


<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>		Document: MGC_POL_8.0	
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ANTI BRIBERY & CORRUPTION POLICY			
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Anti-Bribery and Corruption Policy

Introduction

Bribery and corruption is, unfortunately, a feature of public and corporate life in many countries around the world. Governments, businesses and NGO's, Transparency International and other organisations are working together to tackle the issue of bribery and corruption.

MG Castings while small and with a limited procurement or programme budget does have a global reach and therefore needs a clear policy on anti-bribery and corruption to support our employees to make decisions in line with our values.

Our corporate conduct is based on our commitment to acting professionally, fairly and with integrity. MG CASTINGS does not tolerate any form of bribery and corruption.

Definition of Bribery and Corruption

Bribery is the offering, promising, giving, accepting or soliciting of money, gifts or other advantage as an inducement to do something that is illegal or a breach of trust in the course of carrying out an organisation's activities.

Corruption is the abuse of entrusted power for private gain.

Purpose

The purpose of this policy is to set out the responsibilities of MG CASTINGS employees in observing and upholding our values with respect to bribery and corruption.

In developing this policy, we have made reference to the Anti-Bribery Principles and Guidance for NGOs published by BOND.

Scope

This policy applies to all MG CASTINGS employees (permanent, temporary, volunteers and contractors).

The policy also extends to all our in country representatives in which we operate.

Where we have a minority interest, we will encourage the application of this policy among our partners.

Policy

- 1. Bribery** - We set out our commitment to operate responsibly wherever we work in the world and to ensure we engage with our stakeholders, to manage the ethical and social impact of our activities.

Our principle policy is a “Zero-tolerance of bribery” in any form, meaning that MG CASTINGS institutionally and its employees will not engage in bribery or any form of unethical payments including facilitation payments.

2. **Conflicts of Interest** - All employees are required to avoid any activities that might lead to, or suggest, a conflict of interest with the business of the MG CASTINGS.
3. **Gifts and Hospitality** - Employees must declare and keep a record of hospitality or gifts accepted or offered, which will be subject to managerial review.
4. **Whistle Blowing Policy** - Staff with information on bribery or corruption taking place within the organisation should follow this policy.
5. **Payments Under Duress** – The risk assessment carried out by MG CASTINGS, at the conceptual stage of a project, should also identify the possibility of payments being requested under duress.

In exceptional circumstances staff may feel bound to make a payment/s in order to protect themselves against threats, including loss of liberty, life or limb.

Where these instances occur, staff will need to ensure they report back to management as soon as possible giving a full account of the circumstances, amounts and any action taken to report the incident to the local authorities.

Training and communications

We will communicate this policy and relevant guidance to employees across the Secretariat we will also communicate this policy to our suppliers, contractors and business partners. Managers and employees will receive relevant training on how to implement this policy in the scope of their employment.

Monitoring and review

The MG CASTINGS EXCO team will continue to review the implementation of this policy in respect of its suitability and effectiveness and make improvements as appropriate.