



Mtunzini Group

Anti-Bribery and Anti-Corruption Policy

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Approved by: Managing Director – Mtunzini Group

1. Policy Statement

Mtunzini Group is committed to conducting all its business activities with the highest standards of integrity, transparency, and ethical conduct. Bribery and corruption undermine fair competition, erode public trust, distort markets, and expose organisations to significant legal, financial, and reputational risks.

This policy confirms Mtunzini Group's zero-tolerance approach to bribery, corruption, fraud, kickbacks, facilitation payments, and any other form of improper influence. All business decisions must be made solely on merit and in the best interests of the Group, without personal gain or external pressure.

This policy is aligned with South African anti-corruption legislation, including the Prevention and Combating of Corrupt Activities Act, 12 of 2004 (PRECCA), and supports ethical governance across all operations.

2. Purpose

The purpose of this policy is to prevent bribery and corruption in all forms and to ensure compliance with all applicable South African laws and regulations. It establishes clear standards of behaviour and provides guidance to directors, employees, contractors, and business partners.

This policy further aims to protect Mtunzini Group's reputation, assets, and stakeholders by embedding ethical decision-making, accountability, and transparency into daily operations.

The policy supports the Group's Code of Ethics and Good Business Practice and forms a core part of its corporate governance framework.

3. Scope and Application

This policy applies to all directors, officers, employees, contractors, consultants, agents, suppliers, and any other third parties acting on behalf of Mtunzini Group (collectively referred to as "Applicable Persons").

It applies to all business activities, projects, transactions, and relationships, whether conducted in South Africa or elsewhere, and regardless of whether dealings are with public officials or private sector entities.

Compliance with this policy is mandatory, and failure to comply may result in disciplinary action, termination of contracts, and legal consequences.

4. Legal Framework (South Africa)

This policy is informed by and aligned with South African anti-corruption legislation, including but not limited to the Prevention and Combating of Corrupt Activities Act, 12 of 2004 (PRECCA).

PRECCA criminalises a wide range of corrupt activities, including the offering, giving, receiving, or solicitation of any gratification to influence the exercise of power, performance of duties, or decision-making.

The policy also supports cooperation with the South African Police Service (SAPS) and other law enforcement agencies where corruption or bribery is suspected or identified.

5. Definitions

Bribery refers to the offering, promising, giving, requesting, or accepting of any gratification, whether direct or indirect, to improperly influence a decision or action.

Corruption includes the abuse of entrusted power for private gain and encompasses bribery, fraud, extortion, kickbacks, and other dishonest conduct.

Gratification is broadly defined under PRECCA and includes money, gifts, loans, services, favours, employment opportunities, or any other benefit of value.

6. Prohibited Conduct

Applicable Persons are strictly prohibited from engaging in any form of bribery or corruption, whether directly or indirectly, and whether involving public officials or private individuals.

Prohibited conduct includes offering or accepting bribes, facilitation payments, kickbacks, or any improper advantage intended to influence business outcomes.

No Applicable Person may use intermediaries, agents, or third parties to engage in conduct that would be prohibited if done directly by the Group.

7. Political, Charitable and Public Activities

Mtunzini Group respects the rights of employees to participate in political, civic, and charitable activities in their personal capacity. However, such activities must not create conflicts of interest or imply Group endorsement without prior written approval.

Employees must not use Group funds, resources, premises, or their position within the Group to support political or charitable activities unless expressly authorised in writing by the Managing Director.

Any external appointments, directorships, or trusteeships must be disclosed and approved in advance to avoid real or perceived conflicts of interest.

8. Lobbying and Government Relations

Mtunzini Group does not approve of lobbying activities. Applicable Persons may not engage in lobbying on behalf of the Group or retain external consultants for lobbying or government affairs without explicit written approval.

All interactions with government officials, agencies, and regulators must be conducted honestly, transparently, and in compliance with applicable laws and regulations.

Information provided to government authorities must be accurate, complete, and not misleading.

9. Whistleblowing and Protection

Mtunzini Group encourages the reporting of any suspected bribery, corruption, or unethical conduct. Reports may be made confidentially and in good faith without fear of retaliation.

Whistleblowers are protected under South African law, and any form of retaliation, victimisation, or intimidation against a reporting individual is strictly prohibited.

Reports will be investigated promptly and fairly, and appropriate action will be taken where misconduct is confirmed.

10. Roles and Responsibilities

All Applicable Persons are responsible for understanding and complying with this policy and for avoiding any conduct that could constitute bribery or corruption.

Senior management and the Social and Ethics Officer are responsible for oversight, implementation, and enforcement of this policy.

Management must ensure that employees are trained on the risks and consequences of corruption, including penalties under PRECCA.

11. Discipline and Sanctions

Any breach of this policy may result in disciplinary action, including dismissal, termination of contracts, and civil or criminal proceedings.

Mtunzini Group may report contraventions to the South African Police Service and other relevant authorities as required or deemed appropriate.

Sanctions under South African law may include imprisonment, substantial fines, personal liability for directors and executives, and significant reputational damage.

12. Related Policies

This policy must be read in conjunction with the Code of Ethics and Good Business Practice, Protection of Personal Information (POPI) Policy, Occupational Health and Safety Policy, and other applicable governance documents.