

#### **ANTI-MONEY LAUNDERING 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 Money Laundering.

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:

## "Money Laundering" is:

the illegal process of concealing the origins of money obtained through criminal activities by integrating it into the legitimate financial system. It involves transactions executed to make the illegal proceeds appear legitimate.

In the case of a business, money laundering can be diverse, often involving exploitation of the company's financial processes and supply chains. Examples of money laundering can include over and under-invoicing, use of shell companies, fictitious sales, bulk cash deposits and international trade manipulation.

### 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

Money Laundering is illegal, unethical and facilitates criminal conduct. Failure to address the risk of Money Laundering 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 Money Laundering and appropriately manage Money Laundering risks. Specifically, Master Plastics operates under the following policies and procedures that describe its approach to the identification of Money Laundering risks and steps to be taken to prevent Money Laundering in its operations and supply chain:

- We are aware of and must be alert to the risk of third parties trying to exploit us to engage in Money Laundering.
- We do not assist, support, participate in or permit Money Laundering.
- We do not accept money or other assets if we know or suspect that they are derived from any kind of criminal activity.
- We do not knowingly deal with criminals, suspected criminals and/or the proceeds of crime.
- We do not facilitate the acquisition, ownership or control of criminal proceeds or other assets deriving from criminal activity nor do we assist others in concealing criminal proceeds or assets.
- We do not tolerate tax evasion of any kind and we do not knowingly or wilfully facilitate tax evasion.
- We implement and monitor procedures to prevent the facilitation of tax evasion by our people and others acting on our behalf.

To manage our Money Laundering risk exposure and 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 money laundering or the facilitation of tax evasion, 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 Money Laundering 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 Money Laundering 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 Money Laundering, 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 Money Laundering 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

- 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. <u>Discipline</u>

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.