


<div><div><div>M.G.</div><div>CASTING SUPPLIERS, PATTERNMAKERS & ENGINEERING (PTY) LTD Reg. No. 2004/021152/07</div><div>MORE THAN 30 YEARS OF SERVICE TO THE MINING INDUSTRY</div></div><div></div></div>		<div>Document: MGC_POL_6.1</div> <div>Revision No: 0.2</div> <div>Page: 1</div>	
CODE OF ETHICS			
Ref: ISO 9001:2008 4.2.2 Quality Manual			
Compiled By:	Approved By:	Revision No:	Effective Date:
D. Vosloo	E.J. Grobbelaar	0.2	June 2021
		0.3	May 2025

1. POLICY

MG Castings is committed to a policy of fair dealing and integrity in the conduct of its business. This commitment, which is actively endorsed by the Directors, is based on a fundamental belief that business should be conducted honestly, fairly and legally. MG Castings expects all employees to share its commitment to high moral, ethical and legal standards.

This policy outlines MG Castings Code of Ethics, which applies equally to all employees and other representatives of the Company. The code is designed to inform employees of the Company's policies in various areas. Please study the Code carefully so that you understand the Company's expectations and your own obligations.

Compliance with the code by all employees and certain other representatives is mandatory. If employees become aware of, or suspect, a contravention of the Code, they must promptly and confidentially advise the Company as set out in the Contravention of the Code section of this document. The matter will be investigated and dealt with as set out in that section.

If employees are in doubt about the application of the Code, they should discuss the matter with one of the Directors.

2. COMPLIANCE WITH LAWS AND REGULATIONS

Employees must comply with all applicable laws and regulations, which relate to their activities for and on behalf of MG Castings. The Company will not condone any violation of the law or unethical business dealing by any employee such as payment for, or other participation in, an illegal act such as bribery, money laundering activities, and unlawful possession of Company property. Employees must ensure that their conduct cannot be interpreted as being in any way in contravention of applicable laws and regulations governing the operations of MG Castings. Employees should bear in mind that the perception of their actions by others is important, and should act accordingly.

3. CONFLICT OF INTEREST

MG Castings expects employees to perform their duties conscientiously, honestly and in accordance with the best interest of the Company.

Employees must not use their positions, or knowledge gained through their employment with the Company, for private or personal advantage or in such a manner that a real or perceived conflict could arise where an employee, a member of an employee's family, or a business with which the employee or family is associated obtains a gain, advantage or profit by virtue of the employee's position with the Company or knowledge gained through that position.

If employees feel that a course of action which they have pursued, are pursuing or are contemplating pursuing, may involve them in a conflict of interest situation or a perceived conflict of interest situation, they should immediately make all the facts known, in writing, to one of the Directors.

3.1 Outside Activities, Employment and Directorships

We all share a very real responsibility to contribute to our local communities, and MG Castings encourages employees to participate in religious, charitable, educational and civic activities. Employees should, however, avoid acquiring any business interest or participating in any activity outside the Company, which would create, or appear to create:

3.1.1 An excessive demand upon their time, attention and energy which would deprive the

- Company of their best efforts on the job; or
- 3.1.2 A conflict of interest – that is, an obligation, interest or distraction, which would interfere or appear to interfere with the independent exercise of judgment in the Company's interest.

Employees may not take up outside employment without the prior written approval of one of the Directors.

Employees who hold, or have been invited to hold, outside directorships should take particular care to ensure compliance with all provisions of this Code. When outside business directorships are being considered, prior written approval must be obtained from one of the directors.

3.2 Relationships with Clients, Customers and Suppliers

MG Castings recognises that relationships with clients, customers and suppliers give rise to many potential situations where conflict of interest, real or perceived, may arise.

Employees should ensure that they are independent, and are seen to be independent, from any business organisation having a contractual relationship with the Company or providing goods or services to the Company, if such relationship might influence or create the impression of influencing their decisions in the performance of their duties on behalf of the Company. In such circumstances, Employees should not invest in, nor acquire a financial interest, directly or indirectly, in such an organisation.

3.3 Gifts, Hospitality and Favours

Conflicts of interests can arise where employees are offered gifts, hospitality or other favours which might, or could be perceived to; influence their judgment in relation to business transactions such as the placing of orders and contracts.

An employee should not accept gifts, hospitality or other favours from suppliers of goods or services or any other category of person or institution, in return for any kind of favor, service or treatment offered by virtue of being an employee of MG Castings. However, acceptance of the following would not be considered contrary to such policy:

- 3.3.1 Advertising matter of limited commercial value;
- 3.3.2 Occasional business entertainment such as lunches, cocktail parties or dinners; and
- 3.3.3 Occasional personal hospitality such as tickets to local sporting events or theaters provided that the cost of any accommodation is borne by the recipient.

In addition, no personal favours or other preferential treatment should be accepted by any employee when they are offered because of the employee's position with the Company and, therefore, might tend to place the recipient under obligation.

3.4 Personal Investments

MG Castings respects the right of all employees to make personal investment decisions as they see fit, as long as these decisions do not contravene the conflict of interest provisions of this Code, any applicable legislation, or any policies or procedures established by the Company, and provided these decisions are not made on the basis of material non-public information acquired by reason of any employee's connection with the Company. Employees should not permit their personal investment transactions to have priority over transactions for the Company and its clients.

When considering the application of this section, employees should ensure that no investment decision is made for their own account with anyone with whom they have a close relationship, or which could adversely influence their judgment or decisions in the performance of their duties on behalf of MG Castings. In addition, employees who are in possession of material non-public information shall not use this information themselves nor pass such information on to others for their use.

3.5 Remuneration

No employee may receive commissions or other remuneration from any of the Company's Clients, Sub-Contractors or suppliers of goods or services, unless written approval has been received from one of the Directors.

4. ENVIRONMENTAL RESPONSIBILITY

4.1 Health and Safety

MG Castings is committed to taking every reasonable precaution to ensure a safe work environment for all employees. Employees who become aware of circumstances relating to the Company's operations or activities which pose a real or potential health or safety risk should report the matter in writing to the SHEQ Manager.

4.2 Use of Resources

MG Castings is committed to conserving resources used in its business operations. All employees are expected to make efficient use of resources and to recycle supplies and materials wherever practical.

4.3 Environmental Management

The Company is committed to developing operating policies to address the environmental impact of its business activities by integrating pollution control, waste management and rehabilitation activities into operating procedures. Employees should give appropriate and timely attention to environmental issues.

5. POLITICAL SUPPORT

MG Castings encourages the personal participation of its employees in the political process and respects their right to absolute privacy with regard to personal political activity. The Company will not attempt to influence any such activity provided there is no disruption to work-place activities and it does not contribute to industrial unrest.

Company funds, goods or services however, must not be used as contributions to political parties or their candidates, and Company facilities must not be made available to candidates or campaigns, unless specifically authorized in writing by one of the Directors.

6. COMPANY FUNDS AND PROPERTY

MG Castings has developed a number of internal controls to safeguard its assets and imposes strict standards to prevent fraud and dishonesty. All employees who have access to the Company's funds in any form must, at all times, follow prescribed procedures for recording, handling and protecting such funds. Operating areas and sites may implement policies and procedures relating to the safeguarding of Company property.

Employees must, at all times, ensure that the Company's funds and property are used only for legitimate Company business purposes. Where an employee's position requires Company funds to be spent, it is the individual's responsibility to use good judgment on the Company's behalf and to ensure that appropriate value is received by the Company for such expenditure.

If employees become aware of any evidence that Company funds or property may have been used in a fraudulent or improper manner, they should immediately and confidentially advise one of the Directors in writing.

7. GROUP RECORDS

The Company books and records should reflect all business transactions in an accurate and timely manner. Undisclosed or unrecorded revenues, expenses, assets or liabilities are not permissible, and the employees responsible for accounting and record-keeping functions are expected to be diligent in enforcing proper practices.

8. DEALING WITH OUTSIDE PERSONS AND ORGANISATIONS

8.1 Prompt Communications

MG Castings strives to achieve complete, accurate and timely communications with all parties with whom it conducts business, as well as government authorities and the public. In addition, prompt internal communication is encouraged.

A prompt, courteous and accurate response should be made to all reasonable requests for information and other client communications. Any complaints should be dealt with in accordance with internal procedures established by various operating areas of the Company and applicable laws.

8.2 Media Relations

In addition to everyday communications with outside persons and organisations, the Company will, on occasion, be asked to express its views to the media on certain issues. Employees approached by the media should immediately contact one of the Directors.

An employee, when dealing with anyone outside the Company, including public officials, must take care not to compromise the integrity or damage the reputation of any outside individual, business, or government body, or that of the Company. As a general rule, the Company's position on public policy or industry issues will be dealt with by the Directors.

Employees should separate their personal roles from the Company position when communicating on matters not involving Company business. They should be especially careful to ensure that they are not identified with the Company when pursuing personal or political activities, unless this identification has been specifically authorised in advance and in writing by one of the Directors.

9. **PRIVACY AND CONFIDENTIALITY**

In the regular course of business, MG Castings accumulates a considerable amount of information. The following principles are to be observed:

9.1 Obtaining and Safeguarding Information

Only such information as is necessary to the Company's business should be collected, used and retained. When personal information is needed, wherever possible it should be obtained directly from the person concerned. Only reputable and reliable sources should be used to supplement this information. Information should only be retained as long as it is needed or as required by law, and such information should be physically protected.

9.2 Access to Information

Information with respect to any confidential product, plan or business transaction of the Company or personal information regarding employees, including their salaries, must not be disclosed by any employee unless and until proper authorisation for such disclosure has been obtained.

10. **CONTRAVENTION OF THE CODE**

MG Castings regards any contravention of the Code as a serious matter. At the same time, any suspected or alleged contravention under investigation must be treated with utmost confidentiality.

If employees believe that their own actions have, or may have, contravened the Code, they should advise one of the Directors in writing.

If employees suspect that a contravention of the Code has been committed by another employee of the Company, they should promptly and confidentially report this, in writing, to one of the Directors. They must not confront the individual concerned. By following this process, confidentiality will be maintained and the matter will be investigated impartially.

As a contravention of the Code is a serious matter, it may result in disciplinary action which could lead to termination of employment. Certain breaches of the Code could also result in civil or criminal proceedings.



Mr J. Grobbelaar
Managing Director