



ANTI- CHILD LABOUR POLICY

1. Policy Statement

Sub-Sahara Tobacco is committed to maintaining high standards of human rights and ethical business practices. We have a zero-tolerance approach to child labour in all our operations and throughout our tobacco supply chain. We understand that child labour is a serious risk in the agricultural sector. As a result, we are committed to preventing, identifying and addressing any cases of child labour in a timely and responsible manner.

2. Scope

This policy applies to all employees, contractors, suppliers, and contracted growers engaged with Sub Sahara Tobacco. It covers all operations including farming, curing, processing, and transportation activities.

3. Legal Framework

Sub-Sahara Tobacco Anti Child Labour policy aligns with Zimbabwe and International standards that regulate child and forced labour. This includes:

- i. Labour Act (Chapter 28:01)
- ii. Children's Act (Chapter 5:06)
- iii. Constitution of Zimbabwe
- iv. Tobacco Industry and Marketing Board Regulations
- v. Agricultural Labour Practices (ALP) Code
- vi. International Labour Organization (ILO) Conventions

4. Definition of Terms

4.1 Child - According to Labour Act (Chapter 28:01) and Constitution of Zimbabwe (Section 81), a Child is defined as any person under the age of 18 years.

4.2 Child labour- Work that deprives children of their childhood, their potential and their dignity, and that is harmful to their physical or mental development, including by interfering with their education. Specifically, it means types of work that are not permitted for children below the relevant minimum age. (ILO)

4.3 Hazardous Work- Any work likely to harm the health, safety, or morals of a child

5. Policy Overview

5.1 Zero-Tolerance Prevention- We maintain a strict Zero-tolerance stance towards child and forced labour.

5.2 Due Diligence- We will conduct due diligence to identify, assess and manage risks related to child labour and forced labour within our operations and supply networks, particularly in contracted tobacco growing.

5.3 Remediation- Where instances of child labour or forced labour are identified, we will take immediate, appropriate and effective corrective action. This includes safeguarding affected individuals and facilitating access to suitable support and remediation measures.

5.4 Transparency- We are committed to transparency in our efforts to eliminate child labour and forced labour and we will disclose our performance and actions through regular sustainability reporting.

5.5 Policy Review- This policy will be reviewed periodically to ensure continued relevance, effectiveness and alignment with evolving legal requirements, industry standards and best practices.

5.6 Employee Awareness- We will ensure that all employees and relevant stakeholders are aware of this policy. It will be communicated during induction and reinforced through continuous training and awareness initiatives across all communication platforms.

6. Company Commitments

Sub-Sahara Tobacco will:

- 6.1 Not employing anyone below the legal working age
- 6.2 Ensure all contracted farmers do not use child labour
- 6.3 Promotes safe and fair working conditions
- 6.4 Support access to education for children in farming communities
- 6.5 Raise awareness of the risks of child labour

7. Implementation Procedures

7.1 Supply Chain Management

Sub-Sahara Tobacco is committed to strengthening the prevention and elimination of child labour across supply chain at both operational and corporate levels. This will be achieved through the following actions:

- i. Providing regular training to employees and contracted farmers on child labour prevention and compliance requirements
- ii. Promoting awareness through communication materials such as posters, digital platforms and other relevant channels
- iii. Working closely with farmer groups, worker representatives, customers, government authorities and other stakeholders to support policies, practices and regulatory improvements aimed at eliminating child labour in tobacco production
- iv. Conducting routine farm inspections by trained personnel to verify compliance with this policy

Ensuring accurate, honest and confidential reporting of any incidents supported by proper investigation processes and clear resolution procedures

- v. Carrying out follow-up assessments to confirm corrective action has been effectively implemented and identify any need for further intervention
- vi. Using information gathered from monitoring activities and assessments to strengthen systems and overall performance

7.2 Requirements for Contracted Growers

Sub-Sahara Tobacco acknowledges that some farming activities may pose risks to young persons. Therefore, all contracted growers are required to follow legal requirements and ensure that no individual under the age of 18 is involved in hazardous work.

Growers must:

- i. Understand and comply with applicable labour laws in their country
- ii. Identify tasks on their farms that may be dangerous to young workers
- iii. Ensure that children, including family members, are not exposed to hazardous conditions

Where specific legal guidance on hazardous work is not available, growers must apply reasonable judgement to prevent anyone under 18 from engaging in risky activities

7.3 Examples of Hazardous Activities

The following are examples of tasks that may be considered unsafe for persons under 18. This list serves as guidance and is not exhaustive:

- i. Handling or working with green tobacco leaves, which may expose individuals to nicotine absorption and related illness
- ii. Operating machinery with moving components or working near active vehicles, unless permitted by law
- iii. Using sharp tools or equipment such as knives, machetes or implements used for planting, weeding or cutting
- iv. Carrying heavy loads or performing physically demanding tasks that may affect health and development
- v. Applying or handling chemicals including fertilizers and pesticides
- vi. Working in extreme weather conditions or for excessive hours
- vii. Any other activities that may threaten the health, safety or well-being of a young person

7.4 Monitoring and Compliance

To ensure compliance, Sub-Sahara Tobacco will:

- i. Conduct regular farm visits and inspections
- ii. Carry out risk assessments in high-risk areas
- iii. Maintain records of workers' ages

8. Remediation and Corrective Action

If Child labour is found:

- i. Immediate action will be taken to remove the child from harmful work
- ii. The child's best interests, including access to education, will be prioritized
- iii. The party responsible will be required to take corrective action
- iv. Continued non-compliance may result in termination of contracts

9. Responsibilities

- 9.1 The ESG department is responsible for developing and implementing this policy and providing training to employees and contracted farmers
- 9.2 Farmers and Suppliers are responsible for complying with this policy and allow inspections and audits where required
- 9.3 All employees are responsible to always following this policy and reporting any suspected cases of child labour.

10. Policy Review

This policy will be reviewed regularly to ensure it remains effective and aligned with laws and best practices.

Approved by:

Executive Chairperson

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