- ▶ **Monitoring** regulatory developments:
  - Tobacco Products and Electronic Delivery Systems Control Bill.
  - Employment Equity Act: Code of Good Practice on the Prevention and the Elimination of Harassment in the Workplace.
  - Proposed changes set out in the Companies Amendment Bill, 2021 as they pertain to the social and ethics committee.
  - Proposed JSE Listings Requirements amendments as may pertain to the social and ethics committee.
  - FICA regarding various risks that gambling operations may be exposed to in terms of money-laundering, terror financing and proliferation financing.
- ▶ **Ensuring** that the committee continues to review its mandate and terms of reference to ensure that it is aligned with the Companies Act and Regulation 43 of the Regulations to the Companies Act, 2011 and whether there is any material non-compliance that requires disclosure.

### ZIMKHITHA ZATU MOLOI

Chairman of the social and ethics committee  
15 March 2024





# REMUNERATION COMMITTEE REPORT

SEE STATUTORY REPORT



# INDEPENDENT ASSURANCE STATEMENT – EIBIS

TO BE UPDATED