
	STANDARD POLICY	Document ID	TNCL-HRE-POL-0001
		Document Owner	Chief Human Resources Officer
	TNCL HARASSMENT AND DISCRIMINATION POLICY	Revision	00
		Approval Date	13 <sup>th</sup> January 2026


# TNCL HARASSMENT AND DISCRIMINATION POLICY

## TNCL-HRE-POL-0001

	STANDARD POLICY	Document ID	TNCL-HRE-POL-0001
		Document Owner	Chief Human Resources Officer
	TNCL HARASSMENT AND DISCRIMINATION POLICY	Revision	00
		Approval Date	13 <sup>th</sup> January 2026

## APPROVALS

Title	Name	Signature	Date
Author			
Chairperson Standard Committee			
Worker's Representative			
Senior Legal Counsel			
General Manager			
Chief Human Resources Officer			


	STANDARD POLICY	Document ID	TNCL-HRE-POL-0001
		Document Owner	Chief Human Resources Officer
	TNCL HARASSMENT AND DISCRIMINATION POLICY	Revision	00
		Approval Date	13 <sup>th</sup> January 2026

## TABLE OF CONTENTS

APPROVALS.....	2
TABLE OF CONTENTS.....	3
1. INTRODUCTION .....	4
1.1 General .....	4
1.2 Application .....	4
1.3 Objectives.....	4
2. DEFINITION OF TERMS.....	4
2.1 Major Forms of Discrimination .....	4
3. PROCEDURES .....	5
3.1 Confidentiality .....	5
3.2 Reporting Complaints .....	5
3.3 Investigating Complaints .....	6
3.4 Retaliation .....	6
3.5 Complaint Withdrawal.....	6
3.6 Resolution Process.....	6
4. ADMINISTRATION .....	7
5. SYSTEM EVALUATION.....	7
6. DISTRIBUTION.....	8
7. CONTRAVENTION .....	8
8. DOCUMENT CHANGE PROCESS.....	8
8.1 Reason for Change .....	8
8.2 History of Change.....	9
9. RECORD CONTROL.....	9
10. DECLARATION.....	10

### List of Tables

Table 1: Distribution.....	8
Table 2: Reason for Change .....	8
Table 3: History of Change .....	9
Table 4: Record Control.....	9

	STANDARD POLICY	Document ID	TNCL-HRE-POL-0001
		Document Owner	Chief Human Resources Officer
	TNCL HARASSMENT AND DISCRIMINATION POLICY	Revision	00
		Approval Date	13 <sup>th</sup> January 2026

## 1. INTRODUCTION

### 1.1 General

This policy sets a procedure to address complaints of harassment or discrimination in a fair and equitable manner, respecting the rights, dignity and needs of confidentiality of the employee.

### 1.2 Application

This policy covers all employees of Tembo Nickel and people with whom Tembo Nickel employees interface doing their normal course of business.

### 1.3 Objectives

Every employee has a right to work in an environment that promotes equal opportunity and is free from discrimination and harassment.

The objectives of the policy are:

- To provide a working environment free from harassment.
- To educate all employees on harassment and discrimination policy to ensure that they are aware and that certain types of behaviours will not be tolerated.
- To create fair, impartial and confidential procedures for handling and investigating harassment and discrimination complaints.
- To make all employees responsible for maintaining a harassment-free workplace.


## 2. DEFINITION OF TERMS

**Discrimination:** The denial of equal treatment or opportunity in an employee’s employment, training, compensation and promotion on any basis other than an occupational requirement, or exceptions identified in applicable human rights legislation.

**Harassment:** Any conductor comment that is found offensive and that creates an intimidating, hostile or offensive work environment. Harassment occurs if an individual knew or should have reasonably known that his or her behaviour was unwelcoming and offensive to the person to whom it was directed.

### 2.1 Major Forms of Discrimination

- Age
- Colour
- Creed
- Disability
- Ethnic Group
- Political opinion

	STANDARD POLICY	Document ID	TNCL-HRE-POL-0001
		Document Owner	Chief Human Resources Officer
	TNCL HARASSMENT AND DISCRIMINATION POLICY	Revision	00
		Approval Date	13 <sup>th</sup> January 2026

- Gender
- Race
- Pregnancy
- HIV/AIDS
- Marital status or family responsibilities
- Sexual Orientation
- National Origin
- Religion
- Union Membership

Or any other prohibited ground defined by the legislative jurisdiction in which Tembo Nickel operates.

### 3. PROCEDURES

#### 3.1 Confidentiality

Tembo Nickel recognizes that some employees may find it difficult to come forward with a complaint of workplace harassment or discrimination and may wish such matters to remain confidential.

To protect the interest of the complainant, the person complained against, and others, who report incidents of workplace harassment or discrimination, all employees should maintain confidentiality, as much as possible throughout the investigation process. However, any allegations against him/her. Information relating to a complaint 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

#### 3.2 Reporting Complaints

Employees may report incidents of workplace harassment or discrimination in any of the following ways:

- If they feel comfortable doing so, employees are encouraged to discuss their concerns with the person who is allegedly committing the offensive act. Making the other person aware he or she is creating discomfort in the work environment may be enough to resolve the situation.
- If an employee is not comfortable confronting the other party or has tried without effect the employee may directly contact their manager or Human Resources Manager.

Employees should try to report incidents of workplace harassment or discrimination in a timely manner. An individual who has been offended should keep a written record of the date(s) and time(s) the unacceptable behaviour(s) occurred and a record of any witnesses.

	STANDARD POLICY	Document ID	TNCL-HRE-POL-0001
		Document Owner	Chief Human Resources Officer
	TNCL HARASSMENT AND DISCRIMINATION POLICY	Revision	00
		Approval Date	13 <sup>th</sup> January 2026

Any witness to unacceptable behaviour is encouraged to report that behaviour in the same way as complaints are reported. An employee need not be a victim/witness of harassment to report an incident.

**3.3 Investigating Complaints**

Once a complaint is made, Human Resources will assess the complaint and decide the most effective way to deal with it. While the company is aware that employees may not always wish for a formal investigation, circumstances may exist where these wishes may not be complied with.

The Investigation may include:

- Interviews with the complainant
- Interviews with the person against whom the complaint is made
- Interviews with possible witnesses

The nature of the complaint and the assessment by Human Resources will affect how each complaint is handled.

Any investigation will be approached in such a way as to grant both parties a fair opportunity to present his/her side of the matter.

Regardless of how the investigation is conducted, all discussions regarding the complaint and investigation should be documented.

**3.4 Retaliation**

Retaliation in any form against the complaint, the alleged harassed or discriminated person or witness is unacceptable and will be dealt with and treated as harassment.

**3.5 Complaint Withdrawal**

The complainant may withdraw the complaint at any time during the process. If this is done, the reason for the withdrawal should be determined and documented.


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

**3.6 Resolution Process**

Where an incident of harassment or discrimination is found to have occurred, it may be handled in several different ways.

Examples (which are not exhaustive):

- Counselling may be prescribed
- A public or private apology may be required

	STANDARD POLICY	Document ID	TNCL-HRE-POL-0001
		Document Owner	Chief Human Resources Officer
	TNCL HARASSMENT AND DISCRIMINATION POLICY	Revision	00
		Approval Date	13 <sup>th</sup> January 2026

- An employee found to have committed an offence might be subject to disciplinary action. The severity of the discipline would depend upon several factors, including the nature of the offence, and the interests of the victim and others in the workplace.
- Education and/or training may be offered

No record of the complaint will be placed on the personnel file of the complainant or any of the witnesses involved in the investigation. A record of any disciplinary measure will be placed in the personnel file of the employee found to have committed harassment or discrimination.

If the investigation concludes the allegation is unsubstantiated, no further action will be taken. However, frivolous or vindictive complaints may be treated as harassment.

Both the complainant and the person, against whom the allegations have been made, will be told of the results of the investigation and the action being taken.

Each step of the above process (reporting, investigation, and resolution) will be documented. Human Resources will keep all documentation from the investigation process.

Should any party not be satisfied with the outcome, he/she can revert to the formal Grievance Procedure.


#### 4. ADMINISTRATION

Tembo Nickel reserves the sole and exclusive right to interpret and apply this Policy in the manner Tembo Nickel deems appropriate. Tembo Nickel further reserves the right to change or modify this Policy at any time and in any manner it deems appropriate.

The Head of Human Resources shall be responsible for the interpretation and administration of the Policy.

#### 5. SYSTEM EVALUATION

This policy shall be reviewed at least after two years by members of the Human Resources department and presented to the Standard Committee for approval, or when organizational changes take place or are required as part of internal and external audits. The TNCL Document Controller will monitor compliance with the document control system on an ongoing basis.

	STANDARD POLICY	Document ID	TNCL-HRE-POL-0001
		Document Owner	Chief Human Resources Officer
	TNCL HARASSMENT AND DISCRIMINATION POLICY	Revision	00
		Approval Date	13 <sup>th</sup> January 2026

## 6. 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

## 7. 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.

## 8. 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.

### 8.1 Reason for Change

Table 2: Reason for Change

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

	STANDARD POLICY	Document ID	TNCL-HRE-POL-0001
		Document Owner	Chief Human Resources Officer
	TNCL HARASSMENT AND DISCRIMINATION POLICY	Revision	00
		Approval Date	13 <sup>th</sup> January 2026

**8.2 History of Change**

Table 3: History of Change

Date of Change	Revision No	Revised Item (paragraph Number reference if required)	Reason Code	Name of Reviewer

**9. RECORD CONTROL**


Table 4: Record Control

Document Title:	Document ID:	Responsible for Maintenance:	Responsible for Filing:	Location of Storage:	Retention Period:	Method of Disposal:
TNCL Harassment and Discrimination	TNCL-HRE-POL-0001	Document Controller	Document Controller	OHS Department	Hard Copy two Years	Hard copy shared file electronic



02/06/2026

**Benedict Busunzu**  
**CEO - Tembo Nickel**

	STANDARD POLICY	Document ID	TNCL-HRE-POL-0001
		Document Owner	Chief Human Resources Officer
	TNCL HARASSMENT AND DISCRIMINATION POLICY	Revision	00
		Approval Date	13 <sup>th</sup> January 2026

**10. DECLARATION**

I hereby declare that I have taken part in the discussion of this policy, and I understand its contents and do commit that I shall ensure compliance hereto:

	Name and Surname	Company Number	Designation / Role	Signature	Date Signed
1.					
2.					
3.					
4.					
5.					
6.					
7.					
8.					
9.					
10.					
11.					
12.					
13.					
14.					
15.					
16.					
17.					
18.					
19.					






# 9643-HR-POL-000014 TNCL Harassment and Discrimination Policy

Final Audit Report

2026-06-02

Created:	2026-06-02
By:	Jacinta McDermott (jacinta.mcdermott@lifezonemetals.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAAUnVxhzZvhP4TY8IWSIf4n7og0rs5UDX_

## "9643-HR-POL-000014 TNCL Harassment and Discrimination Policy" History

-  Document created by Jacinta McDermott (jacinta.mcdermott@lifezonemetals.com)  
2026-06-02 - 9:10:31 AM GMT
-  Document emailed to Benedict Busunzu (benedict.busunzu@kabanganickel.com) for signature  
2026-06-02 - 9:10:35 AM GMT
-  Email viewed by Benedict Busunzu (benedict.busunzu@kabanganickel.com)  
2026-06-02 - 9:46:07 AM GMT
-  Document e-signed by Benedict Busunzu (benedict.busunzu@kabanganickel.com)  
Signature Date: 2026-06-02 - 9:47:18 AM GMT - Time Source: server - Signature Appearance Selected: IMAGE
-  Agreement completed.  
2026-06-02 - 9:47:18 AM GMT