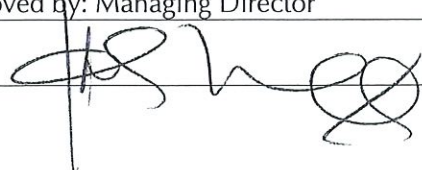


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Forced Labour Policy

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1. Policy statement

Tambankulu Estates is committed to upholding local and international standards regarding human rights and labour practices. We have zero tolerance for forced labour within our operations and supply chain. This policy outlines our commitment and provides guidance and preventative measures to combat forced labour.

2. Indicators of Forced Labour

Tambankulu Estates recognises that the presence of the following indicators may suggest the existence of forced labour in its operations:

- i. Abuse of vulnerability;
- ii. Deception;
- iii. Restriction of movement;
- iv. Isolation;
- v. Physical and sexual violence;
- vi. Intimidation and threats;
- vii. Debt bondage;
- viii. Abusive working and living conditions;
- ix. Excessive overtime;
- x. Withholding of wages and;
- xi. Retention of identity documents

3. Preventative Measures

To avoid and/or mitigate against the risk of forced labour, Tambankulu Estates will engage in the following preventative measures;

- i. Providing training on IR standards;
- ii. Effective recruitment policies;
- iii. Conduct regular human rights due diligence
- iv. Provide clear contracts of employment with defined conditions of employment
- v. Promote freedom of association and collective bargaining

4. Remedial Actions

The following remedial actions maybe undertaken in cases where forced labour is identified;

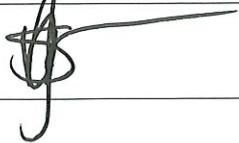
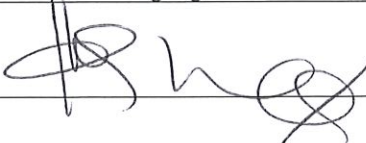
- i. Termination of identified forced labour;
- ii. Termination of supplier and/or contractor contract
- iii. Assist with relocation of affected persons
- iv. Medical assistance where required

5. Responsibilities

Management, employees and contractors/suppliers are responsible for ensuring communication of and compliance with the commitments in terms of this policy

6. Review

This policy shall be reviewed every three years and/or as and when the need arises.

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INDIGENOUS PEOPLES RIGHTS, COMMUNITY ENGAGEMENT AND LAND RIGHTS

1. Purpose

This Policy establishes the Company's commitment to:

- Respect and uphold the rights of Indigenous Peoples and local communities.
- Ensure responsible and ethical engagement with stakeholders.
- Protect land rights, including customary and communal tenure.
- Promote sustainable, inclusive development aligned with recognized international standards.

2. Scope

This Policy applies to:

- All operations, subsidiaries, and projects of the Company.
- All employees, contractors, suppliers, and business partners.
- All interactions with Indigenous Peoples and local communities affected by Company activities.

3. Guiding Principles

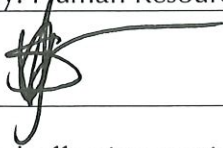
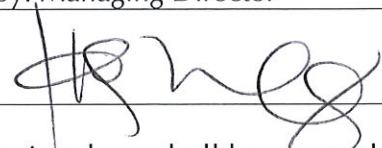
3.1 Respect for Human Rights

The Company commits to respecting internationally recognized human rights standards, including:

- The **United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP)**, which sets minimum standards for dignity, participation, and protection of land and cultural rights.

3.2 Self-Determination and Participation

- Indigenous communities have the right to determine their own development priorities.

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- Full and effective participation in decisions affecting them shall be ensured.

3.3 Free, Prior and Informed Consent (FPIC)

- The Company will obtain **Free, Prior and Informed Consent (FPIC)** for projects affecting Indigenous lands, resources, or livelihoods.
- Consent must be:
 - Freely given,
 - Based on adequate information,
 - Obtained prior to project approval.

3.4 Cultural Integrity

- The Company shall respect cultural traditions, heritage, sacred sites, and knowledge systems.

4. Land Rights and Tenure

4.1 Recognition of Land Rights

The Company shall:

- Recognize both **formal and customary land ownership and use rights**.
- Avoid activities that may result in involuntary displacement or loss of land.

4.2 Protection of Ancestral Land

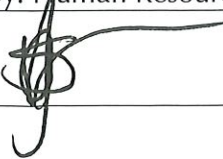
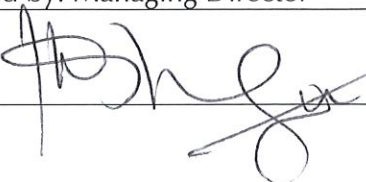
The Company shall:

- Respect Indigenous Peoples' attachment to ancestral territories and natural resources.
- Identify and map community land use where required.

4.3 Avoidance of Land Conflicts

The company shall

- Conduct land due diligence prior to any new project.
- Resolve land disputes through fair, transparent, and participatory mechanisms.

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5. Community Engagement

5.1 Meaningful Consultation

The Company shall:

- Engage communities early and continuously.
- Ensure consultation is inclusive and culturally appropriate.
- Provide information in understandable formats and languages.

5.2 Stakeholder Participation

The company shall Facilitate participation of:

- Traditional leaders,
- Community representatives,
- Vulnerable groups including women, youth, etc.).

5.3 Transparent Communication

- Maintain open, honest, and ongoing dialogue with stakeholders.
- Disclose relevant project information.

6. Impact Management

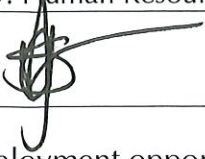
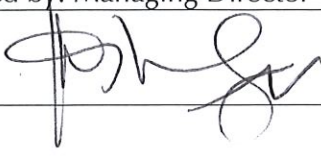
6.1 Social and Environmental Impact

The Company shall:

- Identify potential impacts on communities and land.
- Implement mitigation measures to avoid or reduce harm.

6.2 Benefit Sharing

The Company shall where possible ensure that communities benefit fairly from Company operations through:

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- Employment opportunities,
- Skills development,
- Community development initiatives.

7. Grievance Mechanism

The Company shall:

- Establish accessible and culturally appropriate grievance processes that ensure:
 - Timely resolution,
 - Transparency,
 - No retaliation against complainants.

8. Governance and Accountability

8.1 Roles and Responsibilities

- Executive Management is accountable for implementation.
- Line managers must ensure compliance within operations.

8.2 Monitoring and Reporting

- Monitor compliance with this policy.
- Report annually to Executive Committee/Board (or Sustainability Committee).

9. Training and Awareness

Ensure employees and contractors receive training on:

- Indigenous rights,
- Cultural awareness,
- Community engagement practices.

10. Continuous Improvement

- Regularly review and update this policy to align with:
 - Legal requirements,
 - Industry standards,
 - Stakeholder feedback.