

This Statement is made pursuant to the Modern Slavery Act 2015 and also satisfies the Modern Slavery Act by referencing:

- The Constitution of South Africa,
- The Basic Conditions of Employment Act 75 of 1997 as amended
- The Labour Relations Act No 66 of 1995 as amended
- The Employment Equity Act, No 55 of 1998 as amended

It details the steps that Retina Group has taken to tackle modern slavery and human trafficking in its supply chains and within the groups businesses.

OVERVIEW

Retina Group is committed to preventing acts of modern slavery and human trafficking from occurring in its business and supply chain and expects the same high standards from all of its portfolio companies.

Retina Group's mission is to build profitable business and elevate leaders through leading Agriculture, Import and Export, Engineering, Green Energy and Distribution portfolio companies. We develop and deliver innovative products, services, and technologies that save lives and protect our environment. Over the course of 10 years, the Retina Group brand has become synonymous with product quality, service, and innovation.

Retina Group strives to make a valuable contribution to portfolio and group associated companies such that wherever in the world they live, people can enjoy profitable, job creating and sustainable conditions. Retina Group innovates to meet customer needs, and to improve the conditions of communities by supporting and developing business to serve for the greater good and grow the economy.

This document describes the steps Retina Group has taken to help detect, prevent and respond to modern slavery issues within our business and our portfolio companies.

OUR COMPANY

Retina Group comprises a group of companies and is the leading enabler of venture capital, growth funds and capital injection in the South Africa region, providing a full suite of diversified investments as a holding company to portfolio companies of all types and sizes, including acquiring and adding value-added services.

OUR SUPPLY CHAIN

1. In order to provide services to our clients, we procure a range of goods and services from third party suppliers.
2. We partner with a diverse group of suppliers, majority of whom are either technology or services related to companies in our portfolio selection.
3. Based on the nature of our services and the goods and services we procure from third party suppliers, we believe that our risk of inadvertent involvement in slavery and human trafficking is low.
4. To ensure that we and our supply chains remain free of slavery and human trafficking issues, we have adopted the following controls:

POLICIES

The Group's management has communicated its commitment against slavery and human trafficking through the development of policies that clearly articulate management's guidance against such practices both within our business and by the suppliers, portfolio that support our organisation. The details of these policies are as follows:

1. Code of Conduct: This code requires all Group employees to exemplify the highest standards of conduct and ethical behaviour and comply fully with all applicable laws and regulations. Third parties including our suppliers are also required to abide by this code and exemplify the same high standards expected of our employees.

2. Whistleblower Policy: The Group encourages all its employees, external consultants and contractors to report any concerns or wrongdoing at an early stage safely, anonymously and without the fear of reprisals. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Employees, external consultants and contractors who have concerns can report the matter using the following channels:

- An anonymous 24-hour whistleblowing hotline and related online reporting channel, operated by an independent third party;
- An e-mail address (ethics@retinagroup.co.za); and
- A telephone line direct to the Chief Risk Officer & Group Company Secretary

3. Group Vendor Management Policy: The Group maintains a robust Vendor Management Policy, which requires the performance of due-diligence and identification of potential risk with the supplier engagement. This policy also focuses on an on-going monitoring of our suppliers which requires appropriate escalation and response to any activity that could be considered outside of the Group policies.

4. Vendor Code of Conduct: The Group is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions, treat workers with dignity and respect, deploy ethical employment practices and comply within the law in their use of labour. The supplier must provide a confirmation that they and their supply chain do not practice modern slavery, human trafficking and child labour. Violations of the Group's Vendor Code of Conduct will lead to the termination of the business relationship.

PORTFOLIO COMPANIES DUE DILIGENCE AND MONITORING

Retina Group undertakes due diligence when considering funding on new portfolio companies, and regularly reviews its existing portfolio companies and investment portfolios. As part of the assessment, the modern slavery and human trafficking risks are evaluated for each new company in the funding process, acquisition process and business support stages .

Once on-boarded, the companies are monitored on a regular basis. Ongoing monitoring includes reperformance of due diligence activities and regular on-site assessments of the identified companies. Conducting company and associated audits or assessments depends on many factors including but not limited to:

- High risk businesses,
- Usage of labour intensive methods to deliver services,
- Health and human safety practices employed by the company.
- In addition to the above controls, the risk management and due diligence controls have been enhanced to the following effect:

CONTRACTING

Our standard terms and conditions for use with our potential suppliers include a reference to compliance with the Modern Slavery Act, and an obligation on suppliers to respect all internationally proclaimed human rights laws including but not limited to employing workers who meet the minimum legal age requirement and not engaging in child or forced labour.

TRAINING

Regular training is imparted to our staff involved in supply chain management to ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business.