

Sustainable Procurement Policy

1. Purpose and Scope

MMC's shared behavioural values—**Grit, Decisiveness, Inclusivity, Disruption, and Belief**—guide how we collaborate with suppliers and stakeholders to achieve our strategic and sustainability goals.

This policy ensures that all procurement and supply chain activities support MMC's long-term success, uphold ethical standards, and contribute to responsible growth. It reflects MMC's commitment to quality, environmental protection, social responsibility, and sound governance in accordance with South African legislation and international best practices.

This policy is for use by all MMC employees, contractors, consultants, and suppliers providing goods, services, or raw materials to MMC.

2. Quality

We pride ourselves on superior product quality and reliability. MMC sources goods and services from reputable local and international suppliers who operate with robust and transparent quality systems. Procurement decisions are based on total value, considering technical performance, sustainability, and total cost of ownership. Suppliers are expected to demonstrate consistent quality, responsible sourcing, and traceable supply chains.

3. Environment

The protection of the environment is integral to MMC's daily operations. MMC complies with all relevant South African environmental legislation and similarly we expect our suppliers to meet applicable environmental legislation.

MMC and its suppliers are expected to:

- Minimise environmental impact and support a circular materials economy through recycling, reusability, and waste reduction.
- Manage water use and biodiversity responsibly.
- Disclose product carbon footprint and Scope 1 & 2 emissions where applicable, favouring suppliers with credible climate targets.

4. Health and Safety

MMC prioritises the health, safety, and wellbeing of all personnel - our own and those of our contractors and service providers. MMC operates with a comprehensive safety management system. Suppliers must comply with the South African Occupational Health and Safety Act and MMC's site-specific protocols, to prevent incidents and ensure safe working conditions.

5. Ethical Responsibility

MMC upholds ethical, transparent, and fair business conduct with internal and external stakeholders. Appropriate processes and procedures are in place to ensure we maintain a zero-tolerance approach to corruption, bribery, fraud, and conflicts of interest. All suppliers must adhere to the MMC Business Code of Conduct, unless their respective Code(s) of Conduct supersedes ours in being more comprehensive regarding ethical and sustainability objectives.

When MMC procures goods or services from a supplier, we take measures supporting the prevention and combating of corrupt activities; these include responsible handling and verification of data and performing credit checks.

6. Social Responsibility and Human Rights

Social responsibility is integral to MMC's success. MMC and its suppliers must respect human rights, promote fair labour practices, and engage communities transparently and inclusively.

Commitments include:

- **Fair Labour Practices:** Compliance with South African labour laws and ILO conventions to ensure fair pay, safe workplaces, freedom of association, non-harassment and non-discrimination.
- **Community Engagement:** Local area procurement where applicable.
- **Zero Tolerance for Forced or Child Labour:** All operations are free from any form of coercive, exploitative, or underage labour.

7. Slavery and Human Trafficking

MMC is committed to the protection of human rights and the prevention of modern slavery and human trafficking in all its forms. Our zero-tolerance approach extends to all business partners, and we require all suppliers to ensure that their operations and supply chains are free from such practices.

8. Governance and Legal Compliance

MMC's supply chain governance focuses on responsible spending, risk management, and compliance with all relevant laws and regulations while aligning with applicable international responsible sourcing standards.

Suppliers are expected to:

- Maintain transparent governance structures and uphold compliance with relevant laws and regulation, with sound financial integrity.
- Declare potential conflicts of interest.
- Provide transparency to support MMC's compliance with emerging international frameworks related to ESG objectives.

9. Risk Management and Responsible Sourcing

MMC applies a structured, risk-based approach to procurement to identify, assess, and mitigate risks across its supply chain. Periodical supplier evaluations are performed in accordance with the risk

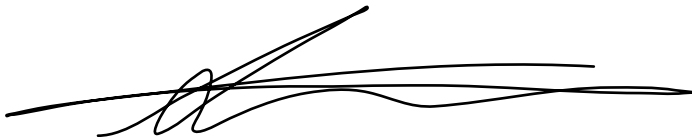
assessment and supplier ranking. Suppliers should demonstrate resilience and contingency plans to prevent disruptions and ensure business continuity. MMC engages with suppliers to address identified non-compliances before considering termination. When required, we provide support and share information to help suppliers strengthen their ESG performance.

Regarding mineral sourcing, the framework of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas applies. The manganese mining companies from whom MMC sources its mineral feed are clearly mapped and assessed to confirm the absence of the type of risks covered in the Guidance.

10. Implementation, Monitoring and Review

The Executive Management of MMC shall ensure that responsibilities and authorities for activities related to this policy are assigned and supported. Regular performance monitoring happens within the standard monthly processes; annual KPIs and targets are set to increase effectiveness and sustainability. A commitment to continuous improvement guides the KPIs. This commitment also drives internal capacity building and external collaboration and benchmarking, where possible.

This policy will be reviewed every three years, or earlier if required by new legislation or applicable customer standards.



Louis Nel
Chief Executive Officer



Albert Brugman
Chief Financial Officer



Deirdre van der Walt
Supply Chain Manager

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