



SCHWEIZER AGRICULTURE LIMITED

NON-DISCRIMINATION, HARASSMENT AND EQUAL OPPORTUNITY POLICY

ESG POLICY & GOVERNANCE FRAMEWORK

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Sustainable Solutions. Resilient Communities. Shared Prosperity.

DOCUMENT CONTROL, DISCLAIMER & PROHIBITION

Document	Non-Discrimination, Harassment and Equal Opportunity Policy
Company	Schweizer Agriculture Limited
Registration No.	320190001653
Website	www.schweizeragriculture.co.zm

Purpose. To promote a respectful workplace and prohibit discrimination, harassment, bullying, sexual harassment, victimisation and retaliation in employment and business-related activities.

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 promote a respectful workplace and prohibit discrimination, harassment, bullying, sexual harassment, victimisation and retaliation in employment and business-related activities.

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 employees, directors, contractors, applicants, visitors and relevant business partners in workplaces, field sites, travel, training, digital communications and work-related events.

3. CORE COMMITMENTS

- Make employment and participation decisions on legitimate, job-related and programme-related criteria.
- Prohibit discrimination or harassment based on legally protected or personal characteristics unrelated to legitimate requirements.
- Prohibit sexual harassment, bullying, intimidation, humiliating conduct and retaliation.
- Provide confidential reporting and fair investigation procedures.
- Promote reasonable inclusion and accessibility measures where practicable.
- Hold managers accountable for addressing inappropriate behaviour they observe or become aware of.

4. GOVERNANCE AND RESPONSIBILITIES

- Board/Executive: visible commitment and oversight.
- Human Resources: prevention, complaints handling and employment remedies.
- Managers: maintain respectful teams and escalate concerns.
- Employees/Contractors: treat others with dignity and report misconduct in good faith.

5. IMPLEMENTATION REQUIREMENTS

- Include standards in induction, codes of conduct and relevant contracts.
- Provide confidential complaint channels and protection against retaliation.
- Use impartial investigators and conflict-of-interest controls.
- Apply proportionate disciplinary or contractual consequences for substantiated misconduct.

6. MONITORING, RECORDS AND REPORTING

- Maintain confidential complaint and outcome records.
- Monitor trends while protecting privacy.
- Review recurring hotspots, management failures or retaliation risks.

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.