



Master Plastics (Proprietary) Limited

## ANTI-BRIBERY & CORRUPTION POLICY

(the “Policy”)

### 1. Purpose:

Master Plastics (Pty) Limited, its subsidiaries and affiliates (collectively, “**Master Plastics**” or the “**Company**”) is committed to conducting business fairly & honestly and in accordance with our values and the Master Plastics Code of Conduct & Business Ethics.

We prohibit all forms of Bribery & Corruption.

This Policy provides guidance about conducting business ethically and in compliance with all ruling laws & regulations and standards consistent with the Master Plastics Code of Conduct & Business Ethics.

### 2. Definitions:

“**Bribery**” means offering, promising, or giving anything of value to any other party, directly or through a third party, to improperly influence the decision-maker for the purpose of obtaining or retaining business or to gain a business advantage.

“**Corruption**” means the abuse of power for personal gain, which includes bribery, fraud, money laundering and kickbacks.

“**Anything of Value**” means any form of benefit, including, but not limited to cash or cash equivalents (e.g., gift cards), gifts, services, employment offers, loans, travel expenses, entertainment, political contributions, charitable donations, excessive discounts, allowances and sponsorships, even if nominal in value.

“**Facilitation Payment**” means payment of cash or cash equivalents (e.g. alcohol or tickets to events) used to secure or expedite the performance of a routine government action, for instance, processing a visa, obtaining a license or permit, having police protection and gaining utility services.

“**Kickback**” means a situation where the seller gives a portion of sales (in the form of cash or cash equivalents) for the purchased product to a buyer to improperly influence future purchasing decisions.

“**Government Officials**” means anyone, regardless of title, who is (i) an officer or employee of a government or any department or agency of the government (e.g., members of parliament, customs inspectors, police officers, traffic officers etc.) or instrumentality of a government; (ii) any person acting in an official capacity for or on behalf of a government or any department, agency, or instrumentality of a government; (iii) any officer or employee of a company that is owned in whole or part by a government or their decisions are at the government’s discretion; (iv) any officer or employee of a public international organisation; (v) any officer or employee of a political party or any

person acting in an official capacity on behalf of a political party; (vi) any candidate for political office or (vii) any close relative of any of the above.

**“Third Party or Parties”** means an organisation or person with whom Master Plastics does business, for instance, agents, consultants, distributors, dealers and resellers, suppliers, contractors, joint venture partners, license partners, customers and other business partners.

### 3. Scope

This Policy applies to all Master Plastics locations and Employees. We will strive to ensure that our suppliers and business partners also adhere to the ethical standards outlined in this Policy and according to the Master Plastics Supplier Code of Conduct.

### 4. Policy

Bribery & Corruption is illegal, unethical and facilitates criminal conduct. Failure to address the risk of Bribery & Corruption could undermine our reputation and lead to investigations, fines and/or other penalties for the Company, Employees and/or other individuals.

This Policy sets out Master Plastics approach to ensuring that we comply with all applicable laws and regulations to prevent Bribery & Corruption and appropriately manage Bribery & Corruption risks. Specifically, Master Plastics operates under the following policies and procedures that describe its approach to the identification of Bribery & Corruption risks and steps to be taken to prevent Bribery & Corruption in its operations and supply chain:

- Awareness: We are aware of and must always be alert to the risk of third parties trying to exploit us to engage in Bribery & Corruption. We do not assist, support, participate in or permit Bribery & Corruption and will implement and monitor procedures to prevent the facilitation of Bribery & Corruption involving our people and others acting on our behalf.
- Honesty & Integrity: Bribery & Corruption undermine the free market and erodes public confidence. Master Plastics expects all Employees and Third Parties to act in accordance with the highest ethical standards. This means we compete in the market with honesty and integrity. There is no deal, no matter how lucrative, that is acceptable, if it is built on a foundation of illicit payments and unfair business practices. We hold ourselves accountable to speak up against corrupt actions and walk away from such business.
- Facilitation Payments & Kickbacks: Master Plastics prohibits Facilitation Payments & Kickbacks as we consider them a form of Bribery & Corruption. These payments are not always just about winning business or securing services, but may also include payments made to Government Officials to secure or speed up the performance of governmental and other institutional services or to avoid prosecution of any nature (fines, penalties etc).
- Gifts & Entertainment: Master Plastics values the importance of building relationships with our business partners, in fact, partnerships is one of our core values. We know that trust is not built overnight. Master Plastics supports growing partnerships through engagements and events (including golf days, charitable events, company sponsored events, meals etc.) intended to create business connections, and it is permissible (with the proper approval) to participate and organise such events. However, it is never acceptable to give or receive, if it has the intention of influencing the outcome of a business decision or could have the

perception of impacting such a decision, or it violates Master Plastics or another entity's policy. It is also unacceptable to give or receive frequently.

No employee of Master Plastics is empowered to receive or gift Anything of Value from or to a third party without seeking proper approval in accordance with the Master Plastics Code of Conduct & Business Ethics.

- Donations & Sponsorships: Donations to charitable organisations are ordinarily regarded as good corporate citizenship. Master Plastics may make charitable contributions in the form of in-kind services, knowledge, product, time or direct financial contributions. Contributions to charities and social projects require additional review as they can be a means to make corrupt payments. To minimize this risk, it is important to follow the process in obtaining the appropriate authorisation from the CEO of Master Plastics. The request should describe the rationale for the donation, details around the recipients of the donation and to note if someone directed you to the charitable organization. If necessary, Master Plastics will conduct due diligence on the organization. Donations to political parties are prohibited.

No employee of Master Plastics is empowered to receive or gift any donation, sponsorship or similar of any nature from or to any third party without seeking the proper approval in accordance with the Master Plastics Code of Conduct & Business Ethics.

- Third Parties: Master Plastics values our third parties as they are an integral part of our business. They are crucial to meet customer demands and fight corruption and unethical behaviour. We expect our third parties to also hold themselves accountable to the highest ethical standards. This means they are true business partners, not conduits to make illicit payments. It is never acceptable to use a third party to make an improper payment, or give anything of value, to a Government Official or an employee or other representative of a commercial entity. Global Anti-Bribery & Corruption laws explicitly state that Master Plastics can be held responsible for the corrupt acts of a third party acting on our behalf. This is why we are responsible for knowing the third parties who perform services on our behalf. Simply turning a blind eye or ignoring red flags does not absolve us from responsibility.
- Accurate and Complete Books &Records: Each Master Plastics entity is required to keep accurate books and records that reflect the Company's transactions, which include expense reports, invoices, vouchers, business entertainment and other courtesies. The requirement to be accurate and complete applies to all books and records, including forms required for processing payments, attachments used to justify payment requests, and authorizations and classifications of payments by accounting codes. Expense reimbursements must be approved in accordance with this policy and the relevant processes that apply to you locally. Master Plastics expects complete documentation, such as original receipts and detailed invoices, to be reimbursed. Such documentation includes a detailed description of the event, purpose, others involved and their organization, and amounts to be paid. Books and records of entities are subject to scrutiny by internal and external parties to ensure compliance with Master Plastics policies and confirm that no transactions involving Bribery & Corruption has occurred.

To manage our Bribery & Corruption risk exposure and to ensure compliance, we implement several controls and processes. These include:

- Conducting know your counterparty and due diligence procedures to determine the background and identity of counterparties with whom we engage.
- Implementing controls in respect of payments we make and receive using a risk-based approach to ensure that they are consistent with the requirements of this Policy.
- Requiring and encouraging our Employees and all other internal and external stakeholders to be alert to any unusual or suspicious arrangements which could expose Master Plastics to the risk of Bribery & Corruption, and to immediately report any such suspicious arrangements via the appropriate channels.
- We train and empower our Employees to ensure they can recognise and report unusual or suspicious arrangements.

## **5. Risk Management**

We will evaluate risks associated with Bribery & Corruption within our operations in our annual enterprise risk assessment program. During this process, we will capture general operational and business risks, along with reputational and compliance risks. We also periodically focus specifically on Bribery & Corruption risks as we see changes in the external and regulatory landscape. The results from the risk assessment survey and discussions will be documented and retained for record-keeping purposes.

Master Plastics will aspire to only engage with suppliers and business partners who are aligned to our Policy and will join efforts to build a sustainable and responsible supply chain free of Bribery & Corruption and any other form of crime.

As part of our risk mitigation strategy, we will provide training to our team members. The training will cover the identification of red flags associated with Bribery & Corruption violations and again encourage and promote the importance of speaking up if any such situation arises.

## **6. Speaking Up**

We are each responsible for ensuring that we conduct our business in accordance with our values and the Master Plastics Code of Conduct & Business Ethics. We expect and encourage our Employees and all stakeholders to speak openly and raise concerns about possible breaches of the Master Plastics Code of Conduct & Business Ethics, this Policy, or any other policy of Master Plastics through any of the following communication channels available to internal and/or external parties:

- immediate Supervisor, Line, Department or Business Unit Manager;
- a Human Resources Representative;
- a Senior Manager;
- your designated Company contact (for external parties); or
- the independently managed Master Plastics Fraud & Ethics Hotline (available to both internal and external parties):
  - Free Call Telephone: 0800 204 432
  - Email: [masterplastics@thehotline.co.za](mailto:masterplastics@thehotline.co.za)
  - Website: <https://www.thehotline.co.za/report> - use 0800 204 432 to report
  - Mobile application: Vuvuzela Hotline app - download from google play use 0800 204 432 to report

- SMS: 30916
- Post: PO Box 10512, Centurion, 0046
- Fax: 0867 261 681

Master Plastics takes all concerns raised seriously and undertakes to handle them promptly through the appropriate channels.

#### **7. Retaliation**

Master Plastics has a zero tolerance for retaliation against anyone who speaks openly about conduct they believe is unethical, illegal, or not in accordance with the Master Plastics Code of Conduct & Business Ethics and policies, even if the concern isn't substantiated, if they have reported such matter in good faith.

#### **8. Discipline**

Failure to comply with any provision in this Policy, including the failure to report a violation or being unwilling to co-operate in an investigation or not acting in good faith, is seen as a serious violation and breach of this Policy, which may result in disciplinary action, up to and including termination, or the termination of a business relationship, as well as possible civil or criminal charges.