



PROTOCOL FOR COMMUNICATING ON COVID-19

Updated on 20 May 2020

CONTEXT

The Minerals Council South Africa recognises the novel COVID-19 pandemic as a serious threat to South Africa. As a significant contributor to South Africa's economy, and a major direct employer, the mining sector has an important role to play in seeking to mitigate the impact of the virus, especially on its employees, communities and operations.

The Minerals Council acknowledges that transparency is a critical component of communicating about the disease and its impact, and at the same time sustaining trust and avoiding panic. But we also need to take care to ensure accuracy and consistency of communication and information flow, and we need avoid misinformation.

In developing this communications protocol, the Minerals Council is cognisant that mining companies have a duty to report to the relevant local, provincial and national government authorities, and to share information with their employees, organised labour and their communities. Further, listed companies are required to report information to their shareholders in terms of the guidelines and listing requirements of the JSE, and/or other where they may be listed, and companies will determine how they will address this.

REPORTING OBLIGATIONS

In the first instance mining companies are required to report confirmed cases of COVID-19 in line with the requirements of the Department of Health (DoH) and the Department of Mineral Resources and Energy (DMRE) in the required format. Occupational Medical Practitioners are legally appointed under Section 13.3 of the Mine Health and Safety Act and must play a central and coordinating role in the sourcing and flow of data.

Member companies are obliged to report screening, testing and outcome statistics on the Minerals Council's online reporting system on a daily basis for new cases and weekly for

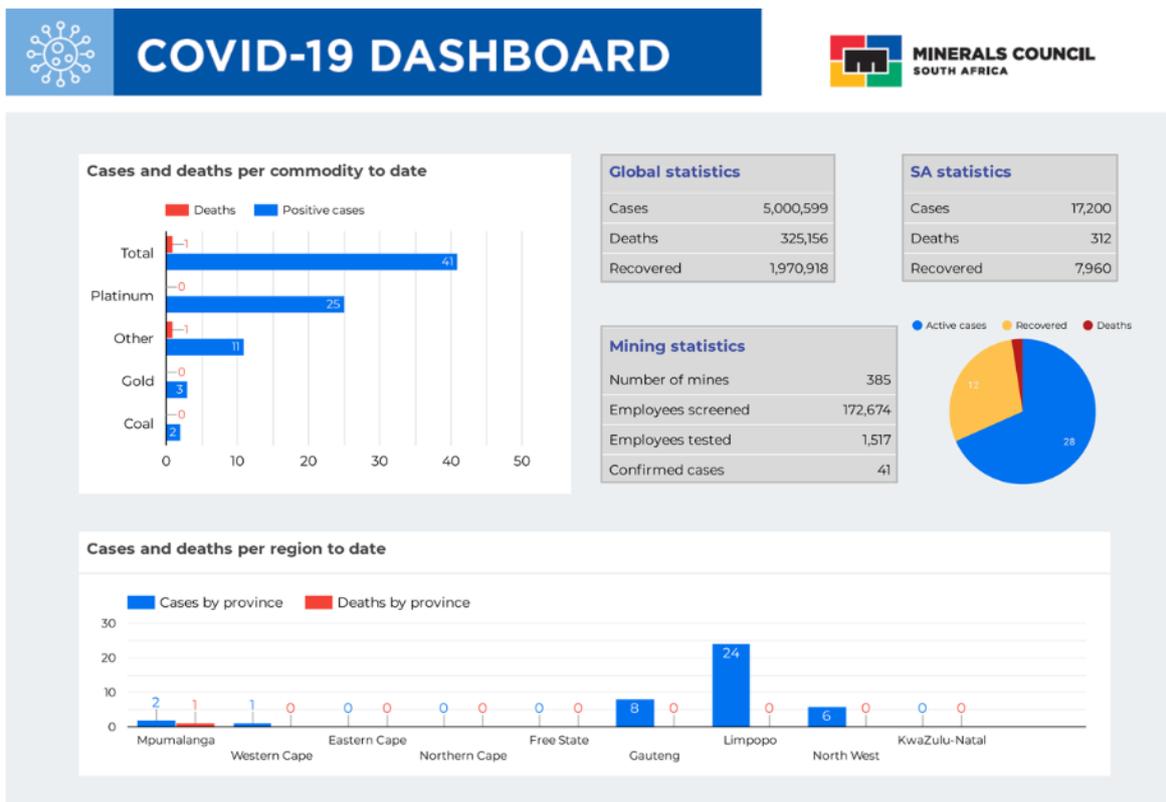
numbers screened and tested in respect of all employees and all permanent contractor employees. There is no current facility to report community screening. For further information on the information required, and the processes to be followed contact Dr Khanyile Baloyi: kbaloyi@mineralscouncil.org.za.

MINERALS COUNCIL REPORTING

The Minerals Council collates this information into a dashboard between 10:00 and 11:00 every weekday, and which is:

- Shared with all member CEOs on a daily basis when there is an update
- Shared with the relevant Minerals Council committees such as the Health Policy Committee and Group Environmental Engineers
- Shared with the Director General of Mineral Resources and Energy, the Chief Inspector of Mines, the Mine Health and Safety Council and the Minister's spokesperson every day
- Posted onto the Minerals Council's COVID-19 portal at:

<https://www.mineralscouncil.org.za/minerals-council-position-on-covid-19>



Detailed case report

The Minerals Council compiles a detailed case (and deaths, if necessary) report. This is by mine, commodity, district, province, occupation of employee and the outcome (whether the individual recovered or died). The Minerals Council does not disclose the name or specific location of the company, or any information about the individuals. This report is shared with the member company CEOs when information on a new case is available.

Further:

- Where there has been a significant incident, the Minerals Council may attach the company's own statement for clarification, with the company's prior approval.
- Where statistics change significantly, the Minerals Council will develop a statement for use in response to queries and will feature this prominently alongside the dashboard.

KEY CONSIDERATIONS WHEN REPORTING ON COVID-19 INCIDENTS

Currently, the DoH provides a daily update to the public on the number of confirmed cases. The incidents are reported according to the age of the person and the province in which they reside, and whether this was 'imported' or community transmission. However, depending on the situation, the DoH could provide additional details. It is possible, and even probable, that the DoH will indicate when there are incidents in the mining industry, and which regions these are in. Similarly, and as has been seen recently, provincial authorities are likely to make these disclosures as well.

While a suggested industry approach is outlined below, each company will have its own particular circumstances and will be guided by market regulations whether information is market sensitive.

However, companies are advised to take into consideration that:

- Their approach will **set a precedent** both for the mine and the company where the incident occurred, for other mining companies in their sector and around their operations, and for the industry as a whole.
- We need to **avoid double-counting of cases and causing panic**, the chances of which increase when there are multiple sources of information.
- The **identity of affected individuals always needs to be protected**. Individuals who are confirmed to be infected with the virus and their families could face

victimisation by other employees and community members if the company publicly discloses their identity.

- Only **confirmed cases** are to be reported.
- It is very important to report when employees have **recovered**.
- When the Minerals Council reports on the **death of an employee**, it will seek to do so within context (e.g. Off-mine transmission, co-morbidities, etc). Care will be taken to refer to the death of an employee, and not a fatality. While the difference might appear to be insignificant, we want to ensure that there is no confusion with on-mine fatalities and fatality rates.

COMMUNICATING WITH UNIONS AND EMPLOYEES

The Minerals Council advocates a proactive approach to communicating with unions and employees. In this regard it is recommended that unions and employees are fully briefed on the measures being undertaken by the company to prevent infection and its spread, and the details of the screening and testing mechanisms in place. Companies are particularly advised to share with employees and unions:

- What protocols are used for screening and why
- What protocols are in place for testing and why
- Awareness materials on COVID-19
- The quarantine/isolation/treatment measures in place for anyone suspected of being infected
- The support (including facilities) the company can make available to employees or family members should they test positive for COVID-19. If the company is not able to provide medical support, it should indicate how and where employees and their families should access state facilities.

Further, companies should encourage employees to self-declare honestly and accurately, and remind them of their responsibilities under the regulations to do so. Companies should provide a mechanism (phone, email, test message or WhatsApp facilities) to do so.

Unions

It is recommended that companies advise recognised unions of any cases in writing as soon as these have been confirmed. Care should be taken to protect the identity of employees.

Details that should be provided include:

- Age and sex of employee
- History of travel or contact with a COVID-19-positive person
- How the case was detected
- Details of quarantine prior to test results
- Date of test and receipt of outcome
- Health status of employee
- Details of isolation – self-isolation, isolation in a company or state facility, hospitalisation
- Employee contacts and means, status and outcomes of contact tracing
- A summary of COVID-19 cases on mine to date and their status
- A summary of screening and testing undertaken to date and their outcomes.

Employees

It is recommended that employees are similarly briefed as soon as possible after a positive case has been identified. The brief should provide a summary version of the information provided to the unions, but written in such a way as to:

- Provide relevant and necessary information
- Provide reassurance on what the company is doing to detect the disease and prevent its spread
- Reinforce the prevention measures in place

Care needs to be taken to prevent panic and undue concern, or stigmatisation of the disease. Communications campaigns aimed at addressing these issues are advised.

Media and public

It should be expected that as soon as the unions or employees have been informed, that this information will then become public, either on social media or in traditional media.

Companies are therefore advised to prepare a holding statement to be used in response to queries. The holding statement should contain the following:

- Confirmation that a case/cases has/have been identified at a specific operation
- How the case/cases was/were identified
- The support measures in place to assist the employee
- The risk-based precautionary measures in place to detect and prevent the spread of the virus based on each company's Code of Practice, including activities related to



screening, testing, the provision of PPEs, hygiene practices, awareness training and facilities

- Confirmation that the case/cases have been reported to the NICD, DoH and the DMRE

Note: Be mindful not to use wording that could unintentionally result in stigmatisation and do not disclose the identity or personal details of the relevant employee/s.

Companies will decide whether or not to proactively issue a statement to the media when a first or subsequent case is detected. It should be borne in mind that this approach will set a precedent for future reporting and for reporting by peers. It is recommended that – where there is a material impact on the operation, that such a proactive statement should be made.

Please provide any feedback on this protocol to:

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