

# Health and Safety Policy - Trukumb Mining

## 1 Purpose and Scope:

Trukumb Mining is committed to ensuring the health and safety of all employees, contractors, visitors, and other stakeholders. This policy establishes the framework for creating a safe and healthy work environment across all operations, outlining the responsibilities and procedures to be followed.

## 2 Legal Compliance:

Trukumb Mining is unequivocally committed to aligning its Health and Safety Policy with key acts and regulations outlined in the Zimbabwean mining laws. The following legislative frameworks are of paramount importance:

### 2.1 Mines and Minerals Act (Chapter 21:05):

Trukumb Mining recognizes the Mines and Minerals Act as the cornerstone of mining legislation in Zimbabwe. This act comprehensively addresses various aspects of mining operations, including safety standards, environmental considerations, and licensing requirements. Our Health and Safety Policy aligns with the specific provisions related to the safety of personnel and operational practices as stipulated in this act.

### 2.2 Mining (Management and Safety) Regulations (Statutory Instrument 109 of 1990):

Trukumb Mining diligently adheres to the Mining (Management and Safety) Regulations, which provide detailed guidelines on safety measures within mining operations. This includes provisions for risk assessments, emergency preparedness, and the use of personal protective equipment (PPE). Our Health and Safety Policy is designed to mirror the stringent requirements outlined in these regulations.

### 2.3 Explosives Regulations (Statutory Instrument 103 of 1979):

Recognizing the importance of safe handling and use of explosives in mining activities, Trukumb Mining aligns its policies with the Explosives Regulations. This ensures that our practices in the storage, transportation, and utilization of explosives comply with the prescribed safety standards.

## **2.4 Environmental Management Act (Chapter 20:27):**

While primarily focused on environmental considerations, Trukumb Mining acknowledges the interconnectedness of safety and environmental sustainability. Our Health and Safety Policy integrates with the Environmental Management Act to promote responsible mining practices that prioritize the well-being of both our workforce and the surrounding ecosystem.

## **3 Risk Assessment:**

Risk assessment is a fundamental component of Trukumb Mining's commitment to ensuring the health and safety of our workforce and maintaining the integrity of our operations. Our comprehensive risk assessment process involves clear steps, procedures, and a well-defined reporting structure to identify, evaluate, and mitigate potential hazards.

### **3.1 Identification of Hazards:**

The initial step in our risk assessment process is the identification of hazards. Employees across all levels are encouraged to actively participate in identifying potential risks associated with mining operations. This involves regular site inspections, collaborative discussions, and feedback mechanisms to ensure a thorough understanding of the working environment.

### **3.2 Risk Evaluation:**

Once hazards are identified, a systematic evaluation is conducted to assess the likelihood and potential severity of each risk. This involves utilizing risk matrices, historical incident data, and industry benchmarks to objectively quantify the level of risk associated with specific activities. Risks are categorized based on their likelihood and consequences.

### **3.3 Control Measures:**

Following the evaluation, control measures are implemented to mitigate or eliminate identified risks. Trukumb Mining prioritizes the use of engineering controls, administrative controls, and the provision of personal protective equipment (PPE). Our focus is on implementing measures that not only address immediate risks but also contribute to the overall improvement of safety across our operations.

### **3.4 Documentation and Record-Keeping:**

All stages of the risk assessment process, including hazard identification, risk evaluation, and control measures, are meticulously documented. This documentation serves as a reference for ongoing safety audits, regulatory compliance, and continuous improvement initiatives. Records are maintained in accordance with legal requirements and are accessible to relevant stakeholders.

### **3.5 Reporting Structure:**

Our reporting structure for risk assessment is designed to ensure transparency and accountability. Employees are encouraged to report hazards and potential risks to their immediate supervisors. Supervisors, in turn, escalate significant concerns to the designated safety officer or committee. In the event of an incident or near-miss, a detailed report is submitted to the Safety Manager, who conducts a thorough investigation.

## **4 Emergency Preparedness and Response:**

Emergency preparedness and response are integral components of Trukumb Mining's commitment to safeguarding the well-being of our personnel and mitigating potential risks. The following outlines clear steps, identifies responsible team leaders, and details the procedures and drills that constitute our emergency response plan.

### **4.1 Emergency Response Team:**

A dedicated Emergency Response Team (ERT) is appointed and trained to manage and coordinate emergency situations. This team comprises individuals with specialized training in first aid, firefighting, rescue operations, and other relevant skills. The team is led by an Emergency Response Coordinator who oversees the overall emergency response strategy.

### **4.2 Emergency Procedures:**

**Immediate Notification:** In the event of an emergency, employees are trained to immediately notify their supervisors or use designated communication channels to alert the Emergency Response Team.

- **Emergency Assessment:** The Emergency Response Coordinator or a designated leader initiates a rapid assessment of the emergency's nature and severity to determine appropriate response measures.

- **Evacuation Protocols:** If evacuation is deemed necessary, clear evacuation routes and assembly points are established. Wardens and designated personnel assist in guiding employees to safe zones.
- **Medical Assistance:** Trained first-aid responders provide immediate medical assistance to those in need. The Emergency Medical Team is responsible for coordinating medical evacuations if required.
- **Communication Protocols:** A communication plan ensures timely and accurate dissemination of information to all stakeholders, including employees, emergency services, and relevant authorities.

#### **4.3 Emergency Drills:**

Regular emergency drills are conducted to test the effectiveness of our response plan and familiarize employees with emergency procedures. These drills include:

- **Evacuation Drills:** Simulated evacuations are conducted every 12 weeks to assess the efficiency of evacuation routes and assembly points.
- **Fire Drills:** Fire response procedures are practiced every 8 weeks ensuring swift and effective actions in the event of a fire emergency.
- **Medical Emergency Drills:** Simulations of medical emergencies done every 6 months help refine the response of first-aid teams and test communication channels.

#### **4.4 Responsible Team Leaders:**

Emergency Response Coordinator: Oversees the entire emergency response plan, coordinating with various teams and authorities.

- **Evacuation Team Leaders:** Responsible for guiding personnel during evacuations and ensuring that everyone reaches designated assembly points.
- **First-Aid Response Team:** Trained medical personnel responsible for providing immediate medical assistance and coordinating medical evacuations.
- **Communication Team:** Manages communication channels during emergencies, ensuring timely and accurate information dissemination.

#### **4.5 Continuous Improvement:**

After each drill or emergency situation, a debriefing session is conducted to evaluate the effectiveness of the response and identify areas for improvement.

Feedback from participants is actively sought to refine procedures and enhance overall emergency preparedness.

## 5 Safety Training and Education:

At Trukumb Mining, we consider safety training and education as paramount to fostering a culture of awareness and preparedness among our workforce. The following outlines the frequency, types of training, responsible authorities, collaboration with HR, recording of attendees, point scoring, and disciplinary procedures for non-compliance.

### 5.1 Frequency of Training:

Safety training sessions are conducted regularly, with the frequency determined by the nature of the training and the specific needs of our operations. Basic safety inductions occur for all new employees, while refresher courses are conducted periodically. Specialized training is provided based on job roles, potential hazards, and changes in safety regulations.

### 5.2 Types of Training:

- **Basic Safety Induction:** Provided to all new employees to familiarize them with general safety practices and emergency procedures.
- **Job-Specific Safety Training:** Tailored to the specific roles and responsibilities of employees, addressing hazards related to their tasks.
- **Emergency Response Drills:** Simulated exercises to prepare employees for various emergency scenarios.
- **Continuous Improvement Training:** Sessions to update employees on changes in safety regulations, best practices, and technological advancements.

### 5.3 Responsible Authority:

The Safety Manager and the Safety Training Coordinator are jointly responsible for overseeing safety training initiatives. The Safety Training Coordinator collaborates closely with department heads and Human Resources (HR) to tailor training programs to meet the specific needs of each team.

## **5.4 Collaboration with HR:**

HR collaborates with the Safety Training Coordinator to ensure that all employees are enrolled in the appropriate training sessions. HR assists in maintaining training records, tracking attendance, and managing the scoring system for each employee.

## **5.5 Recording of Attendees:**

A comprehensive record-keeping system is maintained for all safety training sessions. HR maintains a centralized database of attendees, detailing the type of training, date, and scores achieved by each participant.

## **5.6 Scoring System:**

An incentivized scoring system is implemented to encourage active participation and engagement in safety training. Employees accumulate points for each completed training session, and these points contribute to recognition programs and performance evaluations.

## **5.7 Disciplinary Procedures:**

Non-compliance with safety training without valid reasons is taken seriously at Trukumb Mining. Disciplinary procedures may include:

**Verbal Warning:** Issued for the first instance of non-compliance.

**Written Warning:** Issued for repeated instances of non-compliance.

**Further Training:** Employees may be required to undergo additional training sessions to reinforce the importance of safety.

**Suspension:** In cases of persistent non-compliance, suspension may be considered.

**Termination:** Continued neglect of safety training obligations may result in termination, as it poses a significant risk to the individual and the entire workforce.

## **6 Incident Reporting and Investigation:**

At Trukumb Mining, the prompt and thorough reporting and investigation of incidents are integral to our commitment to maintaining a safe working environment. The following outlines the procedures, timelines, responsible authorities, and disciplinary actions associated with incident reporting and investigation.

## 6.1 Incident Reporting Procedure:

- **Immediate Reporting:** Employees are required to report any incidents, accidents, or near-misses immediately to their supervisors or designated safety personnel.
- **Initial Assessment:** Upon receiving a report, the supervisor or safety personnel conducts an initial assessment to determine the severity and immediate actions required.

## 6.2 Timelines:

- **Immediate Reporting:** Incidents must be reported immediately after they occur.
- **Initial Assessment:** The initial assessment is conducted within 24 hours of the incident report.

## 6.3 Responsible Authorities:

**Supervisor:** Responsible for receiving initial incident reports and conducting the initial assessment.

**Safety Officer/Manager:** Oversees the incident investigation process, conducts a thorough investigation, and determines corrective actions.

## 6.4 Incident Investigation Procedure:

- **Notification:** The Safety Officer/Manager is notified immediately after the initial assessment.
- **Investigation Team Formation:** A team, including safety experts, relevant department heads, and HR representatives, is formed to conduct a detailed investigation.
- **Gathering Evidence:** The investigation team gathers evidence, interviews involved parties, and examines the incident site.
- **Root Cause Analysis:** A root cause analysis is performed to identify the underlying factors contributing to the incident.
- **Report Compilation:** A comprehensive incident investigation report is compiled, detailing findings, root causes, and recommendations for corrective actions.
- **Review and Approval:** The report is reviewed and approved by the Safety Manager and relevant department heads.

## 6.5 Timelines:

- **Notification:** The Safety Officer/Manager is notified within 24 hours of the initial assessment.
- **Investigation Completion:** The investigation is completed within 5 business days of the incident.

## 6.6 Disciplinary Actions:

- **Minor Incidents:** Employees involved in minor incidents may receive counseling and additional training to prevent recurrence.
- **Negligence or Violation of Safety Protocols:** Disciplinary actions such as verbal or written warnings may be issued.
- **Repeated Violations:** Persistent violations may lead to suspension or termination, depending on the severity of the incident and the employee's disciplinary history.
- **Gross Negligence:** In cases of gross negligence or willful violation of safety protocols, immediate termination may be considered.

## 6.7 Continuous Improvement:

Incident reports and investigations serve as learning opportunities for continuous improvement. Recommendations from investigations are implemented to prevent similar incidents in the future.

# 7 Health and Wellness Programs:

At Trukumb Mining, our commitment to the well-being of our employees extends beyond occupational safety to encompass comprehensive health and wellness programs. These initiatives are designed to promote physical, mental, and emotional well-being, fostering a workplace environment that prioritizes the holistic health of our workforce.

## 7.1 Responsible Authorities:

Wellness Coordinator: A designated Wellness Coordinator oversees the planning, implementation, and evaluation of health and wellness programs. This individual collaborates with HR, department heads, and external health experts to ensure the effectiveness of the initiatives.

## 7.2 Physical Health Programs:

- **Sports Programs:** Trukumb Mining encourages physical activity through organized sports programs. This includes team sports, fitness challenges, and wellness walks. Participation in these activities is voluntary, promoting camaraderie and a healthy lifestyle.
- **Video Gaming:** Recognizing the importance of relaxation and stress relief, controlled and structured video gaming sessions are organized. These sessions provide an avenue for leisure and team-building, contributing to the overall well-being of employees.

### 7.3 Mental and Emotional Well-being:

- **Religious Activities:** Trukumb Mining supports employees' spiritual well-being by allowing time for religious activities. This inclusive approach acknowledges and respects diverse religious practices within the workforce.
- **Gamified Lifestyle Programs:** Interactive and gamified programs are introduced to make adopting healthy habits enjoyable. These may include step challenges, fitness competitions, and wellness quests that encourage employees to adopt and maintain healthy lifestyles.

### 7.4 Health Awareness:

- **Sexual and Reproductive Health Programs:** Trukumb Mining recognizes the importance of sexual and reproductive health as integral to overall well-being. Educational sessions, workshops, and access to relevant resources are provided to promote awareness and understanding.
- **Regular Health Check-ups:** Periodic health check-ups and screenings are organized to monitor and assess employees' health status. This proactive approach facilitates early detection of health issues and encourages preventive measures.

### 7.5 Employee Assistance Program (EAP):

- **Counseling Services:** An Employee Assistance Program is established to provide confidential counseling services. This initiative supports employees

facing personal or professional challenges, promoting mental health and resilience.

## 7.6 Collaborative Approach:

- **Cross-Functional Committees:** Cross-functional committees comprising representatives from HR, Safety, and Wellness collaborate to assess the effectiveness of programs and gather feedback for continuous improvement.

## 7.7 Evaluation and Feedback:

**Surveys and Feedback Sessions:** Regular surveys and feedback sessions are conducted to gauge the satisfaction and effectiveness of health and wellness programs. Feedback is actively sought to tailor programs to the evolving needs of the workforce.

# 8 Contractor Safety Management:

At Trukumb Mining, ensuring the safety of not only our employees but also our contractors and visitors is a top priority. The Contractor Safety Management program is designed to establish stringent safety standards and guidelines for all individuals engaged in work or visiting our mining operations.

## 8.1 Contractor Prequalification:

- **Evaluation Criteria:** Before engaging any contractors, Trukumb Mining employs a rigorous prequalification process. This process assesses contractors based on their safety record, compliance with safety regulations, and adherence to industry best practices.

## 8.2 Safety Inductions:

- **Contractor Safety Inductions:** All contractors are required to undergo comprehensive safety inductions before commencing work. These sessions cover Trukumb Mining's specific safety protocols, emergency procedures, and relevant site-specific hazards.

- **Visitor Inductions:** Visitors, including suppliers, clients, and other stakeholders, are also provided with safety inductions to familiarize them with the safety procedures and guidelines they need to follow while on-site. This ensures that all individuals on the premises are aware of potential risks and preventive measures.

### **8.3 Site-Specific Risk Assessments:**

- **Collaborative Assessments:** Trukumb Mining collaborates with contractors to conduct site-specific risk assessments before any work begins. This includes identifying potential hazards, establishing control measures, and ensuring that contractors are equipped with the necessary resources to mitigate risks.

### **8.4 Monitoring and Audits:**

- **Regular Audits:** Trukumb Mining conducts regular audits to monitor contractor compliance with safety standards. These audits assess safety protocols, equipment maintenance, and adherence to contractual safety agreements.
- **Performance Reviews:** Contractor safety performance is regularly reviewed, and feedback is provided to encourage continuous improvement. High safety standards are a crucial criterion for ongoing collaboration with contractors.

### **8.5 Safety Collaboration:**

- **Safety Committees:** Joint safety committees involving both Trukumb Mining and contractor representatives are established. These committees facilitate ongoing communication, address safety concerns, and share best practices.
- **Collaborative Training Programs:** Trukumb Mining collaborates with contractors to develop and implement joint training programs. This ensures that contractors are well-versed in the specific safety requirements of the mining operation.

### **8.6 Emergency Response Planning:**

- **Collaborative Emergency Drills:** Emergency response drills are conducted collaboratively with contractors to ensure seamless coordination during emergencies. This includes simulated scenarios to test the effectiveness of emergency procedures.

## 8.7 Compliance Enforcement:

- **Contractual Obligations:** Safety compliance is explicitly outlined in contractual agreements with contractors. Non-compliance may result in contractual penalties, suspension, or termination, depending on the severity of the safety violation.
- **Continuous Improvement Initiatives:** Contractors are encouraged to actively participate in continuous improvement initiatives. Suggestions and feedback on safety practices are welcomed and integrated into the broader safety management system.

# 9 Safety Inspections and Audits:

Safety inspections and audits are integral components of Trukumb Mining's commitment to maintaining a safe and secure work environment. These systematic evaluations are designed to identify potential hazards, assess compliance with safety protocols, and facilitate continuous improvement in safety practices.

## 9.1 Responsible Authorities:

**Safety Manager:** The Safety Manager is the key authority responsible for overseeing safety inspections and audits. This individual collaborates with a dedicated safety team, department heads, and external safety experts to conduct thorough assessments.

## 9.2 Frequency:

- **Regular Inspections:** Routine safety inspections are conducted on a scheduled basis, with the frequency determined by the nature of the operation, identified risks, and regulatory requirements.

- **Periodic Audits:** Comprehensive safety audits are conducted periodically, typically on a quarterly or semi-annual basis. These audits provide a holistic review of safety management systems, procedures, and overall safety culture.

### 9.3 Safety Inspection Procedures:

- **Identification of Hazards:** Safety inspections begin with a systematic identification of potential hazards within the workplace. This involves visual assessments, equipment checks, and consultation with employees.
- **Documentation of Findings:** The safety team documents all findings during inspections, including observed hazards, non-compliance issues, and positive safety practices.
- **Risk Assessment:** Identified hazards undergo a risk assessment process to determine their level of severity and potential impact. This informs prioritization for corrective actions.

### 9.4 Safety Audit Procedures:

- **Comprehensive Review:** Safety audits involve a more in-depth examination of safety management systems, policies, and procedures. This includes document reviews, interviews with key personnel, and an assessment of training records.
- **Root Cause Analysis:** If safety issues are identified, a root cause analysis is performed to understand the underlying factors contributing to the identified problems.
- **Benchmarking:** Safety audits may involve benchmarking against industry best practices to identify areas for improvement and innovation.

### 9.5 Mitigative Measures:

- **Corrective Actions:** Upon identification of hazards or non-compliance, corrective actions are promptly initiated. These may include immediate interventions, equipment repairs, or procedural changes.
- **Continuous Improvement Plans:** Safety inspections and audits contribute to the development of continuous improvement plans. These plans address not only immediate concerns but also provide a roadmap for enhancing safety practices over the long term.

- **Employee Training:** If deficiencies are identified, targeted training programs are implemented to address specific areas of improvement. This empowers employees to actively contribute to a safer work environment.
- **Technology Integration:** Innovative technologies, such as sensors and monitoring systems, may be integrated based on audit findings to enhance real-time safety monitoring and response capabilities.

## 10 Communication:

Open and transparent communication regarding health and safety matters will be maintained at all levels of the organization. Regular meetings, newsletters, and training sessions will contribute to a culture of shared responsibility for safety.

This Health and Safety Policy will be reviewed annually to ensure its relevance and effectiveness in maintaining a safe and healthy workplace at Trukumb Mining. All employees are expected to familiarize themselves with this policy and actively participate in its implementation.