

ZIMBABWE PLATINUM MINES PRIVATE LIMITED
HRAD34
ANTI CHILD AND FORCED LABOUR POLICY

1. INTRODUCTION

Zimplats is committed to upholding the highest ethical standards and respecting human rights in all aspects of our operations. We have a zero-tolerance policy towards child labour and forced labour. This policy outlines our commitment to preventing these practices and ensuring a safe and respectful working environment for all. Zimplats complies with all applicable Zimbabwean laws and regulations, relating to the protection of children and the prohibition of forced labour.

2. LEGAL FRAMEWORK

This anti Child and Forced Labour Policy is established to ensure compliance with the prevailing legal landscape governing child and forced labour practices in Zimbabwe. The key legal sources that underpin this policy include:

- 2.1 International Labour Organisation (ILO) Conventions
- 2.2 Constitution of Zimbabwe (2013)
- 2.3 Labour Act [Chapter 28:01]
- 2.4 Children's Act [Chapter 5:06]
- 2.5 Manpower Planning and Development Act [Chapter 28:02]
- 2.6 Collective Bargaining Agreement (CBA) for the Mining Industry

3. DEFINITION OF TERMS

- 3.1 A Child – According to the Children's Act [Chapter 5:06] and the Constitution of Zimbabwe (Section 81), a child is defined as any person under the age of 18.
- 3.2 Child Labour - Any work that deprives children of their childhood, their potential, their dignity, and that is harmful to physical and mental development. This includes work that is mentally, physically, socially, or morally dangerous and harmful to children; and/or interferes with their schooling by depriving them of the opportunity to attend school, obliging them to leave school prematurely, or requiring them to attempt to combine school attendance with excessively long and heavy work. (ILO).
- 3.3 Forced Labour - All work or service which is exacted from any person under the menace of any penalty and for which the person has not offered himself or herself voluntarily is classified as forced labour. (ILO).
- 3.4 Hazardous work - Work which, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety, or morals of children. (ILO)

4. SCOPE

This policy applies to:

- 4.1 All Zimplats employees.

5. POLICY OVERVIEW

- 5.1 Prevention - We will proactively prevent child and forced labour within our own operations.
- 5.2 Due Diligence - We will conduct due diligence to identify and assess the risks of child labour and forced labour in our operations.
- 5.3 Remediation - If child or forced labour is identified in our operations, we will take immediate and effective action to remediate the situation and provide appropriate support to the affected individual(s).
- 5.4 Transparency - We will be transparent about our efforts to combat child and forced labour and will report annually in the sustainability report.
- 5.5 Policy Review - We will review this policy periodically to remain relevant and alignment to shifting legal and best practice provisions.
- 5.6 Employee Awareness – This policy will be availed to all new employees at induction and via periodic awareness campaigns disseminated on our employee communication platforms.

6. MINIMUM AGE OF EMPLOYMENT

This policy outlines the legal age threshold of employment permissible at Zimplats to prevent child and forced labour as follows:

- 6.1 General Employment - The minimum age for general employment is 18 years. No person under 18 will be allowed to be employed at Zimplats.
- 6.2 Hazardous Work - Persons under 18 are prohibited from being employed in hazardous work.
- 6.3 Apprenticeship - The minimum age for apprenticeship is 16 years, as defined by the Manpower Planning and Development Act.
- 6.4 Student Attachment / Industrial Placement - Permitted for students over the age of 18 who are enrolled in a recognised course of study at registered institutions of education.

Category	Minimum Age	Legal Reference
General Employment	18	Labour Act [Chapter 28:01] and Children's Act [Chapter 5:06]
Hazardous Work	18	Labour Act [Chapter 28:01] and Children's Act [Chapter 5:06]
Apprenticeship	16	Labour Act [Chapter 28:01] and Manpower Planning and Development Act [Chapter 28:02]
Student Attachment/Internship	18	Labour Act [Chapter 28:01] and Manpower Planning and Development Act [Chapter 28:02]
Child Legal Age	Under 18	Constitution of Zimbabwe (2013) and Children's Act [Chapter 5:06]

7. POLICY IMPLEMENTATION

To prevent the employment of individuals involved in child labour or forced labour, Zimplats will establish an age verification and monitoring mechanisms, that will apply at all stages of the employment cycle and company dealings with its stakeholders.

- 7.1 **Clarity in Job Advertisements** - All internal and external job advertisements will explicitly state the minimum age requirements for the position, in compliance with the Labour Act. The online recruitment platform shall be configured to prompt age of applicant and block those falling short of the minimum age required.
- 7.2 **Age as a Shortlisting Criterion – During shortlisting** any applicant that does not meet the minimum age requirement will be rejected.
- 7.3 **Pre-Employment Age Verification** – The Human Resources division shall ensure that all employees are of legal working age and will implement age verification procedures and require proof of age and identity from all new hires for Zimplats and all business partners coming into/working within our operations.
- 7.4 **Regular Internal Age Audits** - Annual audits of employee records to verify the ages of all workers will be conducted to ascertain compliance to this policy.
- 7.5 **Automated Age Barring** – The Human Resources Information System (HRIS) shall be configured to automatically block the registration or processing of any applicant or employee whose age does not meet the minimum legal requirement. HR personnel should then escalate the matter to be diligently dealt with by management.
- 7.6 **Reporting and Remediation** – The Human Resources division will establish clear procedures for reporting and addressing any instances of age falsification, underage employment and forced labour. Anyone found to have violated this policy will be dealt with in line with the company's code of conduct.
- 7.7 **Forced Labour Grievance Mechanism** – The Human Resources division will ensure a confidential and accessible grievance mechanism for employees and other stakeholders to report concerns about child labour or forced labour without fear of retaliation. All reported concerns will be promptly and thoroughly investigated. Reports can be made to the Human Resources office or through anonymous tipoff hotline.
- 7.8 **Remedial Actions** - In cases where child labour is identified, we will work with the child, and relevant parties to ensure the child's removal from work. If forced labour is identified, we will work to ensure the individual is freed from the situation, provided with appropriate support, and offered opportunities for reintegration were applicable.
- 7.9 **Training and Awareness** - All employees (Zimplats and Contractors), will receive regular awareness on this policy, how to identify child labour and forced labour, and how to report concerns on and off the job.
- 7.10 **Dealing with third parties/business partners** – Those doing dealings with Zimplats, are expected to be free of child labour and forced labour in their activities. Zimplats reserves the right to terminate business relationships with any party for engaging in or promoting child labour and forced labour and who would have failed to rectify the breach within a reasonable time from the date of discovery.

8. PERMISSIBLE EXCEPTIONS

Zimplats adheres to the general principle prohibiting the employment of individuals below the legal minimum age, as defined by applicable national legislation. Any exceptions shall be as guided by the law.

9. FORCED LABOUR

Zimplats strictly prohibits all forms of forced or compulsory labour, in accordance with the Constitution of Zimbabwe, the Labour Act [Chapter 28:01], and International Labour Organisation (ILO) Conventions.

Forced labour includes, but is not limited to:

- Work performed under coercion, intimidation, or threat of punishment
- The withholding of identity documents or wages to compel work
- Use of physical force or psychological pressure to obtain labour or services
- Human trafficking for labour or service exploitation
- Involuntary overtime or inability to leave the workplace freely

Zimplats is committed to:

- Ensuring that no employee is coerced into working against their will
- Prohibiting the use of forced or trafficked labour in any of its operations, Zimplats dealings with its partners, suppliers sponsored and or partnered community projects.
- Conducting regular assessments to identify and mitigate any risk of forced labour
- Training managers and relevant staff to recognise signs of forced labour
- Providing grievance mechanisms for workers to report concerns confidentially and without fear of retaliation

There are no exceptions to forced labour. Any breach of this policy by employees or third parties will result in disciplinary action, contract termination, or legal reporting, as appropriate.

10. RESPONSIBILITIES

10.1 The Human Resources department is responsible for developing and implementing this policy, providing training to employees, and managing the grievance mechanism.

10.2 The Commercial department is responsible for selecting and monitoring suppliers/business partners in accordance with this policy.

10.3 All Employees are responsible for complying with this policy and reporting any concerns about child labour or forced labour.

11. POLICY REVIEW

This policy may be varied, amended, or substituted at the discretion of management to ensure its effectiveness and compliance with applicable laws and regulations as amended from time to time.

12. INTERPRETATION

In all matters of interpretation of this procedure, the decision of the Chief Executive Officer shall be final.

CHIEF EXECUTIVE OFFICER

01.06.2025