

MANDATORY CODE OF PRACTICE FOR THE PREVENTION, MITIGATION & MANAGEMENT OF COVID-19 OUTBREAK

VOH-COP-002C

Version: 7

**This Code of Practice is Drawn Up in Accordance with Guideline DMRE 16/3/2/5-A4
Issued by the Chief Inspector of Mines**

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MITIGATION & MANAGEMENT OF COVID-19 OUTBREAK			

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1. PURPOSE.

To implement and maintain a COVID-19 management programme at Black Mountain Mine to protect the health of employees.

2. SCOPE.

This Code of Practice applies to Black Mountain for the management of COVID-19:

- 2.1 This COP applies to all areas of the mine or parts thereof, mine employees, irrespective of employment category, and contract employees in the SAMI that might be exposed to COVID-19 in the performance of their duties.
- 2.2 The guideline on which this COP is based (and related documents) provides minimum requirements and best practices for the prevention, mitigation and management of COVID-19 outbreak. The aim is to ensure that mine employees returning to work and any other person(s) at mines, are protected from transmission of the Coronavirus at the workplace, and where reasonably practicable, in the community, whilst providing guidance to all stakeholders regarding their roles and responsibilities in the management of COVID-19 outbreak.
- 2.3 This COP should be read in conjunction with:
 - 2.3.1 Directives issued by the Minister of Mineral Resources and Energy &/or Chief Inspector of Mines.
 - 2.3.2 Guiding Principles of Prevention and Management of COVID-19 in SAMI.
 - 2.3.3 Guidelines and directives issued by the National Department of Health, National Institute for Communicable Diseases, National Department of Employment and Labour.

3. STATUS OF CODE OF PRACTICE.

- 3.1 This COP is based on the guideline and the following applies:
 - i. Due to the highly transmissible nature of the SARS-CoV-2, the employer will collaborate as far as possible with national, provincial and the local authorities in dealing with the control of the pandemic including in the community
 - ii. The guideline has been compiled specifically with the view to provide guidance to all stakeholders regarding their roles and responsibilities with regards to the mitigation and management of COVID-19 outbreak
 - iii. This guideline provides for the mitigation and management of COVID-19 outbreak at the mine. In implementing the requirements of this guideline, the employer is required to continue complying with the provisions of MSHA as amended and the related guidelines including the Guiding Principles on the Management of COVID-19 in the SAMI Instruction issued by the CIOM.
 - iv. In ensuring that mine employees are provided with a healthy and safe working environment that is also maintained, the employer must put a procedure in place to be followed by employees to exercise the right in section 23 of the MSHA during the COVID-19 outbreak.

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- v. This guideline and its annexures must be considered as living documents which allow for mandatory COPs to be updated as new developments on the prevention, mitigation and management of COVID-19 emerges.
- vi. The employer must apply the requirements of this guideline as a minimum (where applicable) guiding principle in developing his/her own guideline in preventing and managing COVID-19 transmission.

3.2 This COP was drawn up in accordance with guideline DMRE 16/3/2/5-A4 issued by the Chief Inspector of Mines.

3.3 This is a mandatory COP in terms of section 9(2) of the MHSA.

The COP may be used in an investigation to ascertain compliance and to establish whether the COP is effective and fit for purpose.

3.4 All managerial instructions, recommended procedures (voluntary COP's) and standards on the relevant topics must comply with the COP and must be reviewed to ensure compliance.

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Black Mountain Mining (Pty) Ltd

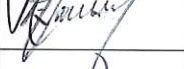
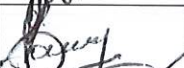
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4. MEMBERS OF THE DRAFTING\REVIEW COMMITTEE.

4.1 In terms of Section 9(4) of the MHSA the employer must consult with the health and safety committee and any other affected parties on the preparation, implementation or revision of this COP.

4.2 I, Xolani Qamata (4.1 Appointee), hereby appointed the members as listed below on the drafting/reviewing committee for this COP.

4.3 Members of the Review Committee:

NAME	DESIGNATION	QUALIFICATION	AFFILIATION	EXPERIENCE	SIGNATURE
Charles Kloppe	VOH Manager	Cert in Mine Environmental Control	Mine Ventilation Society (MVS)	25 years	
Dr Andre Stoffels	Occupational Medical Practitioner	Diploma in Occupational Health	SASOM HPCSA	27 years	
Erich Katzke	Training Manager			32 years	
Mapheu Mawasha	Section Manager: Deeps & Swartberg	B-Tech Min, MO, MMCC		10 years	
Edwin Matlapeng	Safety Manager	B-Tech Safety Management	IOSM	30 years	
Mbongani Mkheto	NUM Health & Safety	Operator	NUM	16 years	
Garth Boersma	HR Manager	P.G. Dip Management		28 years	
Llewellyn Barry	Full Time Health & Safety Rep	COMSOC 1 & 2		9 years	
Wendell Freeman	Full Time Health & Safety Rep	COMSOC 1 & 2 SAMTRAC		17 years	
Jaque Steyn	Manager: Process Plant	NHD-Met Eng; BSc Hons-Applied Science in Mech		34 years	
Gary Ephraim	Commercial Manager	CIPS		29 years	
Dumisani Mathebula	Mining Manager (Act)	BSc Mining	SAIMM	19 years	
Shane Links	Engineering Manager (Act)	GCC; B-Tech Mechanical Engineering		15 ~~31~~ years	

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Signed for and on behalf of the Joint Health and Safety Committee:

Llewellyn Barry

Name

Signature

04/08/2022
Date

Wendell Freeman

Name

Signature

30/09/2022
Date

Approved: Xolani Qamata – General Manager (4.1 Appointee)

Signature: 

Date: 12/10/2022

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5. GENERAL INFORMATION.

5.1 MINE DESCRIPTION & LOCATION.

Black Mountain, coordinates -29.252929/18.817737, a subsidiary of Vedanta Resources Limited, is an underground Base Metal mine situated near the town of Aggeneys, 70 km west of Pofadder and 110 km east of Springbok, consisting of the following major areas:

- Deeps section (situated 8 km west of Aggeneys)
- Swartberg section (situated 15 km west of Aggeneys)
- Concentration Plant (situated 10 km west of Aggeneys)

5.2 COMMODITIES PRODUCED.

The following main concentrates are produced at Black Mountain:

- Lead
- Zinc
- Copper

5.3 MINING METHODS.

Black Mountain (Deeps & Swartberg sections) is a fully mechanized mine utilizing the Cut & Fill and Blast-hole mining methods. The Processing Plant utilizes a sequential floatation process.

The potential risk of exposure to SARS-CoV-2 and/or possible exposure scenarios are as follows:

Potential Risk of Exposure -

- Communal areas (change houses, board rooms, shared office space, workshops, tearooms, etc.)
- Employee meeting areas during shift change
- Accommodation units (employee accommodation)
- Shared equipment (TMM, handheld tools or machinery)
- Communal transport (buses, lift clubs, cage, LDV's)
- Biometric and alcohol breathalyzer testing units

Possible Exposure Scenarios -

- Persons not adhering to social distancing, not wearing or correctly wearing appropriate PPE (eg: cloth masks, FFP2/N95 masks, face shields, safety glasses, hand gloves, etc.) and not adhering to hand washing protocols
- Inadequate disinfecting of work areas, equipment, shared transport, accommodation units, etc.
- Travel to/from COVID-19 epicenters (high risk areas) as determined by the DOH

5.4 GENERAL CONTROLS TO PREVENT EXPOSURE TO COVID-19.

Controls are as follows:

- Social distancing / limitations on gathering areas (eg: offices, change houses, boardrooms, cage, etc.) as per applicable National Guidelines/Protocols (as is amended from time to time) and the necessary hygiene and sanitation protocols for shared transport

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- Hand washing and sanitizing protocols (including at areas with no water/soap available)
- Use of non-contact thermal temperature scanners at key access points
- Use of appropriate PPE (cloth masks - as per applicable NDOH and/or other National Guidelines/Protocols, as is amended from time to time, FFP2/N95 masks, face shields, safety glasses, hand gloves, etc.)
- Sanitizing of equipment before and after use
- Sanitizing of facilities as part of normal cleaning regime (eg: offices, change houses, etc.)
- COVID-19 training and awareness
- Work-from-home where applicable
- Emergency medical services available 24 hours a day

5.5 RELATED COPs, SOPs & OTHER DOCUMENTS.

Related COP's, SOP's and other documentation which should be reviewed concurrently to avoid conflict of requirements as laid down by the employer. The objective would be to have an integrated system:

- CIOM -Instr. OH-02-2022: Guiding Principles on the Revised Measures for the Prevention, Mitigation and Management of COVID-19 Pandemic in SAMI, issued 2022/0/05
- HSE Policy
- COVID-19 Medical Risk Assessment
- SAF-IBR-001 COVID-19 Lock Down Risk Assessment
- SAF-IBR-002 COVID-19 Post Lock Down Risk Assessment
- SAF-IBR-003 COVID-19 Mandatory Vaccination Risk Assessment
- COVID 19 Township Risk Assessment
- VOH-SOP-002C1 COVID-19 Return to Work Medical Surveillance
- VOH-BMF-002C1 COVID-19 Employee Assessment Form
- VOH-BMF-002C2 COVID-19 Information Leaflet to Visitors & Visiting BPs
- SAF-SOP-008 Return to Work Process post Lock Down
- VOH-BMF-002C9 COVID-19 Individual Risk Assessment
- SAF-SOP-0001C Procedure for a positive COVID-19 case in a working place
- COVID-19 Workplace Contact Tracing Investigation Form
- BMC-HR-Pol-001 COVID-19 HR Practices Policy
- BMM-HR-Form-002 COVID-19 Isolation Checklist
- VOH-COP 002: Emergency Preparedness & Response
- VOH-COP 005: Minimum Standards of Fitness to Perform Work at a Mine
- VOH-SOP 005A: Medical Surveillance
- DOH – Guideline for quarantine & Isolation in Relation to COVID-19 Exposure & Infection (2020/05/05)

5.6 UNIQUE FEATURES TO BLACK MOUNTAIN.

- The mine's remoteness: this has an influence on the response times and capabilities from outside Emergency Services e.g. Emergency Medical Services and other mines in the area
- Mechanization of the mine: this limits the number of persons in the same area and interaction between persons

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6. TERMS & DEFINITIONS.

Business Partner	A person or company providing services/ goods to the Mine
BMC	Black Mountain Complex incorporating Black Mountain Mine operation and Gamsberg mine operation
CIOM	Chief Inspector of Mines
Confirmed case	A person who has been diagnosed with COVID-19 by means of a laboratory diagnostic method approved by the Department of Health
COP	Code of Practice in terms of section 9 of the MHSA
COVID-19	Corona Virus Infection Disease 2019 caused by the severe acute respiratory syndrome corona virus 2 (SARS-CoV-2)
Disinfect	The process of cleaning using chemicals to destroy microorganisms
DMRE	Department of Mineral Resources and Energy
DOH	Provincial Department of Health
EAP	Employee Assistance Programme
Employee	Any person who is employed or working at a mine, including the mine's contractors (Business Partners)
Exposure	The state of having no protection from something harmful. For the purposes of this guideline exposure is in reference to SARS-CoV-2
Health Care Worker	All healthcare professionals primarily engaged to enhance health by providing preventative, curative, promotional or rehabilitative health care services
Isolation	Separating a sick individual with a contagious disease from healthy individuals that are not infected with such disease in a manner that aims to prevent the spreading of infection or contamination - Isolation requirements for symptomatic and asymptomatic people will be as per Government protocols as amended from time to time - The number of days to Isolate will be as per Government protocols as amended from time to time
MHSA	Mine Health & Safety Act, 1996 (Act No. 29 of 1996), as amended
MHSC	The Mine Health and Safety Council, established in terms of section 41(1) of the MHSA
NDOH	National Department of Health
NICD	National Institute for Communicable Diseases
OMP	A medical practitioner who holds a qualification in occupational medicine or an equivalent qualification, recognized by the Health Professions Council of South Africa
PPE	Personal Protective Equipment

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PUI	Person Under Investigation
Quarantine	The restriction of activities or separation of a person, who was or may potentially have been exposed to COVID-19, and who could potentially spread the disease to other non-exposed persons, to prevent the possible spread of infection or contamination to healthy individuals with the objective of monitoring their symptoms and ensuring the early detection of cases
Reasonably Practicable	Practicable having regards to: a) The severity and scope of the hazard or risk concerned b) The state of knowledge reasonably available concerning that hazard or risk, and of any means of removing or mitigating the hazard or risk c) The availability of means to remove or mitigate that hazard or risk, and d) The costs and the benefits of removing or mitigating that hazard or risk
RTW	Return to Work
SAMI	South African Mining Industry
Self-Isolation	Separating yourself from others to the greatest extent possible, when you are sick with signs of COVID-19 and you have been told by a health care provider to separate yourself from others
Vulnerable employees	Employees with known or disclosed health issues or comorbidities such as or with any condition which may place such employees at a higher risk of complications or death if they are infected with SARS-CoV-2; also employees above the age of 60 who are at a higher risk of complications or death if they are infected with SARS-CoV-2 (or as defined by the DMA regulations and the DOH guidance note)
VOH	Ventilation & Occupational Hygiene
WHO	World Health Organization

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7. RISK MANAGEMENT.

7.1 RISK ASSESSMENT.

Section 11 of the MSHA requires the employer to identify hazards, assess the health and safety risks to which employees may be exposed and other affected persons may be exposed, record the significant hazards identified and risks assessed. The employer must determine how the significant risks identified in the risk assessment process must be dealt with, having regard to the requirement of Section 11(2) and 11(3) that, as far as reasonably practicable, attempts must first be made to eliminate the risk, thereafter to control the risk at source, thereafter to minimize the risk and thereafter, insofar as the risk remains, to provide personal protective equipment and to institute a programme to monitor the risk.

Baseline/Issue Based risk assessments were conducted, and it include RTW Medical Surveillance, Lock-down / Post Lock-down Risk Assessments and COVID-19 Mandatory Vaccination Risk Assessment. These assessments systematically identified the risk of all the processes and prioritized these risks.

The main purpose of the assessment was to comply with the relevant Occupational Health and Safety legislation, identify and evaluate current control measures, provide recommendation for control of risks in the workplace and to obtain and provide detailed information.

7.2 RELEVANT INFORMATION.

To assist the employer to manage risks associated with COVID-19, all relevant information such as incident statistics, research reports, manufacturers' specifications, approvals, design and performance criteria for all relevant equipment must be obtained and considered

7.3 PERIODIC REVIEW.

In addition to the periodic review required by Section 11(4) of the MSHA, the COP must be reviewed and updated within a reasonable period after implementation thereof, taking into account the number of COVID-19 illnesses at the mine and the results of investigations conducted in terms of section 11(5) of the MSHA. The periodic review will not exceed a period of three (3) years.

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8. ASPECTS ADDRESSED IN THE COP.

The following key elements are addressed in the COP:

- 8.1 Risk Assessment & Review
- 8.2 Start-up and on-going procedures for the mine
- 8.3 COVID-19 Management Programme
- 8.4 Monitoring and reporting
- 8.5 Compensation for occupationally acquired novel corona virus (COVID-19)

8.1 RISK ASSESSMENT.

8.1.1 In terms of Section 11 of the Mine Health and Safety Act (MHSA), the employer must assess and respond to risk. In this regard various COVID-19 risk assessments were conducted, and controls implemented, including:

- COVID-19 Medical Risk Assessment
- COVID-19 Lock Down Risk Assessment
- COVID-19 Post Lock Down Risk Assessment
- COVID-19 Mandatory Vaccination Risk Assessment

8.1.2 Risk-based assessments were conducted covering all workings at mines and the risk assessment included:

8.1.2.1 Sources of COVID-19 Infection Transmission

- Inadvertent personal contact with an infected person
- Touching infected surfaces without proper precautions
- Health care employees:
 - Consultation with infected person
 - During the specimen collection procedure
 - Handling of specimens collected

8.1.2.2 Health effects associated with exposure to COVID-19

- Asymptomatic
- Mild symptoms like fever, coughing, sore throat, body aches, nausea and diarrhoea and loss of smell
- Severe disease with respiratory distress
- Critically ill with septic shock, respiratory failure and death

8.1.2.3 Nature of the key workplace operations and activities that pose a potential risk of COVID-19 transmission are as follows:

- BMM Clinic – as specimens will be collected at the clinic for suspected cases; patients will receive treatment

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- Paramedic service: during initial treatment and transport of suspected/confirmed cases
- Security entry points: as security personnel vet and check employees and visitors entering the mine
- Equipment and common facility sharing – without disinfection

8.1.2.4 Occupations & number of employees likely to be exposed to and spread the COVID-19

Occupations	Number
Medical Personnel, including: OMP, GP, OHNP, sisters, nurses, administrators, cleaners	15
Paramedic personnel: ALS/BLS paramedics, ECT's	8
Security Personnel	35

8.1.2.5 Mines essential occupations or critical skills that might be impacted by SARSCoV-2 transmission:

- Medical Personnel
- Paramedic Personnel
- Security Personnel

8.1.2.6 The risk of vulnerable employees to COVID-19 while at work:

- Employees with pre-existing medical conditions will be reviewed and advised by the OMP on protection measures, self-monitoring, continued use of medication and self-isolation as required
- Advice has also been given to stay at home / work from home in cases where required

8.1.2.7 Control measures in place:

- Engineering: hand sanitizer dispensers positioned at strategic locations, additional engineering controls will be evaluated and implemented as far as reasonably practicable
- Administrative:
 - Standard Operating Procedures, Training & awareness, pamphlets, supervision, Toolbox Talk
 - De-densifying of workplaces as per applicable National Guidelines/Protocols (as is amended from time to time), with physical distancing applied (where possible), Work-from-home where possible
 - Screening (eg: self-assessment declaration form and body temperature monitoring), hand sanitizer (eg: at turnstiles), soap and water
- Personal Protective Equipment: Appropriate PPE supplied to employees based on the risk of exposure, including:

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- Cloth / disposable surgical masks, to be used as per applicable NDOH and/or other National Guidelines/Protocols (as is amended from time to time)
- FFP2/N95 masks – airborne pollutants and COVID-19 exposure prevention (silica/lead dust environments and medical staff)
- Face shields
- Disposable gloves
- Disposable suits

8.1.2.8 De-densification of employees on transport modes and other spaces

- Limitations on gathering areas (eg: offices, change houses, boardrooms, cage, etc.) as per applicable National Guidelines/Protocols (as is amended from time to time)
- On-Mine Vehicle Transport (eg: Buses, mini-busses and private vehicles): Aligned with NDOH and/or other applicable National Guidelines (as is amended from time to time), but with hygiene and sanitation protocols followed
- Social distancing is encouraged (where possible)
- Allowing work-from-home where applicable

8.1.2.9 The additional control measures required to be instituted in order to reduce exposure and the spread of COVID-19 include:

- Human Resource policies on the following have been amended and includes:
 - Business travel – only essential business travel, authorised by General Manager
 - Sick leave
- Allowing work-from-home where applicable
- Dedicated employee accommodation for the purpose of quarantine (restricted to one employee per room)
- Return to Work Medical Assessments are conducted for all employees before returning to work. During the assessment, the medical professional/health care worker will determine if a COVID-19 test is required based on latest DOH/NICD criteria, with the appropriate quarantine/isolation protocols followed if required. If a person is cleared for work during this assessment, the person will be issued with an appropriate colour-coded card (permit) as determined from time to time and can return to work
- Visitors complete COVID assessment forms and get approval from OMP/Health Care Worker before being allowed on site, with the appropriate colour-coded card (permit) issued

8.1.2.10 Frequency of any ongoing monitoring to assess the effectiveness of the controls:

- Inspections and checks are conducted by line supervisors
- Over inspections are conducted by safety/VOH team and management
- COVID-19 Committee meetings (Management, Union, Safety representatives)

8.1.2.11 The mine's risk assessment methodology to take cognisance of the WHO classification of the risk of SARS-CoV-2 infection into 4 risk groups, which are illustrated by the following below Figure 1

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i. Very high exposure risk

High potential for exposure to known or suspected sources of SARS-CoV-2 during specific medical, post-mortem or laboratory procedures

ii. High exposure risk

High exposure risk jobs are those with high potential for exposure to known or suspected sources of SARS-CoV-2.

iii. Medium exposure risk

Medium exposure risk jobs include those that require frequent and/or close contact with i.e., within 2 meters of people who may be infected with COVID-19, but it is unknown

iv. Low exposure risk

Low exposure risk jobs are those that do not require contact with people known to be or suspected of being infected with COVID -19 nor frequent contact (within 2 metres) with the general public

NOTE: The Annexures 1 – 3 as per the guideline, can be utilized by employers for the purpose of conducting COVID-19 risk assessment

8.1.3 Scientific and evidence-based approach

In implementing any solution driven measure, the aim is to apply the best available evidence gained from scientific methods for decision making in preventing COVID-19 exposure, including (but not limited) to social distancing, sanitizers, providing and wearing of facial masks. This also includes information from credible sources such as WHO, DOH, DMRE, NICD, etc. as is distributed and updated from time to time

8.1.4 Review of the Risk Assessment

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8.1.4.1 The risk assessment will be reviewed whenever circumstances arise or change at the mine that could have an impact on the original assessments and the risk of contracting COVID-19 and at least in the following instances:

- i. Outcomes of local outbreaks or community surveillance become known to the mine
- ii. Outcomes of medical surveillance programmes indicate the need for it
- iii. A MHSA Section 11(5) investigation and/or any other investigation(s) indicates the need
- iv. New or revised legislation is introduced
- v. New mining methods are introduced
- vi. Process changes are introduced (e.g. in process plants)
- vii. New types of machinery are introduced
- viii. New epidemiological, public health and medical information on the infection, spread of, symptoms or any other relevant information comes to light in respect of the pandemic that may influence the risk assessment

8.2 Start Up Procedure

A start-up procedure was developed and implemented to address the following:

8.2.1 Prior to allowing the mine to commence with mining activities after a prolonged stoppage; a safe precautionary start-up procedure was developed and included:

- COVID-19 Medical Risk Assessment
- COVID-19 Post Lock Down Risk Assessment
- VOH-SOP-002C1 COVID-19 Return to Work Medical Surveillance
- VOH-BMF-002C1 COVID-19 Employee Assessment Form
- VOH-BMF-002C2 COVID-19 Information Leaflet to Visitors & Visiting BPs
- SAF-SOP-008 Return to Work Process Post Lock Down

8.2.2 The start-up procedure is aligned with the Instruction referenced COVID-19 issued by the Clom – on the 20th April 2020 (Reference - Annexure 5 of the guideline)

8.2.3 Black Mountain conducts routine cleaning or disinfection or industrially sanitising of surfaces that employees come into contact with such as the following areas (but not limited to), as determined by the mine's risk assessment. For more information refer to:

- 8.2.3.1 All transportation of employees provided by employer to the mine
- 8.2.3.2 Change Houses and its surrounding facilities
- 8.2.3.3 Lamp rooms and equipment
- 8.2.3.4 Waiting areas
- 8.2.3.5 Refuge Bays
- 8.2.3.6 Offices (especially open plan spaces)
- 8.2.3.7 Health Care Facilities – BMM clinic and Resus bay as well as ambulances

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- 8.2.3.8 Kitchen and dining areas, including eating utensils
- 8.2.3.9 Mine accommodation and designated dining areas thereto
- 8.2.3.10 Security access points and guard houses
- 8.2.3.11 Functional and physical assessment areas and heat tolerance screening centres (not applicable to BM)
- 8.2.4 Screening and testing procedures have been developed and implemented - Reference:
- VOH-SOP-002C1 COVID-19 Return to Work Medical Surveillance
 - VOH-BMF-002C1 COVID-19 Employee Assessment Form
 - SAF-SOP-008 Procedure for a positive COVID-19 case in a working place
- Summary of procedure(s) are as follows:
- Return to Work Medical Assessments are conducted for all employees before returning to work. If cleared, an appropriate colour-coded card (permit) as determined from time to time is issued to the employee. This is required at all main security entrance points before a person will be allowed inside the work areas
 - Temperature screening are conducted at all security entry points each time a person passes through a point (meaning that the same person will be screened more than once a day should he/she enter at various times/points). Should an abnormal temperature be recorded, the person will be isolated, given a mask and the paramedics contacted to conduct additional screening.
 - If still abnormal the person will be directed to the clinic for review by the OMP\GP
 - In the event that a person meets the criteria (as per DOH), a specimen will be collected for COVID-19 analysis by an accredited laboratory
 - The person will be directed to quarantine until the result is available
- 8.2.5 Withdrawal procedures, to be used in the event of a localised COVID-19 outbreak have developed - Reference
- VOH-SOP-002C1 COVID-19 Return to Work Medical Surveillance
 - SAF-SOP-008 Procedure for a positive COVID-19 case in a working place
 - COVID-19 Workplace Contact Tracing Investigation Form
- Summary of procedure(s) are as follows:
- In the event of a positive COVID-19 result, contact tracing will be conducted as per DOH guidelines as amended from time to time
 - Contacts do not have to quarantine. Advised to practice social distancing, wear mask, practice hand hygiene and self-monitor for symptoms
 - Symptomatic positive cases will isolate for the number of days as per Government protocols, as amended from time to time

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- Asymptomatic positive cases do not have to isolate. Advised to practice social distancing, wear mask, practice hand hygiene and self-monitor for symptoms
- In addition to the DOH/NICD Contact list that must be completed by the positive person, work contacts will only be required to complete the COVID-19 Workplace Contact Tracing Investigation Form should they be symptomatic. The OMP/Medical Care Professional will assess the information, and if deemed necessary, conduct a medical examination of the "contact" and advise on testing as appropriate. Those who display symptoms will be tested for COVID-19 as per DOH criteria (eg: Antigen &/or PCR).
- Disinfection of the affected work environments will be conducted as per the Mine's SOP for a positive COVID-19 case in a working place.

8.2.6 Measures are in place to collaborate with the DOH with the prevention and management of COVID-19 for migrant workers at port of entries

- The Government protocols for entry / exits through ports will be followed, as is amended from time to time
- Should it be necessary, the Namaqua DOH District Communicable Diseases unit will be liaised with to ensure correct entry and exit procedures. Black Mountain management has active members at the District and Provincial forums

8.3 COVID-19 MITIGATION & MANAGEMENT PROGRAMME.

8.3.1 Principles to Consider in the Management of COVID-19 Infection Transmission

The following principles were considered in the management of COVID-19 infection transmission:

- 8.3.1.1 To prevent the COVID-19 workplace infection, the HSE policy was amended to include COVID-19 management into the mine's existing policy, and aligned to / included in existing COPs and standard operating procedures for Health and Safety as deemed appropriate
- 8.3.1.2 The mine's COP and procedure make provision for employees who have signs and/or symptoms of COVID-19:
- The dedicated 24-hour number which employees will use to reach the mine's dedicated healthcare workers / services to assist with COVID-19 is:
 - **9999 (internal phones) or 054 983 9999 (external phones)**
 - The control room operator will then direct the health care service as required
 - Procedure to report when an employee is sick or experiencing symptoms of COVID-19 – Reference
 - VOH-SOP-002C1 COVID-19 Return to Work Medical Surveillance – Case Diagnosis and Management
 - SAF-SOP-008 Procedure for a positive COVID-19 case in a working place
 - COVID-19 Workplace Contact Tracing Investigation Form

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Summary of procedure(s) are as follows:

- Should a person experience symptoms, the person will be isolated, given a mask and the paramedics contacted to conduct additional testing
 - When confirmed, the person will be transported/directed to the clinic for further review by the OMP/IGP
 - In the event that a person meets the criteria (as per DOH), COVID-19 test will be conducted (Antigen &/or PCR)
 - The person will be directed to quarantine until the result is available
- iii. Isolation for Symptomatic employees suspected of being infected with COVID-19 are as follows:
- Appropriate advice will be given to the person(s) to be isolated by the OMP or other medical personnel – see for additional information: BMM-HR-Form-002 COVID-19 Isolation Checklist
 - Isolation locations:
 - At home, where possible
 - Alternatives are: North Rec Club Rooms; Gamsberg Camp
 - In the event of a positive COVID-19 test result, the person will remain in isolation for the days as stipulated by the NICD / DOH / Ministerial Committee / Minister of Health (as is amended from time to time). After the isolation period, the person will be medical assessed by the OMP, and if cleared, issued with an appropriate colour-coded card (permit) as determined from time to time. No test will be conducted after being cleared.
 - Asymptomatic positive cases do not need to isolate (in accordance with Government protocols, as amended from time to time)
- iv. The site(s) where employees with suspected COVID-19 infection will be screened, diagnosed and treated. This includes what will lead to admission to a health care facility and all associated transport arrangements:
- a) VOH-SOP-002C1 COVID-19 Return to Work Medical Surveillance
- Temperature screening of employees are conducted at various locations (depending on work location) including:
 - Main entrance to the mine (before employees or visitors enter the mine areas)
 - Green office entrance
 - Township Engineering entrance
 - Broken Hill for persons residing at the accommodation facility near the Training Centre
 - Black Mountain clinic
 - Broken Hill offices / Swartberg
 - BMM Clinic
 - Should a suspected case of COVID-19 be identified, the person will be issued with a mask and the paramedics will be notified. They will conduct an additional

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assessment, following which the person will be transported/directed to the clinic. Disinfecting and PPE protocols will be followed during and after this process

- Medical screening, diagnosis and treatment will primarily be done in the "COVID-19 Temporary Isolation Room" as designated at the BMM clinic
 - Should a person be in medical distress, the person will be stabilized at the BMM clinic (if required). The medical staff will liaise with an appropriate hospital / advanced medical care facility for further care, with the necessary PPE and sanitizing protocols followed during the process
- v. The requirements of self-isolation will be based on the Guidelines as distributed by the DOH, as amended from time to time: Guidelines for Quarantine and Isolation in Relation to COVID-19 Exposure & Infection.

8.3.1.3 The mines COP and procedures makes provision for employees who have been in contact with confirmed COVID-19 cases and are/not symptomatic which, must include as a minimum

- i. The dedicated 24-hour number which employees will use to reach the mine's dedicated healthcare workers / services to assist with COVID-19 is:
 - **9999 (internal phones) or 054 983 9999 (external phones)**
- ii. The control room operator will then direct the health care service as required
 - Procedure to report when an employee is sick or experiencing symptoms of COVID-19 – Reference
 - a) VOH-SOP-002C1 COVID-19 Return to Work Medical Surveillance – Case Diagnosis and Management
 - b) SAF-SOP-008 Procedure for a positive COVID-19 case in a working place
 - c) COVID-19 Workplace Contact Tracing Investigation Form

Summary of procedure(s) are as follows:

 - Should a person experience symptoms, the person will be isolated, given a mask and the paramedics contacted to conduct additional testing
 - When confirmed, the person will be transported/directed to the clinic for further review by the OMP\GP
 - In the event that a person meet the criteria (as per DOH), a COVID-19 test will be conducted (Antigen &/or PCR)
 - The person will be directed to quarantine until the result is available
- iii. The procedure to be followed and arrangements for the employees to be tested (including the associated PPE required for such an employee), including what will lead to admission to a health care facility and all associated transport arrangements:
 - a) VOH-SOP-002C1 COVID-19 Return to Work Medical Surveillance – Case Diagnosis and Management
 - b) COVID-19 Workplace Contact Tracing Investigation Form

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- Work contacts will only be required to complete the COVID-19 Workplace Contact Tracing Investigation Form should they be symptomatic. The OMP/Medical Care Professional will assess the information, and if deemed necessary, conduct a medical examination of the "contact" and advise on testing as appropriate. Those who display symptoms will be tested for COVID-19 as per DOH criteria (eg: Antigen &/or PCR). Disinfecting and PPE protocols will be followed during and after this process
 - Medical screening, diagnosis and treatment will primarily be done in the "COVID-19 Temporary Isolation Room" as designated at the BMM clinic
 - Should a person be in medical distress, the person will be stabilized at the BMM clinic (if required). The medical staff will liaise with an appropriate hospital / advanced medical care facility for further care, with the necessary PPE and sanitizing protocols followed during the process
- iv. Self-quarantine or self-isolation, aligned to NICD and as determined by the test results and the advice of the OMP/Medical Care Professional, will take place for those employees who have been in contact with confirmed COVID-19 cases
- a) VOH-SOP-002C1 COVID-19 Return to Work Medical Surveillance
- Suspected cases: The person(s) will only be required to complete the COVID-19 Workplace Contact Tracing Investigation Form should they be symptomatic. The OMP/Medical Care Professional will assess the information, and if deemed necessary, conduct a medical examination of the "contact" and advise on testing as appropriate. Those who display symptoms will be tested for COVID-19 as per DOH criteria (eg: Antigen &/or PCR).
 - Asymptomatic: do not need to isolate/quarantine unless they develop symptoms.
 - Symptomatic: Test, prescribe medication and self-isolate until cleared based on DOH recommendations.
 - Symptomatic with respiratory distress: Test and refer to an appropriate hospital / advanced medical care facility for further care, with the necessary PPE and sanitizing protocols followed during the process

NOTE: The criteria for a PUI are dynamic and change from time to time. For the latest criteria visit the NICD website

<https://www.nicd.ac.za/diseases-a-z-index/covid-19/>

<https://www.nicd.ac.za/diseases-a-z-index/covid-19/covid-19-guidelines/>

8.3.2 The Following are Considered in the Development of this COP

8.3.2.1 Provide adequate, usable, and appropriate training, and information material about:

- i. Mine's relevant job functions

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- Medical personnel
- Paramedic personnel
- Security Personnel
- All employees
- ii. Proper hygiene practices and the use of any workplace controls (including PPE)
 - Initial training conducted and included in Induction/Refresher training
 - Social distancing
 - Hand hygiene practices
 - Coughing and sneezing protocols
 - Transportation hygiene practices
 - Appropriate PPE to be used as per job function, including: Cloth/surgical masks (as per applicable NDOH and/or other National Guidelines/Protocols, as is amended from time to time), FFP2/N95 masks, hand gloves, face shields, aprons, disposable suits, etc.
- iii. Black Mountain has implemented continuous awareness programmes and communication with all stakeholders to prevention of COVID-19 stigma and discrimination amongst the suspected, the infected and their families
- iv. While stress and anxiety are normal reactions during crisis situations, the negative impact of COVID-19 outbreak may affect the clinical outcomes of patients with chronic conditions like mental illness and cardiovascular diseases of which the development and management are linked to stress and anxiety – Black Mountain Mine has made a provision for employees requiring psycho-social support to contact a Counsellor of Life EHS (Careways) : Toll free – 0800 004 770; SMS – 31581; WhatsApp – 066 488 2273. Communication (toolbox talk and other communication mediums) are utilized to inform employees about Life EHS contact details
- v. Medical surveillance system and Return to Work Medical Assessment allows for employees to disclose any pre-existing conditions prior to returning to work. This includes request by OMP, during medical surveillance and self-reporting to the medical team
- vi. Covid-19 National Hotline(s) numbers are communicated via the toolbox talk, a dedicated whatsapp group, pamphlets, posters and emails

8.3.2.2 As far as possible, with an employee's consent and respecting medical confidentiality, the designated healthcare worker will inform mine management if the employees have pre-existing conditions that will make them more susceptible to severe COVID-19. Such employees will only be permitted to work after receiving a certificate of fitness to work from the Occupational Medical Practitioner. Where employees are not permitted to work due to a confirmed pre-existing condition, the management will arrange for transportation of such employees back to their homes

8.3.2.3 Medical surveillance makes provision for employees to disclose any pre-existing medical conditions before returning to work and Life EHS (Careways) services are made available to assist employees with counselling and other medical related interventions

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- 8.3.2.4 The review of mine's rescue plans in consideration of COVID-19 will be conducted as and when required. Black Mountain has conducted training for medical staff and paramedics on how COVID-19 cases should be handled. The Mine has conducted Emergency Drills on dealing with COVID-19 suspected/confirmed cases.

8.3.3 Procedure Before Arrival of Employees at the Mine's Premises

- 8.3.3.1 Procedures were developed for the management of the return to work of employees after the lockdown. The COVID-19 Employee Assessment Form include questions concerning history of COVID-19 contacts) from areas of residence during the lockdown. Reference - VOH-SOP-002C1 COVID-19 Return to Work Medical Surveillance, VOH-BMF-002C1 COVID-19 Employee Assessment Form and SAF-SOP-008 Return to Work Process post Lock Down
- 8.3.3.2 Communication and liaising with the Department of Health (DOH) District Communicable Diseases unit was established for collaborating in order to be familiar with the district's plans and process – BMC has active members as part of the District and Provincial Task Teams forums, and includes:
- Early outbreak detection, diagnosis (testing) procedures, isolation, quarantine, reporting procedures for COVID-19
 - Arrangements for hospitalization of employees who require it (if a mine does not have the hospital facilities):
 - The medical staff will liaise with an appropriate hospital / advanced medical care facility for further care
- 8.3.3.3 Ensure sufficient availability of resources such as:
- i. Facilities - Pre-screening areas: conducted at Black Mountain Clinic, mine access entrances; Isolation areas & quarantine areas: North Rec Club Accommodation; CSG Gamsberg Mine accommodation units. Should a person be in medical distress the medical staff will liaise with an appropriate hospital / advanced medical care facility for further care
 - ii. Staff - Security personnel: access control and social distance enforcement; Medical staff: employee screening/assessments and treatment; Social worker, Counselling psychologists/employee assistance programme specialists: Life EHS (Careways) service provider for employee assistance programme
 - iii. Equipment and medical supplies including soap and water, sanitizers, appropriate PPE for healthcare workers and employees, and waste disposal receptacles for used PPE;
 - iv. Flu vaccination will be provided, when available/applicable, to employees at high risk (Health Care Workers, change house cleaners, Security personnel at main entrances, personnel with comorbidities) and other prophylaxis as recommended by OMP
 - v. Cleaning and disinfection consumables and services

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- vi. Disinfecting single use wipes made of non-woven, high strength material
- vii. Single use dispensing tissue

8.3.3.4 Amended procedures for medical surveillance were developed as part of the Return to Work Procedure and, as reasonably practicable, are communicated with employees before they leave areas of residence during and after the lockdown:

- a) VOH-SOP-002C1 COVID-19 Return to Work Medical Surveillance
 - As far as practicable, the RTW Employee Medical Assessment form will be completed telephonically with employees as part of the screening process

8.3.3.5 Calibration and/or verification procedure for the non-contact thermal scanners will be as follows to calibrate or verify the noncontact instrument/s to correlate with the core body temperature (Original Equipment Manufacturers are also consulted):

- Verification will be conducted by the paramedic and VOH personnel on a bi-weekly basis
- Two non-contact thermal scanners are kept for verification purposes.
- The temperature readings from the two units will be compared and recorded
- One unit will remain in the office, while the second unit will be utilized in field to verify temperatures of in-field units
- Should an in-field unit differ by more than 5% from the verification unit it will be removed from the field and be replaced

8.3.3.6 Daily screening of clinic and paramedic staff assisting with the RTW, before mass screening of employees, have been introduced and records kept of screening

8.3.3.7 Screening of employees from labour sending areas within South Africa who use their own transport at the mine before they RTW

8.3.3.8 In the event there is migrant employees, Black Mountain will ensure, as far as reasonably practicable, that screening is done before boarding the transport, in collaboration with the relevant DOH

8.3.3.9 As far as reasonably practical, Black Mountain will, at the start and increase of capacity at the mine make arrangements to transport employees from their homes to their respective areas of operations. Screening of employees returning to work will be done, as far as reasonably practical, before boarding - Supervisors will attempt contact employees by phone to complete the RTW medical Assessment form as part of the screening and those requiring to be quarantined/ isolated advised as per Return to Work Medical procedures.

- a) VOH-SOP-002C1 COVID-19 Return to Work Medical Surveillance
- b) VOH-BMF-002C1 COVID-19 Employee Assessment Form

8.3.3.10 In cases of employees commuting using public transport, two cloth face masks were provided, and employees are encouraged to make use of it. In cases where the risk assessment has identified a respirator zone(s), specific respiratory protection equipment will be used as per the mine's risk assessment

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- 8.3.3.11 The determination of the appropriate PPE used, is done with inputs from the medical and OH personnel in combination with a risk assessment and expert advice on the characteristics and limitations of each type of PPE, in the context of reasonably practicable
- 8.3.3.12 De-densification is as per applicable National Guidelines/Protocols (as is amended from time to time), with physical distancing applied (where possible):
- Limitations on gathering areas (eg: offices, change houses, boardrooms, cage, etc.) as per applicable National Guidelines/Protocols (as is amended from time to time)
 - On-Mine Vehicle Transport (eg: Buses, mini-busses and private vehicles): Aligned with NDOH and other applicable National Guidelines (as is amended from time to time), but with hygiene and sanitation protocols followed
 - Allowing work-from-home where applicable / conducting meetings via electronic platforms, thus reducing number of people in office environments
 - Personal Protective Equipment: Appropriate PPE supplied to employees based on the risk of exposure, including:
 - Cloth / disposable surgical masks, to be used as per applicable NDOH and/or other National Guidelines/Protocols (as is amended from time to time)
 - FFP2/N95 masks– airborne pollutants and COVID-19 exposure prevention (silica/lead dust environments and medical staff)
 - Face shields
 - Disposable gloves
 - Disposable suits and/or aprons
- 8.3.3.13 A staggered approach has been implemented for Return to Work Medical Assessments to limit the number of employees screened per day to minimize crowding at the screening areas and at the medical center as well as transporting employees to the medical center or assessment areas. When the need required, two alternative venues were utilized (North Rec Club hall and Green Office area) apart from the clinic
- 8.3.3.14 Awareness material were created for employees on COVID-19 and where necessary update with the latest available information (from credible sources such as WHO, DOH, DMRE, etc.) in the predominant languages. These were displayed and circulated via:
- Emails
 - Posters and pamphlets
 - Dedicated WhatsApp number
 - A weekly General Manager communication is also circulated with updated information
- 8.3.3.15 Posters on COVID19 are displayed at various locations at the mine, including: the BM Clinic, entrances, turnstiles, notice boards.
- 8.3.3.16 Employees are informed of their duty to report should they test positive for COVID-19 during the nationwide lockdown, long weekend or leave.

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- 8.3.3.17 Employees are informed of their obligation to provide COVID-19 test results to the employer where available, and with a letter from the relevant health facility stating the date of onset of symptoms, diagnosis, date of specimen collection of positive tests if applicable, and expected date when isolation ends. Return to Work Assessment will not be conducted without said proof.
- 8.3.3.18 Black Mountain will provide an employee's COVID-19 test result to the employee once received from the laboratory or testing facility
- 8.3.3.19 Screening procedure have been implemented for all persons before entering the mine and ensuring that they comply with protective measures including PPE and social/physical distancing (as applicable) while on site:
- VOH-SOP-002C1 COVID-19 Return to Work Medical Surveillance
 - SAF-SOP-0001C Return to Work Process Post Lock Down

8.3.4 Procedure for the Arrival of Employees at the Mine's Premises

- 8.3.4.1 Infection Prevention and Control (IPC) measures have been implemented at all areas as identified by the mines risk assessment. This includes sanitizing of areas as part of the normal cleaning regime as well as deep cleaning should the need arise:
- COVID-19 Medical Risk Assessment
 - COVID-19 Post Lock Down Risk Assessment
 - VOH-SOP-002C1 COVID-19 Return to Work Medical Surveillance
 - SAF-SOP-008 Procedure for a positive COVID-19 case in a working place
- 8.3.4.2 Hand hygiene practices are maintained at the strategic points, such as biometric turnstile access points, offices with hand sanitizers, change houses, ablution facilities and sanitization of equipment, as identified by the risk assessment and Workplaces where close contact among employees is likely to occur including in underground working places
- 8.3.4.3 Maximum capacity allowed as guided by the applicable National Guidelines/Protocols (as is amended from time to time) and risk assessment have been implemented for highly congested areas (such as residences, kitchens, cages and underground working places). Also refer to measures as per section 8.3.3.12.
- 8.3.4.4 Social and/or physical distancing (where possible) and the used of appropriate PPE are encouraged. Also refer to measures and PPE as per section 8.3.3.12
- 8.3.4.5 Awareness training have been implemented on signs and symptoms of COVID-19. This have been included in the Induction / Annual refresher training and is updated as and when required. Employees are regularly updated on awareness material on signs and symptoms of COVID-19 via the toolbox talks and other communication channels.

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- 8.3.4.6 Calibration and/or verification procedure for the non-contact thermal scanners will be as follows to calibrate or verify the noncontact instrument/s to correlate with the core body temperature (Original Equipment Manufacturers are also consulted):
- Verification will be conducted by the paramedic and VOH personnel on a bi-weekly basis
 - Two non-contact thermal scanners are kept for verification purposes.
 - The temperature readings from the two units will be compared and recorded
 - One unit will remain in the office, while the second unit will be utilized in field to verify temperatures of in-field units
 - Should an in-field unit differ by more than 5% from the verification unit it will be removed from the field and be replaced
- 8.3.4.7 As far as possible, with an employee's consent and respecting medical confidentiality, the designated healthcare worker will inform mine management if the employees have pre-existing conditions that will make them more susceptible to severe COVID-19. Such employees will only be permitted to work after receiving a certificate of fitness to work from an occupational medical practitioner
- a) VOH-SOP-002C1 COVID-19 Return to Work Medical Surveillance
b) SAF-SOP-0001C Return to Work Process Post Lock Down
- 8.3.4.8 The importance of adherence to taking of chronic medication for management of non-communicable diseases will be intensified through awareness communication, including OMP and medical staff interactions, Toolbox talk, pamphlets, posters, etc.
- 8.3.4.9 Hand hygiene practices are maintained at the strategic points, such as turnstiles, as identified by the risk assessment and Workplaces where close contact among employees is likely to occur including in underground working places. Refer to section 8.3.4.2
- 8.3.4.10 Minimum standard for appropriate PPE to be worn to prevent exposure to SARS-CoV-2 (including to and from work) and for occupational hazards are as follows:
- Cloth / disposable surgical masks, to be used as per applicable NDOH and/or other National Guidelines/Protocols (as is amended from time to time)
 - FFP2/N95 masks – airborne pollutants and COVID-19 exposure prevention (silica/lead dust environments and medical staff)
 - Face shields
 - Gloves -
 - Disposable suits – medical personnel

NOTE: Taking into account the risk classification groups described in section 8.1.2.11 of this COP, a guide is made in Table 1 to classify the risk for the purpose of providing appropriate PPE, jobs in the mining industry according to the level of risk. Specific circumstances at the mine, within the context of reasonably practicable, is taken into account.

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Table 1: Risk classification for the purpose of providing PPE

CLASSIFICATION	MINE EMPLOYEES AT RISK (This list is not exhaustive)
i. Very high risk	a) Intensive Care Unit b) Occupational health practitioners conducting cough inducing procedures, e.g. spirometry. c) HCWs collecting specimens for diagnosis of COVID-19, e.g. throat swabs. d) Ambulance personnel that do intubation into trachea. e) Health Care Employees (HCWs) that do removal of cardiorespiratory organs for autopsy.
ii. High risk	a) HCWs that examine employees (at Occupational health centers, medical stations and other places with potential to be in contact with a COVID-19 patient (known and unknown), ambulance drivers transporting the sick b) Underground employees who are in confined environment during waiting to be transported, during transportation to underground and to various working stations. c) Security staff at high volume access points or conducting temperature checks and/or alcohol testing. d) Health and Safety reps during investigation of underground working sites e) Hospital waste cleaners f) Change room attendants g) Cleaners involved in workplace disinfection e.g. Following the removal of a PUI and underground sanitation employees
iii. Medium risk	a) Security staff at entrances to facilities and mines b) Mine employees in work areas where social/physical distancing is possible and being practiced c) Change room cleaners d) Laundry staff e) Occupational hygienists -personal sampling procedures f) Clerks working at occupational health centers g) Human resource practitioners that interact very closely with people h) Office cleaners i) Canteen staff
iv. Low risk	a) Office employees b) Control room operators

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- 8.3.4.11 Awareness training is conducted in respect of correct PPE usage, fit testing (where applicable), removal, storage, disposal and workplace practices required to prevent exposure to SARS-CoV-2. Awareness is conducted as far as possible in predominant languages spoken in area.
- 8.3.4.12 Receptacles are provided for all used PPE and where applicable receptacles for hazardous biological waste.
- 8.3.4.13 Waste management procedure(s) is in place where biological waste from the Deeps Resus Bay is stored in appropriate receptacles and transported to Black Mountain Clinic for medical waste disposal

8.3.5 Screening & Testing for COVID-19

- 8.3.5.1 Screening procedure have been implemented at security points for all persons (including visitors) before entering the mine. Anyone who fails screening is denied access and advised to seek medical assistance. All persons are advised to comply with protective measures including PPE and social/physical distancing while on site.
- 8.3.5.2 Black Mountain has put in place a system to screen all the employees as part of the pre-shift screening from the mine's accommodation area near Broken Hill. This is to isolate and quarantine any possible cases and suspects before allowed to work.
- 8.3.5.3 Black Mountain has established a system of temperature screening at the mine entrance points by security officers and/or paramedics. Daily continuous risk assessment provides a symptom check on employees at start of work and end of work. Supervisory Workplace assessment is completed daily. Employees exhibiting any Covid-19 symptoms during or at the end of the shift are attended to by the paramedics for a temperature check and if required referred to the Black Mountain clinic for further assessment by the medical personnel.
- Note:** Calibration or verification procedure is as set out in section 8.3.4.6.
- 8.3.5.4 Temperature screenings are conducted for all employees at mine entrances and at designated areas. Should an employee have an elevated temperature $\geq 37.5^{\circ}\text{C}$, the employee will be referred for further assessment by a paramedic or healthcare worker and advised/provided with a mask. Employees with temperatures of $\geq 38.0^{\circ}\text{C}$ will be temporarily isolated and advised/provided with mask and referred Black Mountain clinic for further assessment by the medical personnel, testing (if required) and referred to self-quarantine while awaiting test results.
- 8.3.5.5 Employees will be tested if they meet the PUI criteria, which includes having symptoms of a respiratory illness of recent or sudden onset. (PUI criteria will be the latest as issued by DOH).
- 8.3.5.6 Black Mountain will provide an employee's COVID-19 test result to the employee via the medical personnel once received from the laboratory

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8.3.5.7 Screening and Return to Work Medical Assessment procedures have been developed and implemented - Reference:

- VOH-SOP-002C1 COVID-19 Return to Work Medical Surveillance
- VOH-BMF-002C1 COVID-19 Employee Assessment Form

Summary of procedure(s) are as follows:

- Return to Work Medical Assessments are conducted for all employees before returning to work. If cleared, an appropriate colour-coded card (permit) as determined from time to time is issued to the employee. This is required at all main security entrance points before a person will be allowed inside the work areas

8.3.5.8 Employees with pre-existing conditions that will make them more susceptible to severe COVID-19 have been identified by the OMP and designated medical staff. Such employees will only be permitted to work after receiving a certificate of fitness to work from the occupational medical practitioner. Refer to section 8.3.4.7

8.3.5.9 A risk-based method to prioritize high-risk individuals for more active interventions such as prophylaxis and individualized counselling have been introduced, including interaction by the OMP and designated medical staff. Refer to section 8.3.4.7

8.3.5.10 Black Mountain has prioritized high-risk individuals for more active interventions such as prophylaxis and individualized counselling. Refer to section 8.3.3.3 (iv)

8.3.5.11 Contact tracing form will be completed during testing and conducted in accordance with NICD/DOH regulations as is amended from time to time.

8.3.6 Isolation

8.3.6.1 Designated areas for isolation have been identified, whereby the following applies:

- Medical screening, diagnosis and treatment will primarily be done in the "COVID-19 Temporary Isolation Room" as designated at the BMM clinic
- Symptomatic employees (who meet the NICD criteria of a PUI) will be referred for further assessment and possible COVID-19 specimen collection/test
- Procedure to report when an employee is sick or experiencing symptoms of COVID-19 while at work – Reference

a) VOH-SOP-002C1 COVID-19 Return to Work Medical Surveillance – Case Diagnosis and Management

b) SAF-SOP-008 Procedure for a positive COVID-19 case in a working place

Summary of procedure(s) are as follows:

- Should a person experience symptoms, the person will be isolated, given a mask and the paramedics contacted to conduct additional testing.
- When confirmed, the person will be transported/directed to the clinic for further assessment by the OMP\GP

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- In the event that a person meets the criteria (as per NICD), a COVID-19 test will be conducted (Antigen &/or PCR)
- The person will be directed to quarantine until the result is available

8.3.6.2 Contact tracing form will be completed during testing, and conducted in accordance with NICD/DOH regulations as is amended from time to time

8.3.7 Follow up System

8.3.7.1 The follow up system implemented are as follows:

- The OMP arranges for medical assessment report and a clearance letter obtained from the isolation/health care facilities. In case of self-isolation an employee must submit a letter from the legal health care worker which will be submitted to the OMP.
- The fitness to work assessment and issuing of a certificate of fitness will be conducted as per VOH-SOP-002C1 COVID-19 Return to Work Medical Surveillance, VOH-BMF-002C1 COVID-19 Employee Assessment Form

8.3.8 Referral for Further Management for Conditions other than COVID-19

8.3.8.1 The referral system is implemented for the following:

- Employees with abnormal findings (which are not related to COVID-19) will be directed to the BMM clinic for further assessment and management in line with VOH-COP 005: COP for Minimum Standard of Fitness to Perform Work at a Mine.
- The provision of psychosocial support services is provided through a contracted Employee Assistance Programme (EAP) managed by Life EHS (Careways) – Black Mountain Mine has made a provision for employees requiring psycho-social support to contact a Counsellor of Life EHS (Careways): Toll free – 0800 004 770; SMS – 31581; WhatsApp – 066 488 2273. Communication (toolbox talk and other communication mediums) are utilized to inform employees about Careways contact details

8.3.8.2 Differential diagnosis for elevated temperature and respiratory symptoms in mine employees is conducted by the OMP and designated medical personnel to exclude underlying medical conditions.

8.3.9 Self-Isolation

8.3.9.1 The employer must allow the employees to self-isolate where possible, under the following conditions:

- Under the guidance of a healthcare worker for employees whose test results are positive for COVID-19 and are symptomatic / have mild disease, with the capacity to self-isolate may do so at home for the number of days as stipulated by the NICD / DOH / Ministerial Committee / Minister of Health (as is amended from time to time).

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- ii. Employees must be provided with the necessary PPE. The contact tracing form will be completed during testing, and conducted in accordance with NICD/DOH regulations as is amended from time to time
- iii. The medical center team/healthcare worker follows up telephonically with the employee on a daily basis, record progress and recommend further medical assessment, as required.
- iv. A register of employees presenting with symptoms, i.e. PUI and who are referred for isolation, as per NDOH guidelines, will be kept as well as list of contacts.

8.3.10 Prevent Infection to Employees & those Visiting the Mine

8.3.10.1 The medical surveillance system has been aligned to the COVID-19 pandemic:

- i. The Mine performed a risk assessment with regards to potential cross infection linked to the different medical surveillance activities (e.g. spirometry, eye testing, audiometry, temperature measurements, etc.). Reference –
 - a) COVID-19 Medical Risk Assessment
 - b) VOH-SOP-002C1 COVID-19 Return to Work Medical Surveillance

Full protective gear will be considered for health care workers, based on the mine's risk assessment. Spirometry and audiometry will be conducted as per the mine's risk assessment.

- ii. Heat Tolerance Screening Test – not applicable

8.3.10.2 The personal hygiene programme establish and implemented in mitigation of transmission of COVID-19 includes the following (but not limited to) – reference:

- a) SAF-SOP-0001C Return to Work Process Post Lock Down
 - i. Maintaining physical distancing.
 - ii. Regular washing of hands with soap
 - iii. Regular sanitizing of hands with alcohol-based hand rub (ABHR) or other appropriate sanitizers
 - iv. Avoid touching of face areas (mouth, eyes and nose)
 - v. Avoid physical hand contact such as handshakes
 - vi. Avoid using other people's personal belongings such as stationery, cell phones and sharing food, etc.
 - vii. When coughing or sneezing do not use hands, rather use a tissue/toilet paper or the inside of the elbow
 - viii. Use disposable tissues rather than a handkerchief; immediately dispose of these tissues in a closed bin and wash or sanitize hands thereafter
 - ix. Avoid big crowds and travelling
 - x. Avoid touching objects before sanitizing, like trollies, toilet seats, turnstiles, tables and chairs
 - xi. Coach and teach family members
 - xii. Wearing and handling of appropriate PPE

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8.3.10.3 Black Mountain has developed measures that will prevent the spread of COVID-19 infection to employees and any person entering the mine operations as is reasonably practicable. This is covered in the SOPs

- a) VOH-SOP-002C1 COVID-19 Return to Work Medical Surveillance
- b) SAF-SOP-0001C Return to Work Process after Lock Down

8.3.11 Use of Breathalyzer Testing

Alcohol breathalyzer testing at Black Mountain is performed by use of handheld breathalyzer units. Security personnel conduct handheld alcohol breathalyzer testing, using appropriate PPE, and employees blow with straws to direct air blow and avoid contact with mouthpiece (blowing more than 50mm from blow point).

8.3.12 Use of Biometrics

8.3.12.1 Biometric systems are utilized at a number of areas throughout Black Mountain. The following systems are in place:

- i. Use of the sanitizers at all times as is installed at entry and exit points.
- ii. Employees are informed through posters and training
- iii. All necessary health and safety measures as informed by Risk Assessment are adhered to.
- iv. The biometric system and turnstiles are regularly disinfected

8.3.12.2 All occupational hygiene personal monitoring equipment are disinfected/sanitized before being issued to the wearer and when retrieved from the wearer to protect both wearer and occupational hygiene personnel – Refer to VOH-BMF-002C3 COVID-19 Disinfection of Occupational Hygiene Equipment

8.4 MONITORING & REPORTING.

8.4.1 Black Mountain has appointed a COVID-19 compliance officer in line with the DMA regulations with the necessary powers to provide oversight on the implementation of this COP and related procedures

8.4.2 Black Mountain Mine Complex established a steering committee (BMC Covid-19 Crisis Committee) that is responsible for monitoring the implementation of this COP and related documents

8.4.3 The employer must:

8.4.3.1 Report to the DOH, all COVID-19 cases as per statutory requirements (confidentiality must be adhered to)

8.4.3.2 Report all cases of COVID-19 at set intervals to the Principal Inspector of Mines using the DMRE's COVID-19 data reporting templates

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- 8.4.3.3 Investigate all confirmed COVID-19 positive cases at the mine, in terms of section 11(5)(a)(ii) and (iii) of the MHSA and deliver a copy of the report to within 30 days from the date of serious illness or health threatening occurrence to the Principal Inspector of Mines
- 8.4.3.4 Consolidate the DMRE COVID-19 reports into a weekly report that must be reported to the Principal Inspector of Mines as determined by the DMRE reporting template
- 8.4.3.5 Keep the COVID-19 data (data for monitoring and investigation reports) at the mine as required by the NDOH and NICD

8.5 COMPENSATION FOR OCCUPATIONALLY ACQUIRED NOVEL CORONA VIRUS DISEASE (COVID-19).

- 8.5.1 Black Mountain will follow the process stipulated in the Notice on Compensation for occupationally acquired novel corona virus disease (as per Annexure 10 of the guideline).

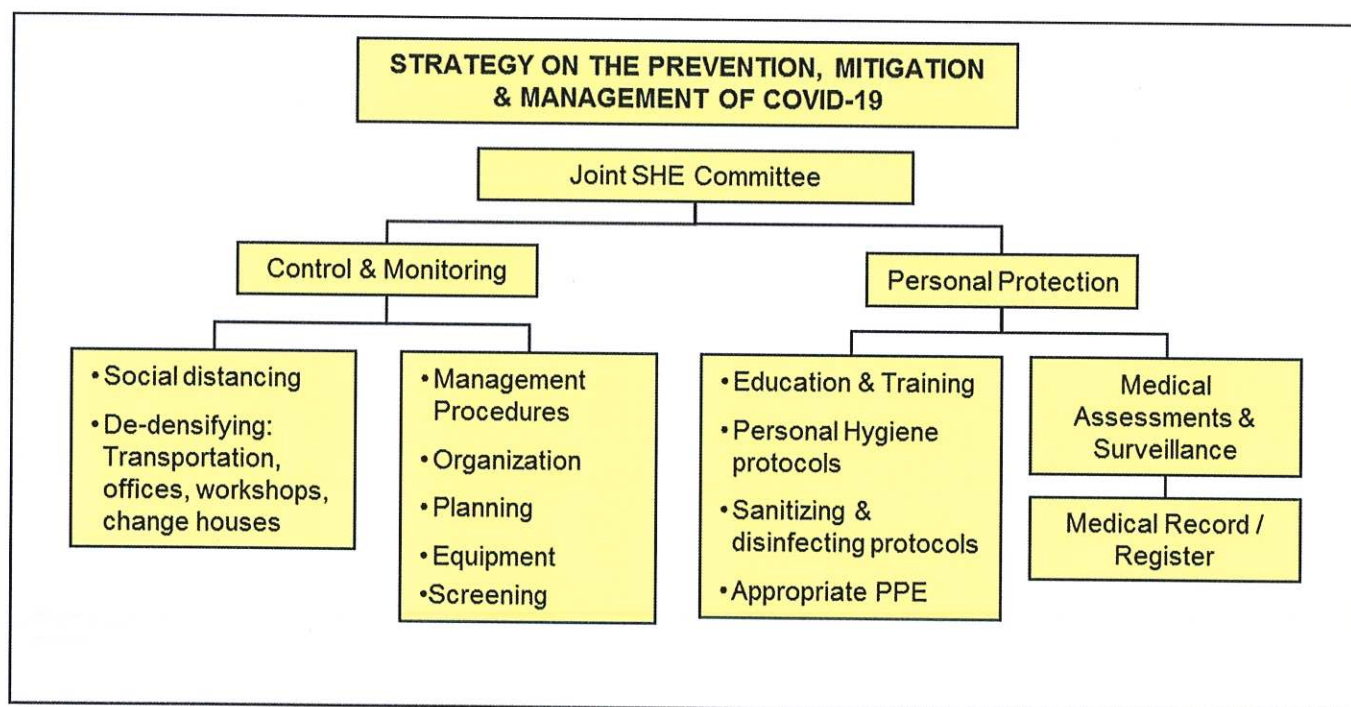
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PART D: IMPLEMENTATION.

1. IMPLEMENTATION PLAN.

- 1.1 The implementation plan for this COP covers the following: Organizational structures, responsibilities of functionaries and programs and schedules for the COP that will enable proper implementation of the COP
- 1.1.1 The overall COVID-19 programme is depicted schematically below. This is an integrated approach that requires planning, co-ordination and co-operation between various departments and structures:



The main focus is the Prevention, Mitigation & Management of COVID-19 in the Workplace and medical assessments, testing and surveillance to provide the necessary assurance on the success of the control programme.

a) COVID-19 Risk Assessment

- Risk assessments for COVID-19 Return to Work Medical Assessment, exposure and control have been conducted taken into account relevant information from creditable sources (such as WHO, DMRE, DOH, etc)

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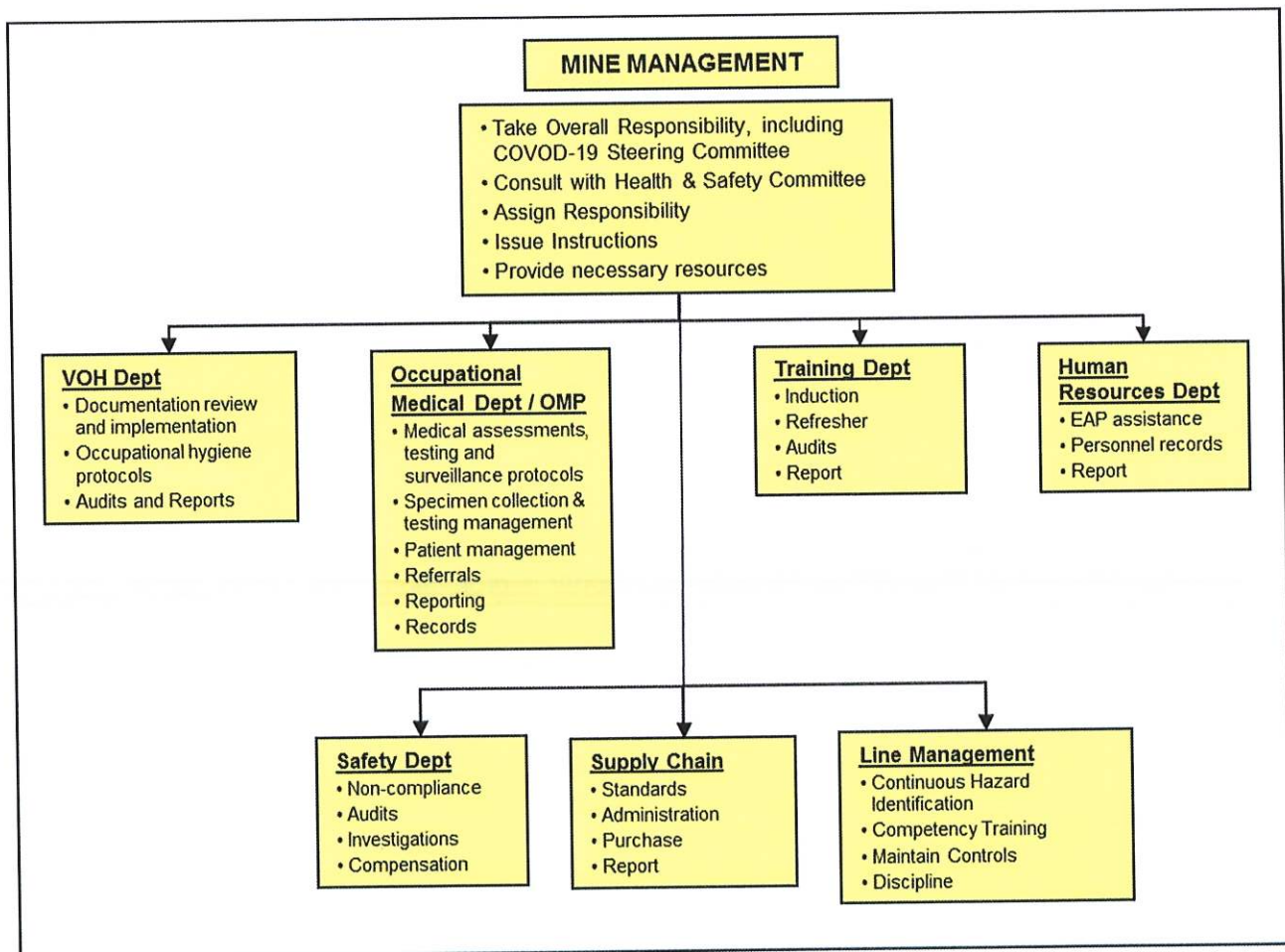
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b) Workplace Monitoring & Assessments

- Workplace monitoring and assessments are conducted by supervisors, with over-inspections conducted by Safety, VOH and Management teams
- Temperature screening is conducted at all main entry points to the mine and some sub-areas; conducted by paramedics, security officers and designated persons. Screening is also conducted at the BMM clinic by the medical personnel

c) FUNCTIONS & RESPONSIBILITIES

The functions and responsibilities of departments, committees and disciplines are depicted schematically below (see text for details):



➤ Mine Management

The owners of the mine must take responsibility for health and safety in terms of the Act. The management of this responsibility is delegated to Mine Management. The Act also requires that a

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health and safety committee be established for consultation on health and safety issues. This role is fulfilled by the "Joint Health and Safety Committee", which is represented by management and employees.

Other responsibilities relating to the COVID-19 Prevention, Mitigation & Management programme include:

- The compilation and implementation of the mine's health and safety policy
- Approval of specific COVID-19 Prevention, Mitigation & Management practices and procedures and the issuing of instructions relating to the implementation of the practices and procedures
- The delegation of responsibilities to designated persons & appointment of a COVID-19 Compliance Officer
- Provision of resources in fulfilling the COVID-19 Prevention, Mitigation & Management practices and procedures

➤ Human Resources

The main functions of the HR department in respect of COVID-19 Prevention, Mitigation & Management practices and procedures are:

- EAP assistance
- The maintenance of personnel records such as job category, work area, occupational career and job restrictions placed on employees as a result of their medical status
- Reporting on demographic information for the purpose of routine reporting, review and formal reporting (legal) on health and safety

➤ Occupational Medical Practitioner (OMP) & Medical Department

The main function of Occupational Medical Practitioner is protection, cure, rehabilitation and compensation for occupational injury and diseases, and includes:

- Provide advice on the COVID-19 Prevention, Mitigation & Management practices and procedures
- Conduct Return to Work Medical Assessments
- Conduct Occupational Medical Surveillance, taking into account COVID-19 risk
- Conduct medical assessments for persons with COVID-19 symptoms, collect specimens and sent to laboratory for analysis
- Referring employees with occupational exposure related impairment for treatment and compensation
- Prepare records and reports on COVID-19 related illnesses for the purpose of routine reporting, review and formal reporting (legal)
- Ensure that Return to Work Medical Assessment forms sheets are filed in each employee Occupational Medical Record

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➤ **Training Department: Education & Training**

Education & Training is a fundamental prerequisite to the success of the COVID-19 Prevention, Mitigation & Management programme. The purpose is to improve employees' awareness of COVID-19 hazards and its consequences, and to motivate them towards active participation on controlling the risks according to their position and function within Black Mountain.

- a) The objectives of employee induction and education with regards to COVID-19 Prevention, Mitigation & Management practices and procedures are to:
 - i) Promote a comprehensive understanding of the nature, the cause and the consequences of COVID-19, and motivate employees to take steps towards limiting exposure and thus preventing exposure & illness
 - ii) Ensure that employees are capable of recognizing potential COVID-19 sources and are encouraged to contribute to risk assessments and the implementation of appropriate control measures
 - iii) Promote positive employee attitudes towards respiratory protection (e.g. facial masks), social distancing and hygiene practices to prevent the spread of the COVID-19 virus
 - iv) Ensure employees' ability to effectively utilize PPE, including respiratory protection (e.g. facial masks), by demonstrating their proper use & care and develop employees' competence through supervised, hands-on training in the fitting of respiratory protection
- b) Target groups for training with regards to COVID-19 Prevention, Mitigation & Management practices and procedures:
 - i) Every person in the workplace (i.e. employers, senior managers, line managers, supervisors, health and safety representatives/committee members and all employees) will be given an overview of the COVID-19 programme, the process of hazard identification and risk assessment, as well as how risk management systems and procedures will be implemented in the workplace
 - ii) Persons responsible for formulating and implementing risk management systems and procedures relating to COVID-19 Prevention, Mitigation Management practices and procedures (i.e. managers, line managers, supervisors and health and safety representatives/committee members) will be required to develop their competence in hazard identification, risk assessment and risk management systems
- c) Main topic areas for an overview or general training course:
 - i) Legislation relating to COVID-19 Prevention, Mitigation & Management practices and procedures and means of compliance, including codes of practice and risk management systems
 - ii) Risk of exposure to the COVID-19 virus, including possible impact on health & safety, family and social life and the work environment
 - iii) Hazard identification, risk assessment and risk management procedures
 - iv) The need for communication and consultation with all concerned in formulating and implementing measures aimed at managing risk and complying with legislation
 - v) Workplace strategies for the management of risks associated with COVID-19 Prevention, Mitigation & Management practices and procedures

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- vi) COVID-19 assessment, testing, quarantine and isolation
- vii) Occupational medical surveillance

➤ VOH Department

Main functions include:

- Preparation of COVID-19 documentation, including Code of Practice, risk assessments, standards, etc.
- Occupational Hygiene monitoring equipment sanitation
- Audits and reporting

➤ Safety Department

From a safety perspective the responsibilities include:

- Audits and reporting of non-conformances
- The administration of compensation for exposure related illnesses
- Investigations

➤ Line Management

The main function of Line Management is to create a culture of limiting exposures by:

- Continuous hazard identification
- Competency training
- Maintenance of controls

➤ Supply Chain

The contribution of the Supply Chain to the programme is to:

- Supply of required PPE, disinfection and sanitation materials
- Report, for review purposes, on procurement statistics

In addition to the above, the Supply Chain plays a major part in the acquisition of new equipment with regards to Manufacturers / Suppliers as is shown below.

➤ Original Equipment Manufacturers (OEM's) / Suppliers

The contribution of the OEM's / Suppliers to the programme is as follows:

- The principle approach to be taken is to control the exposure levels of the equipment supplied to the mine. Section 21 of the MH&S Act is applicable in this regard.
- It should be noted that, if an exposure hazard is associated with equipment supplied to mines, the supplier can only relinquish its responsibility with regard to risks if the exposure characteristics of the equipment are specified, the necessary precautions against exposure control are stipulated and the mine management has accepted, in writing, the responsibility of implementing those precautionary measures
- Therefore, equipment can only be accepted after the relevant documentation of acceptance has been duly completed

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- 1.2 Information may be graphically represented to facilitate easy interpretation of the data and to highlight trends for the purposes of risk assessment.

2. COMPLIANCE WITH THE COP.

Measures to ensure compliance is instituted through auditing from first, second and third party auditors.

3. ACCESS TO THE COP & RELATED DOCUMENTS.

- 3.1 A complete electronic COP, with related documents, is kept readily available at the mine for examination by any affected person. Hard copies, when printed, are treated as uncontrolled copies. Line supervisors and management have direct access to these electronic copies and can distribute it to affected employees when required. On written request to the Manager, any other affected person will be supplied with copies. A register will be kept of such persons or institutions to facilitate updating.
- 3.2 The registered Trade Unions and Full Time Health and Safety Representative will be supplied with copies of this COP. A register will be kept of such persons or institutions to facilitate updating.
- 3.3 The employer will ensure that all employees are fully conversant with those sections of this COP relevant to their respective areas of responsibility.

4. Distribution and Access

- The latest revision of this document is available as a read only on the document on the Intranet. The Compliance Officer shall maintain an authorised hard copy of this policy/procedure in the relevant location.
- Line Managers, who have staff reporting to them that do not have access to the Intranet, shall ensure that these personnel are adequately guided and informed.

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