



CURVERID TOBACCO LIMITED CHILD LABOUR POLICY STATEMENT

Curverid Tobacco Limited (CTL) is committed to the eradication of Child Labour, and will not promote or engage in Child Labour practices of any form.

As a subsidiary of CONTRAF-NICOTEX-TOBACCO GmbH, CTL is represented on the Board of the Eliminating Child Labour in Tobacco Growing Foundation (ECLT) whom is a signatory of the ECLT Pledge of Commitment and Minimum Requirements issued in 2014.

CTL does not employ any children or engage in any Child Labour practices as defined by ILO Convention No. 138 (Minimum Age for Admission to Work); ratified by Zimbabwe on 6 June 2000. CTL is committed to uphold the principles of ILO Convention No 182 (Worst Forms of Child Labour); ratified by Zimbabwe 11 December 2000.

Further to this commitment CTL recognises that... 'not all work done by children should be classified as child labour that is to be targeted for elimination. Children's or adolescents' participation in work that does not affect their health and personal development or interfere with their schooling, is generally regarded as being something positive [...for development of and understanding of the cultural practices and generational transfer of skills...]. This includes activities such as helping their parents around the home, assisting in a family business or earning pocket money outside school hours and during school holidays. These kinds of activities contribute to children's development and to the welfare of their families; they provide them with skills and experience, and help to prepare them to be productive members of society during their adult life.' [International Labour Organisation]..

With respect to this CTL recognises that in accordance with ILO Convention 138, Article 7, paragraph 1 and 2, '...light' work on a family farm, can be for the development of craft skills if:

- (a) ...not likely to be harmful to their health or development (Children's rights to adequate health care article 24).
- (b) ... not such as to prejudice their attendance at school, their participation in vocational orientation or training programs approved by the competent authority or their capacity to benefit from the instruction received. Do not conflict with or impede their proper educational development including school attendance (Children's rights to education article 28).

CTL continues to actively participate in industry wide efforts towards the elimination of child labour in tobacco growing, and where possible engage with stakeholders, internal and external in this endeavour.



CURVERID TOBACCO LIMITED CHILD LABOUR POLICY STATEMENT

OBJECTIVES

The Company policy commitment is upheld through but not limited to:

- Continually and proactive engagement with stakeholders.
- Education and engagement with suppliers and contracted growers.
- Supporting and endorsing through membership / participation / funding of relevant organisations.
- Collection and analysing data from the monitoring and surveying of the CTL contracted grower base.
- Violations of this policy and non-conformance will warrant investigation into the case and appropriate actions taken.

COMMITMENT

CTL applies this commitment throughout its agricultural supply chain, from the application of high standards of agricultural practice in tobacco growing. In order to achieve this CTL ensures that there are resources committed to achieving the goals and personnel responsible for management and reporting.

UPDATES AND REVIEW

This policy statement, its commitments, mentioned activities will be kept under annual routine review by the Management and updated, as often as may be appropriate to ensure all objectives are achieved. Any revision will be published by CTL and brought to the notice of all employees and other relevant personnel by: announcement, publication, notification and/or memorandum.

Signed

Mike Roberts

Managing Director