

## Global Anti-Bribery Policy

**Malesela Taihan Electric Cable (Pty) Ltd.**

### Chapter 1 General Provisions

#### Article 1 (Purpose)

This Global Anti-Bribery Policy ("the Policy") aims to ensure that Malesela Taihan Electric Cable (Pty) Ltd., its domestic subsidiaries, and overseas affiliates (collectively referred to as "the Company") adhere to the anti-corruption laws of South Africa, including the "Criminal Procedure Act," "Act on the Aggravated Punishment of Specific Crimes," "Prevention and Combating Of Corruption Act," "The Financial Intelligence Centre Act," "Public Finance Management Act," "Municipal Finance Management Act," "The Prevention Of Organised Act," "The Companies Act," "Protection Of Personal Information Act," "Promotion Of Access to Information Act," "Consumer Protection Act," "Act On Combating Bribery Of Foreign Public Officials In International Business Transactions," as well as the anti-corruption laws of other countries such as the U.S. "Foreign Corrupt Practices Act" and the U.K. "Bribery Act."

The Policy is designed to promote ethical and lawful business practices, establish transparency, and foster a healthy corporate culture.

In addition to adhering to these laws, the Company prohibits misconduct as outlined in the World Bank Group's Integrity Compliance Guidelines, including but not limited to: Corruption, Fraud, Collusion, and Coercive Practices. The Policy aims to ensure that all employees and associated parties conduct business with integrity and in full compliance with applicable laws and regulations, thereby maintaining the Company's reputation and commitment to ethical standards.

## Article 2 (Scope of Application)

- ① This Policy applies to all executives, regular employees, temporary staff, contract workers, consultants, and other workers ("Employees") of the Company. It also extends to all external entities ("Third-Party Agents") engaged by the Company for business acquisition, maintenance, and operations.
- ② The Company shall make best efforts to comply with anti-corruption laws and this Policy in all its operations.

## Article 3 (Definitions)

- ① "Stakeholders" refer to individuals or entities directly or indirectly involved in the Company's business activities. If it is unclear whether a specific individual qualifies as a Stakeholder, it should be assumed so, and confirmation must be sought from the Compliance Management Team of Malesela Taihan Electric Cable (Pty) Ltd.

### 1. Public officials

- A. Individuals recognized as public officials under the relevant laws of the country where the Company or its third-party representative is located (hereinafter referred to as the "relevant country")
- B. Individuals engaged in legislative, administrative, or judicial duties of the government of the relevant country
- C. Employees of a company in which the government of the relevant country has invested more than half of the paid-in capital and exercises substantial control over the overall operation
- D. Individuals engaged in public duties such as education and healthcare, working for public entities or institutions established according to the laws for performing public tasks, as defined by the relevant laws of the country
- E. Candidates in public elections within the relevant country (such as gubernatorial or mayoral candidates), officials or employees of political parties
- F. Individuals performing public duties for other international organizations
- G. Any person who falls under the scope of "public officials, etc." as defined in the Improper Solicitation and Graft Act of the Republic of Korea, including:
  - Public officials under the State Public Officials Act and the Local Public Officials Act, as well as those recognized as public officials under other laws;
  - Heads, officers, and employees of public institutions and organizations related to public service

- Principals, faculty members, executives, and employees of elementary, middle, and high schools, universities, and educational foundations;
  - Executives and employees of press organizations;
  - Persons performing public duties on behalf of the government or public institutions;
  - Spouses of the public officials.
2. Third parties engaged in transactions related to the Company's business, regardless of their designation, and their representatives or employees. Third parties and their representatives and employees engaged in transactions with the Company are considered Stakeholders unless confirmed otherwise by the Compliance Management Team.
- ② "Bribery" encompasses any tangible or intangible benefits provided by Employees or Third-Party Agents to Stakeholders or received from Stakeholders concerning their duties. It includes, but is not limited to:
1. Money, securities, real estate, goods, accommodation vouchers, membership rights, admission tickets, discount vouchers, invitation vouchers, admission tickets, property rights, and any other pecuniary advantages
  2. Provision of entertainment such as meals, beverages, golf, or convenience provision related to transportation and accommodation
  3. Debt relief, employment opportunities, granting of rights, and other tangible or intangible economic benefits (including actions such as admitting Stakeholders' children to internship programs without following standard procedures, or commissioning work from companies owned by the families of Stakeholders)
  4. Unrestricted use of Company services, facilities, or properties without a legitimate basis
  5. Illegitimate gains such as securing business, tax or penalty avoidance, acquisition of confidential information from competing companies, and other improper benefits or business advantages
- ③ Employees and Third-Party Agents must never offer to pay, pay, promise to pay, authorize to pay or receive bribes. If offered or demanded a bribe, Employees and Third-Party Agents must refuse and promptly report the incident to the Compliance Management Team.
- ④ If a bribe is unavoidably provided due to coercion, the incident must be reported to the Compliance Management Team as soon as one has the opportunity to do so.

## Chapter 2 Prohibitions

### Article 4 (Compliance with Anti-Corruption Laws applicable both domestically and internationally, as well as Relevant International Guidelines)

- ① Employees and Third-Party Agents must comply with anti-corruption laws applicable both domestically and internationally, as well as relevant international guidelines, including the World Bank Group's Integrity Compliance Guidelines, while performing their duties.
- ② Employees and Third-Party Agents of the Company must not obstruct any investigation into potential violations of the above-mentioned laws or guidelines.
- ③ Employees of the company must not instruct or request colleagues, subordinates, or other Third-Party Agents of the company to engage in any business conduct that violates anti-corruption laws, or to engage in acts of misconduct and obstruction of investigations prohibited under the integrity compliance guidelines of the World Bank Group or similar entities.

### Article 5 (Speed Money or Facilitation Payments)

- ① "Speed money or facilitation payments" refer to monetary or other benefits provided to facilitate or expedite routine and repetitive tasks performed by public officials or government-related individuals. Employees and Third-Party Agents must not make facilitation payments to domestic or foreign public officials, especially when providing monetary or other benefits to influence discretionary actions of public officials in areas where discretion is recognized. Such actions may be perceived as bribery and must be avoided.

### Article 6 (Hospitality, Gifts, Travel, and Entertainment)

- ① Gifts, meals, travel, and entertainment within the limits allowed by the laws of the relevant country and at customary levels for smooth business operations or socializing purposes are permissible.
- ② Notwithstanding Paragraph ①, hospitality that aims to exert undue influence on public officials, government-related individuals, customers, collaboration partners, or Third-Party Agents, or to receive or provide improper benefits, is not allowed. Meals, gifts, or congratulatory or condolence payments must not be offered to public officials or others subject to the Improper Solicitation and Graft Act of the

Republic of Korea, where there is a direct interest in connection with the Company's business.

- ③ The permissibility of hospitality, including meals, gifts, travel, etc., should be judged based on the following criteria, and if unclear, confirmation should be sought from the Compliance Management Team:
  1. Legality and customary practices
  2. Whether the amount is reasonable
  3. Whether there is a reciprocal obligation (repayment, provision of favors, etc.)
  4. Whether there is a purpose to influence Stakeholders' decisions or create the appearance of such influence
  5. Whether it falls within the legal and necessary scope of business operations related to the Company
  6. Whether such hospitality is allowed according to the policies of the recipient's company or institution
- ④ The Company may establish separate guidelines (meal amounts, gift values, etc.) or specific criteria for hospitality based on national or business-specific considerations, within the limits not contradicting anti-corruption laws and this Policy.
- ⑤ Employees of the Company shall comply with "The Guidelines on Entertainment Expenses for Overseas Buyers" when providing travel or business trip expenses to employees of foreign clients, including foreign public officials and officers or employees of public institutions.

## **Article 7 (Charitable Donations and Social Welfare Contributions)**

- ① If permitted by the laws of the relevant country, the Company can make donations for charitable, public, and social welfare purposes.
- ② Donations intended to receive illegitimate benefits in relationships with Stakeholders are prohibited. If the purpose of a donation is unclear, it must be discussed with the Compliance Management Team before the donation is executed.
- ③ The Company shall take measures to ensure that charitable contributions are not used as a subterfuge for misconduct. Unless secrecy or confidentiality is legally required, all charitable contributions and sponsorships should be publicly disclosed.
- ④ All donations or contributions shall be carried out in accordance with the Company's established procedures for prior approval and execution. The Ethics Management Department shall determine the relevant details.

## Article 8 (Political Contributions)

- ① The Company will not make contributions to political parties, party officials, and candidates.
- ② Donations will only be made to non-governmental organization (NGO) which is independent, typically nonprofit organization that operates outside government control.
- ③ Appropriate steps shall be taken to publicly disclose all contributions unless secrecy or confidentiality is legally required.

## Article 9 (Restrictions on Contracts with Former Public Officials)

- ① The Company shall not enter into any employment or compensated contract with a counterparty who is a public official who has resigned or retired from office, or an individual or entity associated with such a person, if the contract is related to the duties performed by that official during their tenure or if the official may exert substantial influence over the matters concerned.
- ② If a candidate for employment is subject to post-employment review under Article 17 of the Public Service Ethics Act, the Company shall verify compliance with applicable legal requirements, including employment approval procedures.

# Chapter 3 Reporting and Actions

## Article 10 (Reporting Violations or Suspected Incidents)

- ① If a violation of this Policy or other anti-corruption laws is discovered or suspected (including the actions of Third-Party Agents), it must be reported through the Ethics Management Reporting System or to the Ethics Management Department.
- ② The Company must take appropriate measures, including the protection of the whistleblower, which includes:
  1. Ensuring no discriminatory treatment of the whistleblower due to their report and guaranteeing their anonymity.
  2. Disciplining those who engage in retaliation or discrimination against the whistleblower.
  3. Accommodating the whistleblower's requests for changes in work departments or positions to avoid inconvenience or disadvantage arising from the report.
- ③ Upon receiving such reports, the Company must promptly verify the facts and initiate an investigation.

- ④ To confirm the facts of such reports, the company may conduct a direct investigation or commission an investigation to internal audit departments, external experts, and the like.
- ⑤ The Company must manage and preserve all records, including the results of investigations and relevant documentation, upon completion of the investigation.

### **Article 11 (Actions in Case of Violation)**

- ① The Company must take appropriate measures (disciplinary actions, suspension of transactions, etc.), as per its human resources regulations and the labor-related laws of the relevant country, against employees or Third-Party Agents found to have violated this Policy or relevant laws.
- ② After analyzing the reasons for the violation mentioned in the previous paragraph, the Company must take necessary measures, such as education and improvement of relevant business procedures, to prevent recurrence.

## **Chapter 4 Education**

### **Article 12 (Anti-Corruption Education)**

The Company must conduct regular and ad-hoc anti-corruption education to ensure that Employees are aware of and adhere to this Policy. Records related to education content and attendees must be managed and preserved.

## **Chapter 5 Miscellaneous**

### **Article 13 (Measures in Transactions with Third-Party Agents)**

- ① The Company must adequately inform Third-Party Agents of the obligation to comply with the anti-corruption laws of the relevant country and this Policy. Third-Party Agents must agree to adhere to the contents of this Policy.
- ② The Company shall publish the laws and regulations related to Paragraph ① on the Company's official website and provide guidance on them to Third-Party Agents.

### **Article 14 (Amendment of Regulations)**

The Company may make appropriate modifications or changes to suit the laws of the relevant country.

# Supplementary Provision

- 1. These regulations shall be effective from January 1, 2025.
- 2. These regulations shall be effective from February 5, 2025.
- 3. These regulations shall be effective from November 5, 2025.

All cases that contravene with this policy will be dealt with according to M-TEC Disciplinary Code and Procedure schedule of offences.

  
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Human Resources Manager

  
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CEO (Chief Executive Officer)

05 NOV 2025  
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