

1. Scope

This document describes the Policy regarding Tsebo Solutions Group's (Tsebo) approach to Child Labour practices within its entire supply chain, including subcontractors, suppliers, and business partners.

2. Purpose

To ensure that Tsebo adheres to international standards (specifically, ILO Conventions 138 and 182) and South African national laws (Children's Act No. 38 of 2005 and Basic Conditions of Employment Act) regarding child labour and the employment of young workers.

3. Policy

Tsebo strictly prohibits child labour, defined as employment of children that is either illegal under local or international law or detrimental to a child's health, safety, and moral development. We commit to prohibit the employment of individuals under the age of 18, in line with South African national law and international agreements.

4. General Principal

Tsebo does not accept child labour. Child labour is defined as work undertaken by a child which is legally prohibited from undertaking or is likely to be harmful to the child's health or physical, mental, spiritual, moral, or social development or interferes with a Child's education.

Tsebo supports the United Nations and ILO conventions specifying:

- All actions concerning the child shall take full account of his or her best interests.
- The right of the child to be protected from economic exploitation, from performing any work that is likely to be hazardous or interferes with the child's education, or is harmful to a child's health or physical, mental, spiritual, moral, or social development.

5. Implementation

Tsebo will take the appropriate measures to ensure no Child Labour occurs within the Group including all sub-contractors, suppliers and any organisation that may have direct or indirect links with Tsebo.

This includes but not limited to:

- Recruitment policies verifying age documentation of employees
- Dissemination in contracts, policies, and available documentation such as signage regarding child labour laws and company position on child labour
- Audits are conducted on all Sub-contractors and suppliers for purposes of ensuring compliance with Tsebo policies in respect to Child Labour, Health and Safety and ABAC

Author:	Group Compliance Manager	Issue Date:	01/01/2019
Approver:	Group CHRO	Reviewed Date:	01/04/2024
Doc. No:	PY/HR/03/TSG	Issue No:	03

6. Register of Labour Force

Tsebo collects and maintains documentation from every worker verifying the age of each employee. These are copies of original documents such as Identification cards, birth certificates, passports etc. Tsebo will not collect or hold on to original documentation for any reason.

Where such documentation is not available, all efforts will be made to assess and verify age of employees as per local practise or law.

7. Remediation

If child labour is found within the workforce (sub – contractors or suppliers), Tsebo will seek a resolution in the best interests of the child and take the necessary steps as required by law.

Tsebo will work to develop a responsible solution including a corrective action plan to meet the needs of the child including ensuring they are not disadvantaged, are safe and not discriminated against because of their age.

In instances where child labour is detected, immediate action will be taken to remedy the situation in the best interest of the child. Steps will include:

- Immediate discontinuation of the child's work
- Assessment and verification of the child's age, home, and family
- Ensuring child is reunited with family and/ or relatives/community if this is a safe option
- Collaboration with local child protection services to secure a safe environment for the child
- Ensuring the child has monetary provisions equal to their current wage, or legal minimum requirements for employment, whichever is higher
- Development of a remediation plan that includes educational support and health services, ensuring no disadvantage or discrimination against the child
- Explanation of the legal requirements and restrictions on working ages of children and assurance
- No child found working will be disrespected, discriminated against, or threatened during the process of remediation.

8. Review and Updates

This policy will be reviewed every two years or more frequently if significant changes in legislation occur.

9. Non-compliance

Non-compliance with this policy and the procedures associated with it may result in disciplinary action which may result in the termination of employment. Any transgressions by contractors, service providers and suppliers will result in the implementation of appropriate corrective and remedial action, which may result in the termination of any dealings.

10. Other Policies and Documents

This Policy should be read in conjunction with other Group Policies and documents such as the:

- Code of Ethics and Good Business Practices Policy
- Whistle-blower Policy and Procedures
- Human Resources Standards and Policies
- Occupational Health and Safety Policy
- Group Procurement Policy
- Human Rights Risk Assessment Checklist

NOTE: Respective Countries legislation should be considered when implementing the Child Labour Policy