SCHWEIZER AGRICULTURE LIMITED

DATA PROTECTION AND PRIVACY POLICY

ESG POLICY & GOVERNANCE FRAMEWORK

Policy Framework Reference Date	December 2023
Current Consolidated Edition	2026
Status	For Board adoption / website publication
Applies To	Employees, directors, contractors, suppliers and relevant partners
Document Owner	Board / Governance, Risk & Compliance Function

Sustainable Solutions. Resilient Communities. Shared Prosperity.

DOCUMENT CONTROL, DISCLAIMER & PROHIBITION

Document	Data Protection and Privacy Policy
Company	Schweizer Agriculture Limited
Registration No.	320190001653
Website	www.schweizeragriculture.co.zm

Purpose. To protect personal and confidential information processed by Schweizer Agriculture Limited and to establish minimum rules for lawful, fair, secure and proportionate handling of personal data.

Disclaimer. This policy is a corporate governance and operational framework. It does not replace applicable Zambian law, regulatory permits, employment contracts, collective agreements, technical standards, professional advice or project-specific environmental and social management plans. Where a legal or contractual requirement is stricter, the stricter requirement applies.

Prohibition on Misrepresentation or Unauthorised Alteration. No person may knowingly misrepresent compliance with this policy, falsify implementation records, alter an approved version for external reliance, or use this policy to conceal non-compliance. External publication or material amendment requires appropriate corporate approval.

Date Integrity. December 2023 is presented as the policy framework reference date. The consolidated edition is prepared for current adoption and publication in 2026. If Board records confirm formal approval in December 2023, the status line may be updated to reflect that historical approval.

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1. PURPOSE AND POLICY STATEMENT

To protect personal and confidential information processed by Schweizer Agriculture Limited and to establish minimum rules for lawful, fair, secure and proportionate handling of personal data.

Schweizer Agriculture Limited (SAL) is committed to conducting its activities with integrity, accountability, respect for people, responsible stewardship of natural resources and continuous improvement. This policy forms part of SAL's broader ESG and good-governance framework.

2. SCOPE

Applies to personal data relating to employees, farmers, cooperative members, customers, suppliers, applicants, beneficiaries, visitors and other identifiable individuals processed in paper or electronic form.

3. CORE COMMITMENTS

- Collect and use personal data only for legitimate and clearly defined purposes.
- Limit collection to information reasonably necessary for the stated purpose and keep information accurate where practicable.
- Protect personal information through appropriate access controls, passwords, secure storage, backups and confidentiality obligations.
- Restrict disclosure to authorised persons, service providers or authorities with a legitimate basis.
- Retain personal information only as long as necessary for legal, contractual, operational or safeguarding purposes.
- Respect reasonable data-subject requests and legal rights, subject to applicable law and legitimate exemptions.
- Assess and report material data breaches promptly through governance channels.

4. GOVERNANCE AND RESPONSIBILITIES

- Executive/Board: governance oversight.
- Data/IT/Administration: technical and administrative controls.
- Human Resources/Programme Teams: lawful collection and secure use of personnel and beneficiary data.
- All users: protect passwords, devices, documents and confidential information.

5. IMPLEMENTATION REQUIREMENTS

- Use privacy notices or consent/authorisation mechanisms where appropriate.
- Apply role-based access and secure transfer practices for sensitive information.
- Conduct reasonable due diligence on service providers handling personal data.
- Dispose of records securely when retention is no longer required.
- Escalate suspected loss, unauthorised access or disclosure immediately.

6. MONITORING, RECORDS AND REPORTING

- Maintain records of significant processing activities, incidents, data requests and corrective actions where appropriate.
- Review access rights periodically for sensitive systems and shared drives.
- Monitor material breaches and recurring control weaknesses.

7. TRAINING AND COMMUNICATION

- Relevant employees and contractors shall receive induction and periodic refresher training proportionate to their responsibilities and risk exposure.
- Managers shall communicate policy requirements through toolbox talks, briefings, workshops, written procedures and project-specific instructions.
- Training attendance and competency records shall be retained where appropriate.

8. GRIEVANCE, REPORTING AND NON-RETALIATION

Concerns may be raised through line management, the Ethics/Compliance function, the whistleblowing email, hotline/SMS, confidential reporting box, or direct escalation to senior management, the Audit Committee or Board. Good-faith reporters shall be protected from retaliation. Existing whistleblowing procedures apply to investigations and confidentiality.

9. SUPPLIER AND PARTNER EXPECTATIONS

- Suppliers, contractors, agents and implementation partners are expected to meet applicable legal requirements and the relevant standards of this policy.
- SAL may require due diligence, contractual commitments, corrective action plans, evidence of licences or records, and reasonable monitoring for material ESG risks.
- Serious or repeated non-compliance may lead to suspension, remediation requirements or termination subject to contract and law.

10. REVIEW AND CONTINUOUS IMPROVEMENT

This policy should be reviewed at least annually, or earlier where material legal, regulatory, operational or stakeholder changes occur. Findings from incidents, grievances, audits, monitoring and project reviews shall inform corrective action and continuous improvement.