

Policy Statement

COVID-19, the infectious disease caused by the coronavirus SARS-CoV-2, was declared a pandemic by the World Health Organization on March 12, 2020.

Shortly thereafter and on 15 March 2020, our President declared a national state of disaster with a raft of regulations to attempt to curb the spread of COVID-19.

Thorburn is greatly concerned about this global health challenge and its significant impacts on its employees and their families, communities, health systems, and its wider society.

Thorburn takes heed of the call of government to do all it can to assist in curbing the spread of COVID-19 and this policy establishes Thorburn's approach to doing so.

Thorburn has established an internal task force comprised of all Exco members and functional heads who meet daily to discuss developments, report back on operations and staff well-being, and allocate action items to be executed in furtherance of this policy and instructions from government.

For more information, useful educational materials and contact details for testing stations etc, please visit www.Thorburn.com.



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Chief Executive Officer

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1 Purpose

To ensure a safe working-environment for Thorburn employees and clients and to inhibit the spread of COVID-19.

2 Objectives

To set out the Thorburn approach to slowing the spread of COVID-19 and to educate and inform Thorburn staff and clients about measures Thorburn is taking to meet this objective and purpose.

3 Applicability

To all staff, operations and offices across our various sites and in various jurisdictions in South Africa and the rest of Africa.

This policy may be distributed to clients and government authorities where requested or compelled to do so.

4 Responsibility and Accountability

The responsibility for execution of and adherence to this policy lies with Thorburn and each employee in respect of themselves and their direct reports.

Accountability lies with the CEO of Thorburn.

5 Legislation

Thorburn bases this policy on COVID regulations gazetted on an *ad hoc* basis by government as well as the Occupational Health & Safety Act 1993 and the Disaster Management Act 2002.

Thorburn is also guided by the National Institute of Communicable Diseases Act and the World Health Organisation.

6 Updates

This policy is subject to change with the introduction of additional governmental guidelines and regulations. Thorburn will keep this policy updated and communicate changes as soon as possible by email and other avenues available to it.

For more information or queries you are welcome to contact the Compliance Officer Abigail Damon ADamon@thorburn.co.za or your divisional Human Resources Manager or manager.

7 Penalties and Consequences of Breach

If an employee breaches this policy the necessary disciplinary action will be taken. It should also be noted that Thorburn may face penalties or its employees may face jail time of up to six months or more if the government regulations are not adhered to.

8 Data Protection

Thorburn recognises that in complying with its legislative obligations is it obligated to collect and report on sensitive employee personal information. Thorburn will treat this information with a high degree of confidentiality and sensitivity and under strict controls.

9 General Information About COVID-19

Covid-19 is contracted through close personal contact, such as when shaking hands or touching others or touching an object or surface on which the virus is found (after an ill person touches, coughs, sneezes or exhales close to these objects or surfaces such as desks, tables, doors, lifts, bio-metric measuring devices or telephones etc, then - before washing hands - touching the mouth, nose, or eyes.

The primary symptoms, which may take as long as 14 days to appear after the initial infection, are a fever, cough and/or shortness of breath or difficulty breathing, but one should be aware that because this is a new virus, scientists are still learning about its symptoms and the World Health Organisation or the National Institute for Disease Control for South Africa should be referred to for further updates on symptoms or you should contact your general health practitioner.

Hotline for COVID-19 as per the Department of Health website: 0800 029 999

10 Thorburn's Approach

10.1 Reporting & Control of Incidences

If an employee has been diagnosed with COVID-19, Thorburn will inform the Department of Health and the Department of Employment and Labour. Thorburn will investigate the cause including any control failure and review its risk assessment to ensure that the necessary controls and PPE requirements are in place and will give

administrative support to any contact-tracing measures implemented by the Department of Health.

If an employee or visitor presents with symptoms, or advises Thorburn of his/her symptoms, Thorburn will not permit the employee/visitor to enter the workplace or report for work.

If the employee is already at work Thorburn will isolate the employee, provide the employee with a FFP1 surgical mask and arrange for the employee to be transported in a manner that does not place other workers or members of the public at risk either to be self-isolated or for a medical examination or testing.

Thorburn will assess the risk of transmission, disinfect the area and the employee's workstation, refer those employees who may be at risk for screening and take any other appropriate measure to prevent possible transmission.

Thorburn will ensure that the employee is tested or referred to an identified testing site; advise the employee to self-isolate for the required period of time, place its employee on paid sick leave in terms of section 22 of the BCEA or if the employee's sick leave entitlement under the section is exhausted, make application for an illness benefit in terms of clause 4 of the Directive issued on 25 March 2020 on the COVID-19 Temporary Employer Relief Scheme under regulation 10(8) of the Regulations promulgated in terms of section 27(2) of the Disaster Management Act.

Thorburn will ensure that the employee is not discriminated against on grounds of having tested positive for COVID-19 in terms of section 6 of the Employment Equity Act, 1998 (Act No. 55 of 1998).

If there is evidence that the worker contracted COVID-19 as a result of occupational exposure, Thorburn will lodge a claim for compensation in terms of the Compensation for Occupational Injuries and Diseases Act, 1993 (Act No. 130 of 1993) in accordance with Notice 193 published on 3 March 2020.7 7 GG 43126 GN193 of 23 March 2020.

If a worker has been diagnosed with COVID-19 and isolated in accordance with the Department of Health Guidelines, Thorburn will only allow a worker to return to work on the following conditions:

- 1) The employee has undergone a medical evaluation confirming that the worker has been tested negative for COVID-19;
- 2) The employee ensures that personal hygiene, wearing of masks, social distancing, and cough etiquette is strictly adhered to; and

3) Thorburn will closely monitor the employee for symptoms on return to work.

10.2 Working from Home

Thorburn supports working from home as a point of departure for all employees who are able to do so and will implement a rotation/shift work scheme if required.

Thorburn has a separate policy around this that should be consulted and implemented.

Thorburn will try to minimise those employees required to work from its offices and or client sites and will develop a work rotation roster and shift systems to minimise those required to go in to the office/client site.

10.3 Traveling & Meetings

All work trips and events – both domestic and international – will be cancelled/postponed until further notice.

In-person meetings should be done virtually, where possible, especially with non-company parties (e.g. candidate interviews and partners).

If an in-person meeting must be held ensure that all participants in the meeting have washed their hands for 20 seconds prior to the meeting commencing.

Ensure all delegates are seated at least one and a half metres apart.

The names and contact details of all participants within the meeting should be retained for at least one month. This will assist health care authorities to trace who have been exposed to the virus if participant do become ill shortly after the meeting.

If someone should contract the virus shortly after the meeting, the company should inform all participants.

All visitors to Thorburn offices shall be required to provide their full names and contact details for contact tracing purposes if required and this information will be carefully and securely stored and used only for the intended purpose. All visitors will have their temperatures taken by a non-contact temperature gun prior to entering the premises and will be required to declare their COVID-19 status. The World Health Organisation considers a temperature to be 37.3c or above.

10.4 General Hygiene Rules

All staff and visitors will be encouraged to wash their hands for at least 20 seconds on a regular basis, and if they cough/sneeze into their hands (follow the 20-second hand-washing rule).

All staff and visitors should also regularly use the sanitizers placed around the office.

All staff and visitors are to be encouraged to cough/sneeze into their sleeves, preferably into their elbow. If a tissue is used, it should be discarded immediately in the appropriate manner and their hands immediately washed for 20 seconds.

Windows should be opened for ventilation.

Employees should avoid touching their face, particularly eyes, nose, and mouth with their hands to prevent from getting infected.

Handshakes should be avoided - rather do the elbow bump or 'Wuhan' foot tap.

If an employee finds themselves coughing/sneezing on a regular basis, they should avoid close physical contact with your co-workers and take extra precautionary measures (such as requesting sick leave).

An employee should clean and disinfect your workspace regularly using a regular household cleaning spray or wipe provided by the company.

Only one person at a time may be in a bathroom facility.

10.5 Symptom Screening

Thorburn will provide a temperature gun to each office and employees and visitors will be subject to screening when reporting to work/visiting Thorburn offices.

Thorburn will require every worker to report any symptoms they may have and make a positive declaration of their COVID -19 status.

10.6 Workspaces

Thorburn will ensure that those returning to work have workspaces at least 1.5m apart and employees are required to also implement these measures. To the extent required, for example at receptions, sneeze guards will be erected.

10.7 Communication & Training

Thorburn has developed various informative posters which are available on its website but which will also be distributed to its offices and sites for display.

Toolbox Talks occur weekly across the divisions highlighting certain dangers and protocols and Thorburn conducts training and awareness through various other channels and mediums.

10.8 Lifts

Use of lifts in Thorburn buildings should be avoided or, if not possible, should only have one occupant at a time. A tissue should be used to push the buttons and then discarded. Hands should be washed thereafter.

Thorburn will ensure regular cleaning of lifts and buttons.

10.9 Masks

Thorburn will provide each employee with 2 cloth masks in accordance with the regulations and will have FFP1 Surgical masks on site if employees at work develop symptoms.

Thorburn is a geographically disbursed business and thus, as with their own uniforms issued to staff, Thorburn has arranged for staff to wash, dry and iron their masks at home and has issued staff with a guide on how to wear masks and attend to their washing etc.

10.10 Additional PPE

Thorburn will provide its employees with additional and appropriate PPE where required by government or particular industries or client sites.

10.11 Hand Sanitizers

Thorburn will provide hand sanitizing dispensers and hand sanitizer (70% alcohol based) at the entrance to Thorburn premises and at various pause areas around their buildings. Thorburn employees working at client sites will be provided with hand sanitizer. Thorburn client facing operations will also be provided with hand sanitizers and dispensers and will be cleaned regularly throughout the day.

10.12 Cleaning

Thorburn will ensure that workspaces, high touch point areas like printers and light switches and offices in general are cleaned each day before and after work commences.

10.13 Biometric System

Biometric Systems will be cleaned and sanitized after each use and if not possible, alternative manual systems will be introduced.

11 Additional Support Measures

Thorburn considers the wellbeing of its staff on a holistic basis. A summary of the various support measures being implemented by Thorburn can be found on the Thorburn website and will be communicated shortly.

Thorburn also understands that the financial implications for staff may be considerable and so and so supports **Project Ubuntu** launched by Tsebo Group where employees can donate a portion of their salary to a fund, and the monies raised will top up salaries of those Thorburn employees most affected. The joint-CEOs will personally donate one-third of their salaries for the next 3 months, in order to get the fund started.

The scheme will be 100% anonymous and voluntary for anyone at any level of the company who has the means to contribute.

There are 3 opportunities for staff to contribute to the Tsebo Ubuntu Initiative via payroll deductions:

1. Volunteering a salary sacrifice for up to three months (Rands or %)
2. Donating to the fund via a once-off deduction;
3. Sponsoring community support to the Christel House School's Outreach Programme - 166 Families in Crisis (once-off deduction). Thorburn supports the Christel House School for the underprivileged in Ottery, Cape Town. Christel House has identified 166 learner families who are at severe risk during the lockdown. The school is organising to provide a small stipend every week for the next 8 weeks to these families to purchase basic food supplies.

12 OTHER POLICIES

This policy should be read in conjunction with other Thorburn and Tsebo Group policies such as the "Work From Home" policy and the "Data Privacy" Policy available on TseboNet.