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December 8, 2017

Tobs Strong  
Chief Executive Officer  
Rift Valley Corporation  
12 - 14 Paisley Road  
Southerton, Harare  
Zimbabwe



**Re: Human Rights Watch research on tobacco farms in Zimbabwe**

Dear Mr. Strong,

We are writing to follow up on our communications with you regarding Human Rights Watch's research on child labor and human rights abuses on tobacco farms in Zimbabwe. Thank you for your letter of August 23, 2017. We appreciate the opportunity to learn more about Rift Valley Corporation's policies and practices with respect to human rights due diligence.

We are writing now to update you on our next steps and share with you some initial recommendations that will be included in our report.

Over the last few months, we have written to 15 tobacco companies regarding human rights due diligence policies and practices in the tobacco industry in Zimbabwe. We have received responses from 13 companies. We have had constructive discussions with some company executives about their approaches to human rights in the supply chain. We also wrote to several government offices.

Human Rights Watch has been following the political situation in Zimbabwe in recent weeks. Due to the change in administration, we plan to publish our report in the first half of 2018, rather than publishing the report this year.

With the change in timeframe for our report, we wanted to give Rift Valley Corporation/Northern Tobacco the opportunity to share with us any updated information regarding its operations in Zimbabwe, or any updates regarding the company's policies and practices for addressing child labor and other human rights risks in the supply chain. To be reflected in our report, we would need to receive information on any actions taken or planned by January 5, 2018.

Below we share some preliminary recommendations to companies purchasing tobacco from Zimbabwe. We hope Rift Valley Corporation/Northern Tobacco will carefully consider these recommendations.

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## Preliminary Recommendations To All Companies Purchasing Tobacco from Zimbabwe

- Adopt or revise a global human rights policy prohibiting the use of child labor anywhere in the supply chain, if the company has not yet done so. The policy should specify that hazardous work for children under 18 is prohibited, including **any work in which children have direct contact with tobacco in any form**. The policy should also include specific provisions regarding labor rights and occupational safety and health, consistent with international standards.
- Conduct regular and rigorous monitoring, including regular field level monitoring, in the supply chain for child labor and other human rights risks, and engage entities with expertise in human rights and child labor to conduct regular third-party monitoring in the supply chain.
- Regularly publish detailed information about internal and external monitoring, including issues of non-compliance, remediation and results, in a form and frequency consistent with the guidelines on transparency and accountability in the United Nations Guiding Principles on Business and Human Rights.

We welcome any additional information you would like to share with us, in particular information on steps you are taking or planning to take within a defined time frame to address our recommendations above.

We appreciate our engagement with you on these issues, and look forward to discussing them with you further.

Sincerely,



Jane Buchanan  
Associate Director  
Children's Rights Division



Dewa Mavhinga  
Southern Africa Director  
Africa Division

Cc: James Egremont-Lee, Head of Corporate Affairs, Rift Valley Corporation  
Kevin Beattie, Sustainability Compliance Manager, Northern Tobacco