



IMPLATS GROUP PEOPLE POLICY

Harassment, Bullying
and Victimization



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INTRODUCTION

The Implats Harassment, Bullying and Victimization 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
 - institute policies that entrench and uphold fundamental human rights; and
 - maintain and develop effective relations with our employees and employee representative bodies.

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OVERVIEW

Implats believes that every individual has the right to be treated with dignity and respect. Any form of harassment, victimization and/or bullying in the workplace will not be permitted or condoned. Persons who have been, or are being, subjected to harassment, bullying and/or victimization in the workplace have the right to lodge a grievance/complaint.

The purpose of this Policy is to give practical guidance to all employees, job applicants and other persons who have dealings with Implats on the conduct which constitutes harassment, sexual harassment, bullying and victimization and to make provision for procedures to deal with any allegation of sexual or other harassment.

Implats views harassment, bullying and victimization of any kind in a serious light, and is committed to:

- Preventing harassment, bullying and victimization from occurring in the workplace;
- Assisting all victims; and
- Taking appropriate disciplinary action against any employee who has been found guilty of harassment, bullying and victimization.

The Company will ensure that all managers are appropriately informed and trained to manage incidents of harassment, bullying and victimisation by:

- Circulating and making this Policy available to all employees;
- Offering educational and awareness campaigns; and
- Providing training to managers as and when required.



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DEFINITION

Definition of Harassment and Sexual Harassment

Harassment means any behaviour, which is hostile or offensive to a reasonable employee, job applicant, or any other person who has dealings with Implats and any behaviour that undermines the integrity or dignity of an employee, job applicant or any other person who has dealings with Implats.

Such behaviour would be unwanted by any reasonable employee, job applicant or any other person who has dealings with Implats and could not be justified through a personal or family relationship and could make such person feel uncomfortable, unsafe, frightened and embarrassed. The behaviour may be physical, verbal or non-verbal. This definition of harassment extends to include victimization which is the punishment or threat to punish someone if they do or do not do something which is in violation of their rights.

Sexual harassment means any unwanted conduct of a sexual nature. The unwanted nature of sexual harassment distinguishes it from behaviour that is welcome and mutual. Such unwanted conduct becomes sexual harassment if:

- 3.1.** The behaviour is persisted in, although a single incident of harassment can also constitute sexual harassment; and/or
- 3.2.** The recipient has made it clear that the behaviour is considered offensive; and/or
- 3.3.** The perpetrator should have known that the behaviour is regarded as unacceptable

(Refer to the Sexual Harassment Policy.)

Bullying/Victimization

Workplace bullying is the repeated, harmful (physical and mental) mistreatment of one or more persons (the targets) by one or more perpetrators.

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SCOPE

- 4.1** This Policy applies to all directors, employees, employers, managers, supervisors, job applicants, clients, suppliers, contractors and others having dealings with the Company.
- 4.2** It is the responsibility of all directors, officers and employees to comply with this Policy and report

violations. Employees can report violations to their manager, HR manager or submit a complaint as provided for by the Company Disciplinary Code.

- 4.3** This Policy should be read together with Gender Mainstreaming, Sexual Harassment, and the Group Disciplinary policies.

POLICY

5.1 Sexual Harassment

- It is the policy of the Company, as per the Sexual Harassment Policy, that:
- All employees, job applicants and other persons, who have dealings with the Company, have the right to be treated with respect and dignity;
- Sexual harassment in the workplace will not be permitted or condoned;
- Persons who have been or are being subjected to sexual harassment in the workplace have a right to raise a grievance and management will take appropriate action;
- Management are required to encourage victims of sexual harassment to report such incidents;
- Information on sexual harassment and the content of this Policy are integral to cultural diversity interventions and induction/ orientation sessions at each operation. This includes departmental inductions where the Human Resource team and line management should take responsibility;
- Management are required to implement this Policy and take disciplinary action against employees who do not comply with it. Serious incidents of sexual harassment or continued harassment are dismissible offences;
- Allegations of sexual harassment will be dealt with seriously, expeditiously, sensitively and confidentially.

- Allegations of sexual harassment will be properly investigated and all steps possible taken to protect the complainant;
- It is a disciplinary offence to victimise or retaliate against an employee who lodges a complaint of sexual harassment;
- Management should be wary of simply accepting bare denials on the part of the alleged perpetrators;
- False or vindictive accusations shall be viewed in a very serious light.

5.2 Bullying/Harassment/Victimization

Workplace bullying is the repeated, health-harming mistreatment of one or more persons (the victims or targets) by one or more perpetrators.

Abusive conduct is threatening, humiliating, intimidating or causes work interference – including sabotage - which prevents work from being done.

5.3 Management's Duty

Management has a duty to investigate all allegations of harassment (including sexual harassment), bullying, victimization and to take appropriate disciplinary action, in accordance with the Company's disciplinary processes against employees who have been found guilty.

- Harassment (including sexual harassment), bullying and victimization is a serious transgression, which may justify dismissal at the first offence.

POLICY (continued)

- It is a disciplinary offence to victimise or retaliate against an employee who lodges a complaint/grievance. An employee, who takes part in such victimisation or retaliation, will be disciplined, with due regard to all the facts and circumstances.
- The Company may take disciplinary action against an employee who makes false allegations of harassment (including sexual harassment), bullying and victimization against another employee.
- Implats does not have the authority to take disciplinary action against non-employees. Attempts should however be made by the Company's senior management, to deal with allegations with the relevant senior level of management of the third party involved, as applicable.

Implats management will consider providing additional assistance that may be required by an employee who has been harassed or bullied, and will ensure that its stance on sexual harassment and the possible consequences thereof are made known at the Company.

5.4 Dealing with Grievances/Complaints pertaining to Harassment (Sexual or other), Bullying and Victimization

Implats realises that harassment (including sexual harassment), bullying and victimization is a sensitive issue. In light thereof, Implats undertakes the following:

- not to ignore or trivialise grievances relating to these offences and to deal with all allegations seriously, expeditiously, sensitively and with the utmost confidentiality; and
- to protect its employees, to the best of its ability, against victimisation, false accusations or retaliation due to the lodging of a grievance/complaint.

In light of the undertakings in the above paragraph, management at the relevant Implats operation will take prompt and appropriate action where instances or allegations of harassment (including sexual harassment) or bullying in the working environment are brought to their attention or reported.

- When an incident has been brought to the attention of management of the respective Implats operation, the operation must advise the employee of the procedures available to deal with the incident, and where reasonably practical, offer the employee advice, assistance and counselling.



POLICY (continued)

- The employee should be re-assured that he/she would not face job loss or any other adverse consequence if he/she elects to follow the procedure pertaining to harassment or sexual harassment.
- The employee may choose to attempt to resolve the matter in an informal or formal manner in terms of the Company's internal procedures, and/or to proceed with such civil or criminal steps as may be appropriate in terms of existing legislation.
- The employee must invoke the procedures in the applicable Company policy as soon as reasonably possible in the circumstances, and without delay.
- The steps to be followed in an informal and formal procedure are set out in the Company's Grievance Procedure Policy.
- Should the employee choose not to follow a formal procedure and Implats, after a proper investigation of the incident(s), is of the opinion that other employees may be at risk, the Company may follow a formal procedure irrespective of the wishes/consent of the employee.
- Where reasonably practicable, Implats may offer the employee assistance from a person outside of line management, with the appropriate skills and experience, to advise, assist and counsel the employee through the procedures as set out.
- A non-employee (job applicant or any other person who has dealings with Implats) who is a victim of harassment (including sexual harassment) and or bullying/victimization perpetrated at Implats' may also lodge a complaint/grievance, if the alleged harassment/bullying/victimization has taken place in the course of the alleged harasser's employment.



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CONFIDENTIALITY

Managers must ensure that any complaints or grievances against any form of discrimination, victimisation or harassment, as described in this Policy, are investigated and handled in a manner that ensures that the identities of the persons involved are kept confidential. Where disciplinary enquiries are held, all parties concerned must ensure confidentiality in the disciplinary enquiry.

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REVIEW

This policy document will be reviewed as and when necessary.

CONTACT DETAILS

For further information visit Implats' corporate website:

www.implats.co.za

HEAD OFFICE

2 Fricker Road, Illovo, 2196
Private Bag X18, Northlands, 2116

Tel: +27 (11) 731 9000

E-mail: investor@implats.co.za

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