1. PURPOSE

The purpose of this document is to provide a guiding framework for managing people related issues, within the AEMFC (this refers to all employees), in response to COVID-19. These guidelines will only be in place for the duration of state of National Disaster or in line with any other change of circumstances associated with COVID-19. This document also considers guidance provided by the Minerals Council SA. It also refers to the Mine Health and Safety Act, Occupational Health and Safety Act, Employment Equity Act and Government Gazette for Regulations related to the Disaster Management Act. The document needs to be regarded as dynamic and evolving in that the impact of the COVID-19 virus is not static and that our operating environment is influenced by several factors and stakeholders.

The document is divided into four key areas;

a. Workplace Management
b. Work area risk management
c. Employer responsibility
d. Accurate information reporting

Definition of terms

<table>
<thead>
<tr>
<th>Abbreviation</th>
<th>Description</th>
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<tbody>
<tr>
<td>HOD</td>
<td>Executive Head of Department</td>
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<td>MHSA</td>
<td>Mine Health and Safety Act</td>
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<tr>
<td>EEA</td>
<td>Employment Equity Act</td>
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<tr>
<td>HR</td>
<td>Human Resources</td>
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<tr>
<td>Business Units</td>
<td>Refers to all AEMFC Head Office and Mining Operations,</td>
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<tr>
<td>WHO</td>
<td>World Health Organisation</td>
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<td>MCSA</td>
<td>Mineral Council of South Africa</td>
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2. WORKPLACE MANAGEMENT

2.1. EMPLOYEE LEAVE AND ABSENCE

The employee leave management process is dependent on what the nature and type of absence occurs as a result of COVID-19. There is also a responsibility on employees and line managers to continuously track prognosis during the process. Employee leave and absence are managed through taking the following into account:

a. Employee obligations
b. Employee testing protocol
c. Employee imposed quarantine
d. Employee isolation

2.2. EMPLOYEE OBLIGATIONS AND RESPONSIBILITIES

The Employee obligations contained in this guideline needs to be considered in light of the obligations placed on employees in Section 22 of the MHSA to:

- Take reasonable care to protect their own health and safety.
- Take reasonable care to protect the health and safety of other persons who may be affected by any act or omission of that employee.

Further obligations on employees, contractors and visitors are as follows:

a. Employees returning from high risk areas or who had contact with COVID-19 positive individuals should inform their line manager at the relevant business unit. The high-risk areas include but are not limited to Italy, China, Iran, France, Spain, UK, Germany, USA, Republic of Korea, Switzerland, Denmark, Belgium, Austria, Netherlands, Japan, Norway and Sweden (Confirmed through latest WHO statistics).

b. Employees, Contractors and Visitors to complete self-test questionnaire as distributed by Risk and Compliance.

c. If employees, contractors and visitors suspect that they may have contracted COVID-19 to report immediately when feeling the symptoms associated with COVID-19.

d. Employees to provide accurate and truthful information in relation to COVID-19 responses where required.

2.3. EMPLOYEE TESTING PROTOCOL (SEE FIGURE 1 BELOW)

If an employee suspects that they may have COVID-19 or displays any symptoms in line with the self-test questionnaire provided, the following process needs to be followed:

a. Employees should not report to work but consult their Doctor
b. Doctor to issue medical certificate to enable testing at a laboratory or state institution after due consideration of risks
c. Notify their Line Manager immediately through the quickest means.
d. Line manager to inform HOD/Executive Head
e. Whilst the employee is awaiting test results the employer-imposed quarantine process will be initiated
2.4. EMPLOYER IMPOSED QUARANTINE (SEE FIGURE 2 BELOW)

a. In the event of employees travelling back from a high-risk area for business or personal reasons or who has had contact with COVID-19 positive individuals, the protocol is the application of a 14-day quarantine for self-assessment. The time off would be considered as "working from home" and employees would need to provide proof of exposure (i.e. stamped passport, airline tickets or affidavit). These employees should also follow the employee testing protocol during this time and inform their Line Manager appropriately.

b. The employee to be granted 3 days sick leave whilst awaiting test results. This leave will be approved by HR manager in conjunction with the HOD.
The following options are available in relation to employer-imposed quarantine:

<table>
<thead>
<tr>
<th>Option 1: Sick Leave (If employee shows symptoms)</th>
<th>Option 2: AEMFC Leave Policy</th>
<th>Option 3: No Leave – work from home (Assessment of work from home as an option)</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Employee can obtain medical certificate</td>
<td>• Employee to be managed in line with the AEMFC leave policy</td>
<td>• If it is possible for the employee to work from home, the period of quarantine will not require any leave as employee will continue working.</td>
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<tr>
<td>• Period of quarantine/isolation will be sick leave</td>
<td>• AEMFC may issue a directive to enable employees to move into negative leave balances in special circumstances</td>
<td>• At the discretion of the employer</td>
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<tr>
<td>• If employee is diagnosed with Covid-19, he/she may require prolonged treatment (in hospital/ICU)</td>
<td></td>
<td>• This may not be an option for all mine-based employees</td>
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### 2.5. WORKING FROM HOME

The intent of working from home as an option is to reduce employee contact and potential exposure to COVID-19. The application of the work from home principle needs to consider the work deliverables, possible team rotations and operational continuity. It is the discretion of the applicable Executive Head and/or HOD to consider and make final recommendations on work from home as an option for identified employees.
The following factors to be considered when recommending the work from home principle:

a. The nature of the work needs to be compatible with working from home
b. The categories of work that can be conducted from home must be clearly identified
c. Employees who work from home must have clear deliverables and regular check-ins
d. The impact of additional costs of enabling employees to work from home
e. Company Intellectual property protection
f. Potential and impact of employee injury whilst working from home

2.6. EMPLOYEE ISOLATION

In the event of an employee testing positive during quarantine and moving into isolation the following will apply:

a. The employee will utilise sick leave during time of absence
b. In the event of sick leave being exhausted, an extension of sick leave may be granted in line with the current AEMFC sick leave policy
c. The OMP or Doctor required to confirm that the employee is fit for work
d. The OMP or Doctor to ensure continued monitoring for the first 8 weeks after return to work.

2.7. CONSEQUENCE MANAGEMENT

Although we expect all our employees to remain aligned to ethical practices and in line with our values during this period of managing the COVID-19 pandemic, there may be instances where we need to monitor employee conduct and utilise consequence management. There are four broad areas where consequence management (Disciplinary Action) may be required during this period:

a. Employees refusal to carry out any reasonable precautionary measure as communicated by AEMFC
b. Any unjustified, unapproved absence and unreasonable refusal to work by any employee
c. Employees not following established protocols to raise issues and concerns (i.e. Grievance procedure)
d. In terms of the Regulations pertaining to National Disaster Act, individuals who refuse to be quarantined after testing positive can be criminally charged and receive a fine or jail sentence for refusing to be isolated during the pandemic
e. In terms of the Regulations pertaining to National Disaster Act, spreading of false information is a criminal offence and punishable by a jail sentence or a fine.

2.8. COLLECTIVE AGREEMENTS

There are collective agreements, particularly wage agreements governing employee conditions of employment across AEMFC. These wage agreements will be considered in relation to employee entitlements in all forms of leave and other relevant benefits. Furthermore, all collective agreements pertaining to employee health and safety will also be adhered to during the management of COVID-19.
3. **WORK AREA RISK MANAGEMENT**

The key principle of work area risk management is to minimize movement between Head Office and the mine (which are geographically isolated) which limits exposure and potential spreading of COVID-19, AEMFC has therefore issued the necessary protocols related to business unit contact and travelling.

3.1. **WORKPLACE EXPOSURE**

In the event that there is an unexpected workplace exposure due to a positive or suspected positive COVID-19 case, please follow the guidelines provided by Risk and Compliance on an ongoing basis.

3.2. **EMPLOYEE COMMON AREAS**

It is recommended that as far as possible we limit the amount of people within common areas such as tea rooms/meeting rooms/changehouse/greenpoint area, etc. At business unit level it may require that we further stagger tea and lunch breaks or request employees to eat at the work area where possible.

   a. Increase levels of cleaning within these common areas and provide hand sanitizing facilities.
   b. AEMFC have already issued further protocols limiting face-to-face meetings and interactions with external parties.

3.3. **TRAINING FACILITIES**

   a. Relevant business units to implement increased hygiene management

   b. Access to facilities to be managed more vigilantly with a focus on sanitizing and limiting numbers where possible

   c. Where there is a need for the operations to provide more detailed guidelines in this regard, as deemed necessary, the operations in question can continue to do so.

3.4. **EMPLOYEE TRAVEL/COMMUTING**

Employees travelling and commuting at business units need to be managed in line with risk mitigation and with a focus to minimize operational disruptions. It is however understood that this is an inherent risk, particularly where common transport is the only means of getting employees to their place of work.
3.5. HIGH RISK EMPLOYEES

a. The onus is on the employee to disclose any medical condition/ suspected medical condition that may be deemed to be high risk to their OMP or Doctor. Conditions like TB, Diabetes

b. The OMP or Doctor to implement relevant management process and increase monitoring where necessary.

c. On appointment employees disclose medical conditions, all OMPs (Clinic Plus) should therefore have a view of high-risk employees already.

d. If employees disclose a medical condition during this period, it should be supported and confirmed by a medical certificate from the OMP or Doctor.

4. EMPLOYER RESPONSIBILITY

4.1. MINE HEALTH AND SAFETY ACT

In accordance with the General Obligation (Section 5 of MHSA), AEMFC will continue to:

a. maintain a safe and healthy working environment for employees as far as reasonably practicable

b. ensure the workplace must be without risk to the health of employees

c. in the context of COVID-19, employer must manage risk of contamination to safeguard employees

AEMFC to staff the mine with due regard to health and safety (Section 7 of MHSA).

a. Employer must institute measures to secure, maintain and enhance health & safety.

4.2. COVID-19 EMPLOYEE TESTING

Employee testing done in compliance with the provisions of the MHSA and complies with the provisions of the Employment Equity Act (Section 7 of EEA). The application of testing, rate or frequency of employee testing to be determined by Risk and Compliance,
4.3. STAKEHOLDER ENGAGEMENT

HODs and HR Officials to continue engagements with all employees and relevant unions.

5. ACCURATE INFORMATION REPORTING

a. The OMP or Doctor to provide the HR Manager with updated information daily.

b. HR to provide input into proposed communication related to the workforce.

c. The AEMFC guideline document will be updated in line with any changes in circumstances or approach related to COVID-19 management.

d. Protection of employee data confidentiality.

Should you wish to have further clarity on the document, please contact the relevant HR Officials. These guidelines will be effective with immediate effect.

MM MODIPA
INTERIM CHIEF EXECUTIVE OFFICER
2020/03/29