



## **SPARK Schools Anti-Discrimination Policy**

### **1. INTRODUCTION**

- 1.1. In accordance with the Diversity Policy, SPARK Schools is committed to upholding diversity by providing equality of opportunity and anti-discriminatory practice for all Stakeholders.
- 1.2. SPARK Schools seeks to ensure that all Stakeholders, defined as the Company, its Employees, Parents, and other Third Parties, will receive equitable treatment and that no discrimination takes place on the grounds of any of the following protected characteristics. These include: race, colour, nationality, ethnicity, religion or belief, gender, marital status, responsibility for children or other dependents, disability, sexual orientation, gender reassignment, age, political activities, socio-economic status, living situation or spent convictions.
- 1.3. SPARK Schools comply with all anti-discrimination laws and explicitly prohibits behaviour that undermines the fundamental rights and freedoms enshrined in the: Constitution of the Republic of South Africa of 1996, the Employment Equity Act 55 of 1998, the Promotion of Equality and Prevention of Unfair Discrimination Act 4 of 2000, the Schools Act 84 of 1996, and SPARK Schools Policies and procedures.
- 1.4. This Policy applies to all Employees, Scholars, Parents, visitors, suppliers, and related Stakeholders.
- 1.5. For the purpose of this Policy, “discrimination” is any negative action or attitude directed toward someone because of protected characteristics. Any discrimination that creates a hostile or unpleasant environment for a SPARK Schools Stakeholder is prohibited.
- 1.6. This Policy has been established to:
  - 1.6.1. prevent and eliminate any unfair discrimination by any SPARK Schools Stakeholder, whether against another Stakeholder, whilst representing (or being reasonably identifiable as representing) SPARK Schools



1.6.2. clarify the procedure, responsibilities, and obligations of all SPARK Schools Stakeholders in upholding anti-discriminatory practises; and

1.6.3. establish appropriate and accessible interventions for Stakeholders to address allegations of unfair discrimination.

1.7. This Policy is applicable at all times when a Stakeholder is reasonably identifiable as affiliated with SPARK Schools, both on the Company's Premises, or outside of same, even if he/she is online at the time.

## **2. PREVENTION OF DISCRIMINATION**

2.1. To ensure that the Company's conduct and processes are fair, lawful, and anti-discriminatory, it is recorded that the following practises are in place:

### **2.1.1. Recruitment and Selection**

2.1.1.1. Recruitment, selection, and placement of staff should seek to achieve and establish equity by

2.1.1.1.1. using inclusive language in job vacancy posts,

2.1.1.1.2. referencing employment equity initiatives,

2.1.1.1.3. setting formal job-related criteria for hiring and promotion,

2.1.1.1.4. and offering compensation and benefits according to position, seniority, qualifications, and performance.

### **2.1.2. Training and Professional Development**



- 2.1.2.1. The Human Capital team of SPARK Support will organise and promote training sessions, workshops, and professional development opportunities on diversity, communication, and conflict resolution to improve collaboration and understanding among employees of diverse backgrounds.
- 2.1.2.2. Training and professional development will be provided in an equitable manner based on the individual needs of Employees.
- 2.1.2.3. Onboarding programs for Employees shall include education on the Company's Policies related to diversity, unfair discrimination, and employment equity.

### 2.1.3. Leadership and Line Management

- 2.1.3.1. Leaders and line managers are responsible for the promotion of anti-discrimination and equity in their respective sites, units, and departments.
- 2.1.3.2. Leaders and line managers should examine annual staff wellness survey results to determine whether there is evidence of discrimination on the basis of gender, race, age, or other protected characteristics.
- 2.1.3.3. Leaders and line managers should promote the use of the Company's whistleblower program for the reporting of anti-discriminatory behaviour.
- 2.1.3.4. Leaders and line managers should monitor the working environment to ensure that acceptable standards of conduct are observed at all times and should take the necessary steps to ensure that discriminatory behaviour is appropriately dealt with;



failure to do so may lead to disciplinary action being taken against them.

- 2.1.3.5. Leaders and line managers must demonstrate appropriate behaviour themselves, including ensuring that they do not engage in conduct that may breach the Policy and procedures set out herein or any other applicable School/Company Policies.
- 2.1.3.6. Leaders and line managers must ensure that employees and other relevant Stakeholders understand this Policy and procedures set out herein.

### 3. ACTION IN CASES OF DISCRIMINATION

- 3.1. An Employee of SPARK Schools who believes that they are a victim of discriminatory behaviour should report it to their line manager and the Human Capital Team ([hr@sparkschools.co.za](mailto:hr@sparkschools.co.za)). If the employee's line manager is the alleged perpetrator of the discriminatory behaviour, the Employee should not include the line manager in their reporting.
  - 3.1.1. The Human Capital Team is responsible for the investigation of the claim, in line with the Company's grievance procedure, and for determining the appropriate disciplinary procedure and consequence.
- 3.2. A SPARK Schools Scholar who is the victim of alleged discriminatory behaviour (or a Parent representing a Scholar) should report it to the Principal of the School in which the Scholar is enrolled. If the Principal is the alleged perpetrator of the discriminatory behaviour, the Scholar and/or Parent should report it to the Regional Manager of the School in which the Scholar is enrolled.
  - 3.2.1. The Principal and the Regional Manager are responsible for the investigation of the claim, in line with the School's Grievance Procedure and Anti-Bullying Policy, and may include the Human Capital Team (where



the claim involves an Employee of SPARK Schools) or the Head of Schools.

- 3.3. A supplier of or visitor to SPARK Schools who is the victim of alleged discriminatory behaviour should report it to the Company's Legal Counsel, who will instigate an investigation with the Human Capital Team.
- 3.4. Any SPARK Schools Stakeholder should report discriminatory behaviour via the Company's toll-free whistleblower hotline: 0800 212 050.
- 3.5. The Social and Ethics Committee of the Board of Directors of the Company is responsible for monitoring the Company's commitment to anti-discrimination and equitable operations.