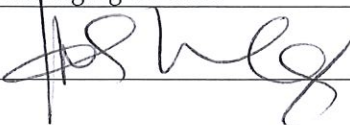


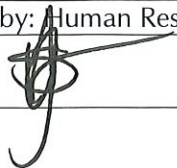
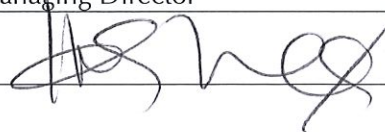
	Tambankulu Estates	Page 1 of 4	Issued Date: 03.02.2025
		Section: Yellow pages	
	Section: Policy Manual	Doc. Ref. 41512 – BPS 1.4.2	Revision Date: Jan 2026
			Revision No: 01
	Issued by: Human Resources Manager	Approved by: Managing Director	
			

EXTERNAL GRIEVANCE MANAGEMENT PROCEDURE

CONTENTS

1. TERMS, DEFINITIONS, AND INTERPRETATION	2
2. OBJECTIVE.....	2
2.1. United Nations Guiding Principles (UNGP) on Business and Human Rights.....	2
2.1.1. UNGP Principles	2
3. SCOPE	2
4. EXTERNAL JUDICIAL PROCESSES	2
5. GRIEVANCES	2
5.1. Environmental and health hazards:	2
5.2. Land and/or Water Rights:.....	3
5.4. Transport:	3
5.5. SED OR CSI Projects:.....	3
6. EXTERNAL FEEDBACK/COMPLAINTS PROCESS	3
6.1. Receipt of feedback:	3
6.2. Acknowledgement:.....	4
6.3. Action plan:.....	4
6.4. Investigation & Engagements:.....	4
7. THIRD PARTY MEDIATOR.....	4
8. CONFIDENTIALITY	4
9. POLICY REVIEW	4

	Tambankulu Estates	Page 2 of 4	Issued Date: 03.02.2025
		Section: Yellow pages	
	Section: Policy Manual	Doc. Ref. 41512 – BPS 1.4.2	Revision Date: Jan 2026
	Issued by: Human Resources Manager	Approved by: Managing Director	Revision No: 01

1. TERMS, DEFINITIONS, AND INTERPRETATION

'Grievance' refers to an officially reported issue in which a stakeholder expresses his/her dissatisfaction with a defined impact which could be real or perceived arising from Tambankulu Estates operations, the activities of its contractors and or its employees.

'Stakeholder' refers to an external natural or juristic person who is impacted by the activities or operations of Tambankulu Estates, its contractors and or its employees.

2. OBJECTIVE

Tambankulu Estates recognises that as a Corporate Citizen it has external stakeholders and that these external stakeholders may be impacted by its operations both on and off the Estate. The main objective of this procedure is to set out Tambankulu Estates commitment to social dialogue with external stakeholders. This procedural document further sets out official organisational processes, assigns roles and responsibilities for receiving, registering, investigating, and addressing external grievances.

2.1. United Nations Guiding Principles (UNGP) on Business and Human Rights

Tambankulu Estates commits and aligns itself with the United Nations Guiding Principles (UNGP) on Business and Human Rights.

2.1.1. UNGP Principles

The UNGP sets out the following 2 principles for businesses;

- i. Avoid causing or contributing to adverse human rights impacts through their own activities, and address such impacts when they occur;
- ii. Seek to prevent or mitigate adverse human rights impacts that are directly linked to their operations, products, or services by their business relationships, even if they have not contributed to those impacts.

3. SCOPE

This procedure shall apply and is open to all external grievances raised by external stakeholders arising in connection with or from official Tambankulu Estates operations and/or activities, the conduct or omission of its employees in the course of employment and from contractors engaged by Tambankulu Estates.

4. EXTERNAL JUDICIAL PROCESSES

This policy does not intend to limit and/or impede access to State-based judicial processes. Stakeholders are not compelled to first bring or report a grievance through this procedure prior to instituting any legal/judicial process.

5. GRIEVANCES

For the purposes of this procedure document, grievances may generally be defined into the following categories;

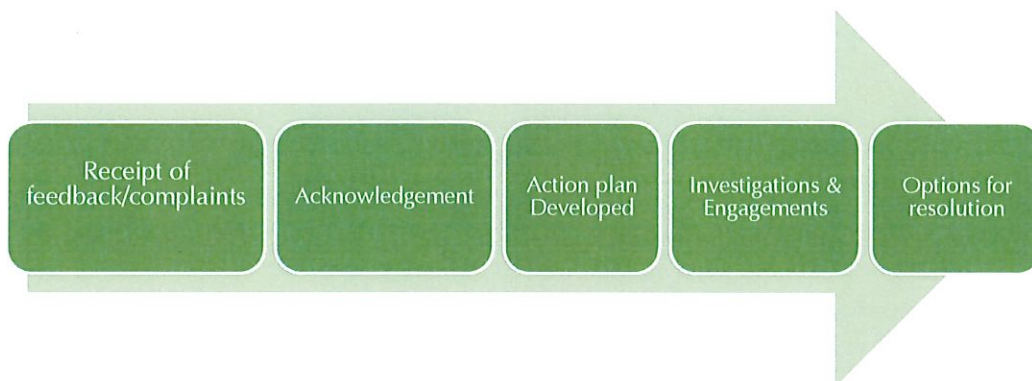
5.1. Environmental and health hazards:

	Tambankulu Estates	Page 3 of 4	Issued Date: 03.02.2025
		Section: Yellow pages	
	Section: Policy Manual	Doc. Ref. 41512 – BPS 1.4.2	Revision Date: Jan 2026
	Issued by: Human Resources Manager	Approved by: Managing Director	Revision No: 01

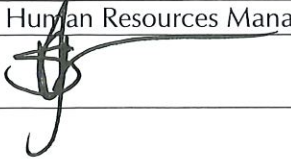
Issues arising from Tambankulu activities or operations which have an impact on the environment and/or health of stakeholders.

- 5.2. Land and/or Water Rights:
Issues relating to land tenure/ usage/ claims and water usage rights.
- 5.3. Employment Practices:
Complaints arising from recruitment processes. Perceived or real employment discrimination practices including fraud, child labour, forced labour etc.
- 5.4. Transport:
All issues relating to complaints about bad/negligent driving, road accidents, unsafe driving.
- 5.5. SED OR CSI Projects:
All issues arising from social economic development projects or Corporate Social Investment projects implemented by Tambankulu Estates.
- 5.6. Supplier or Contractor:
All issues relating to suppliers or contractors.

6. EXTERNAL FEEDBACK/COMPLAINTS PROCESS



- 6.1. Receipt of feedback:
 - Feedback and complaints may be submitted on a named or anonymous basis. Anonymous submissions will be accorded the same degree of importance and priority as unnamed submissions.
 - Confidentiality- all submissions will be treated as confidential and will be afforded protection against intimidation and harassment.
 - Feedback and/or complaints may be submitted through any of the following channels;
 - Email to: complaints@tamb.co.sz
 - Call anonymous tip-offline @ **+268 78069700**
 - Physical visit at any of our TE section offices across the Estate
 - Estate Security Office

	Tambankulu Estates	Page 4 of 4	Issued Date: 03.02.2025
		Section: Yellow pages	
	Section: Policy Manual	Doc. Ref. 41512 – BPS 1.4.2	Revision Date: Jan 2026
	Issued by: Human Resources Manager	Approved by: Managing Director	Revision No: 01
			

6.2. Acknowledgement:

Feedback/and or complaints received shall as far as is feasible will be acknowledged in writing within 48 hours where contact details have been provided.

6.3. Action plan:

TE will work with the concerned stakeholder on appropriate actions or remediation and communicate the plan to the complainant where applicable.

6.4. Investigation & Engagements:

Investigations may take place through engagement and onsite visits with affected stakeholders.

6.5. Options for resolutions

Options for the resolution of the complaint will be explored with the complainant and relevant stakeholders.

7. THIRD PARTY MEDIATOR

Where resolution of the grievance is not obtained through utilising the process mentioned in 6 above, the intervention of an external mediator may be sought. The TE Officer handling the grievance, in consultation with the complainant, shall find a third party who will serve as mediator and will propose a non-binding solution.

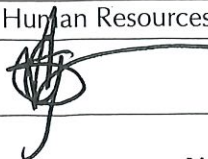
8. CONFIDENTIALITY

TE will do everything it reasonably can to respect confidentiality when requested by any complainant wishing to give feedback and/or register a complaint in a confidential manner.

9. POLICY REVIEW

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

	Tambankulu Estates	Page 1 of 2	Issued Date: 20.01.2008
		Section Yellow Pages	
	Section: Policy Manual	Doc. Ref.41512 – BPS 2.3.2 (b)	Revision Date: Feb 2026
	Issued by: Human Resources Manager	Approved by: Managing Director	Revision No: 01




WHISTLEBLOWING POLICY

1. PURPOSE

The purpose of this Whistleblowing Policy is to provide a clear and confidential process for employees, contractors, and other stakeholders to report concerns about wrongdoing or unethical behaviour within Tambankulu Estates.

This policy aims to encourage the reporting of such concerns without fear of retaliation.

2. SCOPE

This policy applies to all:

- Employees (permanent, seasonal, fixed term and casual)
- Contractors and consultants
- Board members
- Any other individual associated with the Tambankulu Estates

3. DEFINITION OF WHISTLEBLOWING

Whistleblowing is the disclosure of information which relates to suspected wrongdoing or risks at work. This may include:

- Criminal activity
- Miscarriage of justice
- Risk to health and safety
- Environmental damage
- Breach of legal obligations
- Corruption, bribery, or financial fraud
- Concealment of any of the above

Personal grievances (e.g., bullying, harassment, or discrimination) are not covered under this policy unless they relate to systemic issues. Such matters should be addressed under the grievance or HR policy.

4. REPORTING PROCEDURES

Concerns can be reported in the following ways:

- **Internally to Management:** Employees are encouraged to first report concerns to their line manager or department head.
- **Whistleblowing Hotline:** Reports can also be made directly through the following communication channels:

- Email: Complaints@tamb.co.sz
- Phone: 7806 9700

	Tambankulu Estates	Page 2 of 2	Issued Date: 20.01.2008
		Section Yellow Pages	
	Section: Policy Manual	Doc. Ref.41512 – BPS 2.3.2 (b)	Revision Date: Feb 2026
	Issued by: Human Resources Manager	Approved by: Managing Director	Revision No: 01

- **Anonymous Reporting:** Tambankulu Estates accepts anonymous disclosures, though this may limit the ability to investigate effectively.

5. CONFIDENTIALITY

All reports will be handled sensitively and, where possible, confidentially. The identity of whistleblowers will not be disclosed without their consent, unless required by law.

6. PROTECTION AGAINST RETALIATION

Tambankulu Estates prohibits any form of retaliation against individuals who report concerns in good faith. Any acts of retaliation should be reported immediately and will be treated as a serious disciplinary matter.

7. INVESTIGATION PROCESS

Once a disclosure is made:

- Tambankulu Estates through the designated official will acknowledge receipt within 5 working days.
- A preliminary review will be conducted to determine whether an investigation is warranted.
- If necessary, a formal investigation will be conducted.
- The whistleblower (where identity has been disclosed) may be kept informed of progress, subject to legal and confidentiality constraints.
- Findings will be documented, and appropriate actions will be taken.

8. FALSE ALLEGATIONS

Disclosures made in bad faith or based on intentionally false or misleading information may result in disciplinary action.

9. TRAINING AND COMMUNICATION

All employees will be informed about this policy during onboarding and through regular training. The policy will also be made available on the company's communication platforms.

10. REVIEW

This policy will be reviewed every three years and/or as and when a need arises to ensure it remains effective and compliant with legal requirements.