




	STANDARD POLICY	Document ID	TNCL-DEPT-POL-XXXX
		Document Owner	Dept Manager
	POLICY TITLE	Revision	XX
		Approval Date	DD/MM/YYYY

**POLICY AND PROCEDURES TO ADDRESS SEXUAL HARASSMENT, DISCRIMINATION
& ABUSE OF AUTHORITY IN THE WORKPLACE**

	STANDARD POLICY	Document ID	TNCL-DEPT-POL-XXXX
		Document Owner	Dept Manager
	POLICY TITLE	Revision	XX
		Approval Date	DD/MM/YYYY

APPROVALS

Title	Name	Signature	Date
Author	Gladys Fimbari		9/08/2025
Chief Human Resources Officer	Saimon Sanga		9/08/2025

	STANDARD POLICY	Document ID	TNCL-DEPT-POL-XXXX
		Document Owner	Dept Manager
	POLICY TITLE	Revision	XX
		Approval Date	DD/MM/YYYY

POLICY STATEMENT

Tembo Nickel Corporation Ltd and its group of companies (**Tembo Nickel**) is committed to the creation and maintenance of a workplace that is safe, respectful, and free from sexual harassment, discrimination and abuse of authority. Tembo Nickel upholds the principles of dignity, equality, and inclusion as fundamental to our operations and company culture.

Tembo Nickel has zero-tolerance for any form of sexual harassment, and this zero-tolerance applies to all employees, contractors and consultants working with Tembo Nickel or serving its stakeholders on behalf of Tembo Nickel, including short-term labourers or visitors within any of Tembo Nickel's Projects.

This Policy guides the realization of this commitment to promote a workplace culture that respects human rights, upholds ethical standards, and ensures accountability at all levels.

Benedict Busunzu
Chief Executive Officer
Tembo Nickel Corporation Ltd


	STANDARD POLICY	Document ID	TNCL-DEPT-POL-XXXX
		Document Owner	Dept Manager
POLICY TITLE	Revision	XX	
	Approval Date	DD/MM/YYYY	


Table of Contents

APPROVALS	2
POLICY STATEMENT	3
1. INTRODUCTION	6
1.1 Purpose of the Policy	6
1.2 Scope of the Policy	6
1.3 Links to Other Related Documents	7
2. DEFINITION AND ABBREVIATIONS	7
2.1 Definition of Terms:	7
2.2 Abbreviations and Meaning	11
3 RESPONSIBILITIES	12
3.1 Company’s Obligations	12
3.1.1 Tembo Nickel	12
3.1.2 Management & Leadership including Chief Executive Officer	12
3.1.3 Employees Roles & Responsibilities	13
3.1.4 Contractors & Third-Party Obligations	14
4. POLICY CONTENT AND APPLICABILITY	14
4.2 Complaints Procedure & Grievance Mechanism	15
4.2.1 Recognised Company Reporting systems:	15
4.2.2 Types of Reporting	15
4.2.3 Outside Complaints Mechanism	18
4.2.4 Complaints Withdrawal	18
4.3 Sanctions & Disciplinary Measures	19
4.4 Protection Of Complainants, Whistle-Blowers & Affected Parties	19
4.4.1 Confidentiality	19
4.4.2 Protection Against Retaliation	19
4.4.3 Support to Affected Individuals	19
4.4.4 Work Performance Monitoring & Continuity	20
4.5 Communication & Awareness	20
4.6 Monitoring, Audits & Reports	20
6. SYSTEM EVALUATION	21
7. DISTRIBUTION	21
8. CONTRAVENTION	21

Version No: 01

Page 4 of 23

This document is uncontrolled when printed or downloaded.
You are responsible for ensuring that you use the most recent version of this document.

	STANDARD POLICY	Document ID	TNCL-DEPT-POL-XXXX
		Document Owner	Dept Manager
POLICY TITLE	Revision	XX	
	Approval Date	DD/MM/YYYY	

1. INTRODUCTION

Tembo Nickel is committed to fostering a workplace culture rooted in respect, dignity and equality for all employees, contractors, consultants, and stakeholders including the surrounding community.

This Tembo Nickel policy on Sexual Harassment, discrimination and Abuse of Authority outlines our zero-tolerance approach to sexual harassment, discrimination and abuse of authority as a strategy to ensure that the workplace remains inclusive, safe and conducive to productivity and personal growth.

At Tembo Nickel, we recognize the harmful impact that harassment, discrimination and abuse of authority can have on individuals, teams and on Tembo Nickel. Such behaviours undermine trust, compromise well-being and violate fundamental human rights. Therefore, Tembo Nickel is committed to proactively prevent such incidents including addressing any allegations swiftly and fairly, as well as providing support to the victims.


1.1 Purpose of the Policy

This Sexual Harassment, Discrimination and Abuse of Authority policy (**Policy**) is designed to protect all employees, consultants, contractors, and all other Tembo Nickel stakeholders from unwanted sexual advances, all forms of discrimination and any abuse authority. This Policy establishes a safe, inclusive and respectful work pace where everyone can work free from harassment, discrimination and undue influence by authority. This Policy also provides the guidelines on how to report incidences related to sexual harassment, discrimination and abuse of authority, handling procedures for both allegations and the actual incident, disciplinary measures as well as support to the individual victims affected by sexual harassment, discrimination and/or an abuse of the authority.

1.2 Scope of the Policy

The Policy sets clear standards for workplace conduct, emphasizing respect, equity, and professionalism in all interactions. Employees, consultants, contractors and all associated personnel are expected to foster a culture of inclusivity and mutual respect to ensure that all individuals feel safe and valued within the workplace. Professional behaviour is required at all times, both in direct interactions and in communication across physical and virtual platforms, including activities beyond traditional office settings. This includes field operations, resettlement activities, community relations and engagements, off-site meetings, in-house meetings, and all company sponsored activities and events.

The Policy applies to all individuals directly or indirectly associated with Tembo Nickel, ensuring comprehensive coverage to protect and regulate conduct across various stakeholders as stipulated below:

	STANDARD POLICY	Document ID	TNCL-DEPT-POL-XXXX
		Document Owner	Dept Manager
POLICY TITLE	Revision	XX	
	Approval Date	DD/MM/YYYY	

- **Internal Stakeholders:** All employees regardless of rank, location or employment type (permanent, temporary, part-time or contract). This includes interns, volunteers and trainees engaged in the TNCL operations. It extends to current and potential investors, and officers and directors.
- **External Stakeholders:** Contractors, sub-contractors and consultants providing services to Tembo Nickel, third-party service providers, suppliers and vendors interacting with Tembo Nickel employees or its facilities.
- **Surrounding Communities:** Members of communities impacted by Tembo Nickel operations including Project Affected Persons (PAPs), women, children (girls and boys) people with disabilities, elderly, and others.
- **Visitors and Partners:** Guests, clients and business partners present at premises or participating in Tembo Nickel sponsored events or meetings; NGO representatives of external collaborators involved in Tembo Nickel related activities.

1.3 Links to Other Related Documents

This policy reinforces Tembo Nickel's commitment to upholding ethical practices and ensuring compliance with legal and company standards. It is designed to complement other existing key documents that guide behaviour and decision making across Tembo Nickel operations creating a unified framework for integrity and accountability. These documents([POLICIES](#)) include:

- a) Lifezone Metals Human Rights Policy
- b) Anti-Corruption and Anti-Bribery Policy
- c) Lifezone Metals Code of Conduct
- d) TNCL Disciplinary Procedure
- e) TNCL Employee Handbook
- f) TNCL Terms and Conditions of Employment
- g) TNCL Supplier Code of Ethics


2. DEFINITION AND ABBREVIATIONS

2.1 Definition of Terms:

For the purposes of this Policy, the definitions of the terms will apply as follows:

This section provides clear and concise explanations of key concepts and terminologies used throughout this Policy. These definitions are intended to ensure a common understanding among all employees, consultants, stakeholders and partners, facilitating consistent interpretations and applications of the provisions of this Policy.

The definition of terms of this Policy will draw from internationally recognized standards including those established by the International Labour Organization (ILO), World Bank (WB) and the United Nations (UN). This enhances the Policy's credibility, foster alignment

	STANDARD POLICY	Document ID	TNCL-DEPT-POL-XXXX
		Document Owner	Dept Manager
	POLICY TITLE	Revision	XX
		Approval Date	DD/MM/YYYY

with international frameworks and support compliance with both national and global expectations for ethical and responsible corporate conduct.


a) Sexual Harassment

Any unwelcome sexual advance, request for sexual favour, verbal or physical conduct or gesture of a sexual nature, or any other behaviour of a sexual nature that might reasonably be expected or be perceived to cause offence or humiliation to another; especially when such conduct interferes with work, is made a condition of employment or creates an intimidating, hostile or offensive work environment. While typically involving a pattern of behaviour, it can take the form of a single incident.

Sexual harassment may occur between persons of the opposite or same sex. Both male and female can be either the victims or the offenders.

Forms of sexual harassment and/or violence can take the following forms, but not limited to:

- I. sexual assault, rape, indecent exposure, stalking or obscene communication.
- II. unwelcome physical contact including patting, pinching, tickling, stroking, kissing, hugging, fondling, brushing up against, cornering, or inappropriate touching;
- III. asking intrusive questions about an employee's private life or body;
- IV. making insulting comments or jokes about someone's gender identity or sexual orientation;
- V. repeated asking for dates despite being rebuffed;
- VI. Open or implied threat that submission to sexual advances will be a condition of some form of commendation, work status or access to promotion or development opportunity or positive performance evaluation.
- VII. sharing or displaying sexually explicit pictures, videos, screen savers or posters;
- VIII. Obscene messages sent by text message, email, video chat, social media platform or left on an answering machine or voice mail.
- IX. Unwelcome compliments: such as giving unsolicited compliments about someone's looks or physical features in a sexualized manner.
- X. Threatening to negatively affect someone's job or career unless they comply with sexual demands.
- XI. Using unwelcome 'pet' names, such as "honey", "doll", "babe", "princess"
- XII. Bullying or retaliation for rejecting advances: Making someone's work life difficult because they rejected sexual advances, including exclusion, punishment, or negative performance reviews.

	STANDARD POLICY	Document ID	TNCL-DEPT-POL-XXXX
		Document Owner	Dept Manager
	POLICY TITLE	Revision	XX
		Approval Date	DD/MM/YYYY

b) Harassment

The International Labour Organisation (ILO) defines harassment (alongside violence) in the workplace as “a range of unacceptable behaviours and practices, or threats thereof, whether a single occurrence or repeated, that aim at, result in, or are likely to result in physical, psychological, sexual or economic harm, and includes gender-based violence and harassment”¹


c) Discrimination

The ILO Convention C111 Discrimination (Employment and Occupation) Conversion of 1958 No. 111 defines “discrimination in employment” as any distinction, exclusion, or preference made based on race, colour, sex, religion, political opinion, national extraction, or social origin, which has the effect of nullifying or impairing equality of opportunity or treatment in employment or occupation. Such other distinction, exclusion or preference which has the effect of nullifying or impairing equality of opportunity or treatment in employment or occupation as may be determined by the Member concerned after consultation with representative employers' and workers' organisations, where such exist, and with other appropriate bodies.”

Discrimination and harassment can take many forms, including but not limited to:

- Sexual
- Gender-based
- Race
- Ethnic
- Physically/mentally differently abled (disability)
- Age
- Religion
- Workplace bullying
- Retaliation
- Cyber harassment
- Class or socio-economic status
- Union Membership
- HIV/AIDS
- Marital status or family responsibility
- Political opinion
- Pregnancy
- Creed

¹ ILO (2022): Violence and harassment at work: a practical guide for employers; retrieved: https://www.ilo.org/sites/default/files/wcmsp5/groups/public/%40ed_dialogue/%40act_emp/documents/publication/wcms_857915.pdf

	STANDARD POLICY	Document ID	TNCL-DEPT-POL-XXXX
		Document Owner	Dept Manager
	POLICY TITLE	Revision	XX
		Approval Date	DD/MM/YYYY

d) Abuse of Authority

United Nations Development Programme defines abuse of authority as the improper use of a position of influence, power or authority by personnel against internal or external personnel or a group thereof. This includes situations when the person in question uses their influence, power or authority to arbitrarily influence the career or employment conditions (including, but not limited to, appointment, assignment, contract renewal, performance evaluation or promotion) of other internal or external personnel.

It refers to the misuse of power or control by a person in a position of authority, such as a manager, supervisor, or other employer, to intimidate, coerce, manipulate, or harm employees, or contractors.

This form of abuse occurs when an individual exploits their position to impose unfair, unethical, or illegal demands or behaviour on subordinates or colleagues, often for personal gain or to exert dominance. Abuse of authority can manifest in various forms, including harassment, discrimination, blackmailing, exploitation, retaliation, or creating a hostile work environment.

Other forms of abuse of authority can also include the following:-

False Positive Affirmation: A person in position of authority provide misleading, exaggerated or knowingly false affirmations regarding performance, qualifications or capabilities of any individual or team.

Unqualified Promotions: Where a person in position of authority promotes an individual who does not meet the required qualifications, competences due to favouritism, nepotism, personal bias, or undue influence.


e) Complaints

A **Complaint** is any report made by an employee, contractor, third party or Tembo Nickel employee, consultant or contractor about an alleged incident of misconduct, which includes Sexual Harassment, any other form of Harassment, Discrimination, or Abuse of Authority.

Complaints can be made in relation to behaviour that violates Tembo Nickel's core values, workplace standards, or legal obligations.

f) Grievance

A **Grievance** is a formal grievance or reporting of an incident that infringes on the rights of the grievant(s), which include conducts or behaviours of

	STANDARD POLICY	Document ID	TNCL-DEPT-POL-XXXX
		Document Owner	Dept Manager
	POLICY TITLE	Revision	XX
		Approval Date	DD/MM/YYYY

Sexual Harassment, any other form of Harassment, Discrimination, or Abuse of Authority.

Grievance is broader than a Complaint, and can encompass a range of workplace issues, including systemic problems or organizational decisions, with the goal of finding a fair and satisfactory resolution through a formal process.

g) Investigator

This is a committee appointed internally by Human Resources Department or an independent individual or entity responsible for conducting partial, thorough and confidential inquiries into allegations of misconduct.

h) Legal Mechanism

Includes Commission For Mediation And Arbitration (CMA), Police Force, Courts, Prevention and Combating Of Corruption Bureau (PCCB).

i) Retaliation

Threats or acts of retribution against an individual or individuals who raise(s) concerns, acclaim, assist to make claims, provide information about harassment, discrimination or abuse of authority.

j) Whistle-blowing (and whistle-blower)

Whistleblowing is defined as the disclosure of information which relates to suspected wrongdoing or dangers at work, as provided in Tembo Nickel 's Code of Conduct. Zoning into the application of this Policy, whistleblowing can include reporting openly, in confidence, or anonymously allegations or incidents of Sexual Harassment, forms of Harassment, Discrimination, Abuse of Authority or any other illegal or unethical conduct that may compromise the safety, integrity, or ethical standards of the workplace.

A whistleblower may be a person directly affected by the violation, or not; or can be a witness or recipient of complaints from the victim(s).

2.2 Abbreviations and Meaning

CEO: Chief Executive Officer


CHRO: Chief Human Resources Officer

CMA: Commission For Mediation And Arbitration

GM: Site General Manager

ILO: International Labour Organisation

PCCB: Prevention and Combating Of Corruption Bureau

	STANDARD POLICY	Document ID	TNCL-DEPT-POL-XXXX
		Document Owner	Dept Manager
	POLICY TITLE	Revision	XX
		Approval Date	DD/MM/YYYY

3 RESPONSIBILITIES

The successful implementation of this Policy relies on the shared responsibilities of all individuals within Tembo Nickel and those associated with its operations. Each person plays a critical role in fostering a workplace free from harassment, discrimination and abuse of authority.

To ensure the effectiveness of the implementation of this Policy, specific roles and responsibilities are assigned to various personnel within Tembo Nickel. These responsibilities are critical for creating a workplace that upholds respect, equity and accountability.

3.1 Company's Obligations

3.1.1 Tembo Nickel


- a. Tembo Nickel will act in accordance with this Policy. It will provide appropriate and adequate resources to ensure its implementation, including but not limited to administrative, investigative, disciplinary, and access to remedy for its employees and non-employees, regardless of their function, title, length of service or contractual status. (As listed in point 1.2- the Scope of this Policy)
- b. In promoting awareness, access and implementation of the Policy, Tembo Nickel will provide mandatory trainings and workshops; ensure accessibility; as well as provide technical assistance where necessary.

3.1.2 Management & Leadership including Chief Executive Officer

- To review and approve the Policy.
- Demonstrate a visible commitment to the principles of this Policy by showing appropriate behaviour and promoting a culture of zero-tolerance for Sexual Harassment, Harassment, Discrimination and any Abuse of Authority.
- Ensure adequate resources are available and are timely provided to support the implementation of the Policy.
- Set example by holding themselves and others accountable for upholding the Policy.

a) Human Resources Department

- The Chief Human Resource Department (CHRO) is the custodian of this Policy.
- Review and ensure the policy aligns with industry standard operating procedures both international and national.
- Ensure all employees, consultants, contractors and other and stakeholders are aware of the Policy and understand its provisions through regular communication.
- Ensure organisation and delivery of training sessions to educate personnel on identifying, reporting, preventing and addressing policy violations.

	STANDARD POLICY	Document ID	TNCL-DEPT-POL-XXXX
		Document Owner	Dept Manager
	POLICY TITLE	Revision	XX
		Approval Date	DD/MM/YYYY

- Oversee the grievance mechanism, ensuring timely and confidential handling of Complaints.
- Maintain documentation of reported incidents, investigation and outcomes to track trends and ensure transparency.
- Review the Policy and propose amendments to accommodate developments as per the industry emerging practices.
- Oversee the management and coordination of all disciplinary meetings including appointing Chairperson for those meetings. The CHRO is the Secretary for all disciplinary meetings or will appoint a representative in their place.
- To ensure that all employees, contractors, volunteers and consultants are well informed about this policy, attached to their contracts with dully signature of each individual working with TNCL.
- Officials from the department will be involved in investigating and/or addressing any complaints/grievances raised as per this Policy.


b) Managers & Supervisors

- Must act as role models by upholding only the highest standards of conduct in order to achieve a safe workplace free from any form of Sexual Harassment, Harassment, Discrimination, or Abuse of Authority.
- Take all necessary actions in preventing Harassment, Sexual Harassment, Discrimination and Abuse of Authority among employees, consultants, and non-employees, consistent with this Policy and all other Tembo Nickel guidelines and policies.
- Promote, encourage, and support the creation of a positive work environment that is free from intimidation, hostility, offense, Harassment, Sexual Harassment, Discrimination, and Abuse of Authority.
- Inform and guide all employees, consultants and contractors within your charge, of the Tembo Nickel policies and standards that address all forms of Harassment, Sexual Harassment, Discrimination and Abuse of Authority.
- Address all incidents of Harassment, Sexual Harassment, Discrimination, or Abuse of Authority promptly and in compliance to this Policy and all other Tembo Nickel policies and standards. Demonstrate fairness, impartiality, respect confidentiality, and execute their role with justice.

3.1.3 Employees Roles & Responsibilities

All Tembo Nickel employees must:

- Comply with this Policy and conduct themselves respectfully and professionally, avoiding any acts of Harassment, Sexual Harassment, Discrimination, or Abuse of Authority.

	STANDARD POLICY	Document ID	TNCL-DEPT-POL-XXXX
		Document Owner	Dept Manager
POLICY TITLE	Revision	XX	
	Approval Date	DD/MM/YYYY	

- Undertake mandatory training, knowledge management programmes, including inductions and refreshers, to familiarise themselves with this Policy, related policies, standards and procedures, and set their behavioural expectations.
- Show a commitment to zero-tolerance of Sexual Harassment and treat all individuals in the workplace with courtesy and respect, being mindful of one's own behaviour and how it may be perceived or received by others, in ensuring a safe workplace for everyone.
- refrain from encouraging other employees, consultants and non-employees to engage in sexually harassing or abusive behaviour, or intimidation and retaliation.
- Report any potential misconducts or cases of Harassment, Sexual Harassment, Discrimination or any form of Abuse of Authority anonymously in confidence, or openly.
- Cooperate with any investigation raised regarding Harassment, Sexual Harassment, Discrimination and/or Abuse of Authority, in conformity with this Policy, all other Tembo Nickel policies and standards, as well as legal requirements.

3.1.4 Contractors & Third-Party Obligations


All contractors, consultants, direct, suppliers, short-term labourers or third parties directly engaged with Tembo Nickel have the following obligations:

- Understand that Tembo Nickel has zero-tolerance of any acts, forms or leniency in relation to Sexual Harassment, Harassment, Discrimination or any Abuse of Authority, whether towards Tembo Nickel employees or among any personnel working or residing within Tembo Nickel Projects.
- Ensure that they have policies and systems in place to address Harassment, Sexual Harassment, Discrimination and Abuse of Authority; as per the standards set by this Policy and all other related policies, standards and procedures.
- In any case where there is a gap in the Contractor's or Third-party's policies and systems in addressing incidents of Harassment, Sexual Harassment, Discrimination, and/or Abuse of Authority that have happened within the Tembo Nickel Projects areas or related to Tembo Nickel employees, community stakeholders or reputation, Tembo Nickel's policies and procedures will apply.
- Should provide cooperation in all audits, including periodic audits, that demand compliance to this policy, and national legal requirements.

Adherence by all employees, contractors and third parties to their obligations under this Policy shall be reflected in workplans, performance reviews, and performance benefits, that are administered periodically in accordance with Tembo Nickel's established systems and procedures.

4 POLICY CONTENT AND APPLICABILITY

Anyone can be a victim of Sexual Harassment, Harassment, Discrimination or an Abuse of Authority, regardless of their sex, title, function, and/or physique, and those of the perpetrator.

	STANDARD POLICY	Document ID	TNCL-DEPT-POL-XXXX
		Document Owner	Dept Manager
POLICY TITLE	Revision	XX	
	Approval Date	DD/MM/YYYY	

Tembo Nickel recognizes that Sexual Harassment may also occur between people of the same sex. It is considered Sexual Harassment when the sexual conduct is unwanted and unwelcomed by the recipient.

All Sexual Harassment, other forms of Harassment, all Discrimination and any Abuse of Authority are prohibited, whether they take place within Tembo Nickel sites, premises or outside, including in communities, at social events, business trips, training sessions or conferences sponsored by Tembo Nickel.

4.2 Complaints Procedure & Grievance Mechanism

Any current employee of Tembo Nickel, including full-time, part-time, temporary, or contract workers, can file a Complaint.

Complaints can also be made by non-employees such as contractors, consultants, short-term labourers, visitors, vendors, or stakeholders, if they are affected by the alleged misconduct.

Complainants are encouraged to report issues in good faith. Complaints made with malicious intent or that are knowingly false can lead to disciplinary action.

4.2.1 Recognised Company Reporting systems:

Anyone can report incidents or Grievances relating to Harassment, Sexual Harassment, Discrimination or an Abuse of Authority through the following channels:

- a) Physically/In-person (verbally)
 - Tembo Nickel Supervisors, managers, Human Rights Specialist, Human Resources Office/Personnel, Site General Manager, Company Chiefs, leadership of the Worker's Forum and members of the Human Rights Standard Committee.
 - An affected party or victim can also report through a trusted third-party who would report in person to any of the above.
- b) Written


Reports can also be submitted in written format through

 - Suggestion/Complaints/Grievance boxes placed within Tembo Nickel's Projects Areas and Offices
 - The Tembo Nickel Community Office in Rulenge, Ngara District.
 - P.O. Box 106119, Dar es Salaam, Tanzania; or P. O. Box 26, Ngara, Kagera
- c) Virtual
 - Email address: legal@lifezonemetals.com
 - Hotline numbers: +255-800-120-032 or +255-800-120-067 (SWH); code 596

4.2.2 Types of Reporting

a) Anonymous Reporting

Anonymous involves reporting of Grievances without revealing identity. The report is typically submitted in a manner that keeps the source identity unknown.

	STANDARD POLICY	Document ID	TNCL-DEPT-POL-XXXX
		Document Owner	Dept Manager
	POLICY TITLE	Revision	XX
		Approval Date	DD/MM/YYYY

Anonymous reporting is often designed to protect the complainant from any form of retaliation, such as job loss, harassment and discrimination.

Complaints made anonymously shall first be investigated to determine their authenticity before any action can be taken.

Steps of anonymous reporting:

1. Hotline numbers

- A complainant or whistleblower may report the Grievance or issue (anonymously if they choose) through hotline numbers identified above – 4.2.1 (c) point two.
- All complaints received through the Hotline numbers are investigated.
- All the reports will be taken seriously by Tembo Nickel. The report will be assessed carefully to determine whether further investigation is required.

2. Suggestion /Grievance Boxes

Stage 1

- Complainant may submit the Grievance through grievance box
- The complaint/grievance should include the details such as date, issue description, affected parties and any supporting documentation.

Stage 2


- Designated committee that includes representatives of CHRO, Worker's forum and human rights club shall be responsible for opening the grievance boxes, review and classifying the issues.

Stage 3

- Representative of HR or an appointed investigator shall gather facts, interviews parties and review evidence.
- The investigator shall ensure confidentiality and non-retaliation for the complainant.
- A written summary of findings is prepared.

Stage 4

- Management or HR decides on an appropriate resolution based on findings including mediation, disciplinary action, policy changes or additional training and where necessary to find other avenues to address the grievance (contractors, third parties and stakeholders).

	STANDARD POLICY	Document ID	TNCL-DEPT-POL-XXXX
		Document Owner	Dept Manager
	POLICY TITLE	Revision	XX
		Approval Date	DD/MM/YYYY

Stage 5

- The Complainant shall be informed of the decision and any corrective measures
- If action is taken, responsible parties are notified while maintaining confidentiality
- If the Complainant disagrees with the resolution, they may request an appeal

b) Informal Grievance Mechanism

- The informal approach is aimed at resolving a grievance through an assisted negotiation process between the person who believes he/she is being subjected to a Grievance.
- A complainant who believes they are being subjected to Sexual Harassment, Discrimination or an Abuse of Authority may decide that they wish to use an informal option, to resolve the issue as soon as possible.
- A complainant should be entitled to use informal Grievance mechanism at their election and when it is within 30 days of when the original issue occurred.
- complainants are encouraged to discuss any Grievance with their immediate manager first, provided that this is not required if it would be unreasonable to expect the employee to do so or where the grievance is in respect of their manager. In circumstances where a Grievance concerns an immediate manager, the complainant may proceed directly to formal complaints mechanism.
- The manager who deals with a Grievance in the informal grievance mechanism must fill in Form Annexed to this policy.
- Where the manager fails to resolve the Grievance to a complainant's satisfaction within five working days or any other period agreed between them, the complainant may complete a formal Grievance form.


c) Formal Complaints Mechanism

Stage 1

- Complainant may lodge a Grievance to Human Resources Department. The Grievance should be in writing and include details such as date, issue description, affected parties and where possible supporting documentation.

Stage 2

- Once the Grievance form is received, Human Resource Department review and classify the issues.
- Human Resource Department shall gather facts, interviews parties and review evidence and where necessary shall appoint the investigator.

	STANDARD POLICY	Document ID	TNCL-DEPT-POL-XXXX
		Document Owner	Dept Manager
	POLICY TITLE	Revision	XX
		Approval Date	DD/MM/YYYY

- Investigator shall be appointed on matters that involves Tembo, third party, contractors, consultants or stakeholders.
- The investigator shall ensure confidentiality and non-retaliation for the complainant.
- Grievance hearing will follow the usual HR process relating to formal Disciplinary Procedures and any investigation of an employee.
- For In the event that a grievance related to sexual harassment or abuse of authority is submitted by or involves an employee of a contractor, supplier, or other third party, the Company will review the matter and, where appropriate, refer the grievance to the Human Resources department of the respective contractor or supplier for further disciplinary measures. This process will be carried out with due respect for the privacy and confidentiality of all parties involved.
- The Company expects all its partners to uphold high standards of professional conduct and to take appropriate action in accordance with their internal policies and relevant laws. The Company reserves the right to re-evaluate its business relationship with any contractor or supplier who fails to address such matters appropriately.

4.2.3 Outside Complaints Mechanism


Tembo Nickel acknowledges that employees may seek to address their Grievances through national legal mechanisms. Hence, at any point during the informal or formal processes, should it become apparent that the alleged act of Harassment, Sexual Harassment, Discrimination, or an Abuse of Authority constitutes a serious breach of local laws, CHRO and CEO should be informed.

The CHRO, CEO or similar hierarchy (provided they are neither the alleged offenders nor may have conflict of interest) will determine whether the case should be referred to appropriate local authorities, within the established procedures.

4.2.4 Complaints Withdrawal

The complainant may withdraw a Grievance at any time during the process. In such circumstances, the reason for the withdrawal should be determined and documented. There should not be any undue influence on a complainant to withdraw the complaint, but at their sole discretion.

The requirements to continue an investigation will be reviewed and will be discontinued if prudent to do so.

	STANDARD POLICY	Document ID	TNCL-DEPT-POL-XXXX
		Document Owner	Dept Manager
	POLICY TITLE	Revision	XX
		Approval Date	DD/MM/YYYY

4.3 Sanctions & Disciplinary Measures

Tembo Nickel has a formal Disciplinary Procedure, from which the sanctions and disciplinary measures henceforth are based or further clarified for the sake of implementing this Policy. Further any employee who commits offence of Discrimination, Sexual Harassment, Harassment or an Abuse of Authority may be subjected to:-

- Verbal or written warning
- Suspension
- Demotion or Transfer
- Termination of Employment
- Legal Action including reporting the case to the relevant authorities

4.4 Protection Of Complainants, Whistle-Blowers & Affected Parties

4.4.1 Confidentiality

Tembo Nickel recognizes that some individuals may find it difficult to come forward with a Grievance of Harassment or Discrimination, Sexual Harassment or an Abuse of Authority and may wish such matters to remain confidential.

To protect the interests of the complainant, the person complained against, and people who reported incidents have an obligation to maintain confidentiality, as much as possible throughout the investigative process. Nevertheless, a complainant should be advised that the person complaining has a right to know about allegations levelled against him/her. Information relating to grievance should only be disclosed to the extent necessary to:

- carry out investigative procedures.
- inform certain senior management if there is a business reason to do so.
- or if corrective measures are warranted, to carry out those measures.


4.4.2 Protection Against Retaliation

Retaliation against any individuals who report Discrimination, Harassment, Sexual Harassment or an Abuse of Authority, and against any participants in an investigation is strictly prohibited. Any individual found to have engaged in retaliation will face disciplinary action, up to and including termination.

4.4.3 Support to Affected Individuals

Tembo Nickel acknowledges that guidance and support to affected person(s) may be required at different stages, including:

- Before making a grievance regarding options to address the matter;

	STANDARD POLICY	Document ID	TNCL-DEPT-POL-XXXX
		Document Owner	Dept Manager
	POLICY TITLE	Revision	XX
		Approval Date	DD/MM/YYYY

- In case of any physical, psychological or emotional repercussion;
- During any formal or informal process;
- Managing confidentiality requirements;
- At and following the conclusion of any formal or informal process or investigation.

4.4.4 Work Performance Monitoring & Continuity

- Tembo Nickel will ensure work continuity during any formal or informal process, including a positive work environment for all workers. This will include close monitoring of all parties involved in the process, and mitigating any potential impact to work output.
- Tembo Nickel will support the victim/survivor during and after the investigations to protect them from spill-over effects and providing appropriate health/performance support in ensuring work continuity.
- Interim measures may also be necessary to protect the interests of Tembo Nickel, including the effective functioning of its Projects. Such measures may include:
 - a. measures to physically separate the alleged offender and the target/victim/complainant.
 - b. reassignment of either the alleged offender or the target/victim/complainant with the consent of the alleged offender or target/victim/complainant.
 - c. the consideration of special leave for either the alleged offender or the target/victim/complainant.
 - d. temporary changes in reporting lines.
 - e. any other appropriate measure or combination of measures to the extent consistent with an entity's policies and practices.


4.5 Communication & Awareness

Tembo Nickel will ensure that this policy is widely disseminated to all relevant persons. It will be included in the staff handbook.

All new employees must be trained on the content of this policy as part of their induction into Tembo Nickel. Every year, Tembo Nickel will require all employees to attend a refresher training course on the content of this Policy. It is the responsibility of every manager to ensure that all his/her employees are aware of the Policy.

4.6 Monitoring, Audits & Reports

Tembo Nickel recognizes the importance of monitoring this Policy and will ensure that it anonymously collects statistics and data as to how it is used and whether it is effective. Supervisors, managers and those responsible for dealing with Grievances will report on compliance with this Policy, including the number of incidents, how they were dealt with, and any recommendations made. This will be done on a yearly basis. As a result of this report, Tembo Nickel will evaluate the effectiveness of this Policy, detect violation and ensure accountability.

	STANDARD POLICY	Document ID	TNCL-DEPT-POL-XXXX
		Document Owner	Dept Manager
	POLICY TITLE	Revision	XX
		Approval Date	DD/MM/YYYY

5 CONFLICT OF INTEREST

In handling Grievances, members of investigative and decision-making teams shall, at all times, avoid conflict of interest. A member with a conflict of interest shall declare it to the management. After declaring the interest, the member shall not be allowed to participate in investigation and decision-making processes concerning the person with whom the member has a conflict of interest.

6 SYSTEM EVALUATION

This Policy shall be reviewed after at least one year by members of (list department responsible) and presented to the Standard Committee for approval, or when organizational changes take place or required as part of internal and external audits.

The Document Controller will monitor compliance with the document control system on an ongoing basis.

7 DISTRIBUTION

List physical locations which require a controlled copy of this document.

Table 1: Distribution

Copy	Controlled Document Folder Location
Master	Controlled Documents Central Filing System

8 CONTRAVENTION

Any breach of this Policy shall be regarded as refusal/failure to carry out a lawful instruction and will be dealt with as per the disciplinary procedure.

9 DOCUMENT CHANGE PROCESS

The document change process starts when the document custodian identifies a need to make changes within the document. The document custodian/ owner shall complete the document change request form, sign it off, and submit it to the Document Controller.

The Document controller shall issue the controlled word copy of the document to the respective document custodian/owner so that changes may be made. The document custodian/owner shall resubmit the updated document to the document controller so that the document can be controlled and updated within the Filing system ready for use by the end users.


9.1 Reason for Change

Table 2: Reason for Change

Version No: 01

23

Page 21 of

	STANDARD POLICY	Document ID	TNCL-DEPT-POL-XXXX
		Document Owner	Dept Manager
	POLICY TITLE	Revision	XX
		Approval Date	DD/MM/YYYY

A	As a result of incidents	F	Change in training requirements
B	As a result of the audit findings	G	Results of risk assessments
C	New / changes in governance documents	H	Change due to spelling or grammatical error
D	Changes in legislation	I	New document format
E	Changes in technology	J	To integrate special instruction into the document control system

9.2 History of Change


Table 3: History of Change

Date of Change	Revised Item (paragraph Number reference if required)	Reason Code	Name of Reviewer

10 RECORD CONTROL

Table 4: Record Control

Document Title:	Document ID:	Responsible for Maintenance:	Responsible for Filing:	Location of Storage:	Retention Period:	Method of Disposal:
XXXXXXXX	Document Controller	Document Controller	Document Controller	Department	Hard Copy two Years	Hard copy shared file electronic

	STANDARD POLICY	Document ID	TNCL-DEPT-POL-XXXX
		Document Owner	Dept Manager
	POLICY TITLE	Revision	XX
		Approval Date	DD/MM/YYYY

11 DECLARATION

I acknowledge receipt of this policy of Sexual Harassment, Discrimination and Abuse of Authority, and I have read, understand and accept its contents and do commit that I shall ensure compliance hereto:

Name:

Job Title:.....

Employee Number:.....

Department:.....

Signature:

Date:.....