

Annexure 3:

Debswana Group Commitments Procedure	
Policy Owner	Head of Corporate Affairs
Policy Reference	PO-CA-0013
Effective Date	01 September 2022
Related Procedures/Guidelines or Policies	Debswana Social Performance Policy (GCA/CA/007) Debswana CSI Procedure (PROC/GCA/CSI/001) Debswana Employee Volunteerism Procedure Debswana Socio-Economic Development Strategy Debswana Sponsorships Guidelines Debswana Human Rights Policy Debswana O.D.O.T Strategy 2024 Social Way version 3.0 Building Forever Strategy

1.0 INTRODUCTION

1.1 This procedure is developed to guide Debswana operations in the proactive management of commitments made to external stakeholders. Adherence to the procedure will enable Debswana sites to record, monitor and respond to commitments made.

1.2 This procedure will help Debswana in the management of stakeholder expectations and reduce the risk of losing the legal and social license to operate as a result of unfulfilled commitments and expectations.

2.0 OBJECTIVES

2.1 To ensure that Debswana sites manage social commitments, including all regulatory, permitting and other stakeholder commitments made by the leadership and senior management and other authorised employees of the company, including members of the Board of Directors.

2.2 To manage stakeholder expectations and any social risks that may be associated with the business in order to safeguard loss of both the legal and social license to operate.

3.0 SCOPE

3.1 The procedure will not be limited by time and will include management of commitments that were made before its effective date. It covers all reasonable and perceived site related commitments from the beginning of all operations, during life of operations and major projects that have a bearing on the communities during their execution.

3.2 All commitments should be recorded in the Site Commitments Register. These could be legal, permitting and stakeholder social commitments. It is not a copy of the legal or permitting register but requires the social elements within legal and permitting obligations to be understood and managed. This could include commitments made in public Social Impact Assessments that enabled a mining license to be granted or national requirements for Citizen Economic Empowerment.

3.3. Commitments made by individual employees or employee charitable groups will not be managed under this procedure.

The following types of commitments may require proactive management, provided they may have reputational risks to the company. These commitments may originate from the following sources;

3.3.1. Agreements made by the Managing Director, General Managers or authorised Senior Managers.

3.3.2. National Policies and Strategies that bind Debswana such as Citizen Economic Empowerment obligations or requirements in mining licenses.

3.3.3 Management committees such as EXCO and mine Social Performance Management Committees (SMPC) may also make commitments to communities guided by this procedure and the CSI policy.

3.3.4. Debswana contractors and business partners are included in this scope of this procedure and are required to maintain the stipulated supporting documents.

4.0 DEFINITIONS

4.1 A Social Commitment refers to any formal agreement made by Debswana with a social aspect. This includes commitments made to deliver socio-economic benefits or projects, and commitments made to avoid certain impacts or to take specific actions.

4.2 Commitments Register refers to any framework/tool used to log all commitments made by Debswana or its contractors/business partners.

5.0 RESPONSIBILITIES

5.1 Senior Leadership at Debswana and designated proxies or SPMC, guided by Debswana policies in consultation with relevant departments shall make social commitments on behalf of the Company.

5.2 Business partners should communicate their social commitments to the Corporate Affairs (CA) Social Performance team to be included in site Commitments Registers.

5.3 Site CA department shall record, monitor and report on the implementation of mine-wide social commitments, including, but not limited to accountability, timeline, budget allocated and closure for each commitment.

5.4 Corporate Affairs will ensure that all social commitments are included in the site Social Management Plans (SMP).

5.5 The status of commitments will be reported to the Social Performance Management Committees and Social Way Champions forums at their respective sittings.

5.6 CA should be notified of all social commitments, including those made verbally and include them in the Commitments Register and manage them in accordance with the requirements of the Social Way V3.

5.7 CA will ensure that the key messages from this procedure are understood by all relevant staff and that commitments by the site are captured.

6.0 GENERAL

6.1 Social Commitments made by the Debswana to external stakeholders, including government, district and community groups, should strictly be made by authorised employees.


6.2 A commitment that is incorrectly made should also be managed and tracked. Feedback on the decision made shall be given to relevant stakeholders. It may also need to be managed as a reputational risk and require a plan to lower community expectations and explain the 'false' commitment.

6.3 Action will be considered for employees who commit the company without proper authority.

- 6.4 All formal site documents with social commitment implications (such as CSI, Closure plans and Environmental Impact Assessments) will be signed off as part of normal site procedures. These documents will be reviewed to identify the commitments that need tracking.
- 6.5 Legal, permitting and contractual commitments will be made in accordance with Debswana Company Policies and Procedures.
- 6.6 An annual review of commitments will be conducted to tie in with annual Social Human Rights Risks and Impacts Assessment (SHIRA) and guide socio-economic planning and reviews.

7.0 AMENDMENT HISTORY

Issue No	Effective Date	Date Last Revised	Amendment Details
01	15/09/2016	15/09/2018	New template
02	15/09/2018	20/10/2020	Alignment to Social Way version 3 Signatories
03	01/09/2022	01/08/2022	Update to align with Social Way Version 3

	TITLE	NAME	SIGNATURE	DATE
ORIGINATOR	Corporate Affairs Manager - Social Performance	R. Tswiio		22/08/2022
APPROVAL	Head of Corporate Affairs	R. Mothibatsela	<i>Rachel Mothibatsela</i>	22/08/2022