



CODE OF ETHICS & GOOD BUSINESS PRACTICE

PSIRA-Compliant | Psira Reg: 3082701

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Purpose of Code

Mtunzini Group is committed to the highest standards of ethical conduct, lawful operation, corporate governance, and professional integrity. This Code of Ethics and Good Business Practice (“the Code”) sets out the ethical, professional, and governance standards required of all persons associated with Mtunzini Group, including directors, officers, employees, contractors, suppliers, consultants, service providers, joint-venture partners, and any other parties acting on behalf of or representing the Group (“Applicable Persons”).

Compliance with this Code is mandatory and forms an integral part of all conditions of employment, engagement, appointment, and contractual relationships with Mtunzini Group. Failure to comply with this Code may result in disciplinary action, termination of employment or contractual relationships, and, where applicable, civil or criminal proceedings.

1. LEGAL, REGULATORY AND STATUTORY COMPLIANCE

Mtunzini Group is registered with the Private Security Industry Regulatory Authority (PSIRA) under Registration Number 3082701 and operates in full compliance with all applicable South African legislation governing the private security industry and corporate conduct.

This includes, but is not limited to:

- The Private Security Industry Regulation Act and PSIRA Code of Conduct
- The Employment Equity Act
- The Labour Relations Act
- The Basic Conditions of Employment Act
- The Protection of Personal Information Act (POPIA)
- The Prevention and Combating of Corrupt Activities Act (PRECCA)
- The Criminal Procedure Act (Section 49)
- The Firearms Control Act
- The Occupational Health and Safety Act (OHSA)
- All other applicable laws, regulations, standards, and industry codes

No business objective, commercial pressure, or instruction from any level of management shall justify unlawful, unethical, or improper conduct.

2. ETHICAL LEADERSHIP, GOVERNANCE AND INTEGRITY

Mtunzini Group is committed to ethical leadership, sound corporate governance, accountability, transparency, and responsible decision-making. Directors and senior management are expected to lead, by example, and to foster a culture of integrity throughout the organization.

All decisions must be made in good faith, in the best interests of the Group, its clients, employees, and stakeholders, and in alignment with applicable legal, regulatory, and ethical standards.

3. HUMAN RIGHTS, MODERN SLAVERY AND LABOUR PRACTICES

Mtunzini Group respects and promotes internationally recognized human rights principles. The Group adopts a zero-tolerance approach to forced labour, human trafficking, child labour, modern slavery, and any form of exploitation.

All employment relationships must be voluntary, lawful, and fair. The Group expects the same standards from its suppliers, contractors, and business partners.

4. USE OF FORCE AND FIREARMS COMPLIANCE

As a provider of private security services, Mtunzini Group acknowledges its heightened responsibility regarding the use of force.

- **Minimum Necessary Force:** The use of physical force must always be a last resort. Only the minimum force necessary to restrain a person or prevent a crime—proportionate to the threat encountered—is permitted.
- **Legal Compliance:** All use of force must be in strict accordance with Section 49 of the Criminal Procedure Act and the Firearms Control Act.
- **Firearm Ethics:** Firearms may only be used for self-defense or the defense of others against an immediate threat of death or grievous bodily harm.
- **Reporting:** Any incident involving the discharge of a firearm or the use of significant physical force must be reported to the Group Compliance Officer and the relevant authorities (SAPS) immediately.

5. SUBSTANCE ABUSE AND FITNESS FOR DUTY

To ensure the safety of our clients, the public, and our colleagues, Mtunzini Group maintains a Zero-Tolerance Policy regarding substance abuse.

- **Duty Readiness:** No employee or contractor may report for duty, operate a vehicle, or carry a firearm under the influence of alcohol, illegal narcotics, or any prescription medication that impairs cognitive or physical function.
- **Testing:** The Group reserves the right to conduct random or "for cause" testing in accordance with the Occupational Health and Safety Act.
- **Professionalism:** Consumption of alcohol while in uniform, even if off duty, is strictly prohibited.

6. GENERAL PRINCIPLES OF CONDUCT

All directors, employees, suppliers, joint venture partners, and contractors of the Group are required to:

- Perform their duties with honesty, integrity, personal accountability, without favoritism or intimidation, and to the best of their ability.
- Communicate openly and honestly and demonstrate a sense of purpose and commitment to achieving the best possible results, even under adverse conditions.
- Treat all people with fairness, courtesy, sensitivity, and respect for their rights, and demonstrate respect for diversity.
- Accept accountability for their actions and decisions.
- Comply with the policies, procedures, and systems that apply to the Group and the way Mtunzini Group conducts its business.
- Use information obtained from the Group strictly for the purpose for which it was intended, namely the legitimate business of the Group.
- Protect the assets and property of the Group, its employees, clients, customers, and suppliers with the same care and respect as if such assets were their own personal property.
- Not wasting Group resources, including time.
- Declare and disclose any information relating to an actual or potential conflict of interest, whether personal or relating to the Group, as soon as such conflict becomes apparent.
- Refuse any gift, benefit, or hospitality that could reasonably be regarded as an attempt to exert undue influence or gain favor; and
- Challenge others if they believe conduct is unethical or in conflict with this policy. The Group does not condone any form of retaliation or retribution against individuals who raise concerns in good faith.

7. HELPFUL QUESTIONS

When in doubt about any action or decision, Applicable Persons should consider the following questions. If the answer to any question is “No”, the action should not proceed:

1. Is it constitutional?
2. Is it legal?
3. Does it uphold the standards of affiliated professional bodies?
4. Could you justify your actions to: Your staff and colleagues? Society at large, including your community? Your family?
5. Does the action uphold the spirit and culture of Mtunzini Group?
6. Does it create a genuine “win-win” situation?
7. Have the moral and ethical aspects been properly considered?
8. Are you attempting to find a way to justify something that is fundamentally wrong?
9. Is there any undue influence impacting your judgment, including: Consideration of profit only? Personal performance pressures? Pressure from a superior? Job security concerns?
10. Do you have a personal interest in the transaction?
11. Will another organization’s employee or external party be personally enriched?
12. Is the action within acceptable business norms and practices?
13. Does it comply with Group policies and the Anti-Bribery and Corruption Policy?
14. If I use force in this situation, would a court of law agree that it was the only reasonable option left to me?
15. How would it appear if reported on the front page of tomorrow’s newspaper?

8. HARASSMENT, SEXUAL HARASSMENT AND DIGNITY AT WORK

Mtunzini Group is committed to providing a safe, respectful, and dignified working environment in which all people are treated with fairness, dignity, and respect. The Group adopts a zero-tolerance approach to harassment, bullying, racism intimidation, victimization, and sexual harassment in any form.

Harassment includes, but is not limited to, unwanted verbal, non-verbal, visual, physical, or digital conduct that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating, or offensive working environment.

Sexual harassment, whether physical, verbal, or non-verbal, is strictly prohibited. This includes unwanted sexual advances, requests for sexual favors, sexually suggestive remarks, gestures, jokes, images, messages, or any conduct of a sexual nature that interferes with an individual's work performance or dignity.

All complaints of harassment or sexual harassment will be treated as serious misconduct, investigated promptly, impartially, and confidentially, and addressed in accordance with applicable legislation, including the Labour Relations Act, the Employment Equity Act, and relevant Codes of Good Practice.

Any employee, contractor, or representative found to have engaged in harassment or sexual harassment will be subject to disciplinary action up to and including summary dismissal, termination of contracts, and referral to law-enforcement authorities where appropriate. No mitigating circumstances will be accepted where conduct is found to be intentional, repeated, or abusive.

Mtunzini Group strictly prohibits any form of retaliation, intimidation, or victimization against any person who, in good faith, reports harassment, participates in an investigation, or supports another person in raising concern. Retaliatory conduct will constitute a serious disciplinary offence.

This commitment is fully aligned with the Employment Equity Act, the Constitution of the Republic of South Africa, and all applicable human rights legislation.

Any breach of this policy will result in immediate disciplinary action, which may include dismissal, termination of contractual relationships, and further legal action where applicable. Mtunzini Group will not tolerate any conduct that undermines equality, dignity, or human rights within the workplace or in any work-related environment.

9. CONFIDENTIALITY, INFORMATION SECURITY AND POPI

9.1 Confidentiality

All directors, employees, contractors, and representatives of Mtunzini Group are required to maintain strict confidentiality in respect of all non-public, proprietary, operational, commercial, security-related, client, employee, and sensitive information obtained in the course of their duties. Confidential information may not be disclosed, shared, discussed, copied, reproduced, or made available to any unauthorized person or entity, whether within or outside the Group, unless such disclosure is required for legitimate business purposes and has been properly authorized. This obligation always applies and survives the termination of employment.

9.2 Information Security

Mtunzini Group is committed to safeguarding its information assets and systems against unauthorized access, loss, misuse, disruption, or damage. All Applicable Persons must comply with the Group's information-security controls, policies, procedures, and access-management requirements. Information systems, devices, networks, software, and data provided or authorized by the Group may only be used for legitimate business purposes.

9.3 Protection of Personal Information (POPIA)

Mtunzini Group is committed to protecting the privacy, integrity, and confidentiality of all personal information entrusted to it. All personal information shall be collected, processed, stored, accessed, transmitted, and disposed of strictly in accordance with the Protection of Personal Information Act, 2013 (POPIA). Personal information may only be processed for lawful and legitimate business purposes, on a need-to-know basis. Any actual or suspected data breach must be reported immediately.

10. OUTSIDE BUSINESS INTERESTS

Outside activities, including personal businesses, second employment, or board service, must be declared to the Group Compliance Officer or Human Resources. Employees and directors shall not:

- Use Group resources for private business activities.
- Confer benefits on entities in which they or relatives have an interest.
- Derive personal benefit from Group intellectual property.
- Engage in outside business interests that interfere with duties or performance.
- Work for competitors or suppliers.
- Act in a manner that may damage the Group's reputation.

11. INVOLVEMENT WITH SUPPLIERS, CUSTOMERS AND BUSINESS PARTNERS

Employees and directors, including immediate family members, must avoid personal associations with suppliers, customers, competitors, joint venture partners, or service providers that may create conflicts of interest.

Examples of inappropriate involvement include:

- Acquisition of a significant interest in a business entity dealing with the Group.
- Profit-sharing, incentive, creditor-debtor, or similar economic relationships.
- Serving in any capacity within such entities.
- Acceptance of loans or non-monetary benefits, except customary bank lending.

12. MEDIA COMMUNICATION

The Company is committed to non-selective, fair, and transparent disclosure of information. In support of this commitment, no employee, contractor, or representative of the Company is permitted to speak to the media, issue statements, provide comments, or report on any incident, matter, or activity on behalf of the Company. All media-related inquiries must be immediately referred to Management. The Managing Director is the Company's official spokesperson.

13. WHISTLEBLOWING AND PROTECTED DISCLOSURES

In accordance with the **Protected Disclosures Act**, Mtunzini Group encourages a "speak-up" culture.

- Reporting: Any Applicable Person who witnesses a breach of this Code, criminal activity, or safety risks is encouraged to report it to the Social & Ethics Officer or via the anonymous reporting channel: [Insert Email/Hotline].
- Non-Retaliation: The Group guarantees that no person will be victimized, harassed, or penalized for making a report in good faith. Any attempt to intimidate a whistleblower is a serious disciplinary offense.

14. ROLES AND RESPONSIBILITIES

It is the responsibility of every Applicable Person to read, understand, and comply with this policy. The prevention, detection, and reporting of bribery, corruption, and unethical conduct is the responsibility of all Applicable Persons. The Social & Ethics Officer is responsible for oversight and enforcement of this policy. Senior management has a duty to prevent bribery and corruption and may face personal liability for failure to do so.

15. DISCIPLINE AND SANCTIONS

Any breach of this policy may result in disciplinary action, termination of employment or contracts, and reporting to law-enforcement authorities where required. Sanctions may include imprisonment, fines, civil liability, reputational damage, and director liability under PRECCA.

16. RELATED POLICIES

This policy must be read in conjunction with:

- Anti-Bribery and Corruption Policy
- Social Media Policy
- Occupational Health and Safety (OHS) Policy
- Standard Operating Procedures

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