



Maintaining our legitimacy



The board, assisted by the social and ethics committee, ensures MultiChoice Group is, and is seen to be, a responsible corporate citizen by considering not only its financial performance but also the business's impact on the environment and the societies where it operates. The group's purpose, values and strategy are aligned with the principles of responsible corporate citizenship.

Responsible corporate citizenship

The group's businesses manage numerous corporate citizenship initiatives affecting the workplace, economy, society and environment.

These include:

- BBBEE and employment equity performance for South African subsidiaries
- Local employment
- Health and safety laws
- Employee development opportunities
- Responsible tax policy
- Fraud and anti-bribery and anti-corruption initiatives
- Initiatives to minimise our environmental impact
- CSI initiatives
- Privacy and data protection

Ensuring compliance with laws and regulations

The group has a primary listing on the JSE and is subject to the JSE Listings Requirements, the recommended practices in King IV and other legislation applicable to publicly listed companies in South Africa. The group is committed to complying with both the spirit and the letter of applicable obligations and to always act with due skill, care and diligence.

The board is responsible for ensuring the group complies with applicable laws and adopted rules, codes and standards in a way that supports the organisation being ethical and a good corporate citizen. The risk committee is responsible for reviewing and approving the legal compliance policy, recommending such policy to the board for approval, and monitoring its implementation. The board and senior management empower and properly resource the group legal compliance and ethics officer, who is responsible for supervising, managing and overseeing the legal compliance function.

The legal compliance policy follows the principles, standards and guidelines recommended by the Compliance Institute Southern Africa, which has been formulated to ensure adherence to both regulatory and supervisory requirements. It incorporates the group governance structures and controls, in line with legislative requirements and international best practices and recognises ethical behaviour and compliant culture as the core elements of the legal compliance programme. The ethical culture in the group supports principled performance, ensuring the efficacy of all preventative, detective and response measures that are implemented.

Risk assessments are revised annually across the business to identify and prioritise new and/or changes in compliance related risks and trends. Updating annual risk assessments also ensures efficient mitigation measures are in place to avoid, mitigate or remediate identified risks. Additionally, the group conducts due diligence on third parties in line with the group's third-party risk management policy and related framework.

The group's legal compliance communication and training programme facilitates awareness of applicable laws, regulations, policies, and procedures, and educates directors, management, employees, and other stakeholders on how to comply with them.

The group conducts regular legal compliance monitoring activities to ensure that the control environment is effective and identifies opportunities for improvement and mitigation on a regular basis. The monitoring programme incorporates specific findings arising from continuous legal compliance monitoring, self-monitoring by the business, and findings identified by internal audit reviews.

In-depth legal compliance reporting ensures that the board, risk committee and senior management can measure the effectiveness of the legal compliance programme. The group's legal compliance and ethics officer reports to the risk committee quarterly, detailing the areas within the business where compliance initiatives are being executed successfully, as well as identifying areas where additional measures are required to align with the applicable regulations, standards, and internal controls.





Maintaining our legitimacy continued

The group audit and risk committee charter and the group compliance policy clearly provide that compliance must not only be understood for its obligations but also for the rights and protections it affords.

The total number of employees who completed the compliance-related online learning modules, rolled out during FY23 and FY24, were as follows as at 31 March 2024:

Compliance training:

Online training activities – Completed during FY23 and FY24

Broken down by audience	Total employees	Total %	Governing body	Employees	Third parties
Cyber security – Essentials	5 498	91	6	5 455	37
Cyber Security – Phishing	5 016	91	1	4 986	29
Digital Transformation	4 934	89	3	4 901	30
Diversity, Equity and Inclusion	3 308	89	4	3 271	33
Occupational Health and Safety	3 381	91	4	3 347	30
Software Asset Management	3 082	83	3	3 051	28
Total modules completed	25 219	87	21	25 011	187

Broken down by segment	Total employees	Total %	Governing body	Employees	Third parties
MultiChoice South Africa	19 862	89	20	19 656	186
MultiChoice Rest of Africa	5 357	83	1	5 355	1
Irdeeto			–	–	–
Total modules completed	25 219	87	21	25 011	187

Assurance on the effectiveness of legal compliance management is achieved through a combined assurance model – line managers own the risks; compliance and risk managers evaluate the compliance exposure; and internal audit conducts independent reviews. The combined assurance model enables the board and the risk committee to oversee the group's legal compliance holistically in a way that supports good corporate citizenship.

Incidents, fines and penalties

The group operates in a highly regulated environment, making legal compliance a critical consideration to our business. We participate in the regulatory processes affecting our industry through various public forums and debates, providing input on formulating standards and strategies for the industry. There have been no significant non-compliance, environmental, social and/or governance-related incidents during the reporting period and directors are satisfied that the group has complied and operated in conformity with:

- the provisions of the Companies Act and any other applicable laws relating to the MultiChoice Group's incorporation; and
- the MultiChoice Group's MOI and other relevant constitutional documents.

Further, there were no inspections conducted by the relevant regulator(s) which have resulted in any significant or repeated fines, settlements, penalties, or other monetary losses suffered in relation to environmental, social or governance incidents or breaches.

Performance and future focus

Our key areas of focus during the reporting period were:

- Managing reputational risk
- Revising relevant compliance-related policies
- Updating risk-based compliance assessments to identify high risk compliance areas
- Implementing enhanced controls to address identified areas of improvement
- Updating applicable compliance statutes, rules and regulations
- Executing training activities and awareness campaigns across the business
- Updating compliance risk management plans
- Monitoring the implementation of compliance programmes

Going forward, we will focus on:

- Continuing to revise the legal compliance-related policies, management processes and compliance culture
- Developing and executing on annual training interventions and awareness campaigns
- Supporting ongoing maturation of the third-party risk management framework
- Revising and launching the group whistleblower online learning module
- Continuing to update applicable compliance statutes, rules and regulations
- Continuing to revise compliance risk management plans