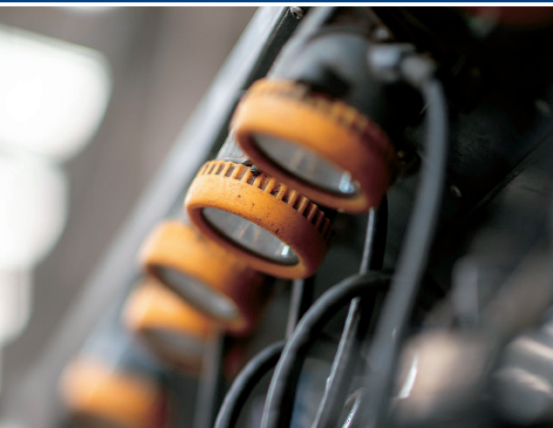




IMPLATS GROUP PEOPLE POLICY

Harassment, Bullying
and Victimisation



RESPECT, CARE
AND DELIVER

2023

CONTENTS

1	Introduction	1
2	Overview	1
3	Definition	2
4	Scope	3
5	Legal.....	3
6	Policy.....	4
7	Confidentiality	5
8	Review	5



INTRODUCTION

The Implats Harassment, Bullying and Victimisation Policy is aligned with:

- 1.1** Our vision to be the world's best PGM producer, sustainably delivering superior value to all our stakeholders;
- 1.2** Our corporate values to respect, care and deliver; and
- 1.3** Our sustainable development policy to
 - create and implement policies that entrench and uphold fundamental human rights; and
 - maintain and develop effective relations with our employees and employee representative bodies. .

2

OVERVIEW

Implats believes that every individual, including all persons who have dealings with Implats, has the right to be treated with dignity and respect. Implats is committed to creating a workplace free from harassment, bullying and victimisation, where employees and others having dealings with the business respect one another's dignity and right to equity in the workplace and in any activity linked to or arising out of work.

Harassment, Bullying and Victimisation are forms of invasive conduct that infringes on the right of individuals to psychological and bodily integrity, human dignity and equality. Harassment, bullying and victimisation in the workplace impedes employees from achieving a meaningful and productive work-life balance and inhibits them from realising their full potential.

As such, harassment, bullying and victimisation are forms of unfair discrimination and constitute barrier to equity in the workplace. Implats is committed to promoting equal opportunity in the workplace by eliminating unfair discrimination, including harassment, in any employment policy or practice.

All persons having dealings with the Company are to be treated respectfully and with dignity. All employees have the right to work in an environment that is free from any form of harassment, bullying, victimisation or unfair discrimination.

Harassment, bullying and victimisation of any kind is a form of misconduct and will not be permitted, tolerated or condoned. Persons who have been, or are being, subjected to harassment, bullying and victimisation in the workplace have the right to lodge a complaint in accordance with the Implats Harassment, bullying and victimisation Policy.



2

OVERVIEW (continued)

All employees, including management,

- must refrain from committing acts of harassment, bullying and victimisation;
- are required to create and maintain a working environment in which the dignity of other employees, clients, customers, suppliers, job seekers, job applicants and other persons having dealings with the Company, is respected and that those persons are not subjected to harassment, bullying and victimisation by its employees or any person representing the employer;

- should ensure that their standards of conduct do not cause offence and they should discourage unacceptable behaviour on the part of others; and
- must take appropriate and timeous action where instances of harassment, bullying and victimisation occur.

The Company will endeavour to create and maintain a climate in which targets of harassment, bullying and victimisation will not feel that their grievances are ignored, trivialised, or fear reprisals.

3

DEFINITIONS OF HARASSMENT, BULLYING AND VICTIMISATION

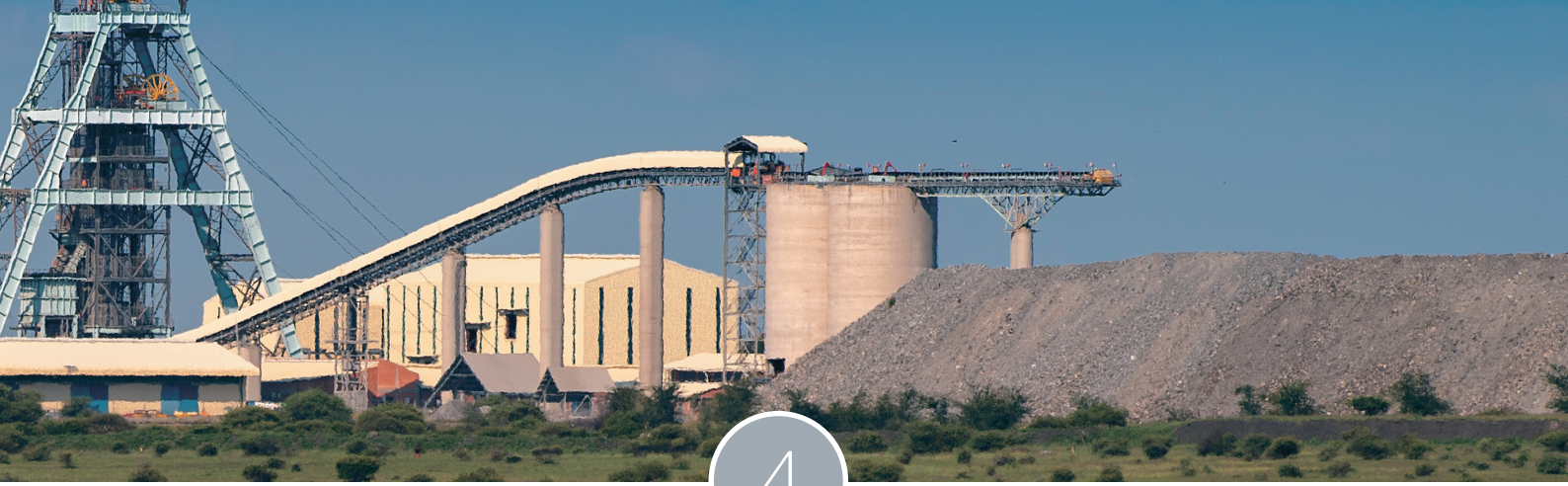
Harassment is distinguished from acceptable conduct in the workplace, and is unwanted conduct which impairs dignity, creates a hostile or intimidating work environment for one or more employees and is related to one or more of the grounds in terms of which discrimination is prohibited in the Employment Equity Act 55 of 1998 (referred to as the “protected grounds”).

Harassment may include but is not limited to **Sexual Harassment and Racial, Ethnic or Social Origin Harassment**.

Bullying and victimisation is unacceptable conduct in the workplace, and is unwanted conduct which impairs dignity, and creates a hostile or intimidating work environment for one or more employees.

A wide range of conduct in the workplace may constitute harassment.

(Refer Implants Harassment, Bullying and Victimisation Procedure and Guidelines).



4

SCOPE

The Implats Harassment, Bullying and Victimization Policy applies to the Group including the Board and all directors, managers, supervisors, employees, job seekers and job applicants, persons in training including interns, apprentices, and persons on learnerships, volunteers, clients and customers, suppliers, contractors and any other person having dealings with the Company.

The protection of Implats's employees and stakeholders against harassment applies in any situation in which the employee or stakeholder is working, or which is related to their work and/or which arises from their work.

A non-employee who is harassed, bullied or victimised may notify the perpetrator's employer if the alleged harassment and/or bullying took place in the workplace or in the course of the perpetrator's employment.

An employee who is harassed or bullied by a third party such as a client, customer, supplier, contractor or other having dealings with the business, should report such harassment or bullying in terms of the Harassment, Bullying and Victimization Procedure and Guidelines.

5

LEGAL RIGHTS

Nothing in this policy precludes an employee who has been assaulted, from pursuing separate charges (whether criminal and/or civil) against an alleged perpetrator, and/or obtaining a protection order.



POLICY

- The Company takes its responsibility to provide a harassment-free work environment seriously. As such, employees are encouraged to report all incidents of harassment, bullying and victimisation, and the Company will seek to resolve such incidents in a sensitive, efficient, effective and confidential manner.
- When an incident of harassment, bullying and victimisation has been brought to the attention of the Company, the Company should investigate the complaint; consult all relevant parties; take the necessary steps to address the complaint in terms of this policy and the law and do so in a manner that is procedurally and substantively fair; and take the necessary steps to eliminate the harassment, bullying and victimisation.
- During the investigation, care should be taken that the complainant and/or witness who has in good faith brought the allegation, is not disadvantaged, victimised, or prejudiced.
- It is a disciplinary offence to victimise or retaliate against an employee who in good faith lodges a complaint of harassment, bullying and victimisation, whether in respect of themselves or another employee.
- Depending on the severity of the incident(s), an employee accused of harassment, bullying and victimisation may be required to attend a disciplinary hearing in terms of the Company's Disciplinary Policy and Procedure.
- The sanction following such disciplinary action should be proportionate to the seriousness of the harassment and/or bullying and may include warnings, dismissal and, where the facts support it, summary dismissal.
- Malicious or bad faith reporting is when an employee lodges a false complaint or report of harassment, bullying and victimisation or uses the procedure for improper reasons. Malicious allegations of harassment, bullying and victimisation are unacceptable and if found guilty may lead to disciplinary action including summary dismissal. Malicious reporting does not include allegations of harassment, bullying and victimisation which are lodged or reported in good faith and which subsequently are not supported by evidence.
- Implats management will consider providing additional assistance that may be required by an employee who has been harassed, bullied or victimised.

(Refer Implats Harassment, Bullying and Victimisation Procedure and Guidelines)



7

CONFIDENTIALITY

The Company and its employees will ensure that complaints and incidents of harassment, bullying and victimisation are investigated and handled in a manner that, insofar as is reasonably possible, ensures that the identities of the parties involved are kept confidential, bearing in mind the Company's primary obligation is to create a workplace free from harassment, bullying and victimisation.

8

REVIEW

This document and the Implats Harassment Bullying and Victimisation Procedure and Guidelines will be reviewed as and when necessary, in the sole and absolute discretion of the Company.

CONTACT DETAILS

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