



# CLICKS GROUP

## L I M I T E D

REG. NO. 1996/000645/06

## ENVIRONMENTAL MANAGEMENT POLICY

<b>Environmental Management Policy</b>	<b>Policy Number: 001</b> <b>Version Number: 02</b>	<b>Date: 22 September 2014</b> <b>Page 1 of 3</b>
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### 1. Approach to Environmental Management

The Clicks Group recognizes the significant impact of climate change brought about by individual and corporate activities. Consequently, sustainable business practices within a culture of responsible environmental stewardship underscores the Group's commitment to conserving our natural environment for future generations in line with the national environmental agenda.

Given this commitment, the Group has moved beyond a narrow focus on legislative and regulatory compliance to embedding environmental management into our strategic and operational planning processes.

### 2. Environmental objectives

- To ensure compliance with relevant legislation and regulations;
- To implement the Group's environmental sustainability reporting process which revolves around continuous engagement with our employees, customers, suppliers and external stakeholders as part of our environmental management system;
- Establishing clear standards and measurable environmental targets;
- Regular assessment and evaluations of our sustainability initiatives and public reporting on our achievements; and
- Fostering a culture of environmental awareness and commitment to a sustainable future amongst staff and suppliers

### **3. Environmental Management System**

The Group's environmental management system is based on a 5-phase process:

#### **Phase 1 - Prepare**

- Gather data around our energy, water and material resource consumption;
- Determine our carbon foot print baseline with specific reference to our carbon emission, effluents and waste;
- Assess the regulatory and legislative framework with which we must comply;

#### **Phase 2 – Connect**

- Build organisational commitment to environmental sustainability practices and reporting processes;
- Build sustainable partnerships with relevant stakeholders; and
- Embed environmental sustainability into Group risk methodology and practices

#### **Phase 3 – Define**

- Define the applicable governance framework and structures with the responsibility for the environmental management system;
- Define the environmental sustainability priority areas with reference to our areas of impact;
- Define measurable sustainability objectives and targets to reduce our carbon emissions and consumption of inputs; and
- Define reporting requirements

#### **Phase 4 – Monitor**

- Implementation of self-assessment tools to measure and analyse the impact of our business activities;
- Implementation of business scorecards to report on our consumption of inputs relative to our goals and target; and
- External verification of our carbon foot print and energy consumption
- Monitor the adequacy and quality of our environmental management system with specific reference to our annual measures to reduce our carbon foot print and inputs consumption

#### **Phase 5 - Communicate**

- To provide a platform for information sharing, dissemination of best practice across the Group or retail sector;
- To promote awareness of the impact of individual and corporate on our natural resources and on the global climate amongst staff and suppliers;
- To actively support staff and stakeholders in the promotion of environmental conservation efforts within their communities; and

- To communicate our commitment to environmental sustainable practices and our progress against our published goals to our employees, suppliers, stakeholders and shareholders through our internal communication channels, regular participation in relevant surveys, through our annual report and via our corporate website

#### 4. Environmental Focus

The Group's response to climate change will be to continue to monitor and evaluate all aspects of our carbon foot print with the following as areas of focus:

- Energy efficiency
- Distribution network optimisation
- Travel
- Waste management/recycling
- Awareness programmes amongst staff, suppliers and local communities

#### 5. Governance

The Social and Ethics Committee, under the chairmanship of a non-executive director, has been designated to overseeing the Group's environmental management agenda. The responsibility of implementing the environmental management policy and its regular review has been assigned to the Group HR Director.

#### 6. Scope

This policy applies to all permanent and fixed-term contract (full-time, part-time and flexi-time) employees of the Clicks Group (Pty) Limited, its subsidiaries, business units and service providers in South Africa only.

#### 7. Responsibilities

Any changes, updates or revisions of the Environmental Management Policy must be approved by the Group HR Director.

#### 8. Revision History

The Group Environmental Management Policy will be reviewed every 3 years from the date of creation.

POLICY NUMBER	POLICY OWNER	CREATION DATE	NEXT REVISION DATE
Version 2	B D Engelbrecht	09 September 2009	22 September 2017