



Gold Class Health Ltd-Modern Slavery Policy

First issued: December 2022

Last revised: 4 June 2025

Reviewed by: Lloyd Makanidzana

1. Overview and Definition of Modern Slavery

1.1 Slavery, forced labour, servitude, and human trafficking are forms of Modern Slavery – serious criminal activities that deprive victims of their liberty and usually involve exploitation, often for financial gain.

1.2 We conduct our business fairly, ethically, and with respect for fundamental human rights. We are committed to preventing all forms of Modern Slavery in both our business and our supply chains. We will not tolerate it under any circumstances.

1.3 This policy applies to everyone working for or on behalf of the organisation, in any capacity. This includes employees, directors, officers, workers, consultants, volunteers, suppliers, and service providers.

1.4 Failure to comply with this policy may result in disciplinary action, including dismissal or termination of contracts. It could also lead to legal proceedings.

1.5 Our Anti-Slavery Officer (ASO) is Mr. Takudzwa Makanidzana, who is responsible for implementing, monitoring, and updating this policy.

1.6 This policy does not form part of your employment contract. We may amend or update it at any time.

2. Preventing Modern Slavery in Our Business

2.1 We carry out appropriate checks on all employees, contractors, and suppliers, so that we know who is working for us, with us, or on our behalf.

2.2 Every employee receives a written agreement and is paid in accordance with the law. We comply fully with our legal obligations to protect the health, safety, and welfare of our employees and workers, including those relating to working hours, rest breaks, and holidays.

2.3 All employees are required to sign a copy of this policy to confirm they have read and understood it. Recruitment consultants are also provided with training on this policy.

3. Expectations of Our Suppliers

3.1 If you supply us with goods or services, you must:

- Comply with all legal obligations relating to Modern Slavery;
- Be committed to ensuring there is no Modern Slavery in your business or supply chains; and
- Provide a copy of your own anti-slavery policy.

3.2 If you breach this policy, or if Modern Slavery is found in your business or knowingly in your supply chain, we may terminate our contract with you and take any necessary legal action.

4. Responsibilities of Employees and Workers

4.1 You must immediately report any suspicions of Modern Slavery in our business or supply chains to our ASO. The ASO will investigate and report to the Board of Directors within a reasonable timeframe on any actions that may be required.

4.2 You will not suffer any detrimental treatment as a result of raising genuine concerns in good faith under this policy, even if those concerns are later found to be unfounded. If you believe you have been treated unfairly for raising a concern, you should notify the ASO immediately. Employees may also refer to our Grievance and Whistleblowing Policies.

Policy Review

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