



SCHWEIZER AGRICULTURE LIMITED

FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING POLICY

ESG POLICY & GOVERNANCE FRAMEWORK

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Sustainable Solutions. Resilient Communities. Shared Prosperity.

DOCUMENT CONTROL, DISCLAIMER & PROHIBITION

Document	Freedom of Association and Collective Bargaining Policy
Company	Schweizer Agriculture Limited
Registration No.	320190001653
Website	www.schweizeragriculture.co.zm

Purpose. To respect workers' lawful rights to organise, associate, elect representatives and engage in collective dialogue or bargaining without intimidation, discrimination or retaliation.

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 respect workers' lawful rights to organise, associate, elect representatives and engage in collective dialogue or bargaining without intimidation, discrimination or retaliation.

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 SAL employees and, where relevant, expectations placed on contractors and suppliers.

3. CORE COMMITMENTS

- Respect lawful freedom of association and the right of workers to choose whether to join or not join lawful worker organisations.
- Engage recognised worker representatives in good faith where applicable.
- Prohibit retaliation, dismissal, harassment or disadvantage based on lawful association or representative activity.
- Where law restricts formal association, support lawful alternative mechanisms for worker representation and dialogue.
- Ensure representatives can raise workplace concerns without improper interference.

4. GOVERNANCE AND RESPONSIBILITIES

- Executive/HR: uphold lawful worker rights and constructive dialogue.
- Managers: avoid interference or retaliation and consult representatives where required.
- Employees: exercise rights responsibly and respect the rights of others.
- Governance/Compliance: receive concerns and monitor material issues.

5. IMPLEMENTATION REQUIREMENTS

- Provide reasonable channels for worker consultation and representative engagement.
- Document material collective agreements, consultation outcomes and commitments.
- Investigate allegations of interference or retaliation promptly.
- Ensure employment decisions are not influenced by lawful association activity.

6. MONITORING, RECORDS AND REPORTING

- Monitor grievances relating to association, representation or retaliation.
- Retain relevant agreements and consultation records.
- Escalate systemic concerns to senior management or the Board.

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.