

ENVIRONMENTAL, SOCIAL & GOVERNANCE (ESG) POLICY

1. Purpose & Scope

Manganese Metal Company (MMC) is a unique and resilient company, committed to producing high-purity electrolytic manganese metal and related products responsibly, ensuring sustainability in all aspects of business.

This policy integrates MMC's Environmental, Social, and Governance (ESG) Principles into a single policy for use by employees, contractors, customers, and suppliers. It applies to all our operations and products.

2. Our Commitment

Our purpose goes beyond beneficiation of natural resources; it is about creating strength in every dimension of our business. We serve a global clientele with an unwavering commitment to quality and sustainable ESG Principles.

Sustainability is integrated into strategic planning, risk management, and capital allocation to strengthen competitiveness and ensure compliance with relevant national and international standards. Embedding ESG Thinking into our business operations is not only about mitigating risks, but also about seizing opportunities to create a legacy for our organisation.

To realise MMC's commitment to each element of ESG sustainability, we undertake to pursue and implement the principles as captured in the rest of the document.

3. Environmental (E)

MMC is committed to responsible environmental stewardship as part of minimising our impact on the environment and maintaining our legal and social license to operate. We are ISO-14001 certified.

3.1. Energy and Climate

- Continuously improve energy efficiency and performance across procurement, production, logistics; identify opportunities for cost-effective upgrades and alternative sources.
- Monitor plant-wide energy distribution and usage through established systems to maximise energy efficiency, identify deviations, and take corrective action.
- Promote awareness towards energy saving opportunities among employees and contractors.
- Understand, measure, and monitor our climate-related risk as efforts to reduce greenhouse gas emissions, tracking Scope 1, 2 and 3 emissions annually.
- Adoption of renewable energy and other sustainable emission reduction technologies where applicable, to reduce our carbon footprint, in line with the company's targets.

3.2. Protection of Land, Air and Biodiversity

- MMC identifies, avoids, and mitigates impacts on biodiversity and sensitive ecosystems.
- Compliance to Air Emissions License; MMC minimises dust and air pollutants and maintains our selenium-free process for low-toxicity production.
- We support conservation partnerships and aim for net positive biodiversity outcomes at operational sites – no net loss of biodiversity.

3.3. Water Resource Stewardship

- MMC prevents pollution of water resources.
- Maintain a water management plan which includes monitoring and reduction of freshwater consumption and increasing water recycling initiatives.
- Compliance to authorisations issued; discharges meet or exceed regulatory standards, and effluent quality is monitored and transparently reported.

3.4. Waste, Residues and Circularity

- Manage waste, residue, and effluent safely in compliance with strict environmental controls and regulatory requirements.
- Explore re-use of waste and residue for circular-economy applications.
- Reduction of waste to landfill.
- Enhance resource efficiency through higher yields and responsible use of materials and reagents.

4. Social (S)

4.1. Health, Safety and Wellbeing

- We prioritise the health, safety and wellbeing of employees, contractors, and visitors through rigorous risk assessments, hazard reduction, emergency preparedness, incident reporting, and continual improvement.
- We promote wellbeing via medical surveillance, wellness programmes, substance abuse screening, and support initiatives.
- We are ISO-45001 certified.
- We provide the necessary resources to achieve these goals and objectives.

4.2. Labour Rights & Working Conditions

- MMC upholds South African labour legislation and align with ILO Core Labour Standards.
- People are a core strategic resource, we attract and retain competent, engaged staff in a productive work environment that is conducive to the development of our employees, providing equal employment opportunities.
- We support freedom of association and collective bargaining and ensure fair wages and working hours.
- We promote diversity, equality, and inclusion across MMC.
- We prohibit and condemn forced labour, child labour, human trafficking.
- We collectively uphold the principals of anti-bullying and anti-harassment and we act against all forms of unfair discrimination or harassment.

4.3. Community Relations & Social Impact

- MMC contributes to local socio-economic development through employment, procurement, and community support and engagement initiatives.
- By fostering transparency and honesty, we aim to be a company whose stakeholders feel respected, informed, and valued, leading to stronger long-term relationships.
- We maintain an accessible community grievance mechanism.

5. Governance (G)

5.1. Accountability

- The Board of Directors oversees sustainability strategy, risk, and performance, and conducts quarterly reviews.
- The Executive Management ensures sustainability objectives are embedded in operational and financial planning, and risk management, to ensure business continuity.

5.2. Ethics & Integrity

- MMC conducts business fairly, impartially and with the highest level of integrity to uphold both personal and corporate reputations and inspire confidence and trust in our actions.
- Our Code of Conduct governs ethical behaviour, conflict of interest management and zero-tolerance for bribery, corruption, and fraud.
- The MMC Ethics & Sustainability Committee reports quarterly to the Board.
- MMC is committed to processing all personal information in accordance with the POPIA Act ensuring lawful and secure approach to data management.
- MMC safeguards personal and corporate information under the POPIA Act for data protection, similarly, our cybersecurity protocols safeguard data integrity.

5.3. Compliance, Transparency & Whistleblowing

- MMC complies with a local, national, and international legislation applicable to our operations and voluntary commitments.
- Customer satisfaction, quality, and excellence are integrated in our core business strategy, we are ISO-9001 certified.
- Regular internal and external audits verify compliance; similarly, we pursue opportunities to benchmark against best practise to drive continuous improvement.
- MMC is transparent in our business conduct, ethics, and stakeholder engagement.
- Employees and stakeholders can report concerns confidentially via the whistleblower hotline (Vuthela).
- MMC's supply chain and procurement practices ensure we source, evaluate, and engage suppliers in alignment with our ESG objectives.

6. Implementation and Monitoring

- The Executive Management of MMC shall ensure that responsibilities and authorities for activities related to this policy are assigned and communicated within MMC.
- KPIs and targets are set and implemented to ensure that the principles set out in this policy are measured, achieved, and reported on; these will be reviewed annually. A commitment to continuous improvement guides these targets and KPIs, to increase effectiveness and sustainability.

- Training on the various ESG principles will be implemented to ensure awareness and commitment to achieving the objectives and KPIs.
- We will share reasonable ESG information (certifications, emissions/energy data, safety performance, policies) requested by customers.
- This policy will undergo annual review to remain relevant, robust, and reflective of our evolving commitments and the world's changing dynamics.

7. Related Documents

- HSEQ Policy
- Ethics Policy
- Energy Policy
- HR Management Policy



Louis Nel
Chief Executive Officer (16.1)



Morne Ruiters
Chief Marketing Officer



Teheli Morabe
Chief Operating Officer (16.2)



Renet Menz
Chief People Officer



Albert Brugman
Chief Financial Officer



Bradley Rottcher
Chief Information Officer

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