

# Code of Ethics:

Quick Reference Guide



# Ethics at Mpact

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Mpact's behavioural standards rest on the moral foundation that is provided by our vision and our values. This foundation remains our platform, and the guidelines provided in our Code of Ethics translate the values into practical action. The vision is our end-goal, and our values are "habits of action" that will ensure that we reach that goal.

## Our vision

At Mpact, our vision is to be a leading business with the highest ethical standards, delivering exceptional value for our customers, employees, communities and shareholders.<sup>1</sup>

## Our values

At Mpact we are differentiated by our people who are resolute, trustworthy and responsible.<sup>1</sup>

## What's in the Code?

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Our Code of Ethics covers a number of key issues, including how to apply our Code:

- Testing our decisions
- Consulting on ethics
- Reporting misconduct

<sup>1</sup> Please see our website, [www.mpact.co.za](http://www.mpact.co.za), for our full vision and values.

The second section provides detailed guidelines on how to deal with specific issues, including:

- Customers
- Health & Safety
- Employment equity
- Use of company resources
- Confidential information
- Declaration of interest
- Gifts and entertainment
- Fraud
- Bribery and corruption
- Political participation and government interaction
- Our communities
- The environment
- Human rights

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## Guidelines on specific issues

### Customers

Mpact is committed to meeting and exceeding customers' requirements for product and service quality, innovation as well as cost competitiveness.

### Health & Safety

We believe that all injuries, occupational illnesses and safety incidents are preventable, and therefore commit ourselves to a target of ZERO incident, and to creating a safe and secure working environment.<sup>2</sup>

### Employment equity

We commit to promoting diversity and transformation throughout Mpact via merit-based employment equity, with

special regard for race, gender and disability.

### Use of company resources

We are committed to using Mpact resources efficiently, for legitimate business purposes, and in the best interest of the company and our stakeholders, bearing in mind that these resources include premises, physical property and equipment, time and information.

### Confidential information

We safeguard Mpact's confidential information and use it in a way that is authorised, legal and in line with legitimate business purposes. This includes the confidential information of our employees, customers, suppliers or any other party.

### Declaration of interest

We are committed to the proactive identification, avoidance and/or mitigation of situations that represent, or could be construed as, conflicts of interest.

<sup>2</sup> The policy, commitments and responsibilities articulated here are based on The CEO's Safety, Health and Environmental Philosophy.

## Gifts and entertainment

We will not allow any exchange of gifts or hospitality to unduly influence decision-making, or to create the appearance of an irregular relationship with outside parties. We will remain free from bias in all our dealings and transactions with Mpac suppliers, customers, potential customers and other relevant third parties.

## Fraud

Mpac is committed to combatting fraud. Mpac and its representative will neither directly nor indirectly commit or participate in fraud. Acts of fraud will not be condoned or tolerated.

## Bribery and corruption

We will not participate in, condone or tolerate bribery or corruption. Mpac and its representatives will not offer, give or receive bribes or improper inducements for any purpose whether directly or indirectly through a third party.

## Political participation and government interaction

As a Group we do not support, donate or sponsor political parties or events, and maintain a neutral position regarding party politics. However, we do foster constructive

relationships with government, and we respect the right of all employees to participate in politics in their personal capacity.

## Our communities

Mpac aims to be a truly transformed company making a difference to the lives of the communities we touch. We are committed to sustainable community and economic development.

## The environment

We are committed to managing natural resources with care, sensitivity and expertise, and to continually reduce our environmental impact.

## Human rights

We commit to creating a work environment that is (i) free from harassment and unfair discrimination, and (ii) provides the opportunity for employees to build esteem, fulfil ambitions and improve their circumstances.

# Applying the Code

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Our guidelines and policies cannot cover every possible situation or dilemma. That is why we need to apply and exercise moral judgment. This means asking not only if our decisions are effective, but also if they are ethical.

### How do we do this?

The PLUS filters:

When faced with a tough decision, ask yourself the following questions:

#### **P = Policies**

Ask yourself whether your decision is in line with Mpack's policies, procedures and guidelines.

#### **L = Legal**

Ask yourself whether your decision is legal or whether it conflicts with any of the laws or regulations that apply to Mpack and also to any other applicable laws and regulations, for example, the laws and regulations of our country.

#### **U = Universal**

Ask yourself whether your decision is in line with the (universal) values that Mpack has adopted. For instance, does your decision demonstrate trustworthiness and responsibility?

#### **S = Self**

Test your decision against your own moral convictions.

If your decision is not in line with any of the PLUS filters, you should seek advice from your supervisor, HR manager or from the Company Secretary.

## Reporting issues

All of us have a responsibility to report fraud, theft, corruption or misconduct when we become aware of it. If you have information on fraud, theft, corruption or misconduct, report it as follows:

- Report it to your supervisor or line manager; or
- report it to your HR manager; or

- report it to the Company Secretary; or
- use Mpact Tip-offs.

## Mpact Tip-Offs

You can report confidentially or anonymously through Mpact Tip-Offs. The contact details are as follows:

- Phone: 0800 111 772
- Email: [mpact@tip-offs.com](mailto:mpact@tip-offs.com)
- Website: [www.tip-offs.com](http://www.tip-offs.com)

Mpact will do everything in its power to protect those who report in good faith from retaliation and victimisation. "Good faith" means that you only report what you believe to be true, and you do not report with some ulterior motive, i.e. to "get back" at someone.



For more information on Mpact Limited's Code of Ethics, please contact the Company Secretary:

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