

POLICIES FOR LTP GROUP OF COMPANIES

(Per definition it includes LTP, TPD, all related companies and contractors that are delivering services)

(Revised 9 October 2017)

INTRODUCTION

Purpose of Manual

1. This Manual has been compiled for LTP Group to create a culture of transparency and responsibility to allow each person the right of accessibility – thereby enabling them effective promotion and protection of their rights.
2. The aim of this Manual is:
 - To introduce of the Company’s policies and procedures.
 - To give guidelines in line with the Statutory Workers’ Relationship requirements.
 - To give guidelines to implement all attuned procedures.
3. This Manual replaces the previous one and is applicable with immediate effect.
4. This Manual is subject to changes, and the responsibility rests with each employee to keep up to date with changes by reading information sent out regularly.
5. This Manual is applicable to all LTP Group employees. The Managing Director of LTP Holdings (Pty) Ltd has to approve and control all deviations from this Manual.
6. This Manual should be seen as a supplement to the Labour Legislation as amended from time to time. Where the Labour Legislation does not cover certain issues, this Manual should be seen as a supplement. Should any policy and/or procedure not correspond with the Labour Legislation, the Labour Legislation shall prevail.
7. In this Manual certain words refer to the male gender which could also refer to the female gender, and certain words refer to singular but could also enclose plural, and vice-versa.
8. The use of the male gender should not be seen as any form of discrimination.
9. Offer of employment should be in accordance with this Manual.
10. It is against the Policy of LTP Group to directly or indirectly discriminate or victimise against any employee on the grounds of race, gender, pregnancy, marital status, family responsibilities, ethnical or social preferences, colour, sexual preferences, age, disability, faith, HIV status, political opinion, culture or language of birth.
11. It is not discrimination if:
 - Steps are taken to promote Affirmative Action with the aim of ensuring equal employment.
 - To distinguish, exclude or rather employ a person on the grounds of inherent requirements for a job or promotion.

12. Basic Conditions of Employment

The Legislation on Basic Conditions of Employment (Legislation no. 75 of 1997) as amended from time to time.

13. Employee

Any person employed by the Company in terms of the Legislation on Labour Relations.

14. Legislation on service Equity.

Refer to the Legislation on Service Equity (Legislation no 55 of 1998)

15. EPS

Means Exquisite Payroll & HR Services.

16. Legislation on Labour Relations

Means the Legislation on Labour Relations (Legislation no 56 of 1995) as amended from time to time.

17. HOD

Head of Department.

18. HR Division

Human Resources Division (HRD)

19. Manager

Means the person appointed as Head of a Department.

20. Information Manual

Manual containing information on all the Policies and Procedures, including amendments.

21. Property

Any movable, immovable, tangible and intangible assets belonging to LTP, including all information gained or assimilated by the employee.

22. RSA

Republic of South Africa.

23. SHE – Safety Health and Environment

Republic of South Africa.

24. Legislation on Skills Development

The Legislation on Skills Development (Legislation no 97 of 1998) as amended from time to time.

25. Legislation on Skills Development Levy

The Legislation on Skills Development levy (Legislation no 9 of 1999) as amended from time to time.

26. Promoter

Person to whom another employee is accountable.

27. LTP

Limpopo Tobacco Processors (Pty) Ltd. Reg. nr. 1998/020096/07

28. TPD

Tobacco Producer Development (Pty) Ltd. Reg. nr. 2015/441055/07

29. LTP Group



LTP, TPD, all related companies and contractors such as agronomists that deliver services. LTP and TPD are also only related companies but using shared services for all administrative, financial and HR functions. This term “LTP Group” does not have the intention to give an impression that there is any shareholding between the companies. Please refer to all the material contracts between the companies that regulates the working between the companies. This is only a convenience term to use because of the use of shared services between the companies.

CORPORATE SOCIAL RESPONSIBILITY POLICY

COMPANY STATEMENT

We, as Board Members and Management, of LTP Group, recognise that we will integrate our business values and operations to meet the expectations of all our stakeholders. This include producers, buyers, customers, contractors, visitors, employees, investors, suppliers, the community and the environment.

We recognise that our social, economic and environmental responsibilities to these stakeholders are integral to our business. We aim to demonstrate these responsibilities through our actions and within our corporate policies.

We value all feedback that we receive from our stakeholders and, where possible, maintain open dialogue to ensure that we fulfil the requirements outlined within this policy.

We shall be open and honest in communicating our strategies, targets, performance and governance to our stakeholders in our continual commitment to sustainable development.

The Managing Director of LTP Holdings (Pty) Ltd is responsible for the implementation of this policy and will make the necessary resources available to realise our corporate responsibilities. The responsibilities for our performance on this policy rests with all employees throughout the Company.

Our partnership focus

We will ensure a high level of business performance while minimising and effectively managing risk ensuring that we uphold the values of honesty, partnership and fairness in our relationships with all our stakeholders.

We shall support the development of our external stakeholders through training courses and using our facilities for all of our business partners to hold meetings.

Our contracts will clearly set out the agreed terms, conditions and the basis of our relationship and will operate in a way that safeguards against unfair business practices.

We shall encourage suppliers and contractors to adopt responsible business policies and practices.

We shall engage with communities in common issues where applicable.

We will register and resolve complaints in accordance with our standards of service.

We shall work with colleges and universities to assist young people in choosing their future careers, being and advocate for our industry.



We shall operate an equal opportunities policy for all present and potential future employees and will offer our employees clear and fair terms of employment and provide resources to enable their continual development.

We shall maintain a clear and fair employee remuneration policy and shall maintain forums for employee consultation and business involvement.

We shall provide safeguards to ensure that all employees of whatever nationality, colour, race or religious belief are treated with respect and without sexual, physical or mental harassment.

We shall provide, and strive to maintain, a clean, healthy and safe working environment in line with our Safety, Health and Environment Policy and safe systems of work.

This policy is available to all interested and affected parties.

This policy will be documented, maintained, implemented and reviewed at least annually.

COMPLAINTS POLICY & PROCEDURE

LTP Group of Companies is committed to:

- Resolving complaints from employees, contractors, visitors and community members in a manner which LTP Group of Companies believe is fair to our business and our stakeholders.
- Ensuring that employees, contractors, visitors and community members have full knowledge of the procedures established for internal resolution of their complaints.
- Ensuring easy access to our complaints resolution facilities at our facility, or by way of post, telephone or e-mail.
- Empowering properly trained people in our business to deal with complaints, as well as with the escalation of serious non-routine complaints.
- Dealing with complaints in a timely and fair manner, with each complaint receiving proper consideration in a process that is managed appropriately and effectively.
- Maintaining records of all complaints received for a year. All records will be maintained by the HR Department.
- Implementing follow-up procedures to:
 - Ensure the avoidance of occurrences giving rise to complaints and;
 - Improve services and complaint system and procedures where necessary.
- All complaints will be treated confidentially by the HR Manager and Management team.
- Complainants will under no circumstances be victimised.

Complaints Procedure

Steps to follow:

- Employees, contractors and visitors can submit a written complaint in the designated complaint box at the stairs to the offices in the factory. Complaints can be anonymous.
- Employees, contractors, visitors and community members can also visit www.ltp.co.za and send an e-mail or phone any employee with his/her complaint.
- All complaints in the complaint box will be collected by the HR Manager and he will evaluate the complaint and take the necessary steps to ensure the complaint is resolved as quickly as possible.
- All e-mails and phone calls will be escalated to the HR Manager to evaluate and take the necessary steps to resolve the complaint.

- If the HR Manager can't resolve the complaint and deems it as very important, he will escalate the complaint to Top Management to resolve. If Top Management deems it necessary, it can be escalated to the next board meeting to resolve.
- Feedback will be provided to complainant if possible and deems reasonable by Management. Feedback of complaints will be the responsibility of the HR Department in coalition with Top Management.

HEALTH, SAFETY & ENVIRONMENT POLICY

LTP Group has a moral and legal obligation to safeguard and protect its staff and visitors against injury, diseases, as well as risks to health and safety within the company premises.

The Occupational Health and Safety Act places the legal onus for Occupational Health and Safety upon myself as Managing Director of LTP Holdings (Pty) Ltd.

In turn this is now formally delegated in terms of section 16.2 of the Act to all Heads of Departments, staff and producers in the LTP Group who are charged with compliance and required to ensure that all legal duties are effectively discharged.

LTP Group, therefore, aims to:

- Provide and maintain a safe work environment by implementing structures and programmes to ensure that hazards to Health and Safety are identified in a systematic manner and timeously actioned;
- Provide the fire prevention and safety training to all staff and visitors;
- Comply with the requirements of the Occupational Health and Safety Act of 1993;
- To take a proactive stance on environment and biodiversity matters;
- Reduce carbon emissions per kg of tobacco;
- To ensure that contractors undertake their duties in a safe and responsible manner.

To ensure the above, LTP Group requires management at all levels to accept responsibility for this, and to ensure full legal compliance in their areas of responsibility as a condition of employment.

LTP Group requires all staff to adhere to all safe work standards and procedures and to:

- Identify, eliminate or control all unsafe acts and conditions;
- Operate and use equipment and vehicles in such a way that their safety and that of others is ensured;
- Maintain and use safe equipment where prescribed or where necessary;
- Adhere to all legal requirements and all other regulations relating to safety.

SUSTAINABLE TOBACCO PROGRAM (STP) POLICY

LTP Group of Companies is committed to:

- The Sustainable Tobacco Programme with the aim of continuous improvement.
- Support the development of sustainable practices in the production and processing of tobacco.
- Develop employees and producers by continuous training and support to enhance sustainable practices.
- Appoint a designated employee as STP co-ordinator and also appoint a STP team to support the co-ordinator to ensure compliance and monitoring of the STP requirements and report back to Management on a regular basis in this regards.
- Assign the necessary resources to the STP team to ensure successful implementation and development of STP.
- Measure STP progress on continuous basis and to ensure all employees are aware of STP requirements relating to his/her function in the company.

CHILD LABOUR POLICY

LTP Group will comply with all relevant and applicable local and international labour regulations and principles relating to the protection, welfare and health and safety of children. Furthermore, LTP Group will not employ any person deemed by local or international laws, conventions or regulations to be a child in any capacity in any industrial operation under its control.

LTP Group is committed to the principles of protecting children from child labour exploitation. LTP Group aims to apply this commitment and principles to all its contracted leaf growers by education through its field extension service, seeking to ensure that:

- The welfare and health and safety of children are paramount at all times;
- Any form of farm practice, including tobacco growing activities undertaken by children for the development of craft skills, do not conflict with, or impede, their proper educational development, including school attendance;
- No farm activity that could be considered to put children at risk is undertaken by children, e.g., handling mechanical equipment or agrochemicals, etc.

LTP Group management is responsible for introducing procedures and programmes to implement this policy and to proactively demonstrate its commitment to corporate social responsibility in this regard.

This policy will be communicated to all role players in LTP Group to encourage adopting this policy as best practice.

AGROCHEMICAL USAGE POLICY

INTRODUCTION

It is required that all producers supplying LTP Group will adhere to this policy.

LTP Group Agrochemical Usage Policy

Pest and disease management must be done according to the principles of GAP (Good Agricultural Practices) and IPM (Integrated Pest Management).

Chemical control is only one of the tools used in the IPM approach. It is very important to highlight that chemical control is not the only option to control pests. The basis of the LTP Group Agrochemical Policy is to use agrochemicals only when necessary to efficiently control the target infestation in tobacco seedbeds and fields, using the minimum amount feasible to control any specific pest, diseases, suckers and weeds according with the GAP, as a way to reduce any negative potential impacts to the applicator, environment and consumers. Agrochemicals should be used safely and in accordance with laws and local regulations.

Before using any agrochemical, it is recommended to put in place all alternatives available to reduce pesticide usage, improving GAP and IPM approaches in the tobacco growing area.

Responsibility of the Individual Grower

Before introducing or recommending any agrochemicals for use in tobacco production, the responsibility of each individual grower is to be compliant with the following GAP principles:

- The agrochemical formulation must be registered for tobacco production in South Africa (mandatory and essential).
- All the aspects regulating agrochemical usage in South Africa must be followed, including waste disposal (rest of product, syrup and packing).
- The agrochemical selected must be efficient to control the target pest(s) and the farmer should have a clear understanding of how to properly use that chemical.
- The agrochemical label instructions must be followed.
- The farmers must be trained in the correct use of agrochemicals.
- Always use the adequate Personal Protective Equipment (PPE) when handling any agrochemical, during storage, syrup preparation and the spray phase.
- The agrochemical must be selected to minimise impacts on the environment and to the applicator.
- Before purchasing an agrochemical for the first time, a specimen of the product label and Material Safety Data Sheet (MSDS) must be obtained from the supplier or manufacturer. This information has to be used to undertake a risk assessment for the storage, syrup application and disposal of any unwanted chemical.

- Every year the agrochemicals purchases should be just enough to meet the needs for the crop season. Do not buy more agrochemicals than needed.
- Do not prepare agrochemicals in tank mix. Use only formulated mixtures, when available, as a way to avoid potential intoxication risks to applicators.
- When feasible, use agrochemicals in hydro-soluble sachets, as a way to reduce any potential intoxication risk during the syrup application step, protecting the applicator.

Agrochemicals Selection in LTP Group

A list of recommended agrochemicals has been approved for LTP Group. The recommendations have been developed taking in consideration the safety (applicator and environment), economic and current regulation factors. It is therefore required that all operations utilise only these agrochemicals (see delivery agreement).

If there is a need to use another agrochemical product which is not included in the recommended list, and provided that it is not included on the prohibited list, approval should be sought from and granted by LTP Group Agronomy Services. Please send the relevant product information to anton@ipmafrica.co.za to request such an approval.

Use of Generic Agrochemicals

The LTP Group policy is that all agrochemicals should be purchased from reputable sources and wherever possible, as branded products from the original manufacturers.

Purchase of generic agrochemicals, i.e. agrochemicals that no longer have patent protection. Many of the older agrochemicals used on tobacco are no longer patent and it is common practice and legal for these to be manufactured by a range of second line agrochemical companies. The quality control applied by these second line manufactures is not always as good as the original manufactures and in some cases the products may contain undesirable contaminants or outdated formulation compounds. By purchasing from the original manufacturers these disadvantages are less likely to be encountered and therefore it is recommended to purchase product from original manufacturers.

Purchase of equivalent active ingredients but in a different formulation from third party manufacturers with no patent protection, producing a similar product. In some cases an agrochemical may not have patent protection in South Africa and it is possible to manufacture and sell formulations comprising the active ingredients without infringing patent rights. These products can be manufactured in one country and sold in another without infringing patent rights, if there is no patent protection in either country. These products are similar to the “Generic Agrochemicals” in that the quality control is not always as good as that applied by the original manufacturers and in some cases the products may contain undesirable contaminants and outdated formulation compounds. This is further exacerbated because most patent protection for agrochemicals is in the



major chemical manufacturing countries of the world, this leaving third party manufacture of these products to countries where patent protection is not in force and that do not always have the same standard of regulation or control. The use of these types of products is not recommended.

GIFTS AND BRIBES POLICY

Purpose

This document sets out the LTP Group policy with regard to the receipt and giving of gifts, bribes and payments through which one person gains a dishonest advantage over another.

Fraud and corruption

These are serious offences which can result in criminal conviction. In terms of the new Corruption Act 12 of 2001. It's a criminal offence for an employer not to report corruption, theft or fraud or a suspicion of the mentioned offences is excess of R100 000 to the police.

Fraud and corruption in these terms are defined as the acceptance of bribes, receiving of money, goods or services for personal gain which are not disclosed to LTP Group.

Equally any company or employee of a company who gives bribes of money, goods or services to gain a business advantage is considered to have committed a criminal offence in terms of the corruption Act.

- Fraud and corruption, or attempted fraud and corruption are breaches of acceptable standards of conduct required of employees. They will not be condoned by LTP Group.
- Where LTP Group suffers a loss, steps will be taken against the employee to mitigate the loss.
- Appropriate action will be taken against the offender whether or not a loss has been suffered. Fraud and corruption of any amount are dismissible offences.
- The policy may be called in where the evidence justifies such action.

Acceptable gifts

The receipt of gifts from suppliers and business associates is to be discouraged. However, on disclosure staff may accept gifts which comply with the following criteria:

- Lunches or meals
- Gifts which can be used in the office (calendars, desk pads, pens bearing a logo etc.)
- Food or drink of a reasonable nature (single bottles of wine, boxes of chocolates)

Gifts should be of a low value so that the staff member does not feel obligated to the giver. All gifts received should be disclosed to the staff member's immediate manager if it exceeds **R1 000.00**. Gifts which are unsuitable will be returned to the supplier. LTP Group reserves the right to take



disciplinary action with regard to employees receiving gifts of more than the stated amount and not disclosing it.

The giving of gifts to employees must be approved by the Managing Director of LTP Holdings (Pty) Ltd and must be in line with the gift receiving policy. All gifts exceeding R1 000.00 must be approved by the Managing Director of LTP Holdings (Pty) Ltd and recorded in the gift register book.

Entertainment of a client must be pre-approved by the Managing Director of LTP Holdings (Pty) Ltd and must have a clear business purpose.

CODE OF ETHICS

Purpose and scope of this code

The purpose of the King Report on Corporate Governance of a Company, is to ensure that LTP Group operates in an ethical manner. It is for this reason that LTP Group implements this policy on ethics. Any employee who works at LTP Group will meet the criteria of the code, which is seen as a strategic business imperative. This code is applicable to all workers.

Obligation of managers

The Manager is responsible for communication and ensuring the understanding of all employees, as well as for compliance with ethical obligations and taking the necessary steps to ensure that the codes are met.

Obligation of managers to clients

A manager must:

- Market the Company's products correctly.
- Not create misleading information or create unreasonable expectations.
- Keep to the agreed price.
- Deliver with promptness (within the reasonable expectations of the client), and where service is slow, keep the client informed of the delay.

The manager has a responsibility to the customer of the LTP Group to determine the standard and quality and to maintain it in particular with:

- Determination of minimum quality.
- Determining the standard of the products of the LTP Group to ensure that the products meet these requirements.
- A reasonable guarantee that the products meet the standards of LTP Group, and replace a product that is lower than the standard.

A Manager should manage the LTP Group with a view to achieving the greatest possible savings and other benefits for customers and consumers and in particular to strive to:

- Reduce inefficiency in the LTP Group, and maintain standards of efficiency in consultation with other workers to ensure its continuation.

- Create awareness with all the people who use the resources of the Companies, including the time resource/factor.
- Not abuse the Companies.
- Not engage in bribery.

Obligations of the Managers and Shareholders

A manager will be honest at all times and in particular:

- Not allow for the use of, or use corporate services for private purposes. Labour, workshops and/or materials that are not normally part of any employment service cannot be used unless special permission is obtained from the Managing Director of LTP Holdings (Pty) Ltd. Any such approval is subject to payment for the use of the service.
- On acting in the best interest and benefit of the LTP Group.
- To perform duties with the skill and care expected of a person of his knowledge and experience.
- Not allow assets of the LTP Group be wasted.
- Accurately report about achievements and prospects.
- Supply Information and explanations required by the auditors to enable the execution of their operations.
- Not run the LTP Group negligently or recklessly.

Managers may not place themselves in a position where their personal interests are in conflict with their obligations to the LTP Group, and in particular:

- Exposing confidential information about the LTP Group to competitors or other interested parties.
- Having conflicting interests without disclosing them to the LTP Group.
- Accepting secret profits.
- Using bribery or any corrupt practices to their advantage.

Obligations of Managers to Providers

A Manager will:

- Always be polite to people with regard to special and individual dignity.

- Give due attention to the training and development of employees.
- Provide safe working conditions including adequate machinery and equipment, protective clothing and competent supervision.

Appointment or promotion

The LTP Group will:

- Not discriminate on any grounds except when required by the strict inherent requirements of a specific job.
- Create promotion opportunities for the employees from historically disadvantaged backgrounds, belonging to the designated groups in terms of the Employment Equity Act.
- Acknowledge employees' efforts by fair and adequate remuneration and other reasonable means.
- Provide a workplace that is free of racial, sexual or any other form of discrimination.
- Comply with all SA labor laws including the Labour Relations Act 56 of 1995, Employment Equity Act 55 of 1988 and Basic Conditions of Employment Act 75 of 1997.

Obligations for Managers with respect to competitors

Managers should not:

- Make dishonest allegations regarding competitors of the LTP Group or with respect to their products.
- Compete unfairly - thereby breaking the agreements as accepted by commercial competition practices or;
- Access personal information of a competitor by means of spying, by extracting information from a competitor's workers, or in any other improper manner.

Obligation of managers to society in general

- Take the environmental and public health considerations into account.
- Take part in community projects that the LTP Group can support them in.

SMOKING POLICY

Goal

The purpose of this policy is to protect non-smokers from exposure to second-hand smoke. The LTP Group has a duty to take reasonable care to protect the health of its employees and will identify specific areas as smoking areas. Smoking will therefore be limited to these areas.

- **Non-smoking areas**

- Offices of all employees
- Reception halls, reception areas and entrance halls which are considered public places.
- All other community areas used by guests, employees, employers and clients such as stairs and toilets.
- The tobacco factory with the exception of designated smoking areas.
- Areas where equipment can be damaged.
- Council Chambers.

- **Temporary smoking areas**

An area can be declared a temporary smoking area for the duration of a meeting if all consent and there is sufficient air ventilation.

- **Smoking areas**

Persons can smoke outside their office / workplace and balcony on condition that they do not neglect their work and also do not cause any inconvenience to any non-smoker.

This policy recognizes the right of employees who choose not to be exposed to tobacco smoke.

Assistance and help

For more information and help to quit smoking, contact:

Department of Health - Health Promotion Directorate: (012) 312-0165/ 6.

Cancer Association of South Africa Toll-free: 0800 22 66 22

Tobacco or Health Information Line: (011) 720-3145

FIREARMS & OTHER DANGEROUS WEAPONS POLICY

Statement

In order to ensure a safe environment for employees and customers, our establishment, LTP Group, prohibits the wearing, transporting, storage or presence of firearms or other dangerous weapons in our facilities or on our property. Any employee in possession of a firearm or other weapon while on our facilities/property or while otherwise fulfilling job responsibilities may face disciplinary action including termination. A client or visitor who violates this policy may be removed from the property and reported to police authorities. Possession of a valid concealed firearm license is **not** an exemption under this policy.

Definition

Firearms or other dangerous weapons mean:

- Any device from which a projectile may be fired by an explosive
- Any simulated firearm operated by gas or compressed air
- Sling shot
- Sand club
- Metal knuckles
- Any spring blade knife
- Any knife which opens or is ejected open by an outward, downward thrust or movement
- Any instrument that can be used as a blub and poses a reasonable risk of injury

Exemptions

This policy does not apply to:

- Any law enforcement personnel engaged in official duties

Notification

“No firearms or other dangerous weapons” signs shall be conspicuously posted within all LTP Group facilities and in parking areas and ground surrounding our facilities. These signs will clearly indicate that firearms and other weapons are not to be carried onto our property or into our facilities.

Reporting

Staff or Security Personnel will request any visitor found in possession of a firearm or other dangerous weapon to remove it from the facility and local law enforcement authorities will be notified promptly.



Special instructions for employees

Any employee concerned about personal safety may request an escort (e.g. to a parking lot off premises) or other appropriate intervention by Security Personnel. Training will be provided to employees on this and other workplace violence prevention measures that LTP Group has implemented.

SECURITY AND RISK MANAGEMENT

It is LTP Group's goal to provide and maintain a safe environment in which all employees can work without exposure to adverse conditions, and the ongoing protection of assets and information belonging to the LTP Group.

All employees, visitors and contractors are obliged to comply with the LTP Group's security measures implemented from time to time.

DRUG AND ALCOHOL POLICY

Purpose

The purpose of this policy is to:

- Show our responsibility and commitment to ensure a safe and healthy workplace for all staff.
- Ensure that the staff at Limpopo Tobacco Processors and Tobacco Producer Development can work in an environment free of alcohol and drug use or abuse.
- Outline the Company's expectations and requirements for creating and maintaining an alcohol and drug free work environment, and for dealing with substance abuse in the workplace.
- Provide an opportunity to staff members with a substance use problem to get well rather than provide grounds to terminate the employment.

Scope

This policy applies, at the workplace, to all staff members of Limpopo Tobacco Processors, Tobacco Producer Development and also includes visitors and subcontractors inside and outside of normal scheduled working hours.

- All individuals working at LTP and TPD are expected to report fit for duty and will be subjected to breathalyser tests. Employees will perform assigned duties safely and acceptably without any limitations due to the use or after-effects of alcohol, illicit drugs, non-prescription drugs, or prescribed medications or any other substance.
- Off the job and on the job involvements with alcohol or drugs can have adverse effects upon the workplace, the integrity of our work product, the safety of other staff, the wellbeing of our staff families, and the ability to accomplish the goal of an alcohol and drug free work environment. Both Companies therefore wants to emphasize that it has zero tolerance for staff who arrive at work under the influence of alcohol or drugs, and/or whose ability to work is impaired in any way by the consumption of alcohol or drugs, or who consume alcohol or drugs on company premises as according to:

- **Occupational Health and Safety Act; General rules, Section 2A Intoxication**

Subject to the provisions of sub regulation (3), an employer or a user, as the case may be, shall not permit any person who is or who appears to be under the influence of intoxicating liquor or drugs, to enter or remain at a workplace.

Subject to the provisions of sub regulation (3), no person at a workplace shall be under the influence of or have in his possession or partake of or offer any other person intoxicating liquor or drugs.

An employer or a user, as the case may be, shall, in the case where a person is taking medicines, only allow such person to perform duties at the workplace if the side effects

of such medicine do not constitute a threat to the health or safety of the person concerned or other persons at such workplace.

- The Company strictly prohibits the use, making, sale, purchase, transfer, distribution, consumption, or possession of drugs or alcohol on company property. To this end, the Company reserves the right to conduct searches for drugs or alcohol, including, but not limited to, searches of lockers, filing cabinets, desks packages, etc. which are on company property or in a company facility. Any drugs or alcohol found as a result of such a search will be confiscated and the occupant or user or the object searched will be subject to disciplinary action, up to and including termination of employment.

Roles and Responsibilities

It is the responsibility of all staff to identify concerns about an individual's immediate ability to perform their jobs, and take appropriate steps. Where necessary, they will advise a supervisor who will remove any staff member who is suspected of breaching this policy from company premises, pending investigation and a decision on appropriate consequences including potential disciplinary action.

Here is some guidance on how to administer this policy; however, not every situation can be predicted:

- If a staff member, visitor or contractor arrives at the workplace, (on company property) and you have reasonable cause to suspect that they are under the influence of alcohol or drugs, the supervisor shall immediately remove him/her from the work environment. If you have any doubt about whether they are, or are not impaired, you should err on the side of caution and remove him/her from the work environment.
- Unexpected circumstances can arise when an off-duty staff member is requested to work. It is the staff member's responsibility to refuse the request and ask that the request be directed to another person if the member feels unfit due to the influence of alcohol or other drugs.
- Staff who are prescribed medication are expected to ask their doctor if the medication will have any potential negative effect on job performance. They are required to report to their team leader if there is any potential risk, limitation or restriction for whatever reason that may require modification of duties or temporary reassignment, and provide appropriate medical verification on any restrictions in performance of their duties.
- If a staff member or contractor believes an employee in a more senior position is in violation of this policy, they are encouraged to get a second opinion where possible. They are also expected to notify their leader or production manager.
- In support of those who may have developed or are developing the disease of chemical dependence, all employees and contractors are required to document and report any violations of this policy. Any staff member, co-worker, contractor or supervisor not

complying with this is enabling the dependence. Enabling behaviour leads to ongoing health and safety concerns for an addicted individual and those around him or her.

Disciplinary Procedure

The disciplinary procedure will follow progressively as follows:

- 1st Offence: Written warning and 1 day suspension (valid for 6 months).
- 2nd Offence: Final written warning with 1 month suspension (valid for 12 months).
 - Upon acknowledgement by the transgressor that he/she has a problem of alcohol, the matter will be treated as illness/incapacity. The transgressor will undergo the EAP program that will be for a period of 6 months.
 - There will be no action taken when the employee who attends the EAP program contravene the same rule.
 - If the employee does not acknowledge that he/she has a problem of alcohol the offence will then be treated as misconduct and he/she will be subjected to a disciplinary code and procedure of the Company.
- After completion of the program and the employee still persist in contravening the same rule, the Company will be left no other remedial action but to mutually terminate the contract.



PRESS

No employee in his private or official capacity may issue any press statement of any nature whatsoever on behalf of the LTP Group unless he has obtained the necessary permission.

If an employee is approached by any member of the press, the employee must refer them to the Managing Director of LTP Holdings (Pty) Ltd for further action.

No employee shall make available any information of a confidential nature; such as annual figures, crop estimates (except for TISA), customer lists, employee lists, or any other related information to the press or any other institution, without prior approval of the Managing Director of LTP Holdings (Pty) Ltd.

SOCIAL MEDIA COMMUNICATION POLICY

Statement

Whether or not an employee chooses to create or participate in a Blog, Wiki, online social network, or any other form of online publishing or discussion, is his/her own decision. However, activities in- or outside of work that affect an employee's job performance, the performance of others, or the LTP Group's business interests, have become a focus point of LTP Group policy at present.

Objectives

- To establish practical, reasonable and enforceable guidelines by which employees can conduct responsible and constructive social media engagement in both official- and unofficial capacities;
- To protect our companies and our employees from violating rules, regulations and legislation through social media channels.

Principles

Our organisation trusts and expects employees to exercise personal responsibility whenever they use social media, which includes not violating the trust of those with whom they are communicating. Employees should never use social media for disclosing secret policy, marketing or public relations. If and when employees use social media to communicate on behalf of the LTP Group, they should clearly identify themselves as employees.

Internet postings should not include company logos or trademarks, unless prior permission has been obtained.

Only those who have been designated officially to handle social media may speak in an official capacity on behalf of the LTP Group.

Employees are responsible to ensure that their online activities do not interfere with their work performance, or their commitments to their managers, colleagues or customers.

The effective management of safeguarding the organisation's trade secrets is a critical responsibility of all its employees. Trade secrets are an asset, whether employees work in the field or in the office. Failure to ensure this safeguarding and management of trade secrets may result in legal- or regulatory fines, damages to LTP Group's reputation and in lost productivity.

Externally, employees are not allowed to reference any customers, partners or suppliers by name, or disclose any confidential details about any of their projects or disclose anything at all in social media, without first obtaining the permission of the individual or organization that the employee may wish to reference.

Social media channels are not the appropriate place to conduct confidential business with colleagues, customers, partners or suppliers.

External social media channels should not be used for internal business communications among colleagues. It is fine for employees to disagree, but not to make it public in external blogs or other social media channels.

For your own protection, and the protection of our organization, employees are prohibited from using internal or external social media channels to discuss trade secrets, legal matters, litigation or our financial performance.

The LTP Group reserves the right to request that certain subjects be avoided, to withdraw certain posts and to remove inappropriate comments.

Action

Failure to comply with this social media policy may result in:

- Disciplinary action, up to and including termination of service;
- Civil or criminal penalties as permitted by law.