



Group Harassment Policy

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Version History

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Purpose

AfriTin Mining is committed to creating and maintaining an environment that is free from any form of harassment and/or bullying. AfriTin Mining is committed to establishing clear guidelines and rules regulating the conduct of its employees, and the values and ethics that employees are required to adhere to.

This policy seeks to encourage the development and implementation of practices which create a working environment that is free from harassment, including sexual harassment, and bullying in which the integrity, dignity, privacy, and the right to equality of all employees, job applicants, and persons who have dealings with the Company, is respected.

AfriTin Mining expects all its employees to always comply and to act in accordance with the principles established in terms of AfriTin Mining's policies and procedures. Any violations of this policy, by any employee, constitutes misconduct and is a ground for disciplinary action. It may result in a sanction being imposed on the employee including termination of employment.

Scope and Application

The policy sets the minimum standard in terms of harassment and bullying procedures for AfriTin Mining. The right not to be subjected to harassment and/or bullying extends not only to employees but also to job applicants and all persons who have dealings with AfriTin Mining and any of its operations including clients, suppliers, contractors and any other third parties.

This policy applies to all AfriTin Mining employees.

This policy also applies to all other persons (including applicants for employment, consultants, contractors, members, suppliers, and any other third-party) who attend any AfriTin Mining premises and/or functions and/or events hosted by the Company within AfriTin Mining.

Each region should develop their own procedures which adhere to the local regulatory environment in which they operate. This Group Policy should be the basis for any regional policy put in place. Members of the AfriTin Mining Group Executive Committee (ExCo), in particular the Chief Executive Officer (CEO) and Chief Operating Officer (COO), will have the right to intervene in any matter should the circumstance arise.

Strategic Linkage

AfriTin Mining believes that every individual has the right to be treated with dignity and with respect for his/her privacy. Any form of harassment and/or bullying in the workplace will not be

permitted or condoned. Persons who have been or are being subjected to harassment and/or bullying in the workplace have the right to lodge a grievance or complaint.

The purpose of this policy is to give practical guidance to all employees, job applicants, and other persons who have dealings with AfriTin Mining on what sort of conduct constitutes sexual or other harassment and to make provision for procedures to deal with any allegation of sexual or other harassment.

AfriTin Mining views harassment and/or bullying of any kind in a serious light and is committed to:

- Preventing harassment and/or bullying from occurring in the workplace;
- Assisting all victims of such harassment and/or bullying; and
- Taking appropriate disciplinary action against any employee who has been found guilty of harassment and/or bullying.

Definitions

Harassment

Any behaviour which is hostile or offensive to an employee, job applicant, or any other person who has dealings with AfriTin Mining and any behaviour that creates an undermining of the integrity or dignity of an employee, job applicant, or any other person who has dealings with AfriTin Mining.

Such behaviour can make an employee, job applicant, or any other person who has dealings with AfriTin Mining feel uncomfortable, unsafe, frightened, embarrassed, and may be physical, verbal, or non-verbal. The common link is that the behaviour would be unwanted by any employee, job applicant, or any other person who has dealings with AfriTin Mining and could not be justified through a personal or family relationship.

Sexual Harassment

Any unwanted conduct of a sexual nature that distinguishes it from behaviour that is welcome and mutual. Such unwanted conduct becomes sexual harassment if:

- The behaviour is persistent, although a single incident of harassment can constitute sexual harassment; and/or
- The recipient has made it clear that the behaviour is considered offensive; and/or
- The perpetrator should have known that the behaviour is regarded as unacceptable.

Forms/Examples of Sexual Harassment

Conduct that can constitute sexual harassment may include, but is not limited to, physical conduct, verbal conduct, non-verbal conduct, *quid pro quo* harassment, and sexual favouritism.

Sexual harassment includes but is not limited to:

- Physical forms of sexual harassment include:
 - All unwanted physical contact, ranging from touching to sexual assault, attempted rape and rape;
 - A strip search by or observed by the opposite gender.
- Unwelcome verbal forms of sexual harassment include:
 - Unwelcome innuendoes/suggestive remarks and hints;
 - Sexual advances, comments with sexual overtones, sex-related jokes or insults;
 - Comments with sexual overtones, sex-related jokes or insults;
 - Insinuations or unwelcome graphic comments about a person's sex or private life, appearance, or body made in their presence or directed towards them;
 - Unwanted whistling directed at a person or group of persons;
 - Continued pressure for dates or for sexual favours;
 - Letter or telephone calls, emails, and short text messages (SMS's) of a sexual nature;
- Non-verbal forms of sexual harassment include:
 - Staring, leering, and unwelcome gestures;
 - Indecent exposure;
 - The unwelcome display of sexually explicit material including pictures, magazines, videos, or objects, including sexually explicit material on computers.
 - *Quid pro quo* harassment occurs where a principal, member of management, or co-employee undertakes or attempts to influence or influences the process of employment, promotion, training, discipline, dismissal, salary increments, or other benefits of an employee or job applicant in exchange for sexual favours.

Bullying

Workplace bullying is repeated, health-harming mistreatment of one or more persons (or targets) by one or more perpetrators.

Abusive conduct is threatening, humiliating, intimidating, or causes work interference which prevents work from being done.

Reporting

An employee who wishes to report harassment (including sexual) and/or bullying must do so promptly via the anonymous email address (grievances@afritinmining.com) or hotline (to be confirmed), or to one of the following persons:

- Group Head of Corporate Services
- The relevant Human Resources practitioner
- Group Chief Operating Officer (COO)
- Anyone who is subject to harassment or bullying should, if possible, inform the alleged harasser that the conduct is unwanted and unwelcome. AfriTin Mining recognises that harassment and bullying may occur in unequal relationships (i.e., between a supervisor and his/her employee) and that it may not be possible for the victim to inform the alleged harasser.
- Anyone who is victim to or witnesses an act of harassment or bullying should report the harassment via the abovementioned avenues.

Formal Procedure

1. AfriTin Mining realises that harassment and bullying are a sensitive issue. In light thereof, AfriTin Mining undertakes the following:
 - Not to ignore or trivialise grievances relating hereto and to deal with all allegations seriously, efficiently, sensitively, and with the utmost confidentiality; and
 - To protect its employees, to the best of its ability, against victimisation, false accusations, or retaliation due to the lodging of a complaint/grievance.
2. In light of the undertakings as outlined above, regional management will take appropriate and prompt action where instances or allegations of harassment or bullying in the working environment are brought to their attention or reported.
 - When an incident has been brought to the attention of management of the employing operation/region, the operation/region must advise the employee of the procedures available to deal with the incident and, where reasonably practical, offer the employee advice, assistance, and counselling.
 - The employee should be reassured that he/she would not face job loss or any other adverse consequences if he/she elects to follow the procedure pertaining to harassment or sexual harassment.
 - The employee may choose to attempt to resolve the matter in an informal or formal manner in terms of the employing operation/region's internal procedures, and/or to proceed with such civil or criminal steps as may be appropriate in terms of existing legislation.
 - The employee must invoke the procedures in the applicable operational/regional policy as soon as reasonably possible in the circumstances and without delay.
 - The steps to be followed in an informal and formal procedure are set out in the Grievance Procedure for each operation/region.

- Should the employee choose not to follow a formal procedure and the employing operation/region, after a proper investigation of the incident(s), is of the opinion that other employees may be at risk, the operation/region may follow a formal procedure irrespective of the wishes/consent of the employee.
 - Where reasonably practicable, the employing operation/region may offer the employee assistance from a person outside of line management, with the appropriate skills and experience, to advise, assist, and counsel the employee through the procedures set out herein.
 - A non-employee (job applicant or any other person who has dealings with AfriTin Mining) who is a victim of harassment and/or bullying perpetrated at the workplace may also lodge a complaint/grievance with the employing operation/region of the alleged harasser if the alleged harassment or bullying has taken place in the course of the alleged harasser's employment.
3. Management has a duty to investigate all allegations of harassment or bullying and to take appropriate disciplinary action, in accordance with the region's disciplinary processes, against employees who have been found guilty of harassment or bullying.
- Harassment and bullying are serious transgressions which may justify dismissal at the first offence.
 - It is a disciplinary offence to victimise or retaliate against an employee who lodges a complaint/grievance. An employee, who takes part in such victimisation or retaliation, will be disciplined having regard to all the facts and circumstances.
 - An operation/region may take disciplinary action against an employee who makes false allegations of harassment or bullying.
 - The employing operation/region does not have the authority to take disciplinary action against non-employees. Attempts should, however, be made by the operation/region's senior management to deal with allegations with the relevant senior level of management of the third party involved.
4. Regional management will consider additional assistance that may be required by an employee who has been harassed or bullied and will ensure that its stance on sexual harassment and the possible consequences thereof are made known.
5. The content of this policy should be communicated and be accessible to all employees.