



**MOPANI COPPER MINES PLC**  
**POLICY**  
**SUPPLIER CODE OF CONDUCT AND ETHICS**

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**PURPOSE**

**The purpose of this policy is to define acceptable business and ethical conduct of suppliers and contractors (external providers) in the day-to-day operations of Mopani Copper Mines PLC. It sets out the minimum ethical standards expected by Mopani Copper Mine PLC**

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**REVIEW AND APPROVAL SIGNATURES**

ROLE	RESPONSIBILITY	NAME	SIGNATURE	REVIEW DATE
ORIGINATOR	Compliance Coordinator	Chimuka Katambo	<i>Katambo Chimuka</i>	25-03-2025
DEPARTMENT MANAGER	Company Secretary	Alick Gondwe	<i>Alick Gondwe</i>	31-03-2025
REVIEWER 1	Manager Quality Assurance and Analytical Services	Obed Mahenga	<i>Mahenga Obed</i>	31-03-2025
REVIEWER 2	Group IT Manager, Implementations	Lynot Tangayi	<i>Lynot Tangayi</i>	02-04-2025
REVIEWER 3	Acting Manager Internal - Audit	Bwalya Peters	<i>Peters Bwalya</i>	02-04-2025
REVIEWER 4	Manager Security	Tilimboyi Singani	<i>Singani Tilimboyi</i>	03-04-2025
REVIEWER 5	Manager Commercial	Ikayi Menzu	<i>Ikayi Menzu</i>	08-04-2025
REVIEWER 6	Head of Processing	Joel Kgomo	<i>Kgomo Joel</i>	28-04-2025
REVIEWER 7	Head of Engineering	Thirugnanam Muthusamy	<i>Thiru muthusamy</i>	28-04-2025
REVIEWER 8	Head Supply Chain	Warwick Higgins	<i>Higgins Warwick</i>	29-04-2025
REVIEWER 9	Head HSE and Governance	Ulrich Sibilski	<i>Sibilski Ulrich</i>	08-05-2025
REVIEWER 10	Head of Mining	Rajeev Bora	<i>Bora Rajeev</i>	19-05-2025
REVIEWER 11	Chief Services Officer	Oscar Matebele	<i>Matebele Oscar</i>	19-05-2025
REVIEWER 12	Chief Financial Officer	Sharad Gargiya	<i>Gargiya Sharad</i>	21-05-2025

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<b>APPROVED BY</b>	Chief Executive Officer	Charles Sakanya	<i>Sakanya Charles</i>	21-05-2025
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**MESSAGE FROM THE CEO**

*At Mopani, we are committed to **business excellence** through integrity, ethical practices, and continuous improvement. We believe in keeping our stakeholders informed, recognising efforts, and working collaboratively to achieve and exceed our targets. We have zero tolerance for bribery and corruption or any unethical practices that would cause harm to our business reputation.*

*We **empower our suppliers** through clear expectations outlined in our Supplier Code of Conduct and Ethics. This ensures accountability, responsible decision-making, and shared ownership in upholding ethical business practices, compliance with laws, environmental responsibility, and fair labour rights.*

***Safety** is at the heart of everything we do. We expect our partners to work with us in achieving zero harm to people, equipment, and the environment. Together, we can build a responsible and sustainable supply chain that supports ethical sourcing and strengthens the communities in which we operate.*

*At Mopani, we believe in **teamwork** and unity. By fostering trust, accountability, and respect, we create strong partnerships that drive sustainable growth. We celebrate diversity, uphold fairness, and ensure that our shared vision leads to mutual success.*

*Thank you for your commitment to excellence, ethical business, and responsible practices. We look forward to continuing our partnership and making a meaningful impact together.*

***Tukachimfya Pamo!***

*Eng. Charles P. Sakanya*

*Chief Executive Officer*

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## 1. SCOPE

The requirements of this Supplier Code of Conduct and Ethics ("**Code**") apply to Vendors/ Suppliers, Contractors, Business Partners and all third-party counterparts including their employees ("**Suppliers**") as they conduct their business dealings with Mopani Copper Mines PLC ("**MCM or the Company**") . It sets forth the principles and standards MCM expects all suppliers to comply with.

### 1.1 VALUES



## 2. OBJECTIVES

The Code of Conduct and Ethics for Suppliers is MCM's roadmap for leading with integrity. It sets out the rules, standards, principles and values outlining the expected standards of Suppliers. This Code is based on our commitment to ethical, responsible sourcing, social and environmental responsibility. By agreeing to supply goods and/or services to MCM, Suppliers acknowledge and agree to follow the requirements outlined in this Code.

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**3. RESPONSIBILITIES**

POSITION TITLE	ROLE	DESCRIPTION OF TASK
Compliance Coordinator	Develop, review and amend this document	Develop and review this Policy as and when necessary.
	Implement	Ensure that this policy plan is implemented within his/her area of responsibility.
	Enforce	Ensure that necessary resources are made available for the efficient and effective enforcement of this Policy.
Departmental Managers	Adhere and Control	Ensure that this Policy is circulated to all departmental staff members and adhered to in their areas of control.
Supply Chain Manager	Initiator, Enforce and Control	Ensure that the contents of this Policy are sent to all Suppliers and Contracting Companies.
Suppliers	Enforce and control	Suppliers and their employees to ensure compliance with this Code. It is the responsibility of every supervisor and principal of a Supplier of goods and/or services to cascade this Code to grassroots level and ensure compliance with the letter and spirit of this Code.
Contracts Superintendent	Initiator	Ensure that the contents of this Policy are issued to all Suppliers.
External Provider	Enforce and control	Ensure that this Policy is circulated to all their employees and that it is complied with in all respects. It is the responsibility of every supervisor and principal of a Supplier of goods and/or services to cascade this Code to grassroots level and ensure compliance with the letter and spirit of this Code.

**4. POLICY STATEMENTS**

QUALITY / SAFETY MESSAGE
<i>By complying with this Code, our Suppliers contribute to a responsible, ethical, and sustainable supply chain that benefits our business, our communities, and the environment. Mopani reserves the right to assess compliance and take necessary action in case of violations</i>

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## 4.1 CODE OF CONDUCT AND ETHICS FOR SUPPLIERS

### 4.1.1 Compliance with Laws and Regulations

Suppliers must operate in full compliance with all applicable laws, regulations, and industry standards. This includes, but is not limited to, laws related to business integrity, labour rights, workplace health and safety, environmental protection, anti-corruption and anti-bribery, fair competition, data protection and privacy. A violation of the Laws of the Republic of Zambia by a Supplier can have a detrimental effect on MCM's reputation as a Company.

### 4.1.2 Compliance with Company Policies and Procedures

The Company expects all Suppliers and their employees to follow MCM's Policies and Procedures.

- a) It shall be the responsibility of Suppliers to obtain relevant Company Policies and Procedures, and to keep abreast of the contents and cascade them down to their employees. (Link to compliance portal with all relevant policies)
- b) Ignorance of the provisions of Company Policies and Procedures will not be accepted as a valid defence.

### 4.1.3 Business Integrity

Our policy is to conduct business honestly and ethically, with zero tolerance for bribery and corruption. We are committed to acting professionally, fairly, and with integrity in all dealings and relationships, implementing effective systems to counter bribery and corruption. We are committed to operating in accordance with strong ethical principles, as detailed in this Code, and expect our Suppliers to take responsibility for ensuring their conduct conforms to these principles.

### 4.1.4 Anti-Corruption and Anti-Bribery

- a) Suppliers must conduct their business with MCM in an ethical and responsible manner.
- b) Suppliers will not pay or offer to pay bribes to an MCM employee, a government or public official, any other party or family members or friends of the aforementioned. Suppliers will not offer or accept bribes in any form, including incentives, gifts, entertainment, kickbacks and other unofficial (e.g. "a facilitation payments") or improper payments with the intention to improperly obtain or retain business, permits, certifications etc.
- c) Suppliers will comply with the provisions of the Anti-Corruption Act No. 3 of 2012 of the laws of Zambia as amended from time to time and all other applicable laws on public and private bribery.
- d) Suppliers must adhere to the provisions of the contracts between the Company and themselves, unless the provisions or scope of the contract have been duly amended and authorised.

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**4.1.5 Fraud**

The Company has a zero tolerance to the act and concealment of fraud.

- a) Suppliers shall provide goods and/or services in the manner, quality, service and/or product description and quantity as agreed and stipulated in contracts between the Company and the Supplier.
- b) Suppliers shall not invoice the Company for goods/services/items not delivered or work not performed in full or completed.
- c) Suppliers are prohibited from engaging in predatory pricing processes irrespective of there being few or no competitors providing the same goods or services.

**4.1.6 Business Records**

- a) Record keeping is a critical aspect of any financial system and as such, Suppliers and Contractors must keep record of their employees, their qualifications, hours worked by their employees, records of work done and goods supplied etc as provided for in the record retention laws of the republic of Zambia.
- b) Suppliers are expected to keep records of importation documents of goods and equipment they intend to supply to the Company. The Company reserves the right to verify importation documents of goods and products to ensure legal compliance.

**4.1.7 Fair and Honest Competition**

Suppliers must ensure they adhere to Competition Laws and ensure business is conducted in a competitive manner.

- a) Suppliers shall provide fair and honest quotations to the Company during the competitive bidding process and shall not engage in price manipulation or price fixing of goods and/or services with other Suppliers, Contractors and/or Mopani employees.
- b) Suppliers are encouraged not discuss their quotations with other Suppliers and shall always render their services and expertise diligently and to the highest standard.
- c) Suppliers shall not quote to supply goods or services to MCM when they do not have the capacity to supply the required goods and services to the Company.

**4.1.8 Labour Rights**

At MCM, we strive for fair labour practices for all our suppliers and expect our suppliers to comply with the Industrial and Labour Laws of the Republic of Zambia, the International Labour Organisation (ILO) Conventions and the Universal Declaration of Human Rights.

- a) We expect that our Suppliers and their supply chains will not permit the use of any forced labour, (including modern slavery and human trafficking).
- b) Suppliers shall instil a harmonious relationship with their employees on any of the Company’s work areas and resolve any labour dispute with their employees in a timely, professional and ethical manner.
- c) It will be a requirement that all Suppliers, especially Suppliers that provide labour services to the Company shall have a formal Human Resources and Industrial Relations Policy.

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- d) To encourage a harmonious relationship with their employees, Suppliers must formally notify their employees of their remuneration, overtime and other benefits during their appointment.
- e) Suppliers must prohibit any form of unfair or unlawful discrimination based on race, nationality, religion, creed, gender, age, disability, social background, trade union affiliation, political views, or any other factor that may result in bias.

In an event where the Code or the Law addresses the same issue, the Supplier is expected, as a minimum, to comply with the applicable legal requirements of the Laws of the Republic of Zambia.

#### 4.1.9 Child Labour

The Company is opposed to the use of any form of child labour. A child is any person below the age of 18 years. Children and young persons below the age of 18 years shall not be permitted to be employed in hazardous environments or areas that are likely to have a negative impact their health.

#### 4.1.10 Human Rights

We expect our Suppliers to uphold internationally recognized human rights, as outlined in the United Nations Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights and the MCM Human Rights Policy.

Suppliers must identify and address human rights risks in their operations and supply chains. If they cause or contribute to human rights violations, they must take appropriate corrective action or cooperate in providing a remedy.

Where applicable, Suppliers should adopt and promote the Voluntary Principles on Security and Human Rights, including training security personnel and ensuring clear expectations when interacting with public security force.

#### 4.1.11 Health, Safety and Environmental Protection

The Company is committed to sustainable mining, and we have a responsibility to protect the environment and ensure the health and safety of our employees, suppliers and the members of communities in which we have operations.

Suppliers must ensure a safe working environment by assessing risks and implementing necessary controls, including:

- a) Comply with all applicable laws and regulations to ensure a safe and healthy working environment.
- b) **Prioritize health, safety, and wellbeing:** Dedicate the necessary resources to proactively manage the health, safety, and wellbeing of all employees, contractors, and visitors potentially affected by their operations.
- c) **Ensure competence through training:** Provide appropriate training to employees to ensure they are capable and competent in their roles.

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- d) **Operate sustainably:** Conduct business activities in an environmentally responsible manner.
- e) **Source responsibly:** Procure products and services from responsible and ethical sources. They must also handle hazardous materials safely and ensure their products comply with all applicable safety standards.
- f) Establishing health and safety requirements, providing Personal Protective Equipment (PPE), and training workers enforcing safe work practices.

**4.1.12 Data protection and Privacy**

Where our Suppliers are processing personal data, they will be expected to adhere to the Data Protection Act No. 3 of 2021 (DPA) of the Laws of Zambia. MCM expects its Suppliers to ensure they comply with the standards as set out in the DPA and all enabling regulations.

**4.2 KNOW YOUR COUNTERPARTIES**

We take care to know our counterparties by implementing a robust risk based Know Your Counterparty ("KYC") programme in relation to all Counterparties. Identifying and verifying Counterparties using a risk-based approach helps us comply with applicable laws (including sanctions, anti-money laundering and bribery and corruption) and to manage the reputational risks that can arise from engaging with certain categories of Counterparties. All prospective counterparties must ensure that they adhere to the requirements of the KYC process to be considered for registration as an MCM Supplier.

**4.3 RAISING CONCERNS**

We value the input and concerns of our Suppliers and understand that sometimes issues or situations may arise that need to be reported. We want to ensure that you have a safe and confidential channel for reporting any concerns or potential wrongdoing without fear of retaliation. To facilitate this, we have established dedicated channels for whistleblowing and reporting concerns. You can raise your concerns through two primary methods:

- a) Email: [Raisingconcerns@mopani.com.zm](mailto:Raisingconcerns@mopani.com.zm).
- b) Toll-Free Numbers: We have also toll-free numbers, **4321/ 8999**, where you can raise a concern anonymously regarding any concerns you may have.

**4.4 CORRECTIVE MEASURES FOR BREACH**

Suppliers are expected to take full responsibility for the actions of their staff, whilst on Company property. When a Supplier violates this Code of Conduct and Ethics, we may take corrective action, which includes but not limited to:

- a) Issuing a warning and requiring prompt remediation, which can include the right to demand compensation for any loss to MCM. Compensation in this regard shall be recovered via the Company's financial system without consultation with the respective Supplier or Contractor. This includes any production, financial or material loss incurred by the Company because of an illegal strike action.
- b) Conducting additional audits or investigations at the Supplier's expense.

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- c) Suspending or terminating contracts for severe or repeated breaches.
- d) Withholding payments until compliance is restored.
- e) Reporting unlawful conduct to relevant Law Enforcement Agencies.
- f) Removing the Supplier from our approved vendor list and putting on Do Not Use.
- g) We reserve the right to take any necessary action to protect our business, employees, and stakeholders.

*The provisions of the Code on this aspect do not supersede the General Conditions of Contract or any other agreements entered into between the Company and the Supplier or Contractor.*

#### 4.5 SEVERE BREACH OF THE CODE OF CONDUCT AND ETHICS

The following breaches will be deemed as severe breaches of the Code:

- a) Where a financial prejudice, real or potential, is caused to the detriment of the Company by the employees of a Supplier which may include, but will not be limited to:
  - i) over invoicing,
  - ii) short deliveries,
  - iii) Theft, fraud, corruption or related offences, which can lead to a financial loss to the Company.
- b) Any criminal involvement or actions with a criminal bias committed by the principals of Suppliers, which is to the detriment of the Company.
- c) Supplying stolen goods or equipment to the Company.
- d) Re-supplying stolen property, goods or equipment from the Company (recycling).
- e) Supplying pre-used or reconditioned goods, property or equipment whilst knowingly purporting it to be new or unused goods.
- f) Paying or offering to pay any unauthorised money, commission, gratuity, or providing any gift or preferential treatment to an employee.
- g) Lending or offering to lend any money in contravention of this Code to an employee of the Company.

All breaches that are severe and considered criminal in nature shall be referred to prosecution by the Law Enforcement Agencies. .

#### 4.6 CONSEQUENCES

The Company reserves the right to terminate any agreement or contract with a Supplier in the event of a serious breach of this Code or any other related policies and/or procedures.

In the event of such termination, the Company may return such goods or property to the Supplier, cancel the payment thereof and/or demand a full refund. The Company may further remove a Supplier from the Vendor Master List and review any future business with the Supplier, Contractor and its principals. Such a Supplier or Contractor will cease to be a business partner.

#### 4.7 CAUTIONING

If after investigating the breach and the Company is of the view that the event by the Supplier is considered not to be a very severe breach of this Code and Ethics or any other relevant policy

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or procedure, the Company may decide to submit a letter of caution to the Supplier. The Company may further request that the Supplier provide reasons for the breach and steps taken to prevent a re-occurrence of a similar event in the future. The Supplier or Contractor shall respond in writing within five working days.

**4.8 REMOVAL OF PERSONS FROM MCM PROPERTY**

- a) The Company reserves the right to remove any person who, in the opinion of the Company, is deemed as unacceptable from its premises and prevent him/her from returning for a specified period or for an indefinite period.
- b) The Company is under no obligation to state a reason for removing a person from its premises.
- c) A decision in this regard is only taken after a careful consideration of all the relevant facts.

**4.9 RIGHT OF ADMISSION TO MCM PROPERTY**

In the interests of health, safety and security of the Company and its employees, the right of admission is reserved on all MCM sites, plants and works areas.

The Company has the right to refuse entry onto any site, plant or work area to any ordinary citizen.

**4.10 BUSINESS RELATED MEETINGS AND SPORTING EVENTS**

The Company recognizes the need for some Suppliers to host business related meetings and sporting events and invite MCM employees to attend on their expense account. This would be allowable with the explicit written permission of the CEO only.

Suppliers or Contractors who wish to invite employees to events in this category should submit a formal request to the CEO with the details of employees invited, purpose, duration and hospitalities offered to employees during the event. The CEO's decision in this regard is final.

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## 5. DEFINITIONS AND ABBREVIATIONS

TERM	DESCRIPTION
Bribery	The offering, promising, giving, accepting or soliciting of an advantage as an inducement for an action, which is illegal, unethical, or a breach of trust. Inducements can take the form of money, gifts, loans, fees, rewards or other advantages (taxes, services, donations, favours etc.)
Company	MCM and any associated and/or subsidiary company of MCM.
Contractor / Supplier/Vendor	Supplier of goods and/or services to MCM. It also includes contractors, consultants, advisors and any person or institution, which conducts business with MCM.
Corruption	Corruption as the abuse of entrusted power for private gain.
Ethics	A system of moral principles that guide an individual's behaviour, which would help them determine what is considered right and wrong, and how to act with fairness and respect towards others in various situations.
Fraud	An intentional act of deceit or misrepresentation to secure an unfair or unlawful gain.

## 6. REFERENCES

REFERENCE	AUTHOR	TITLE
OECD	Organisation for Economic Co-operation and Development	OECD Due Diligence guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, Third edition.
POL-090	MCM	Mineral Supply Chain Due Diligence
POL-042	MCM	Voluntary Principles on Security and Human Rights policy
United Nations	United Nations	UN Universal Declarations on Business and Human Rights

## 7. APPENDICES

None

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