



Manganese Metal Company is committed to create sustainable growth and profitability by being the First Choice in Pure Manganese.

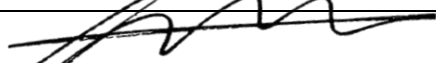
In producing Electrolytic Manganese Metal and related products, we aspire to move beyond regulatory compliance through an active process of identifying, managing and reducing behaviours deemed to be unethical.

We will develop, implement and maintain management systems for sustainable development that drive continual improvement and ensure that we:

- conduct our business in a competent, fair, impartial, and efficient manner;
- demonstrate the highest levels of integrity in order to uphold both personal and corporate reputations and to inspire confidence and trust in our actions;
- respect the environment and the need to protect it and minimise the impact our operations have on it;
- provide a safe and healthy working environment for all employees, contractors and visitors;
- treat all employees with dignity and respect with equal employment opportunities given to all;
- seek to build long-term relationships with our customers and in so doing commit to take all reasonable care to avoid misleading statements, concealment, and overstatement in all of our business' advertising and/or form of public statements;
- seek to comply with all international, national, and local legislation affecting our operations; and
- facilitate compliance with the business Code of Conduct as well as processes towards the prevention of corruption and payments which may be in bribery form.

In implementing this policy, we will endeavour to engage all our stakeholders in providing a workplace that is free of unethical behaviour.

We will be successful when we comply with our company policies and conduct our business to acceptable industry and governance levels.

Chief Executive Officer (16.1) Manganese Metal Company (Pty) Ltd	Signature: 
	Date: 28 th June 2017